City of Lodi
CALIFORNIA

HOUSING ELEMENT &
TARGETED GENERAL PLAN ELEMENT UPDATES

City of Lodi
2023-2031 Housing Element Update

Adopted
March 20, 2024

Certified
April 11, 2024

RESOLUTION NO. 2024-45

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LODI APPROVING A GENERAL PLAN AMENDMENT TO REPEAL THE 5TH CYCLE HOUSING ELEMENT AND ADOPT THE 6TH CYCLE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD OF 2023-2031, IN COMPLIANCE WITH STATE HOUSING ELEMENT LAW (2024-03)

==========

WHEREAS, the California Legislature has found that "California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state's environmental and climate objectives" (Government Code Section 65589.5.); and

WHEREAS, the Legislature has further found that "Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration" (Government Code Section 65589.5.); and

WHEREAS, the Legislature recently adopted the Housing Crisis Act of 2019 (SB 330) which states that "In 2018, California ranked 49th out of the 50 states in housing units per capita... California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years"; and

WHEREAS, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of Lodi's regional housing need allocation (RHNA) of 3,909 housing units, comprised of 947 very-low income units, 2,124 low-income units, 706 moderate-income units, and 1,671 above moderate-income units; and

WHEREAS, to comply with State Housing Element Law, City has prepared the Housing Element 2023-2031 (the Housing Element) in compliance with State Housing Element Law and has identified sites that can accommodate housing units meeting the City's RHNA; and

WHEREAS, as provided in Government Code Section 65350 et. seq., adoption of the Housing Element constitutes a General Plan Amendment; and

WHEREAS, as provided in Government Code Sections 65352 – 65352.5 the City mailed a public notice to all California Native American tribes provided by the Native American Heritage Commission and to other entities listed; and

WHEREAS, one California Native American tribe requested consultation, which was scheduled to occur on February 21, 2024. The tribe rescheduled the consultation for March 20, 2024. As a result of the consultation, staff may make minor edits to the Housing Element with

programmatic mitigation language concerning future housing development and the protection of Tribal Cultural Resources; and

WHEREAS, the preparation, adoption, and implementation of the Housing Element requires a diligent effort to include all economic segments of the community; and

WHEREAS, the City conducted extensive community outreach over the last year including 8 public workshops; and

WHEREAS, in accordance with Government Code Section 65585 (b), on September 12, 2023, the City posted the draft Housing Element and requested public comment for a 30-day review period, and on November 2, 2023, after responding to public comments, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and

WHEREAS, during the statutory 90-day review period, the City facilitated HCD's review through multiple communications and revisions to reflect HCD's comments, and based upon this, City staff revised the draft Housing Element to include additional information and data; and

WHEREAS, the City reposted the draft Housing Element and requested public comment for the statutory 7-day review period, and on January 29, 2024, the City received a letter from HCD stating that the draft Housing Element is in substantial compliance with State Housing Element Law, and will comply with State Housing Element Law when it is adopted; and

WHEREAS, on January 31, 2024, the City published the final draft Housing Element (determined to be in substantial compliance by HCD) on www.planlodi.com and requested public comment on the final draft; and

WHEREAS, on February 28, 2024, the Planning Commission conducted a duly and properly noticed public hearing to take public testimony and consider this Resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's letter of substantial compliance, and oral and written public comments

WHEREAS, on March 20, 2024, the City Council conducted a duly and properly noticed public hearing to take public testimony and consider this Resolution regarding the proposed Housing Element, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's letter of substantial compliance, and oral and written public comments.

NOW, THEREFORE, BE IT RESOLVED, that the City Council hereby finds that, based on substantial evidence in the record:

1. The foregoing recitals are true and correct and are incorporated by reference into this action.

2. The City Council hereby finds:

a. The proposed amendment is internally consistent with the general plan. Comment: The General Plan comprises an integrated, internally consistent, and compatible statement of policies governing land use in the city. The proposed GPA directly affects the Housing Element by entirely replacing the existing 5th Cycle Housing Element. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan. In preparing the 2023-2031 Housing Element, the City reviewed goals and policies in the various elements of the General Plan. With the passage of SB 1035 in 2018, the City will need to update its Safety Element to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies. In coordination with the Housing Element Update, the City is undertaking updates to the Safety Element, Conservation Element, and Environmental Justice Element for internal consistency and compliance with State law. Consistency with the remaining components of the General Plan have been achieved through the adoption of complementary policies in each of the elements that support the goals and policies of the other elements.

b. The proposed amendment would not be detrimental to the public interest, health, safety, convenience or welfare of the city. Comment: The proposed GPA to adopt the 6th Cycle Housing Element is consistent with the provisions of the General Plan. The land use designation changes identified in the 6th Cycle Housing Element are all allowed. The 6th Cycle Housing Element Update is reasonably related to the public health, safety and welfare because it guides and accommodates land uses and housing in accordance with regional and local population growth projections and the housing needs of all economic segments of the community.

c. The site is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested/anticipated land use development. Comment: The proposed land use designation changes identified in the 6th Cycle Housing Element are physically suitable in that the Housing Element Update is consistent with state law and General Plan Guidelines, and accommodates land uses and housing through appropriate zoning and General Plan Land Use map amendments, to be brought forward at another date in the future.

d. The proposed project has been reviewed in compliance with the provisions of the California Environmental Quality Act (CEQA), and the Lodi Environmental Review Guidelines. Comment: The City Council of the City of Lodi, in accordance with the California Environmental Quality Act (CEQA), has found the 6th Cycle Housing Element update is covered by the common sense CEQA exemption (CEQA Guidelines Section 15061[b][3]) which provides that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Since no development project or other physical change to the environment would be approved by the adoption of the Housing Element, it can be seen with certainty that there is no possibility that Housing Element adoption may have a significant effect on the environment, and therefore is not subject to CEQA. Any proposed future amendments to City zoning regulations and the General Plan Land Use Element

pursuant to State housing law, as well as future housing development projects, will be subject to additional review and appropriate documentation pursuant to CEQA.

e. Further, pursuant to CEQA Guidelines Sections 15162 and 15163, none of the circumstances necessitating further CEQA review or preparation of a new EIR are present with respect to the proposed changes to the General Plan Land Use Diagram and Zoning Map Pursuant to the requirements of CEQA, the action to submit the Draft 2023-2031 Housing Element to HCD for review is exempt from CEQA pursuant to CEQA Guidelines Section 15262, as the project involves only feasibility or planning studies for possible future actions which have not been approved or adopted.

3. The Housing Element substantially complies with State Housing Element Law.

4. The City Council hereby repeals the 2015-2023 Housing Element and adopts the 2023-2031 Housing Element attached hereto as Exhibit A, incorporated by this reference.

Dated: March 20, 2024

==========

I hereby certify that Resolution No. 2024-45 was passed and adopted by the City Council of the City of Lodi in a regular meeting held March 20, 2024, by the following vote:

AYES: COUNCIL MEMBERS – Bregman, Nakanishi, Yepez, and Mayor Craig

NOES: COUNCIL MEMBERS – None

ABSENT: COUNCIL MEMBERS – Hothi

ABSTAIN: COUNCIL MEMBERS – None

Olivia Nashed

Olivia Nashed
City Clerk

2024-45

Exhibit A: 2023-2031 Lodi Housing Element

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov

April 11, 2024

John Della Monica, Director
Community Development Department
City of Lodi
221 West Pine Street
Lodi, CA 95240

Dear John Della Monica:

RE: City of Lodi's 6th Cycle (2023-2031) Adopted Housing Element

Thank you for submitting the City of Lodi's (City) housing element that was adopted on March 20, 2024 and received for review on March 27, 2024. Pursuant to Government Code section 65585, the California Department of Housing and Community Development (HCD) is reporting the results of its review.

HCD is pleased to find the adopted housing element in substantial compliance with State Housing Element Law (Gov. Code, § 65580 et seq) as of the date of this letter. The adopted element was found to be substantially the same as the revised draft element that HCD's January 29, 2024 review determined met statutory requirements.

Additionally, the City must continue timely and effective implementation of all programs including but not limited to the following:

- Program 1.1 (Development Code)
- Program 1.2 (Growth Management Allocation Ordinance)
- Program 1.4 (Land Inventory)
- Program 1.9 (Annex Land to Accommodate Future Housing Needs)
- Program 1.11 (Multifamily Development Standards and Design Requirements)
- Program 1.12 (Diversify and Expand the Housing Stock)
- Program 1.13 (Accessory Dwelling Unit (ADU) Strategy)
- Program 1.16 (City-owned Sites)
- Program 1.17 (Large Sites)
- Program 2.1 (Eastside Area Housing Rehabilitation)
- Program 2.5 (Eastside Area Funds for Public Improvements)
- Program 3.4 (Support Transit Facilities and Transit-Oriented Development)
- Program 4.1 (Promote Fair Housing Services)
- Program 4.7 (Affirmatively Furthering Fair Housing)
- Program 4.8 (Place-based Strategies)

- Program 4.9 (Farmworker Housing)
- Program 4.10 (Anti-displacement Strategy)

The City must monitor and report on the results of these and other programs through the annual progress report, required pursuant to Government Code section 65400. Please be aware, Government Code section 65585, subdivision (i) grants HCD authority to review any action or failure to act by a local government that it determines is inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law.

In addition, the element includes Program 1.4 (Land Inventory) identifying adequate sites to accommodate a shortfall of capacity for the lower-income regional housing need allocation (RHNA). The Program commits to rezone capacity at higher densities by December 15, 2026. Among other things, the Program further commits to permit owner-occupied and rental multifamily uses by right (without discretionary action) for developments in which 20 percent or more of the units are affordable to lower income households.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant, the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities program, and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City now meets housing element requirements for these and other funding sources.

HCD appreciates the commitment and responsiveness of the housing element update team provided throughout the update and review. HCD particularly appreciates the diligence, productiveness, and dedication of City staff including Cynthia Marsh, Kari Chadwick and Jennifer Rhyne in preparation of the City's housing element. HCD wishes the City success in implementing its housing element and looks forward to following its progress through the General Plan annual progress reports pursuant to Government Code section 65400. If HCD can provide assistance in implementing the housing element, please contact Sayed Murad, of our staff, at sayed.murad@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

This page is intentionally left blank.

Table of Contents

1. Introduction and Public Participation 1
Purpose and Contents 1
Community Context 2
State Requirements 3
Data Sources and Their Use 3
Public Participation 3
General Plan and Housing Element Consistency 14
2. Housing Needs Assessment 16
Demographic and Employment Profile 16
Household Characteristics and Housing Supply 24
Housing Supply 29
Housing Affordability 33
Special Housing Needs 41
Assisted Housing Units 56
Opportunities to Promote Sustainable Development 59
3. Zoning for a Variety of Housing Types 62
Density Bonuses 62
Multifamily Residential Housing 64
Manufactured (Factory-Built) Homes 64
Mobile Homes and Mobile Home Parks 64
Farmworker / Agricultural Employee Housing 64
Supportive and Transitional Housing 65
Single-Room Occupancy Units 66
Emergency Shelters 66
Low Barrier Navigation Centers 68
Residential Care Facilities 68
Accessory Dwelling Units (Second Dwelling Units) 68
4. Constraints 70
Nongovernmental Constraints 70
Governmental Constraints 73
Environmental, Infrastructure, and Public Service Constraints 94
5. Sites Inventory and Analysis 97
Regional Housing Needs Allocation (RHNA) 97
Meeting the RHNA 98
Site Selection Methodology 100
Development Trends 101
Realistic Development Capacity 110
Sites used in Previous Planning Periods 120

City-Owned Sites 120
Summary of Adequate Sites 136
Adequacy of Public Facilities and Infrastructure 137
Inventory of Local, State, and Federal Housing and Financing Programs 140
Funding Programs and Financial Resources 142
6. Affirmatively Furthering Fair Housing 146
Fair Housing Methodology 148
Fair Housing Resources 151
Segregation and Integration Patterns and Trends 154
Disparities in Access to Opportunities 189
Disproportionate Housing Needs 208
Sites Inventory 234
7. Goals, Policies, & Implementation Programs (Policy Document) 289
Goals and Policies 289
Implementation Programs 291
Quantified Objectives 318
Appendix A: Evaluation of the Previous Housing Element A-1
Overview A-1
Construction Achievements A-1
Program Evaluation A-4
Effectiveness of the 2015 Housing Element A-6
Effectiveness of Programs in Meeting Special Housing Needs A-6

Tables

Table 1 Population Growth (2000 – 2020) 16
Table 2 Population Projections (2025-2050) 17
Table 3 Population Growth by Age Group (2000-2021) 17
Table 4 Race and Ethnicity 19
Table 5 Household Income by Tenure 20
Table 6 Median Household Income by Race/Ethnicity 21
Table 7 Jobs Held by Lodi Residents 22
Table 8 Occupation (types of jobs located in Lodi) by Median Salary 23
Table 9 Major Employers 24
Table 10 Household Growth Trends 25
Table 11 Household Growth Projections 25
Table 12 Household Characteristics 26
Table 13 Occupied Housing Units by Age of Householder 27
Table 14 Homeownership by Race and Ethnicity 27
Table 15 Household Size by Tenure 28
Table 16 Average Household Size 28

Table 17 Overcrowding Severity....29
Table 18 Overcrowding Severity by Tenure....29
Table 19 Housing Type Trends....30
Table 20 Housing Unit Size....30
Table 21 Vacancy Status by Type....31
Table 22 Built Year of Housing Structures....32
Table 23 Housing Problems by Tenure....32
Table 24 Substandard Housing Units....33
Table 25 Affordability Matrix....35
Table 26 Cost Burden by Tenure (Households)....36
Table 27 Cost Burden Severity (Households)....36
Table 28 Cost Burden by Income Level....37
Table 29 Cost Burden by Tenure and Income....38
Table 30 Extremely Low-Income Households (ELI) by Tenure....39
Table 31 Changes in Median Home Sale Prices and Values (2015-2021)....39
Table 32 Values of Owner-Occupied Units....40
Table 33 Median Contract Rents....41
Table 34 Median Rent by Number of Bedrooms....41
Table 35 Special Needs Groups in Lodi....42
Table 36 Persons Aged 65 and Over....43
Table 37 Senior-Headed Households by Tenure....43
Table 38 Persons with Disabilities by Age Group....44
Table 39 Persons with Developmental Disabilities by Age Group....45
Table 40 Large Households by Tenure....46
Table 41 Female-Headed Families by Poverty Status....47
Table 42 Farmworkers- San Joaquin County....48
Table 43 Migrant Worker Student Population....48
Table 44 Homelessness by Race and Ethnicity....51
Table 45 Homeless Assistance Programs....54
Table 46 City Deed Restricted Affordable Housing Developments in Lodi....57
Table 47 Lodi Land Prices (Listed)....72
Table 48 Lodi Land Prices (Sold)....72
Table 49 Development Standards, by Land Use Designation....74
Table 50 Residential Development Standards and Permitted Housing Types....76
Table 51 Growth Management Ordinance Breakdown by Density....80
Table 52 Remaining Growth Management Allocation....81
Table 53 Development Review Process Time Frame....85
Table 54 Street Standards....87
Table 55 Development Impact Mitigation Fees ($/acre)....90
Table 56 Planning Fees....91
Table 57 Comparison of Fees Across Jurisdictions....92

Table 58 San Joaquin County Regional Housing Needs Determination Allocation 98
Table 59 Accessory Dwelling Unit Production, City of Lodi 99
Table 60 Credits Towards RHNA 100
Table 61 Development Trends for Recent Projects 110
Table 62 Realistic Allowable Density per Zone 111
Table 63 Sites Used in Previous Planning Periods 120
Table 64 City-Owned Sites 121
Table 65 Opportunity Sites in Lodi 126
Table 66 Annexation Sites 133
Table 67 Realistic Capacity of Rezoned Sites 136
Table 68 Adequacy of Residential Site Inventory 137
Table 69 Domains and List of Indicators for Opportunity Maps 149
Table 70 Fair Housing Organizations Active in San Joaquin County 152
Table 71 Population by Racial Group (City of Lodi) 156
Table 72 Racial/Ethnic Dissimilarity Trends (San Joaquin County) 157
Table 73 Racial/Ethnic Dissimilarity Trends (Lodi) 157
Table 74 Employment Status by Disability Status (San Joaquin County) 164
Table 75 Tenure by Household Type and Presence of Children (San Joaquin County) 168
Table 76 Tenure by Household Type and Presence of Children (City of Lodi) 169
Table 77 Mean Salary by Occupation (San Joaquin County) 198
Table 78 Major Employers (City of Lodi) 199
Table 79 Assistance Needs of Lower-Income Households (2015-2019) 210
Table 80 Household Overcrowding (City of Lodi) 217
Table 81 Race/Ethnicity of Homeless Population and Overall Population (San Joaquin County) 221
Table 82 Proposed Housing Units by Resource Area 235
Table 83 Sites Inventory by Census Tract Characteristics 279
Table 84 Fair Housing Issues, Contributing Factors, and Meaningful Actions 284
Table 85 Quantified Objectives 318
Table 86 Progress Toward the RHNA, 2015-2023 ..... A-3
Table 87 Housing Programs Progress Report A-7

Figures

Figure 1 Historical Mortgage Rates in the United States (2013-2023) 71
Figure 2 Lodi Site Inventory 125
Figure 3 Neighborhoods in Lodi 147
Figure 4 Percent of Total Non-White Population (San Joaquin County) 158
Figure 5 Predominant Populations (San Joaquin County) 159
Figure 6 Neighborhood Segregation (San Joaquin County) 160
Figure 7 Percent of Total Non-White Population (City of Lodi) 161
Figure 8 Predominant Populations (City of Lodi) 162

Figure 9 Neighborhood Segregation (City of Lodi) 163
Figure 10 Disability by Type (City of Lodi) 165
Figure 11 Percent of Population with a Disability (San Joaquin County) 166
Figure 12 Percent of Population with a Disability (City of Lodi) 167
Figure 13 Female Headed Households With Children, No Spouse/Partner (San Joaquin County) 170
Figure 14 Female Headed Households With Children, No Spouse/Partner Present (City of Lodi) 171
Figure 15 Median Household Income (San Joaquin County) 174
Figure 16 Low and Moderate Income Population (San Joaquin County) 175
Figure 17 Median Household Income (City of Lodi) 176
Figure 18 Low to Moderate Income Population (City of Lodi) 177
Figure 19 Racially/Ethnically Concentrated Areas of Poverty (San Joaquin County) 180
Figure 20 Areas of High Segregation and Poverty (San Joaquin County) 181
Figure 21 Poverty Status (San Joaquin County) 182
Figure 22 Racially/Ethnically Concentrated Areas of Poverty (City of Lodi) 183
Figure 23 Poverty Status (City of Lodi) 184
Figure 24 Racially and Ethnically Concentrated Areas of Affluence (San Joaquin County) 187
Figure 25 Racially and Ethnically Concentrated Areas of Affluence (City of Lodi) 188
Figure 26 Access to Transit within a Quarter Mile (City of Lodi) 192
Figure 27 National Walkability Index (City of Lodi) 193
Figure 28 TCAC Opportunity Areas – Education (San Joaquin County) 195
Figure 29 TCAC Opportunity Areas – Education (City of Lodi) 196
Figure 30 TCAC Opportunity Areas – Economic (San Joaquin County) 200
Figure 31 TCAC Opportunity Areas – Economic (City of Lodi) 201
Figure 32 Jobs Proximity Index (City of Lodi) 202
Figure 33 CalEnviroScreen 4.0 Percentile Scores (San Joaquin County) 204
Figure 34 TCAC Opportunity Areas – Environmental (San Joaquin County) 205
Figure 35 TCAC Opportunity Areas – Environmental (City of Lodi) 206
Figure 36 CalEnviroScreen Disadvantaged Communities (City of Lodi) 207
Figure 37 Housing Cost Burden By Renters (San Joaquin County) 212
Figure 38 Housing Cost Burden By Home Owners (San Joaquin County) 213
Figure 39 Housing Cost Burden By Renters (City of Lodi) 214
Figure 40 Housing Cost Burden By Home Owners (City of Lodi) 215
Figure 41 Overcrowded Households (San Joaquin County) 218
Figure 42 Overcrowded Households (City of Lodi) 219
Figure 43 Sensitive Communities (San Joaquin County) 224
Figure 44 Sensitive Communities (City of Lodi) 225
Figure 45 Households by Displacement Risk and Tenure (City of Lodi) 226
Figure 46 Housing Choice Vouchers 233
Figure 47 Housing Opportunity Sites by TCAC Resource Area (Downtown Lodi) 236
Figure 48 Housing Opportunity Sites by TCAC Resource Area (East Lodi) 237
Figure 49 Housing Opportunity Sites by TCAC Resource Area (West Lodi) 238

Figure 50 Housing Opportunity Sites by TCAC Resource Area (North Lodi) 239
Figure 51 Housing Opportunity Sites by TCAC Resource Area (South Lodi) 240
Figure 52 Housing Opportunity Sites by Low- and Moderate-Income Population Area (Downtown) 242
Figure 53 Housing Opportunity Sites by Low- and Moderate-Income Population Area (East Lodi) 243
Figure 54 Housing Opportunity Sites by Low- and Moderate-Income Population Area (West Lodi) 244
Figure 55 Housing Opportunity Sites by Low- and Moderate-Income Population Area (North Lodi) 245
Figure 56 Housing Opportunity Sites by Low- and Moderate-Income Population Area (South Lodi) 246
Figure 57 Housing Opportunity Sites by Overcrowding (Downtown Lodi) 247
Figure 58 Housing Opportunity Sites by Overcrowding (East Lodi) 248
Figure 59 Housing Opportunity Sites by Overcrowding (West Lodi) 249
Figure 60 Housing Opportunity Sites by Overcrowding (North Lodi) 250
Figure 61 Housing Opportunity Sites by Overcrowding (South Lodi) 251
Figure 62 Housing Opportunity Sites by Overpayment by Homeowners (Downtown Lodi) 252
Figure 63 Housing Opportunity Sites by Overpayment by Homeowners (East Lodi) 253
Figure 64 Housing Opportunity Sites by Overpayment by Homeowners (West Lodi) 254
Figure 65 Housing Opportunity Sites by Overpayment by Homeowners (North Lodi) 255
Figure 66 Housing Opportunity Sites by Overpayment by Homeowners (South Lodi) 256
Figure 67 Housing Opportunity Sites by Overpayment by Renters (Downtown Lodi) 257
Figure 68 Housing Opportunity Sites by Overpayment by Renters (East Lodi) 258
Figure 69 Housing Opportunity Sites by Overpayment by Renters (West Lodi) 259
Figure 70 Housing Opportunity Sites by Overpayment by Renters (North Lodi) 260
Figure 71 Housing Opportunity Sites by Overpayment by Renters (South Lodi) 261
Figure 72 Housing Opportunity Sites by Percent of Total Non-White Population (Downtown Lodi) 264
Figure 73 Housing Opportunity Sites by Percent of Total Non-White Population (East Lodi) 265
Figure 74 Housing Opportunity Sites by Percent of Total Non-White Population (West Lodi) 266
Figure 75 Housing Opportunity Sites by Percent of Total Non-White Population (North Lodi) 267
Figure 76 Housing Opportunity Sites by Percent of Total Non-White Population (South Lodi) 268
Figure 77 Housing Opportunity Sites by Displacement Risk (Downtown Lodi) 269
Figure 78 Housing Opportunity Sites by Displacement Risk (East Lodi) 270
Figure 79 Housing Opportunity Sites by Displacement Risk (West Lodi) 271
Figure 80 Housing Opportunity Sites by Displacement Risk (North Lodi) 272
Figure 81 Housing Opportunity Sites by Displacement Risk (South Lodi) 273
Figure 82 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (Downtown Lodi) 274
Figure 83 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (East Lodi) 275
Figure 84 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (West Lodi) 276
Figure 85 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (North Lodi) 277
Figure 86 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (South Lodi) 278

1. Introduction and Public Participation

Purpose and Contents

The Lodi Housing Element is part of the City's General Plan, which is a comprehensive policy statement regarding the physical, economic, and social development of the city; the preservation and conservation of natural and human features of the landscape; and the reuse of land and buildings within the city. Although housing represents a high priority, planning for housing must be balanced with the community's economic needs and environmental, resource, and open space protection policies, which are also essential aspects of the City's General Plan. Whereas general plans often reflect planning periods 15–25 years long, housing elements are updated every eight years, in accordance with State law.

Housing elements address one of the State-mandated general plan topics and most basic human needs: shelter. For this reason, housing elements represent a critical link between land use and transportation policies, which define the location, layout, and movement of people and goods, and environmental/resource policies. For a city to have a strong and balanced economy, where people live in proximity to where they work, workers must have places to live within their economic means.

In addition to the Introduction, the City of Lodi 2023-2031 Housing Element contains six chapters:

Chapter 2: Housing Needs Assessment contains an analysis of population, housing, and employment characteristics and trends; the needs of special population groups such as seniors, large families, persons with disabilities and developmental disabilities; indicators of unmet need, such as overcrowding, overpayment, substandard housing, and the potential loss of affordable rental housing; and future housing construction needs. The purpose of the community profile is to characterize existing conditions and unmet housing needs among Lodi's current residents and to plan for future residents in the city.

Chapter 3: Zoning for a Variety of Housing Types analyzes the availability of zoning for a variety of housing types to promote a diverse housing stock (i.e., price, style, size).

Chapter 4: Constraints addresses the opportunities and challenges to meet the housing needs identified in the community profile. This includes the impacts of government action on housing availability and affordability, the interaction of market forces, infrastructure, and environmental conditions. This analysis focuses on the magnitude of potential constraints and identifies measures to remove them.

Chapter 5: Sites Inventory Analysis identifies adequate sites with appropriate zoning, development standards, and infrastructure capacity to accommodate new construction needs.

Chapter 6: Affirmatively Furthering Fair Housing identifies fair housing issues in the community, the factors that have contributed to these issues, and meaningful actions that work to overcome them.

Chapter 7: Goals, Policies, & Implementation Programs discusses the approach to meeting Lodi's housing needs.

Community Context

This section describes Lodi's community and demographic context in brief; Chapter 2: Community Profile provides further details.

According to the 2023-2031 Regional Housing Needs Allocation Plan prepared by the San Joaquin County Council of Governments, Lodi should plan to accommodate 3,909 additional residential units between 2023 and 2031. Of those residential units, 1,533, or 39 percent, should be affordable to extremely low-, very low-, or low-income households. It should be emphasized that this is the amount of housing the City should plan for; actual amounts of housing built will be influenced by broader economic forces, including the recent national and regional economic downturn.

Between 2015 and 2020, the city's population increased by six percent. By comparison, Tracy and Manteca, similarly sized cities, grew 10 percent and 13 percent, respectively, while the population of Stockton grew five percent during this period. From 2015 to 2020, population growth in the San Joaquin Valley was primarily in the age groups encompassing seniors (65 years+) and people between the ages of 25 and 64.

Although historically San Joaquin County has been known for its agriculture and food processing industries, in 2020 the sectors that accounted for the greatest shares of total employment were educational, health care, and social assistance (23.3 percent), retail trade (10.5 percent), and construction (9.8 percent). Between 2015 and 2020, the following sectors saw the greatest increases in the number of jobs: transportation/warehousing/utilities, construction, and government. A high percentage of Lodi residents (58.8 percent) work outside the community, reflecting regional employment interdependencies.

The median income for all households in Lodi was $70,302, compared with $74,962 for San Joaquin County as a whole. According to the most-recent American Community Survey (ACS) estimates (2017-2021 ACS 5-years), Lodi had slightly more homeowners than renters in 2021. The majority of renters earn in the $50,000 to $74,999 range, and very few earn over $150,000, demonstrating that individuals with higher incomes are more likely to be able to afford a home.

ACS data indicates that Lodi's housing stock is composed primarily of single-family homes. The total number of housing units increased from 23,792 in 2010 to 24,190 in 2021—a little more than a one percent change. The majority of new units are single-family detached homes, composing 65.6 percent of Lodi's housing stock. There is an overall lack of construction of townhomes, duplexes, and small- and medium-sized apartment buildings, which often represent more affordable rental housing. Of occupied housing units in Lodi, 53 percent are owner-occupied, and 47 percent are renter-occupied. The vacancy rate between 2010 and 2020 decreased significantly from 7.1 percent to 3.8 percent, according to the U.S. Census Bureau's Decennial Survey. A vacancy rate of five percent is considered to be "normal"; a vacancy rate less than five percent indicates a tight market in which households may not be able to find vacant units that fit their needs.

Lodi has experienced a growing gap between housing costs and local incomes. In recent years, there has been a slight decrease in the number of households paying more than 30 percent of their incomes for housing. Based on the 2017-2021 ACS five-year estimates, 37 percent of households are paying more than 30 percent of their income on housing. This is down from 42 percent in 2016.

State Requirements

Beginning in 1980 and refined periodically, the California Legislature adopted requirements for the contents of housing elements (California Government Code Sections 65580 to 65589.5). The contents of a housing element, as mandated by State law, include:

- An assessment of housing needs that includes an analysis of population and housing characteristics, employment and population projections, special housing needs, subsidized rental housing at risk of conversion, future housing construction need (regional housing allocation), and opportunities for energy conservation;
- An analysis of constraints (governmental and non-governmental) to the maintenance, improvement, or development of housing for all income levels;
- An inventory of vacant and underutilized sites by zoning category, with an assessment of the availability of public facilities and services to those sites; and
- A housing strategy containing an evaluation of past program achievements, goals, and policies, and a schedule of implementing actions with quantified objectives.

Although State law regarding housing elements requires communities to address the needs of all residents, particular attention in the housing element law is devoted to the needs of extremely-low-, very low-, and low-income households. Specifically, State law requires housing elements to:

- Identify adequate sites to facilitate and encourage housing for all income levels;
- Remove governmental constraints to housing production, maintenance, and improvement;
- Assist in the development of adequate housing for low- and moderate-income households;
- Conserve and improve the condition of existing affordable housing; and
- Promote housing opportunities for all.

Data Sources and Their Use

A variety of local, regional, state, federal, and private sources of information were used to prepare the Housing Element. As required by State law (Government Code Section 65584), the principal source of information used to determine future housing construction need is the San Joaquin County Regional Housing Needs Allocation for the 2023 to 2031 planning period. The principal sources of information included the US Census Bureau, American Community Survey (2017 to 2021 five-year estimate), California Department of Finance, California Employment Development Department, City of Lodi, San Joaquin County, local housing developers, and residents.

Public Participation

As part of the Housing Element update process, the City implemented the State's public participation requirements in Housing Element law, set forth in Government Code Section 65583©(7), wherein jurisdictions "…shall make a diligent effort to achieve participation of all economic segments of the community in the development of the housing element."

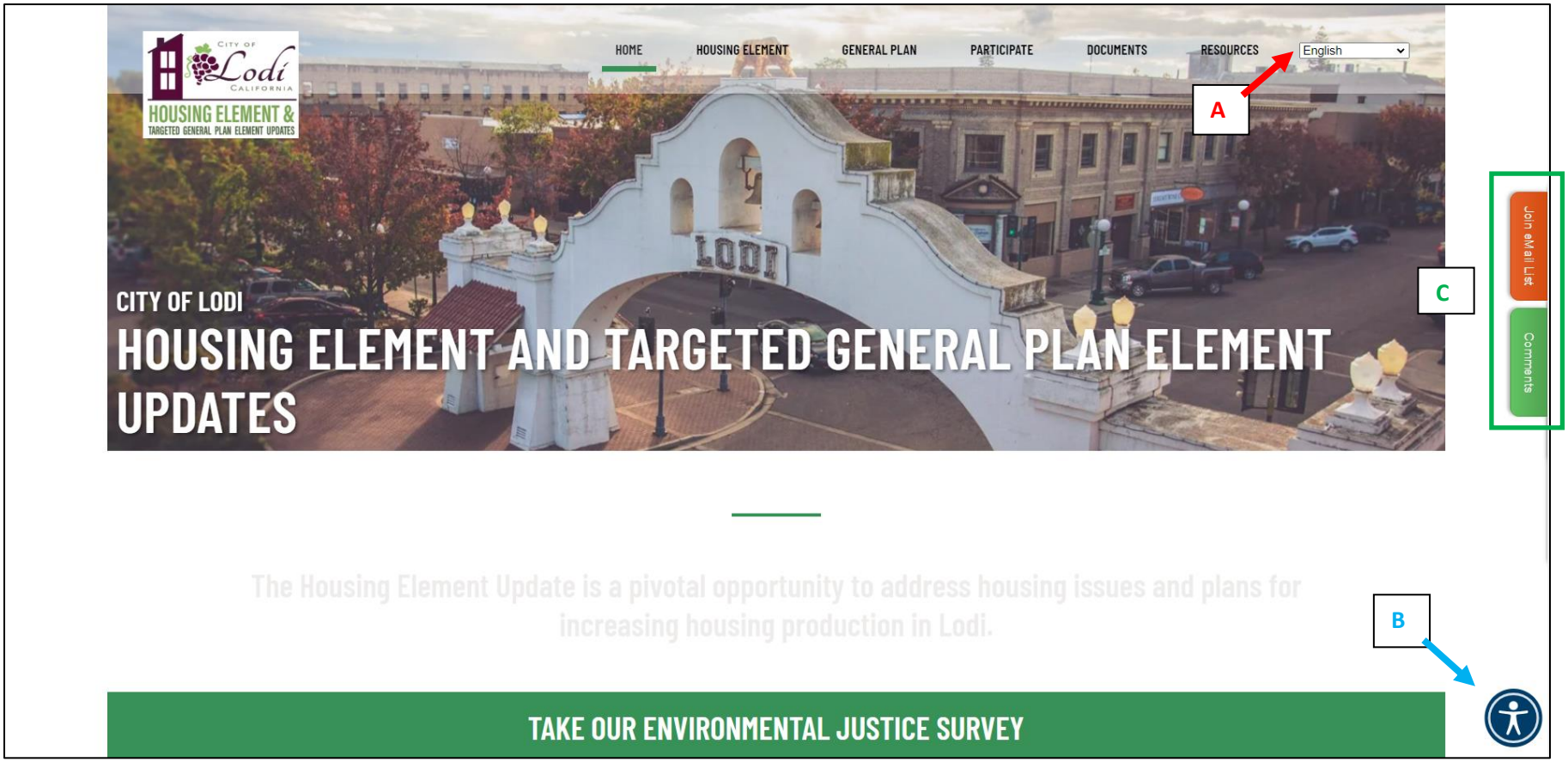
In response to the need for public participation, City planning staff worked with the consultants to develop a robust community engagement program tailored to ensure the community and other stakeholders are engaged in the process and are given ample opportunities to provide input. The key objective of the community engagement program is to maximize opportunities for everyone interested in the Housing Element to participate. The engagement program included branding, a project website, newsletters and e-blasts, announcements on the City website and social media, two community workshops, a housing needs survey, Housing Technical Advisory Committee meetings, and Planning Commission and City Council study sessions and hearings. This section summarizes our engagement program.

Project Branding and Logo

A branding package was prepared for the Housing Element and Targeted General Plan Updates. This included a project logo and styles to be used on all work products, maps, presentations, and publicity materials. The common branding helps to build recognition for the project and ensure that this effort is distinct in the minds of the community. The logo to the left has been and will be used on all materials developed for all elements being updated during the Housing and General Plan Updates.

Project Website (planlodi.com)

During the development and review of the Housing Element, the City created, established, and maintained a website dedicated to the 2023-2031 Housing Element Update and Targeted General Plan Updates. This webpage provided easy access to information on the project, including the Housing Element information and details about the Housing Element workshops, surveys, and events. Project documents were posted to the website and comments were encouraged through the provided "Comments" button on each page. A link on the website allowed residents to sign up for the email list. To enhance accessibility, the project website included a built-in translator to convert the website to Spanish and provided a range of accessibility tools to enhance website accessibility in compliance with the Americans with Disabilities Act (ADA). An image of the Project website is included on the following page.



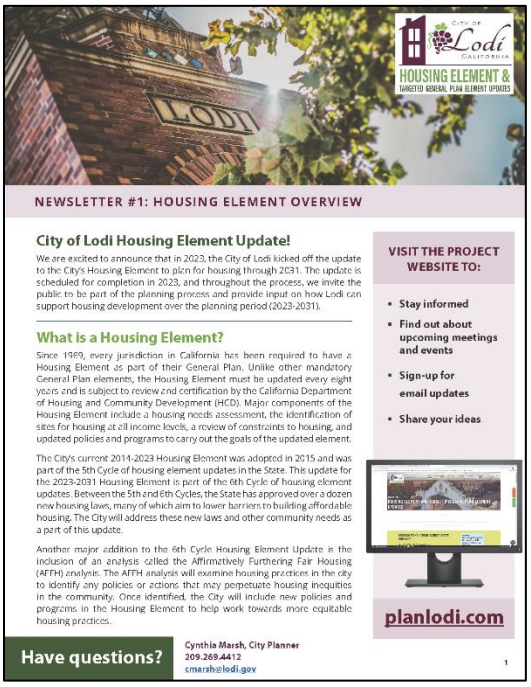
A: Language Menu: This menu allows users to view the website in Spanish.

B: Accessibility Widget: This button allows users to increase text size, contrast, and other attributes to increase accessibility.

C. Email and Contact Buttons: These buttons allow users to join the project email list or provide a comment to the Project Team.

Newsletters

During the Housing and General Plan Element Updates, two newsletters were developed and distributed. The newsletters were designed to give the community a better understanding of the Update process and the Draft Housing Element.



- **Newsletter #1: Housing Element Overview**
  Newsletter #1 describes what a housing element is, how and why it is being updated, the project schedule, and how to get involved in the Update process. The newsletter also describes the other components of the project, including Technical General Plan Updates. The newsletter publicizes the creation of the project website and encourages readers to visit the website for more information.

- **Newsletter #2: Public Review Draft Housing Element**
  Newsletter #2 provides a summary of the Public Review Draft Housing Element, including an explanation of each chapter within the Element. The newsletter also announces the September City Council work session and includes information on ways to participate in the Project.

eMail Notifications (e-Blasts)

The City sent multiple email notifications (e-blasts) to announce upcoming events and the release of project-related documents. Email addresses were compiled from those requesting notification from the City and from those signing up on the project website and at project events. Additionally, the email list includes contacts at local agencies and organizations representing lower-income community members, seniors, and residents with special housing needs. As of August 2023, the Housing Element email list has 267 subscribers. The following agencies/organizations are included in the email list:

Lodi Committee on Homelessness
Women's Center/Youth and Family Services
Ready to Work
The Salvation Army
Visionary Home Builders
San Joaquin County Business Council
Lodi Unified School District
Central Valley Low Income Housing Corp.
United Way
One-Eighty Teen Center
LOEL Senior Center
Housing Authority of San Joaquin
San Joaquin Fair Housing
Lodi Improvement Committee
Inner City Action
Lodi Asset Based Community Development (ABCD)
San Joaquin County Behavioral Health Services
Grace and Mercy Charitable Foundation
Community Services Team
The Lodi House
Chamber of Commerce
Adventist Health
Community Partnership for Families of San Joaquin
Hope Harbor
Community Medical Centers
San Joaquin County WorkNet

Stakeholder Interviews

Throughout April and May 2023, Mintier Harnish, consultants for the City, conducted one-on-one interviews with local housing developers, agencies, and housing and community health advocates to gain an understanding of the housing conditions, issues, and opportunities in the city. The input received during these interviews provides context to the consultants on housing needs and constraints in the community. The interviews included eight participants, identified below.

Who We Spoke to:

Name	Details
Tom Doucette	Developer, FCB Homes
John Mendelson	Affordable Housing, CVLIHC
Adam Cheshire	SJC Homeless Initiatives
Peter Ragsdale	Housing Authority of San Joaquin County
Marjory Schrenk	LOEL Senior Center
Shelby Young	ED Lodi Housing
Kathryn Siddle	Lodi Committee on Homelessness, Lodi Improvement Committee
Robert Munoz	San Joaquin Fair Housing

Input Received

Each interview lasted approximately one hour and was conducted via conference call or Zoom. After the consultants provided a brief project overview, stakeholders were encouraged to provide their thoughts on housing conditions and needs in the city. Although a broad range of opinions and ideas were expressed during the interviews, comments can be generally summarized into the following four categories:

- Local development context and trends
- Housing needs
- Issues
- Opportunities

Input received related to local development context and issues informed the Housing Needs Assessment and Constraints Analysis. Further, comments related to housing needs and opportunities were critical in shaping and prioritizing implementation program efforts, including Program 1.12 (Diversify and Expand the Housing Stock), Program 2.1 (Assist the Eastside Area with Housing Rehabilitation), Program 2.2 (Implement Property Maintenance and management Standards), Program 2.3 (Conduct a Housing Conditions Survey), and Program 3.4 (Support Transit Facilities and Transit-oriented Development), among others.

Please note that the opinions expressed in this summary are those of the stakeholders and do not necessarily reflect the opinions of the City of Lodi, City staff, or the consultants. All comments are paraphrased and presented without attribution.

Local Development Context and Trends

- Stakeholders report that Lodi planning staff is responsive and allow developers to build with flexibility.
- Single-family development has been historically successful in Lodi and developers continue to prioritize single-family development due to its market reliability.
- The last six to eight years have seen an increase in the number of multifamily developments as parcels allowing multifamily housing have become available.
- Lodi is generally expanding westward due to geographical boundaries to the North, industrial and commercial concentration to the east, and a historical greenbelt region to the south.
- Despite this westward development, there has been some community pushback when agricultural parcels are proposed for non-agricultural development.
- Stakeholders stress the importance of transit-oriented development and the expansion of current transit networks.
- The county is a medically underserved area. Recruitment is challenged by the high cost of living and lack of accessible housing in the county, further compounding the issue.
- Funding applications for low-income housing developments require sites to be in proximity to transit, community resources, and healthcare services.
- The City of Lodi has done a good job working to scale up staffing to meet housing needs and put more resources towards housing initiatives.

Housing Needs

- Stakeholders reported that a small portion of the multifamily housing stock consists of substandard units that are not being addressed by property owners or management agencies.
- There is a need for increased emergency housing as current facilities are often at full capacity.
- Stakeholders comment on the rising number of people experiencing homelessness in the region, observing that displacement pressures have forced residents out of the city, or to live in their cars, move in with family, or to lose housing completely.
- Overcrowding is an issue. Residents often live in overcrowded households with multiple families to make ends meet.
- The number of shelter beds provided in the city does not meet the number of unsheltered individuals.
- Shelters report that a majority of the unsheltered residents have little reliable income, posing a serious issue in attaining long-term housing.

Issues

- Supply chain issues, particularly during the COVID-19 pandemic, have been a serious challenge for developers, resulting in long lead times for basic materials and labor challenges.
- Stakeholders note that the requirements of the State building code can be burdensome for both planning staff and builders.
- Observations of ADU trends indicate that ADUs are often built for personal use or family members, pointing to the fact that ADUs are not entirely effective at providing new rental opportunities.
- Credit-based application requirements can act as a barrier to affordable housing for special needs groups including seniors, veterans, and extremely low-income households.
- The lack of transportation services beyond the city limits restricts residents from accessing healthcare services and other amenities outside the city.
- Residents without reliable transportation find it difficult to access the Kaiser hospital located in Stockton as public transportation options are extremely limited.
- Shelter workers note that point-in-time counts are often inaccurate due to the short observation windows when estimating.
- The point in time count can miss unsheltered individuals and those living in temporary shelter situations.
- Rising interest rates pose a constraint to multifamily development. Investment groups are often needed to finance medium and large multifamily projects, and when interest rates rise (and profit margins fall) investment in multifamily development is seen as less attractive.
- Local opposition to permanent housing for people experiencing homelessness can be a constraints to the development of shelters and transitional or supportive housing types.
- Transitional and supportive housing types are needed to provide long-term housing opportunities beyond what can be provided at an emergency shelter.

Opportunities

- The western area of the city has the potential to support new development.

- Despite some remaining local opposition, stakeholders note that the community is becoming increasingly more accepting of multifamily developments.
- There was a desire for the county to take a greater leadership role in encouraging affordable housing development.
- Stakeholders suggest that an inclusionary housing ordinance may help encourage affordable development.
- Government agencies and local non-profits providing resources should work to streamline the application process for housing programs to eliminate barriers to access.
- Many programs contact applicants via email, which is not an accessible communication method for all applicants, particularly those without access to a cell phone.
- While programs provide free cell phones to residents, if the phone is lost and replaced, a new email address must be set up with the new phone. This creates issues for residents that have applied for programs under their old email address. Unhoused residents often find it hard to keep a phone, access to email accounts, and login information.
- Additionally, some program applications require a permanent mailing address posing an additional barrier.
- Local agencies need places within the community to meet with clients, provide classes, and distribute resources. The City may have an opportunity to provide meeting spaces through partnerships with local organizations.
- "Safe Place to Park" facilities could help to provide acceptable and safe parking locations for individuals and families living in cars or tents at night. Facilities should be centrally located and could include bathrooms and showers. These facilities could also provide access to laundry, meals, and information on available resources.

Community Workshops

Community Workshop #1: Introduction to the Housing Element & Targeted General Plan Updates

On Thursday, March 23, 2023, the City held the first workshop on the Housing Element & Targeted General Plan Updates. The workshop included an introductory presentation, a live poll conducted in three parts throughout the workshop, and an opportunity for the public to provide input on housing needs, issues, and opportunities in Lodi.

Public Comments from Workshop #1

During the workshop, the Project Team facilitated a group discussion on housing needs and the Housing Element Update. Comments received are paraphrased below. This input informed the fair housing assessment and implementation programs related to rental assistance and community revitalization. Specifically, Program 1.7 commits the City to work with the Housing Authority to support and expand the Housing Choice Voucher program, and to engage local rental property owners annually to encourage greater participation in the Voucher Program, particularly targeting properties in moderate and high resource areas

- The availability of housing for low-income households is limited and economic conditions continue to strain residents.

- Acquiring Housing Choice Vouchers (HCV) is becoming increasingly competitive as the waitlist continues to grow.
- The waitlist for vouchers currently includes approximately 2,000 people.
- Finding property owners that welcome low-income residents is a barrier to housing.
- While property owners are required by law to accept HCVs, application criteria, such as credit score or rental history, provide additional barriers to housing access.
- Barriers to housing access for low-income renters imposed by property owners through application requirements contribute to fair housing issues in the city.
- There are substandard housing issues among units available to residents using Housing Choice Vouchers.

Community Workshop #2: Vacant and Underutilized Sites Assessment

On Thursday, April 13, 2023, the City held the second community workshop on the Housing & General Plan Updates. The purpose of the workshop was to review and discuss the sites assessment methodology, present findings, and describe implications for rezoning. Input was collected through group discussion.

Participants provided comments related to the distribution of housing capacity outlined in the draft sites inventory. Participants encouraged the City to distribute sites in a way that avoids concentrating lower income capacity in the southern quadrant of the city. Input received was considered in the development of the sites inventory and capacity was redistributed to include more capacity in the western quadrant of the City, and fewer lower income units in the southern quadrant.

Housing Needs Survey

The outreach program included the development of a housing needs survey, which was distributed digitally and in hardcopy at events and city offices. The surveys were accessible to the public from March 29, 2023, to August 02, 2023.

A total of 75 residents completed the survey. A summary of responses for each survey is included below. Input received assisted the City with crafting and prioritizing implementation program efforts.

Barriers to access (input received informed Programs 1.7, 1.12, 2.4, 4.5, and 4.6.) :

- Twenty-nine respondents (39.7 percent) ranked the cost of rent as the largest barrier to accessing housing in Lodi, followed by the cost of a mortgage (37 percent) and upfront costs and few options for rent or sale (11 percent).
- One respondent (1.4 percent) ranked the lack of accessible units as the largest barrier to accessing housing in Lodi.

Housing Types (input received informed Programs 1.10, 4.3, and 4.5) :

- Rental units of all types (35.2 percent) and affordable homes available for purchase (35.2 percent) were ranked as the most needed types of housing in Lodi, followed by more affordable housing types (11.3 percent), emergency and transitional housing (7.0 percent), housing for seniors and those with special

housing needs (5.0 percent), housing for large or multi-generational families (4.2 percent), and multifamily or workforce housing (1.4 percent).

Development Opportunities (input received informed Programs 1.11, 1.12, and 4.5):

- Thirty-eight respondents (55.1 percent) voted triplexes, four-plexes, and other smaller multifamily housing types as a development opportunity they would like to see pursued in Lodi.
- Accessory dwelling units for rent were the second most popular development opportunity identified (26 respondents, 37.7 percent).
- Thirty-six respondents (51.4 percent) voted that an easy application and permitting process would encourage respondents to add an ADU to their property, while (38.6 percent) voted that they have no interest in this type of development on their property.
- When asked about concerns surrounding renting an ADU, thirty-four respondents (50.8 percent) stated they have no interest renting this housing type.
- Twenty-four respondents (35.8 percent) were concerned about affordability when considering renting an ADU, while only six respondents (9 percent) stated that they have no concerns and are very interested in renting an ADU.

Siting of Multifamily Development (input received informed Programs 1.4, 1.6, 1.9, and 1.12):

- Forty-one respondents (55.4 percent) identified underutilized or vacant commercial areas as well-suited for multifamily development, followed by areas near shopping centers (51.4 percent) and areas in proximity to transportation (50 percent) and employment (44.6 percent)
- Parks (71.2 percent) and shopping centers (71.2 percent) were equally considered the most desirable amenities near multifamily development, followed by schools (50.7 percent) and public facilities (45.2 percent); proximity to health care providers (20.6 percent) and pharmacies (13.7 percent) were ranked lower.

New Housing Types in Existing Neighborhoods (input received informed Programs 1.6, and 1.12):

- Thirty-one respondents (43.1 percent) were in favor of new housing types in their neighborhood, while nineteen voted no (26.4 percent) and twenty-two said maybe (30.6 percent).

Comments:

- Increased funding for local government agencies including the police department and fire department is needed to support housing capacity. (input informed Program 3.2)
- Increase affordable housing development for low to moderate-income households. (input informed Programs 1.5, 1.12, and 4.5)
- Expand services and shelters for people experiencing homelessness with long-term solutions for permanent housing. (input received informed Program 4.3)
- Increasing housing opportunities for special needs groups including seniors and people with disabilities is a priority. (input received informed Programs 1.5, 4.6, and 4.7)

- Minimize single-family development and provide more multifamily housing near commercial districts, especially in the downtown area. (input received informed Programs 1.6 and 1.12)

Planning Commission and City Council Meetings and Hearings

The City will hold meetings and hearings with the Planning Commission and City Council throughout the process of updating the Housing Element. This section will be revised to include information related to shirt sleeve work sessions, meetings, and hearings, as they are scheduled. Each event will include an opportunity for public input.

City Council Shirt Sleeve Session #1: Public Review Draft Housing Element

On September 12, 2023, City staff held a study session with the City Council to discuss the Public Review Draft Housing Element. The meeting included a presentation summarizing the Draft Housing Element, as well as opportunities for City Council questions and public comments. The in-person study session was broadcast on Zoom for those unable to attend.

Comments on the Public Review Draft Housing Element

Input from the community is critical to the development and refining of the Housing Element Update. The Public Review Draft Housing Element was posted for public comment on September 13, 2023, and comments were taken through October 13, 2023. The City worked diligently to publicize the availability of the Draft and encourage public input. In this effort, the City:

- discussed the Draft and promoted its upcoming release at the September 12 City Council work session,
- published Newsletter #2 summarizing the Draft and how to provide comments,
- sent multiple eblast notices and reminder to residents and local organizations,
- posted notices on City social media, and
- emailed the Draft directly to local agency contacts with a request for comment.

One public comment was received on the Public Review Draft Housing Element. This comment, and the City's responses, are included below.

Public Comment
Name: Alane Dashner

Comments:

Thank you for providing this wonderful data!

- *Table 21 - "other vacant" is almost half - please break down for more detail*
    - Response: A housing unit is classified as "other vacant" when it does not fit into any year-round vacant category. Common reasons a housing unit is labeled "other vacant" is that no one lives in the unit and the owner does not want to rent or sell, is using the unit as storage, or is elderly and living in a nursing home or with family members. Additionally the unit may be being held for

settlement of an estate, repaired or renovated, or foreclosed. We have added this information in the notes to Table 21.

- *Printed p45 The Women's Center at 29 S Washington is "permanently closed"*
    - Response: We have removed the location at 29 S. Washington from the bulleted list of resources.
- *Table 45 - no Access Center?*
    - Response: We have added the Access Center to the table.
- *Table 46 - it's Hotel Lodi, not Lodi Hotel*
    - Response: We have made this correction in the table as well as on page 212.
- *Table 65 - our historic Japantown is an "opportunity site"? how can we learn more about plans for Japantown and get involved w historic preservation of important sites?*
    - Response: The sites identified as Housing Opportunity Sites in Table 65 are sites that currently allow residential uses. The table summarizes the potential residential capacity of these sites under existing zoning. Currently (October 2023) there are no active plans for these sites.
- Table 67/Figure 2 - hard to understand - please include addresses esp related to historic districts
    - Response: We have added addresses to Table 67.
- Review tables like 81 whose math doesn't add up, probably because of mixing race and ethnicity
    - Response: You are correct, the percentages in Table 81 does not add to 100 due to the fact that residents can identify as racially white, Asian, or black, but also ethnically Hispanic. This table is used as a general comparison; for more precise demographic information related to race and ethnicity, please see Table 4.
- Printed p284 - where do we stand with the Access Center having a permanent place with running water in 2024?
    - Response: City staff are diligently working with the architect and consultants to deliver a well-developed project. They aim to break ground in early spring for optimal construction weather. The temporary Access Center will remain open, providing services to those experiencing homelessness. Source: https://www.lodi.gov/CivicAlerts.aspx?AID=372

General Plan and Housing Element Consistency

California Government Code Section 65300.5 requires that a general plan be internally consistent, meaning that no conflicts exist among the elements of the plan. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan. In preparing the 2023-2031 Housing Element, the City reviewed goals and policies in the various elements of the General Plan. With the passage of SB 1035 in 2018, the City will need to update its Safety Element to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies. In coordination with the Housing Element Update, the City is undertaking updates to the Safety Element, Conservation Element, and Environmental Justice Element for internal consistency and compliance with State law. Additionally, the City has committed to revise the Growth

Management System through Program 1.2 and will need to update the Land Use Element and Development Code for consistency. Consistency with the remaining components of the General Plan has been achieved through the adoption of complementary policies in each of the elements that support the goals and policies of the other elements.

2. Housing Needs Assessment

This assessment aims to evaluate the effectiveness of existing housing policies and programs and provide a general direction and focus for future housing initiatives.

Demographic and Employment Profile

The purpose of this section is to establish "baseline" population, employment, and housing characteristics for Lodi. The main sources of data used in this section are the 2010 and 2020 U.S. Census, the 2016-2020 and 2017-2021 American Community Survey (ACS) estimates, and the U.S. Department of Housing and Urban Development (HUD).

Population

Population characteristics, such as growth rate, age, and income levels, affect the type and amount of housing needed in a community. Residents' age and income, employment trends, and other factors influence the type of housing needed and the community's ability to afford housing. The following section analyzes Lodi's population characteristics and trends.

Table 1 shows population growth from 2000 to 2020. Between 2000 and 2010 the population of the city grew by 9.0 percent from 56,999 to 62,134. Between 2010 and 2020, the population grew at a slower rate of 6.8 percent, reaching 66,348 in 2020. Population growth in the city is similar to statewide growth (10.0 percent from 2000-2010 and 6.1 percent from 2010-2020), but significantly lower than growth in the county (21.6 percent from 2000-2010 and 13.7 percent from 2010-2020).

Table 1 Population Growth (2000 – 2020)

Jurisdiction	2000	2010	2020	Percent Change 2000-2010	Percent Change 2010-2020
Lodi	56,999	62,134	66,348	9.0%	6.8%
San Joaquin County	563,598	685,306	779,233	21.6%	13.7%
California	33,871,648	37,253,956	39,538,223	10.0%	6.1%

Source: US Census, Decennial Census, 2000 Table DP1; 2010 Table P1; 2020 Table P2.

Table 2 shows the San Joaquin Council of Government's population projections through 2050 for Lodi and San Joaquin County. According to this forecast data, Lodi is projected to grow by approximately 14 percent between 2025 and 2050 with an estimated increase of 10,082 persons. Population growth in San Joaquin County is projected to be much higher at approximately 23 percent.

Table 2 Population Projections (2025-2050)

Jurisdiction	2025	2030	2035	2040	2045	2050
Lodi	72,277	75,445	77,357	79,058	80,763	82,359
County Total	833,053	882,163	917,811	951,985	987,241	1,022,228

Source: San Joaquin Council of Governments, Adopted 2022 RTP/SCS Plan, Appendix Q.

Age

Table 3 below presents the population data by age group. In 2021, young adults aged 25 to 35 account for the largest age group in Lodi, followed by adults aged 35 to 44 and adults 45 to 54. During the last two decades, the city's population of adults aged 55 to 64 grew faster than any other age group. However, no age group has decreased in the last two decades, though children aged 15 to 19 and adults aged 35 to 44 grew the slowest. The median age has stayed the same since 2000, at 34 years old.

Table 3 Population Growth by Age Group (2000-2021)

	2000	2010	2021	Percent Change (2000-2010)	Percent Change (2010-2021)	Percent Change (2000-2021)
Preschool (under 5 years)	4,495	4,662	4,708	3.7%	1%	4.7%
School Age (5-9 years)	4,581	4,692	4,623	2.4%	-1.5%	0.9%
School Age (10-14 years)	4,448	5,259	5,426	18.2%	3.2%	22%
School Age (15-19 years)	4,184	4,798	4,465	14.7%	-6.9%	6.72
College Age (20-24 years)	3,855	4,573	4,401	18.6%	-3.8%	14.2%
Young Adults (25-34 years)	7,605	7,929	9,585	4.3%	21%	26%
Adults (35-44 years)	8,427	7,836	8,635	-7%	10.2%	2.5%
Adults (45-54 years)	6,896	8,042	7,468	16.6%	-7.1%	8.3%
Adults (55-59 years)	2,421	3,742	3,832	54.6%	2.4%	58.3%
Adults (60-64 years)	1,946	3,394	3,711	74.4%	9.3%	90.7%
Seniors (65+ years)	8,141	8,915	8,953	9.5%	0.4%	10%
Total Population	56,999	62,225	66,107	9.2%	6.2%	16%
Median Age	34.1	34.2	34.5	-	-	-

Source: U.S. Census Bureau, Decennial Census, 2000 Table DP1; 06-10, 17-21, ACS (5-Year Estimate), Table S0101.

Race and Ethnicity

Table 4 provides a comparison of the racial and ethnic composition of Lodi for the years 2010 and 2020. According to the 17-21 ACS estimates, the largest racial/ethnic population in Lodi is non-Hispanic white, followed by Hispanic/Latino. This is consistent with the State data, though the largest group in the San Joaquin County is Hispanic/Latino, followed by white alone.

In the past decade, Native Hawaiian and other Pacific Islander and Non-Hispanic Black populations increased, both of which are significantly higher than the State and County numbers. Native Americans have the highest decrease in Lodi's population, which is consistent with the County and State data. However, while San Joaquin County and California have high increases of Non-Hispanic Other Race, Lodi saw a high population decrease of 52.1 percent.

Table 4 Race and Ethnicity

Race/ Ethnicity	Lodi			San Joaquin County			California		
	2010	2021	Percent Change (2010-2021)	2010	2021	Percent Change (2010-2021)	2010	2021	Percent Change (2010-2021)
Non-Hispanic/ Latino									
White	33,194	28,810	-13.2%	245,919	228,197	-7.2%	14,956,253	14,109,297	-5.7%
Black/African American	388	1,009	160.1%	48,540	51,696	6.5%	2,163,804	2,128,184	-1.7%
Native American	248	61	-75.4%	3,179	1,604	-49.5%	162,250	124,341	-23.4%
Asian American	4,167	7,420	78.1%	94,547	124,282	31.4%	4,775,070	5,802,086	21.5%
Two or More Races	1,342	2,324	73.2%	22,149	33,159	49.7%	968,696	1,413,870	46%
Native Hawaiian and Other Pacific Islander	88	340	286.4%	3,248	4,320	33.0%	128,577	134,692	4.8%
Other Race Alone	94	45	-52.1%	1,383	1,963	41.9%	85,587	146,096	70.7%
Hispanic/ Latino[1]									
Total	22,613	26,098	15.4%	266,341	326,185	17.7%	14,013,719	15,593,787	9.8%
White	-	7,360	-	-	130,186	-	-	6,444,435	-
Black/African American	-	60	-	-	2,147	-	-	105,074	-
Native American	-	216	-	-	4,402	-	-	236,266	-
Asian American	-	160	-	-	3,251	-	-	85,310	-
Two or More Races	-	13,048	-	-	95,808	-	-	2,821,347	-
Native Hawaiian and Other Pacific Islander	-	30	-	-	397	-	-	13,586	-
Other Race Alone	-	5,224	-	-	89,994	-	-	5,887,769	-
Total	62,134	66,107	7.1%	685,306	771,406	9.7%	37,253,956	39,452,353	5.6%

[1] The 2010 census did not calculate racial identity amongst those identifying as ethnically Hispanic/Latino.
Source: U.S. Census Bureau, Decennial Census, 2010 Table P2; ACS 17-21 (5-Year Estimates), Table B03002.

Household Income

Table 5 describes income by tenure in Lodi. Homeowners have a significantly higher median income ($93,092) than renters ($50,629). Households with earnings of $150,000 or more and those earning $100,000 to $149,999 make up the two largest owner-occupied household income groups. By contrast, households with earnings of $50,000 to $74,999 make up the largest renter-occupied household income group.

Table 5 Household Income by Tenure

Household Income	Owner-occupied		Renter-occupied	
	Number of Households	Percentage of Total	Number of Households	Percentage of Total
Less than $5,000	192	1.6%	462	4.4%
$5,000 to $9,999	134	1.1%	231	2.2%
$10,000 to $14,999	302	2.5%	526	5.0%
$15,000 to $19,999	282	2.3%	378	3.6%
$20,000 to $24,999	288	2.4%	742	7.0%
$25,000 to $34,999	548	4.5%	1,494	14.1%
$35,000 to $49,999	1,108	9.2%	1,368	12.9%
$50,000 to $74,999	1,917	15.9%	1,990	18.8%
$75,000 to $99,999	1,688	14.0%	1,444	13.7%
$100,000 to $149,999	2,510	20.8%	1,557	14.7%
$150,000 or more	3,086	25.6%	374	3.5%
Median Income	93,092	-	50,629	-

Source: U.S. Census Bureau, 17-21 ACS 5-Year Survey, Table S2503.

Table 6 provides data on median household income by race and ethnicity. As shown, the citywide median income in Lodi rose from $48,695 in 2010 to $58,236 in 2020. During this time, all racial and ethnic groups experienced an increase in median income except American Indian and Alaska Native, which decreased significantly from $83,690 in 2010 to $44,081 in 2020. Black/African American households experienced the greatest increase in median income, followed by Hispanic/Latino, and Other Race. Non-Hispanic White and Asian American households were the only racial/ethnic group with median household income above both the 2010 and 2020 citywide median incomes.

Table 6 Median Household Income by Race/Ethnicity

Race/Ethnicity	Median Household Income (2010)	Median Household Income (2021)	Percent of Citywide Median Household Income (2010)	Percent of Citywide Median Household Income (2021)
Non-Hispanic White	$53,925	$73,548	110.7%	104.6%
Hispanic/Latino	$37,175	$65,933	76.3%	93.8%
Black/African American	$18,250	$58,875	37.5%	83.7%
American Indian and Alaska Native	$83,690	$53,214	171.9%	75.7%
Asian American	$56,487	$75,163	116.0%	106.9%
Other Race	$36,505	$68,828	75.0%	97.9%
Two or more races	$45,313	$67,958	93.1%	96.7%
Citywide Median Income	$48,695	$70,302	-	-

Note: The race/ethnicities include Hispanic/Latino origin unless stated otherwise.

Source: U.S. Census Bureau, 06-10, 17-21 ACS 5-Year Estimate, Table S1903.

Employment

According to the 2017-2021 ACS data, Lodi has a total employed population of 29,304. As seen in Table 7 below, the main occupations in the city are educational/healthcare/social assistance, followed by construction, then retail trade.

Table 7 Jobs Held by Lodi Residents

Occupation Sector	Number of Jobs	Percent of Total
Educational, health care, and social assistance	6,851	23.3%
Professional, scientific, management, admin., and waste management	2,499	8.5%
Retail trade	3,031	10.3%
Arts, entertainment, and recreation, accommodation, and food services	2,425	8.3%
Manufacturing	2,840	9.7%
Construction	3,052	10.4%
Transportation and warehousing, and utilities	1,741	5.9%
Finance, insurance, real estate, and rental and leasing	1,379	4.7%
Other services, except public administration	1,487	5.1%
Public administration	1,236	4.2%
Wholesale Trade	698	2.4%
Information	399	1.4%
Agriculture, forestry, fishing and hunting, and mining	1,733	5.9%
Total Employed Population	29,371	-

Source: U.S. Census Bureau, ACS17-21 (5-year Estimates), Table C24050.

Table 8 displays 2017-2021 ACS data on median salary by occupation for residents in Lodi. In 2021, the estimated median salary was $52,304 for all occupations. Architecture/engineering ($126,017), healthcare practitioners/technical ($100,147), and protective services ($92,898) had the highest median salaries, while building/grounds cleaning/maintenance ($30,543), farming/fishing/forestry ($26,580), and food preparation/serving related occupations ($20,018) had the lowest median salaries.

Table 8 Occupation (types of jobs located in Lodi) by Median Salary

Occupation Sector	Median Salary	Number of Persons Employed
Architecture and Engineering	$126,017	509
Legal	-	97
Healthcare Practitioners and Technical	$100,147	1,830
Life, Physical and Social Science	$51,783	251
Computer and Mathematical	-	162
Business and Financial Operations	$56,494	1,357
Management	$73,949	2,960
Protective Service	$92,898	508
Installation, Maintenance and Repair	$46,448	1,195
Community and Social Service	$47,472	675
Arts, Design, Entertainment, Sports, and Media	-	150
Education Instruction and Library	$73,482	2,642
Office and Administrative Support	$41,632	3,719
Construction and Extraction	$70,867	2,366
Transportation occupation	$70,437	726
Material Moving occupation	$35,897	2,087
Production	$31,831	1,730
Healthcare Support	$36,667	509
Building, Grounds Cleaning, and Maintenance	$30,543	1,415
Sales and Related occupations	$50,662	2,462
Farming, Fishing and Forestry	$26,580	1,353
Food Preparation and Serving Related	$20,018	1,771
Personal Care and Service	-	460
All Occupations	$52,304	30,934

Source: U.S. Census Bureau, ACS 17-21 5-Year Estimate Table S2401 and Table S2412.

Table 9 shows major employers in the city. As shown, Lodi's major employers are primarily in healthcare, government, warehouse, and education. With multiple hospitals and healthcare services in Lodi and Stockton, the healthcare industry is a major employer in the region. There are also many government departments near Lodi, including a youth corrections center and the county government.

Table 9 Major Employers

Employer	Location	Industry	# of Employees
Adventist Health Lodi Memorial	Lodi	Healthcare	1,000-4,999
Amazon Fulfillment Center	Stockton	Warehouse	1,000-4,999
Blue Shield of California	Lodi	Insurance	5,000-9,999
Dameron Hospital	Stockton	Healthcare	1,000-4,999
Lodi Health Home Health Agency	Lodi	Healthcare	1,000-4,999
NA Chaderjian Youth (Department of Corrections and Rehabilitation)	Stockton	Government	1,000-4,999
Pacific Coast Producers	Lodi	Manufacturing	1,000-4,999
Safeway Distribution Center	Tracy	Warehouse	1,000-4,999
San Joaquin County School	Stockton	Education	1,000-4,999
San Joaquin General Hospital	French Camp	Healthcare	1,000-4,999
San Joaquin County Government	Stockton	Government	1,000-4,999
St. Joseph's Regional Health	Stockton	Healthcare	1,000-4,999
Stockton Unified School District	Stockton	Education	1,000-4,999
Waste Management-Lodi Transfer	Lodi	Business	1,000-4,999

Source: California Employment Development Department, Major Employers in California, San Joaquin County, 2023.

Household Characteristics and Housing Supply

The section provides an analysis of household characteristics and housing supply. The first part of this section analyzes household characteristics, such as household population, composition, size, tenure, and overcrowding. More simply stated, it summarizes the profile of Lodi residents living in private households, whether they are renters or owners, how many people live in a household, and if it is overcrowded. The second section analyzes the city's housing inventory and supply, including a discussion of vacant units.

The discussion of the housing stock in Lodi uses a significant amount of data from the 2020 American Community Survey estimates as well as U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (CHAS) data. This data was compiled and provided in an HCD pre-approved data package by the San Joaquin Regional Early Action Planning (SJV REAP) program. The City has supplemented this data with more recent local data where appropriate and available.

Household Characteristics

This section analyzes household characteristics including household population, tenure, and household composition.

Household Population

Household population is an important measure for establishing the number of persons residing in private households. Table 10 shows the growth in Lodi's housing stock from 2000 to 2020. The number of housing units increased 6.79 percent from 2000 to 2010, with a growth of 1,405 units. However, the growth rate of the next decade declined compared to the 2000s, with a 4.16 percent increase from 2010 to 2020.

Table 10 Household Growth Trends

Jurisdiction	2000	2010	2020	Percent Change (2000-2010)	Percent Change (2010-2020)
Lodi	20,692	22,097	23,017	6.79%	4.16%

Source: U.S. Census Bureau, Census 1980(STF1:T3), 1990(SF1:P3), 2000(SF1:P15); ACS 16-20 (5-year Estimates), Table B25003.

Table 11 shows growth projections through 2045. Between 2025 and 2045, Lodi's household growth is projected to grow at rates between 2.1 and 3.9 percent every five years. On average, these projected changes are lower than those of San Joaquin County, which has expected growth rates between 3.5 and 5.2 percent every five years.

Table 11 Household Growth Projections

Jurisdiction	2025	2030	2035	2040	2045
Lodi	25,113	26,085	26,712	27,313	27,881
Percent Change		3.9%	2.4%	2.2%	2.1%
San Joaquin County	258,347	271,810	281,984	292,147	302,229
Percent Change		5.2%	3.7%	3.6%	3.5%

Source: San Joaquin County Demographic and Employment Forecast, 2022.

Household Composition

The U.S. Census divides households into two different categories, depending on their composition: family and non-family. Family households are those consisting of two or more related persons living together. Non-family households include persons who live alone or in groups composed of unrelated individuals.

Table 12 provides information on household characteristics. The largest household type in Lodi is married couple households, representing 50.2 percent of the total households, of which less than half have children under 18. This is similar to the county and state, where married couple households make up 52.4 percent of households in San Joaquin County and 49.5 percent throughout California. There is a slightly higher percentage of single female-headed households in Lodi with (25.5 percent) compared to the county (24.6 percent). In Lodi, there are notably more single female-headed households (26.2 percent) than single male-headed households (16.2 percent). This trend is consistent across both the county and state.

Table 12 Household Characteristics

Household Type	City of Lodi	City of Lodi	San Joaquin County	San Joaquin County	California	California
Total:	22,621	100.0%	234,662	100.0%	13,217,586	100.0%
Married-Couple Household	11,366	50.2%	123,027	52.4%	6,539,445	49.5%
With Own Children Under 18 Years	5,389	23.8%	58,661	25.0%	2,780,272	21.0%
With No Own Children Under 18 Years	5,977	26.4%	64,366	27.4%	3,759,173	28.4%
Cohabiting Couple Household	1,827	8.1%	17,719	7.6%	938,780	7.1%
With Own Children Under 18 Years	982	4.3%	9,545	4.1%	338,874	2.6%
With No Own Children Under 18 Years	845	3.7%	8,174	3.5%	599,906	4.5%
Female Householder, No Spouse or Partner Present	5,769	25.5%	57,833	24.6%	3,432,983	26.0%
Living Alone	3,239	14.3%	26,926	11.5%	1,719,210	13.0%
With Own Children Under 18 Years	929	4.1%	13,448	5.7%	614,747	4.7%
With No Own Children Under 18 Years	1,601	7.1%	17,459	7.4%	1,099,026	8.3%
Male Householder, No Spouse or Partner Present	3,659	16.2%	36,083	15.4%	2,306,378	17.4%
Living Alone	1,974	8.7%	20,031	8.5%	1,418,021	10.7%
With Own Children Under 18 Years	487	2.2%	4,406	1.9%	172,162	1.3%
With No Own Children Under 18 Years	1,198	5.3%	11,646	5.0%	716,195	5.4%

Source: U.S. Census Bureau, ACS 17-21 (5-year Estimates), Table DP02.

Tenure

Tenure, or how many units are owner-occupied versus renter-occupied, is a measure of the rate of homeownership in a jurisdiction. Tenure for housing type and number of bedrooms can help estimate demand for a diversity of housing types.

Home equity is the largest single source of household wealth for most Americans. Median net wealth for renters is about 3 percent of that of homeowners. The national homeownership rate rose from around 40 percent before World War II to around 65 percent in the 1990s. The rate plateaued at approximately 69 percent around 2005, fell to approximately 63 percent around 2016, and has increased again to over 66 percent in 2023.

Table 13 describes tenure by age of householder based on 2021 ACS data for occupied housing units. Of the 22,621 occupied housing units in Lodi, 12,055 units (53.3 percent) are owner-occupied and 10,566 (46.7 percent) are renter-occupied. Homeowners aged 55 to 64 make up the largest group of homeowners, while under 35-year-olds make up the largest group of renters. The number of renters declines with age, while the number of homeowners remains relatively steady through age 74.

Table 13 Occupied Housing Units by Age of Householder

Household Income	Owner-Occupied		Renter-Occupied	
	Number	Percentage of Total	Number	Percentage of Total
Under 35 Years	1,368	11.3%	3,145	29.8%
35 to 44 Years	1,680	13.9%	2,684	25.4%
45 to 54 Years	1,996	16.6%	1,942	18.4%
55 to 64 Years	3,031	25.1%	1,358	12.9%
65 to 74 Years	2,292	19.0%	680	6.4%
75 to 84 Years	1,214	10.1%	455	4.3%
85 Years and Over	474	3.9%	302	2.9%

Source: U.S. Census Bureau, 17-21 ACS 5-Year Survey, Table S2502.

Table 14 shows the total homeownership distribution by race and ethnicity. In Lodi, American Indian and Alaska Native alone and non-Hispanic white residents have the highest homeownership rates at 65.5 percent and 61.7 percent respectively. The racial/ethnic group with the lowest rate of homeownership in Lodi is Black/African American residents, with 11.2 percent owning homes. With the exception of the American Indian and Alaska Native Alone category, all racial categories in Lodi experience lower homeownership rates compared to the county.

Table 14 Homeownership by Race and Ethnicity

	Lodi	Ownership Rate	San Joaquin County	Ownership Rate
American Indian and Alaska Native Alone	55	65.5%	945	56.3%
Asian-American Alone	1,175	52.9%	22,519	67.2%
Black/African American Alone	24	11.2%	7,218	41.9%
Hispanic/Latino	2,455	35.8%	40,689	50.0%
Native Hawaiian and Other Pacific Islander Alone	0	-	580	53.5%
White Alone	9,114	61.7%	70,110	71.0%
Two or more Races Alone	1,180	30.5%	14,865	47.5%
Other Race Alone	507	35.8%	11,992	51.7%

Source: U.S. Census Bureau, 17-21 (5-year Estimates), Table B25003.

Table 15 summarizes households in Lodi by size and tenure based on 2021 ACS data. As shown, Lodi has more homeowners (12,055, 53.3 percent of total households) than renters (10,566, 46.7 percent). Households with 2-3 people make up the largest percentage of the city's households regardless of tenure. Both homeowners and renters have similar numbers of living alone, with slightly more renters than homeowners. However, renters have a higher

percentage of larger households with four or more people, making up 32.3 percent of all renters compared to 25.4 percent of owners.

Table 15 Household Size by Tenure

Household Size	Owner-occupied	Percent	Renter-occupied	Percent
Householder living alone	2,652	22.0%	2,561	24.2%
Households 2-3	6,339	52.6%	4,590	43.4%
Households 4+	3,064	25.4%	3,415	32.3%
Total Households	12,055	100.0%	10,566	100.0%

Source: U.S. Census Bureau, 17-21 ACS 5-Year Survey, Table S2501

Household Size

Average household size is a function of the household population (the group quarters population is not counted) divided by the number of occupied housing units. As illustrated in Table 16 below, the average household size in Lodi is around three people per household, increasing from 2.79 in 2010 to 2.86 in 2021. This is lower than the San Joaquin County average size of 3.07 in 2010 and 3.18 in 2021. Lodi has a larger average household size among renter-occupied units (2.96 in 2021) than owner-occupied units (2.83 in 2021).

Table 16 Average Household Size

Tenure	Lodi- 2010	Lodi- 2021	San Joaquin County- 2010	San Joaquin County- 2021
Owner-Occupied Units	2.77	2.83	3.22	3.22
Renter-Occupied Units	2.82	2.96	3.09	3.20
Total Occupied Units	2.79	2.89	3.07	3.21

Source: U.S. Census Bureau, ACS 17-21 (5-year Estimates), Table B25010; ACS 06-10 (5-year Estimates), Table B25010.

Overcrowding

U.S. Census standards define a housing unit as overcrowded when the total number of occupants is greater than one person per room, excluding kitchens and bathrooms. Units with more than 1.5 persons per room are considered severely overcrowded and should be recognized as a significant housing problem.

Table 17 provides information on overcrowding severity. Most households in Lodi and San Joaquin County have one occupant or less per room. In Lodi 90.6 percent of households have one occupant or less per room, compared to 91.8 percent in San Joaquin. The percentage of overcrowded households is greater in Lodi (7.0 percent) than in the county (5.9 percent). Both the city and county experience similar rates of severely overcrowded households.

Table 17 Overcrowding Severity

Jurisdiction	1.00 Occupants per Room or Less	Percent- 1.00 Occupants per Room or Less	Overcrowded		Severely Overcrowded	
			1.01 to 1.50 Occupants per Room	Percent- 1.01 to 1.50 per Room	1.50 Occupants per Room or More	Percent- 1.50 Occupants per Room or More
Lodi	21,957	90.6%	1,699	7.0%	589	2.4%
San Joaquin County	221,883	91.8%	14,208	5.9%	5,669	2.3%

Source: U.S. Census Bureau, ACS 2021 (1-Year Estimate), Table B25014.

Table 18 shows Lodi's overcrowding by tenure. Lodi has a total of 2,288 overcrowded households, with 74.3 percent of these units overcrowded and 25.7 percent severely overcrowded. Renters account for most of the overcrowded households (63.1 percent) and all of the severely overcrowded households.

Table 18 Overcrowding Severity by Tenure

Tenure	Overcrowded		Severely Overcrowded		Total Households with More than 1.0 Occupants per Room
	1.0 to 1.5 Occupants per Room	Percent 1.0 to 1.5 Occupants per Room	More than 1.5 Occupants per Room	Percent More than 1.5 Occupants per Room	
Owner Occupied	255	11.1%	0	0.0%	255
Renter Occupied	1,444	63.1%	589	25.7%	2,033
Total Households	1,699	74.3%	589	25.7%	2,288

Source: U.S. Census Bureau, ACS 2021 (1-Year Estimate), Table B25014.

Housing Supply

While the previous section discussed the characteristics of persons living in households, this section provides information about the total supply of existing housing units in Lodi. This section includes information about the total number housing units available in the city, changes in vacancy, and structural condition of the units.

Housing Units

Table 19 provides information on the type and trends of housing units in Lodi. The city's total housing stock grew 4.2 percent between 2010 and 2020. During this time, the number of mobile homes grew the most (26.4 percent increase), and single-family detached homes grew at the lowest rate (6.7 percent increase). Multi-family housing of five units or more was the only unit type that declined during this time, with an 8.5 percent decrease.

Table 19 Housing Type Trends

Building Type	2010	2021	Percent Change (2010-2021)
Single-Family Home: Attached	1,388	1,512	8.9%
Single-Family Home: Detached	14,425	15,386	6.7%
Multi-family Housing: Two to Four Units	1,775	1,924	8.4%
Multi-family Housing: Five-plus Units	4,867	4,452	-8.5%
Mobile Homes	421	532	26.4%
Boat, RV, Van, etc.	0	26	-
Total	22,876	23,832	4.2%

Source: U.S. Census Bureau, ACS 06-10, 17-21 (5-year Estimates), Table B25024.

Table 20 provides information on the size of housing units. Three-bedroom units account for the largest proportion of the housing stock, with 9,975 units making up 44.1 percent of the city's housing. This is followed by 2-bedroom units (30.9 percent) and 4-bedroom units (11.7 percent). Units with five or more-bedroom units make up the smallest proportion of the city's housing stock at just 1.5 percent.

Table 20 Housing Unit Size

Type of Unit	Number of Units	Percent of Total
Studio	617	2.7%
1 Bedroom	2,050	9.1%
2 Bedrooms	6,988	30.9%
3 Bedrooms	9,975	44.1%
4 Bedrooms	2,650	11.7%
5 or more bedrooms	341	1.5%

Source: U.S. Census Bureau, ACS 17-21 (5-year Estimates), Table B25042.

Occupancy / Vacancy Rates

According to the California Department of Housing and Community Development (HCD), the desired vacancy rates necessary to provide a stable housing environment is approximately 2 percent for owner-occupied housing and five percent for renter-occupied housing. As illustrated in Table 21, Lodi's total vacancy status of housing units has decreased 8.8 percent between 2010 and 2021. Housing units for sale decreased 87 percent, from 238 units in 2010 to 31 units in 2021. Housing units sold but not occupied followed next, decreasing 63.7 percent. Units that were rented but not occupied increased 135.9 percent during this time, and housing for seasonal, recreational, or occasional use increased by 121.6 percent.

Table 21 Vacancy Status by Type

Vacancy Status	2010	Percent of Total (2010)	2021	Percent of Total (2021)	Percent Change 2010-2021
For rent	333	25.1%	325	26.4%	-2.4%
Rented, not occupied	39	2.9%	92	7.3%	135.9%
For sale only	238	17.9%	31	1.8%	-87.0%
Sold, not occupied	171	12.9%	62	3.7%	-63.7%
For seasonal, recreational, or occasional use	74	5.6%	164	12.4%	121.6%
For migrant workers	0	0.0%	0	0.0%	-
Other vacant*	473	35.6%	537	48.3%	13.5%
Total	1328	-	1211	-	-8.8%

** A housing unit is classified as "other vacant" when it does not fit into any year-round vacant category. Common reasons a housing unit is labeled "other vacant" is that no one lives in the unit and the owner does not want to rent or sell, is using the unit as storage, or is elderly and living in a nursing home or with family members. Additionally, the unit may be being held for settlement of an estate, repaired or renovated, or foreclosed.*

Source: U.S. Census Bureau, ACS 17-21 (5-year Estimates), Table B25004; ACS 2010 (5-year Estimates), Table B25004; Melissa Kresin, Social, Economic, and Housing Statistics Division, U.S. Census Bureau, https://www.census.gov/housing/hvs/files/qtr113/PAA-poster.pdf

Housing Conditions

This section helps to identify the number of substandard housing units (both renter and owner) in need of repair, rehabilitation, or replacement. The Census provides only limited data that can be used to infer the condition of Lodi's housing stock. For example, the Census reports on whether housing units have complete plumbing and kitchen facilities (seen in Table 24).

Since housing stock age and condition are generally correlated, one Census variable that provides an indication of housing conditions is the age of a community's housing stock. Most of Lodi's housing stock was built between 1950 and 2000, as illustrated in Table 22. When units are 30 years or older, they typically begin to require some major improvements and repairs to retain their quality, suggesting a large portion of homes may need substantial upgrades if they have not been maintained over the years. Approximately 75.9 percent of housing units in Lodi were built prior to 1990 and are more than 30 years old.

Table 22 Built Year of Housing Structures

Year	Number of Structures	Percentage of Total Structures
Built 1939 or earlier	2,509	10.5%
Built 1940 to 1949	1,237	5.2%
Built 1950 to 1959	2,916	12.2%
Built 1960 to 1969	3,129	13.1%
Built 1970 to 1979	3,697	15.5%
Built 1980 to 1989	4,632	19.4%
Built 1990 to 1999	2,372	10.0%
Built 2000 to 2009	2,325	9.8%
Built 2010 to 2019	1,015	4.3%
Built 2020 or later	0	0.0%

Source: U.S. Census Bureau, 17-21 ACS 5-Year Survey, Table B25034.

The Comprehensive Housing Affordability Strategy (CHAS) was developed by HUD to assist jurisdictions in writing their consolidated plans. Table 23 shows CHAS data related to housing problems, include lacking kitchen facilities or plumbing, overcrowding, or overpayment. As shown, 27,635 households in Lodi have at least one housing problem. Among renters, more households have at least one housing problem (6,280) than have no housing problem (4,715). Renters are more likely to experience housing problems than owners. Additionally, more than twice as many renters experience severe housing problems than homeowners.

Table 23 Housing Problems by Tenure

Households	Owner-occupied		Renter-occupied	
	Number of Households	Percentage of Total [1]	Number of Households	Percentage of Total
Housing Problems [2]				
Household has at least 1 of 4 Housing Problems	3,620	15.6%	6,280	27.1%
Household has no Housing Problems	8,525	36.8%	4,715	20.4%
Severe Housing Problems [3]				
Household has at least 1 of 4 Housing Problems	1,480	6.4%	3,930	17.0%
Household has no Housing Problems	10,665	46.1%	7,070	30.6%

1 This percentage is of the total 23,145 households in Lodi.
2 The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.
3 The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.
Source: U.S. HUD, 2015-2019 CHAS data.

Table 24 shows data for occupied substandard housing units, which includes units with incomplete plumbing or kitchen facilities. As shown, total substandard units make up 2.4 percent of Lodi's housing. Units lacking complete kitchen facilities make up 1.8 percent of the total housing. Those lacking plumbing facilities make up 0.6 percent of Lodi's occupied units.

Table 24 Substandard Housing Units

Condition	Number of Occupied Units	Percentage of Total Occupied Units
Lacking complete plumbing facilities	134	0.6%
Lacking complete kitchen facilities	402	1.8%
Total occupied substandard units	536	2.4%

Source: U.S. Census Bureau, ACS 2021 (5-year Estimates), Table B25049; 17-21 ACS (5-year Estimates), Table B25053.

The City's Code Enforcement staff estimates that 0.74 percent of units citywide are in need of major repair or replacement. Additionally, in the eastern portion of the city (Eastside area), where the housing stock is older, staff estimates that approximately 1.5 percent of housing units are substandard and in need of major repair or replacement. In response to conditions on in the Eastside area, Program 1.8 commits the city to developing neighborhood improvement strategies for the Eastside area, Program 2.1 works to assist the Eastside area through targeted rehabilitation assistance, and Program 2.5 targets the Eastside area for use of funds for public improvement.

Housing Affordability

State law (Government Code Section 65583(a)(2)) requires "an analysis and documentation of household characteristics, including level of payment compared to ability to pay." Identifying and evaluating existing housing needs are a critical component of the housing element. This requires comparison of resident incomes with the local cost of housing. The analysis helps local governments identify existing housing conditions that require addressing and households with housing cost burdens or unmet housing needs. This section includes an analysis of housing cost burden, ability to pay for housing, and the cost of housing.

Cost burden and overpayment data in this section uses the most recent (2015-2019) Comprehensive Housing Affordability Strategy (CHAS) data from the United States Housing and Urban Development (HUD). Household income groups shown in the CHAS tabulation are based on the HUD-adjusted area median income (AMI). The list below shows the definition of housing income limits as they are applied to housing units in Lodi, according to the HUD 2023 Income Limits Summary. Table 25 calculates housing 24,867 for each of these categories using the median income for Lodi, based on the most recent ACS data for median income by household size. For reference, the median income for a four-person household in Lodi is $82,891.

- **An Extremely Low-Income Unit** is one that is affordable to households whose combined income is less than 30 percent of the area median income (AMI) for Lodi. A 4-person household is considered to be extremely low-income in Lodi if its combined income was $24,867 or less.
- **A Very Low-Income Unit** is one that is affordable to a household whose combined income is between 31 and 50 percent of the AMI. A 4-person household is considered to be very low-income in Lodi if its combined income was between $24,868 and $41,446.
- **A Low-Income Unit** is one that is affordable to a household whose combined income is at or between 51 and 80 percent of the AMI. A 4-person household is considered to be low-income in Lodi if its combined income was $41,447 and $66,313.
- **A Median-Income Unit** is one that is affordable to a household whose combined income is at or between 81 and 100 percent of the AMI. A 4-person household is considered to be median-income in Lodi if its combined income was $66,314 and $82,891.
- **A Moderate-Income Unit** is one that is affordable to a household whose combined income is at or between 100 and 120 percent of the AMI. A 4-person household is considered to be median-income in Lodi if its combined income was $82,892 and $99,469.
- **An Above Moderate-Income Unit** is one that is affordable to a household whose combined income is above 121 percent of the AMI. A 4-person household is considered to be above moderate-income in Lodi if its combined income exceeded $99,469.

Table 25 Affordability Matrix

	Annual Income Limits	Affordable Monthly Housing Costs	Rental Utility Allowance (2022)	Taxes, Insurance, Homeowners Association Fees	Affordable Rent	Affordable Home Price
Extremely Low Income (0-30% AMI)						
1-Person (Studio)	$10,242	$256	$297	$152	$(41)	$45,338
2-Person (1 BR)	$24,284	$607	$361	$174	$246	$106,558
3-Person (2 BR)	$28,125	$703	$436	$202	$267	$122,570
4-Person (3 BR)	$24,867	$622	$509	$243	$113	$107,738
5-Person (4 BR)	$26,113	$653	$503	$284	$150	$109,983
Very Low Income (30%-50% AMI)						
1-Person	$17,070	$427	$297	$254	$130	$75,563
2-Person	$40,473	$1,012	$361	$290	$651	$177,596
3-Person	$46,875	$1,172	$436	$326	$736	$204,284
4-Person	$41,446	$1,036	$509	$362	$527	$179,564
5-Person	$43,521	$1,088	$503	$392	$585	$183,305
Low Income (50%-80% AMI)						
1-Person	$27,311	$683	$297	$406	$386	$120,901
2-Person	$64,757	$1,619	$361	$464	$1,258	$284,154
3-Person	$75,000	$1,875	$436	$522	$1,439	$326,854
4-Person	$66,313	$1,658	$509	$579	$1,149	$287,302
5-Person	$69,634	$1,741	$503	$626	$1,238	$293,288
Median Income (80%-100% AMI)						
1-Person	$34,139	$853	$297	$521	$556	$151,126
2-Person	$80,946	$2,024	$361	$595	$1,663	$355,193
3-Person	$93,750	$2,344	$436	$669	$1,908	$408,567
4-Person	$82,891	$2,072	$509	$744	$1,563	$359,127
5-Person	$87,042	$2,176	$503	$803	$1,673	$366,610
Moderate Income (100%-120% AMI)						
1-Person	$40,967	$1,024	$297	$625	$727	$181,352
2-Person	$97,135	$2,428	$361	$714	$2,067	$426,231
3-Person	$112,500	$2,813	$436	$803	$2,377	$490,280
4-Person	$99,469	$2,487	$509	$893	$1,978	$430,953
5-Person	$104,450	$2,611	$503	$964	$2,108	$439,932

Assumptions:

1. Income limits are the 2022 HCD limits for San Joaquin County.

2. Affordable housing costs are 30 percent of gross household income.

3. Utility costs are based on Tulare County Housing Authority Utility Allowance Schedule for 2022.

4. Taxes, insurance, private mortgage insurance, and homeowners' association dues are calculated at 35 percent of monthly affordable cost.

5. Affordable home price assumes a 30-year fixed mortgage with a 3 percent interest rate and 10 percent down payment.

6. Taxes and insurance costs apply to owners only.

Source: 2022 HCD Income Limits.

Housing Cost Burden

This section provides an analysis of the proportion of households "overpaying for housing" based on income level and percentage of income used for housing (i.e., housing cost). Lower-income households are defined as those that earn 80 percent or less of the area median income. Housing cost is measured as the percentage of income. A "moderate cost burden" is defined by HUD as gross housing costs between 31 and 50 percent of gross income. A "severe cost burden" is defined as gross housing costs exceeding 50 percent of gross income. For renters, gross

housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

The impact of high housing costs falls disproportionately on extremely low-, very low-, and low- income households, especially renters. While some higher-income households may choose to spend greater parts of their income for housing, the cost burden for lower-income households reflects choices limited by a lack of a sufficient supply of housing affordable to these households. Low-income households, who are overpaying for housing, frequently have insufficient resources for other critical essentials, including food and medicine. This is a significant hardship for many workers, families and seniors, but it also impacts local economies as money that might otherwise be spent in local stores generating sales tax revenues is being spent on housing.

Table 26 provides information on Lodi's cost burden breakdown based on 2021 ACS data. As shown, 13,891 households in Lodi's are not cost burdened, while 4,516 experience cost burdens between 30 and 50 percent of household income and 3,793 experience severe cost burdens greater than 50 percent of household income. The number of households without a cost burden increased by 1,047 from 2016 to 2021, while the number of households with cost burdens decreased during this same time period. Renter-occupied households account for the majority of households experiencing either level of cost burden.

Table 26 Cost Burden by Tenure (Households)

Tenure	2016			2021		
	Not Housing Burdened	Paying 30%-50% of Income on Housing	Paying 50%+ of Income on Housing	Not Housing Cost Burdened	Paying 30%-50% of Income on Housing	Paying 50%+ of Income on Housing
Owner Occupied	8,479	2,218	1,320	8,944	1,834	1,229
Renter Occupied	4,365	2,523	3,004	4,947	2,682	2,564
Total Households	12,844	4,741	4,324	13,891	4,516	3,793

Source: U.S. Census Bureau, ACS 12-16, 17-21 Table B25091; ACS 12-16, 17-21 Table B25070.

Table 27 shows cost burden severity for households in Lodi. Among both owner- and renter-occupied households in Lodi, the majority of households are not experiencing a cost burden. Although there are fewer total renter-occupied households, renter-occupied households are far more likely to experience either a moderate or severe cost burden than owner-occupied households.

Table 27 Cost Burden Severity (Households)

Tenure	No Cost Burden	Moderate Cost Burden	Severe Cost Burden	Cost Burden Not Computed
	0%-30% of Income Toward Housing Cost	30%-50% of Income Toward Housing Cost	50%+ of Income Toward Housing Cost	
Owner-Occupied	8,944	1,834	1,229	0
Renter-Occupied	4,947	2,682	2,564	319

Source: U.S. Census Bureau, ACS 17-21 Table B25091; ACS 17-21 Table B25070.

Table 28 shows data for cost burdens by income levels over time in Lodi. As shown, in 2019 approximately ten percent of households with earnings less than 80 percent of the area median income (AMI) experienced housing cost burdens, compared to 2.5 percent of those making 80 to 100 percent of the AMI and 3.8 percent of those making more than 100 percent of the AMI. Households making less than 50 percent of the AMI are much more likely to be severely cost burdened. Between 2014 and 2019, the percentage of cost burdened households remained relatively stagnant among those making less than 80 percent of the AMI. Among those making more than 80 percent of the AMI, the percentage of those experiencing cost burdened decreased significantly during this same period.

Table 28 Cost Burden by Income Level

Income Group	2014		2019	
	All Cost Burdened Households Spending >30% on Housing	Severely Cost Burdened Household Spending >50% on Housing	All Cost Burdened Households Spending >30% on Housing	Severely Cost Burdened Household Spending >50% on Housing
0-30% AMI	8.9%	8.4%	10.6%	8.4%
31-50% AMI	11.5%	7.3%	10.9%	5.5%
51-80% AMI	9.6%	3.0%	10.4%	1.6%
81-100% AMI	4.1%	1.0%	2.5%	0.3%
Greater than 100% AMI	8.2%	1.0%	3.8%	0.4%

Source: U.S. HUD, CHAS data, 2010-2014, 2015-2019.

Table 29 includes cost burden data by tenure and income for Lodi. As shown, renters account for a larger percent of cost burdened households across all income categories except for those making more than the median income. Additionally, renters making below 80 percent of the AMI are more likely to be severely cost burdened than owner-occupied households. Notably, 1,315 owner-occupied households earning 100 percent or more of the AMI experienced a cost burden in 2019. This group accounts for approximately 10.8 percent of the owner-occupied households in the city.

Table 29 Cost Burden by Tenure and Income

Income Group	Owners[1]		Renters[2]	
	All Cost Burdened Households Spending >30% on Housing	Severely Cost Burdened Household Spending >50% on Housing	All Cost Burdened Households Spending >30% on Housing	Severely Cost Burdened Household Spending >50% on Housing
0-30% AMI	505	440	1,455	1,415
Percent	4.1%	3.6%	14.3%	13.9%
31-50% AMI	610	390	1,905	1,220
Percentage	5.0%	3.2%	18.7%	12.0%
51-80% AMI	640	345	1,480	315
Percentage	5.2%	2.8%	14.5%	3.1%
81-100% AMI	405	145	485	60
Percentage	3.3%	1.2%	4.8%	0.6%
Greater than 100% AMI	1,315	135	490	70
Percentage	10.8%	1.1%	4.8%	0.7%

1: Percentages are calculated based on total owner-occupied households.

2: Percentages are calculated based on total renter-occupied households.

Source: U.S. HUD, 2015-2019, 2010-2014 CHAS data.

Housing Cost Burden for Extremely Low-Income Households

Extremely low-income (ELI) households are defined as those households with incomes under 30 percent of the area median income. Extremely low-income households typically consist of minimum wage workers, seniors on fixed incomes, the disabled, and farmworkers. This income group is likely to live in overcrowded and substandard housing conditions. This group of households has specific housing needs that require greater government subsidies and assistance, housing with supportive services, single room occupancy (SRO) and shared housing, and/or rental subsidies or vouchers. In recent years, rising rents, higher income, and credit standards imposed by landlords, and insufficient government assistance has exacerbated the problem. Without adequate assistance this group has a high risk of homelessness.

As shown in Table 25, a household of four persons with an income of $24,867 or less is considered extremely low-income. Table 30 shows the number of extremely low-income households and their housing cost burden in Lodi based on the CHAS 2015-2019 data. As shown in the table, Lodi had a similar percentage (12.7 percent) of ELI households to San Joaquin County (12.9 percent), but lower than and the State (16.8 percent). In Lodi, 83.9 percent of ELI renter households had a housing cost burden greater than 30 percent of income for housing and 70.2 percent had a “severe” housing cost burden (paying more than 50 percent of income for housing).

Throughout the city, county, and state, ELI renter-households had a higher likelihood of severe housing cost burden than owners. In Lodi, 70.2 percent of renters had a severe cost burden compared to 57.6 percent of owners. The percentage of owner-occupied households experiencing a cost burden of at least 30 percent is considerably higher in Lodi (83.5 percent) than in the county (77.0 percent) and state (73.1 percent).

Table 30 Extremely Low-Income Households (ELI) by Tenure

Jurisdiction	ELI-Owners			ELI-Renters			ELI Households as Percent of Total Households
	Total Households	Cost Burden of >30%	Cost Burden of >50%	Total Households	Cost Burden of >30%	Cost Burden of >50%	
Lodi	850 (100%)	710 (83.5%)	490 (57.6%)	2,080 (100%)	1,745 (83.9%)	1,460 (70.2%)	12.7%
San Joaquin County	8,686 (100%)	6,690 (77.0%)	5,545 (63.8%)	20,775 (100%)	17,370 (83.6%)	14,950 (72.0%)	12.9%
California	648,640 (100%)	474,115 (73.1%)	381,175 (58.8%)	1,547,895 (100%)	1,255,275 (81.1%)	1,038,395 (67.1%)	16.8%

Note: Cost burden percentages are calculated out of the total ELI population by respective tenure.

Source: U.S. HUD, 2015-2019 CHAS data.

Housing Values

Table 31 shows the median home sale price in 2015 and 2021 based on 2021 ACS estimates. In 2021, Lodi's median home sale value was $368,500, which is a 56.1 percent increase from 2015. During this period, home values in San Joaquin County increased at a significantly higher rate of 75.6 percent.

Table 31 Changes in Median Home Sale Prices and Values (2015-2021)

Jurisdiction	Median Home Sale Price 2015	Median Home Sale Price 2021	Percent Change (2015-2021)
Lodi	236,100	368,500	56.1%
San Joaquin County	223,000	391,500	75.6%

Note: The 2015 price has not been adjusted for inflation to 2022 dollars.

Source: U.S. Census Bureau, 11-15 ACS (5-Year Estimate), Table B25077; 17-21 ACS (5-Year Estimate), Table B25077.

Figure 1 shows Zillow.com data for average home values in recent years. The data indicates that between March 2019 and March 2023, the average home value in Lodi rose by more than $115,000. The most recent available Zillow data (as of November 2023) shows an average home value of $502,359 in the city.

Figure 1: Zillow Home Value Index, Lodi, 2019-2023

Table 32 shows 2021 ACS data on the value of owner-occupied housing units in Lodi. As shown, 51.8 percent of the city's total housing is valued between $300,000 and $499,999, followed by units valued between $200,000 and $299,999, which account for 19.6 percent of owner-occupied units. Similarly, in San Joaquin County, the largest percentage of units (44.8 percent) is valued between $300,000 and $499,999. The County, however, has a greater proportion of owner-occupied homes valued between $500,000 and $999,999 (25.1 percent) than in Lodi (17.4 percent).

Table 32 Values of Owner-Occupied Units

Jurisdiction	Units Valued Less than $50k	Units Valued $50k-$99,999	Units Valued $100k-$149,999	Units Valued $150k-$199,999	Units Valued $200k-$299,999	Units Valued $300k-$499,999	Units Valued $500k-999,999	Units Valued $1M+
Lodi	366	206	278	300	2358	6241	2097	209
Percent of total	3.0	1.7	2.3	2.5	19.6	51.8	17.4	1.7
San Joaquin County	4,834	2,731	2579	5382	22571	62102	34815	3721
Percent of total	3.5	2.0	1.9	3.9	16.3	44.8	25.1	2.7

K = thousand, M = million

Source: U.S. Census Bureau, ACS 2021 (5-Year Estimate), Table DP04.

Rental Rates

Table 33 compares data on median contract rent (rent paid exclusive of utility costs) in Lodi and San Joaquin County. Median contract rents in Lodi have increased over the last decade from $815 to $1,119. Lodi has seen a substantial increase in rent from 2015 to 2021 (36.8 percent increase), which is a dramatic increase from the 0.4 percent increase between 2010 and 2015. Throughout the decade, the median rent in the city has been slightly lower than in the countywide.

Some of Lodi's increase in median rent over the last decade may be attributed to inflation, but the demand for rental housing combined with a lack of rental housing construction has also likely contributed to the rise in rents.

Table 33 Median Contract Rents

Jurisdiction	2010	2015	2021	Percent Change 2010- 2015	Percent Change 2015- 2021
Lodi	815	818	1,119	0.4%	36.8%
San Joaquin County	831	864	1,167	4.0%	35.1%

Source: U.S. Census Bureau, 17-21, 11-15, 06-10 ACS (5-Year Estimates), Table B25058.

Table 34 provides information on the median rent in Lodi by number of bedrooms. This data is provided by Zumper, an online tool that identifies the average rent price of various jurisdictions. As shown, the median rent for a 1-bedroom unit is $1,210 and a 2-bedroom unit is $1,698. The median rent for 3-bedroom units ($2,395) and 4-bedroom units ($2,995) is considerably more than the median rent for 2-bedroom units.

Table 34 Median Rent by Number of Bedrooms

Number of Bedrooms	Median Rent
Studio	$1,095
1 Bedroom	$1,210
2 Bedroom	$1,698
3 Bedroom	$2,395
4 Bedroom	$2,995

Source: Zumper, 2023.

Special Housing Needs

Certain groups in the Lodi encounter greater difficulty finding decent, affordable housing due to their special needs or circumstances. Special circumstances may be related to a household's employment and income, family characteristics, medical condition or disability, and/or household characteristics. A focus of the Housing Element is to ensure that people from all walks of life have the opportunity to find suitable housing in Lodi.

State Housing Element law identifies the following special needs groups: senior households, persons with disabilities, persons with developmental disabilities, single-parent (particularly female-headed) households, large households, farmworkers, extremely- and very low-income persons, and families in need of emergency shelter. This section provides a discussion of housing needs for each particular group and identifies the programs and services available to address their housing and supportive services needs.

Table 35 includes population and household data for groups with special housing needs in Lodi. There are 9,759 single-parent households in Lodi, making up 40.3 percent of total households. Lodi also has 6,968 large households of four to more people, making up 28.7 percent of total households. There are also a significant number of farmworkers, with 19,741 people.

Table 35 Special Needs Groups in Lodi

Special Needs Group	Total	Percent of Total Population	Percent of Total Households
Senior Households	5,417	-	23.9%
Female-Headed Households[1]	6,248	-	27.6%
Large Households[2]	6,968	-	30.8%
Persons with Disabilities (including Developmental Disabilities)	9,105	13.7%	-
Persons in Poverty	7,640	11.5%	-
Farmworkers[3]	1,733	2.6%	
Unsheltered Persons	1,558	2.6%	-

[1] This is composed of female householder with no spouse or partner present.

[2] Large households are categorized as households with four or more people.

[3] This is composed of people employed in the agriculture, forestry, fishing and hunting, and mining industries.

Source: U.S. Census Bureau, ACS 2021 (1-Year Estimate), Table S1810, Table S0103, Table DP02, Table S1701; ACS 17-21 (5-Year Estimate), Table C24070; U.S. HUD, CoC Homeless Populations and Subpopulations Reports (2020).

Seniors

Senior citizens or qualifying residents in the state of California are defined as persons 65 years and older. Seniors often face unique housing problems. While many may own their homes outright, fixed retirement incomes may not always be adequate to cover rising utility rates and insurance. Also, many elderly homeowners do not have sufficient savings to finance the necessary repairs costs. As illustrated in Table 36, people 65 years and older make up 13.5 percent of Lodi's population. This is higher than in San Joaquin County's where 12.6 percent of the population is 65 or older.

Table 36 Persons Aged 65 and Over

Jurisdiction	Total Population	Persons Age 65+	Percent of Population Age 65+
Lodi	66,107	8,953	13.5%
San Joaquin County	771,406	97,523	12.6%

Source: U.S. Census Bureau, 17-20 ACS 2021 (5-Year Estimate), Table S0101.

Table 37 shows the senior households by tenure in Lodi. Owner-occupied households aged 65 to 74 make up the highest percentage of senior households, followed by owner-occupied households aged 75 to 84. More seniors over 65 years own than rent, which is consistent with trends countywide.

Table 37 Senior-Headed Households by Tenure

Jurisdiction	Owner-Occupied			Renter-Occupied		
	65 to 74 Years	75 to 84 Years	85 and over	65 to 74 Years	75 to 84 Years	85 and over
Lodi	2,292	1,214	474	680	455	302
Percent	10.1%	5.4%	2.1%	3.0%	2.0%	1.3%
San Joaquin County	23,173	11,606	4,954	7,637	3,678	1,866
Percent	9.6%	4.8%	2.0%	3.2%	1.5%	0.8%

Source: U.S. Census, ACS 17-21 (5-Year Estimate), Table B25007.

While some seniors may prefer to live in single-family detached homes, others desire a smaller, more affordable home with less upkeep, such as condos, townhouses, apartments, or mobile homes. In general, most senior households consist of a single elderly person living alone or in a couple. In comparison, among non-senior households, a smaller percentage of households live alone. This information suggests that senior households may prefer smaller housing units than the general population. Some seniors have the physical and financial ability to continue driving well into their retirement; however, those who cannot or choose not to drive must rely on alternative forms of transportation. This includes bus routes, ride sharing, and walking.

Resources for Senior Households

The Bethel Gardens Senior Apartments is a nonprofit- and church-owned property that has a subsidized mortgage that has kept the units affordable. The property was constructed in 1971 and is currently in good condition. The mortgage matured in December 2011, but the property owner has indicated that they intend to continue to maintain the affordability for the next 10 years and it is not the mission of the church to operate a for-profit business. The property is not considered at risk, but the City will continue to encourage the owner to maintain affordability and prepay the HUD 236 mortgage (if feasible) to ensure that tenants are able to receive enhanced vouchers.

Eden Housing is a nonprofit developer that has completed more than 5,000 housing units. Eden Housing serves low-income families, seniors, persons with disabilities, the formerly homeless, and first-time homebuyers. Eden Housing has substantial experience in applying for funding through government programs, including Low-Income

Housing Tax Credit, and HUD Section 202 and 811 programs. Eden Housing manages an 80-unit affordable senior housing development on Tienda Drive.

The LOEL Gardens Senior Center, in addition to providing supportive services and activities to seniors at their facility at 105 S. Washington, also provides affordable housing to seniors. With funding provided through the City's CDBG and HOME programs, LOEL has acquired several residential properties around their Senior Center and has a total of 14 units designated for very low- and low-income seniors.

Adventist Health Lodi Memorial's Adult Day Services is a licensed program at Hutchins Street Square for older and disabled adults who cannot fully care for themselves. The program provides friendly, stimulating care and support through a variety of daily activities that encourage group participation. Caregiving families can also find support services through this program, as well as referral to other programs and services for older and disabled adults and their caregivers.

Health for All is a non-profit multi-ethnic community corporation dedicated to providing seniors and underserved adults comprehensive health and social services so they may achieve or maintain current functioning capacity. Their objective it to provide participants the opportunity to remain as healthy and active as possible by helping them to restore or maintain their highest level of functioning, improve the quality of their lives, and prevent unnecessary admissions into skilled nursing homes.

People with Disabilities

Persons with disabilities may have special housing needs because of health costs, fixed or limited incomes, and/or a lack of accessible and affordable housing. A disability is defined broadly by state and federal agencies as any physical, mental, or emotional condition that lasts over a long period of time, makes it difficult to live independently, and affects one or more major life activities.

Individuals with disabilities do not necessarily require special housing features or supportive services. However, to maintain independent living, persons with disabilities may need special housing design features, income support, and/or in-home supportive services. More severely disabled individuals may require a group living environment supported by trained personnel.

Table 38 includes data on residents with a disability in Lodi. As shown, 48.1 percent of those with a disability are between 18 to 64 years old, 43.7 percent are seniors, and 8.2 percent are between age five and 17. The total population with a disability (7,928) make up 12.1 percent of Lodi's population.

Table 38 Persons with Disabilities by Age Group

	Age 5 to 17	Age 18 to 64	Age 65+	Total
Persons with Disabilities	648	3,817	3,463	7,928
Percent	8.2%	48.1%	43.7%	100.0%

Source: U.S. Census Bureau, ACS 2021 (1-Year Estimate), Table S1810.

Senate Bill (SB) 812 requires the City to include the needs of individuals with a developmental disability within the community in the special housing needs analysis. According to Section 4512 of the Welfare and Institutions Code, a "developmental disability" means a disability that originates before an individual attains age 18 years, continues,

or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental retardation, cerebral palsy, epilepsy, and autism.

Many developmentally disabled persons can live and work independently in a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

Table 39 provides information on Lodi's population with developmental disabilities by age. As shown, 922 people in Lodi have a developmental disability. Individuals under 18 years make up 59.0 percent of those with a developmental disability in Lodi, which is similar to percentages countywide (57.8 percent) and higher than in California (50.9 percent). Additional data from the Department of Development Services indicates that 733 of the 922 of individuals with a developmental disability in Lodi live with in the home of a parent, family member, or guardian.

Table 39 Persons with Developmental Disabilities by Age

	City of Lodi	San Joaquin County	State
0-17 years	544	5,405	192,384
18+ years	378	3,953	185,353
Total	922	9,358	377,737

Source: Source: DDS Quarterly Consumer Report, December 2021

A number of housing types are appropriate for people living with a development disability: rent-subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 housing, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this special needs group. Incorporating "barrier-free" design in all new multi-family housing (as required by California and federal fair housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

Housing Resources for People with Disabilities

Eden Housing is a nonprofit developer that has completed more than 5,000 housing units. Eden Housing serves low-income families, seniors, persons with disabilities, the formerly homeless, and first-time homebuyers. Eden Housing has substantial experience in applying for funding through government programs, including Low-Income Housing Tax Credit, and HUD Section 202 and 811 programs. Eden Housing's 80-unit affordable senior development includes eight units for persons with developmental disabilities.

Additionally, the Lodi Housing Authority provides three public assisted housing complexes that are available to people with disabilities. These complexes are located at 375 North Main Street, 20 Rennie Place, and 15 Massey Street, consisting of two-story buildings with 40 units at each complex (120 total units).

Large Families / Households

Large households, defined as having five or more members, often have special housing needs due to a limited supply of adequately sized, affordable housing units.

The ACS reported 3,116 large households in Lodi, of which more than half were renter households. Large households represent 13.8 percent of the city's total households, as illustrated in Table 40. Although rates of overcrowding have declined in recent years, there are still over 2,288 overcrowded households. Although these numbers do not necessarily represent the same set of households, they do indicate there is currently an unmet need for affordable housing with more bedrooms in Lodi.

Table 40 Large Households by Tenure

Jurisdiction	Owner-Occupied Large Households	Percent of Total Households	Renter-Occupied Large Households	Percent of Total Households
Lodi	1,553	6.87%	1,563	6.91%
San Joaquin County	26,611	11.34%	20,426	8.70%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25009.

Resources for Large Households

As stated above, the 2021 ACS 5-year estimate reported a total of 3,116 large households in Lodi. Comparatively, there are a total of 3,116 housing units with four or more bedrooms in Lodi.[1] Of these large units, 2,775 have four bedrooms and 341 have five or more bedrooms. As stated before, a housing unit is overcrowded when the total number of occupants is greater than one person per room, excluding kitchens and bathrooms. Based on this data, there is not a significant resource gap for large households in the city.

Female-Headed Households

Single-parent households may have special housing needs due to limited income and child day care requirements. These special needs particularly affect female householders with children because their incomes tend to be lower than male householders.

Female-headed households with children make up 11.6 percent (1,861 households) of the total number of households in Lodi, as seen in Table 43 below. According to 2021 ACS data, 10.5 percent of the city's population lives in poverty, and almost half of those are female-headed households.2 Of female-headed households, 35.8 percent live in poverty. Compared to the city's overall rate of poverty at 10.5 percent for the entire population, this

[1] *U.S. Census Bureau, ACS 16-21 (5-year Estimates), Table B25041.*
[2] *U.S. Census Bureau, ACS 16-21 (5-year Estimates), Table S1703.*

is a significantly higher rate. Battered women with children comprise a subgroup of female-headed households that are especially in need.

Table 41 Female-Headed Families by Poverty Status

Family Type	At or Above Poverty Level- Percent	Below Poverty Level- Percent	Total Female-Headed Families	Percent of Total Families in Lodi
Female-Headed Families With Children	64.2%	35.8%	1,861	11.6%
Female-Headed Families Without Children	88.8%	11.2%	1,226	7.6%

Note: Please note that these values are evaluating female householders/ female-headed families with no spouse present. Children is defined as related dependents but does not include children under 18 not related to the householder.

Source: U.S. Census Bureau, 17- 21 ACS (5-year Estimates), Table B17010.

Because they generally have only one potential wage earner, single-headed households, and especially female-headed households, have more difficulties finding adequate, affordable housing than families with two adults. Single-headed households with small children may need to pay for childcare, which further reduces disposable income. This special needs group will benefit generally from expanded affordable housing opportunities. More specifically, the need for dependent care also makes it important that housing for single-headed families be located near childcare facilities, schools, youth services, and medical facilities.

Resources for Female Headed Households

In the Lodi area, several social service providers and emergency housing facilities serve women in need, including the Women's Center of San Joaquin County, Women's Center – Youth and Family Services, and the Lodi House.

- **Women's Center of San Joaquin County.** Located at 620 North San Joaquin Street in Stockton, providing a safe and supportive environment for women and children who have suffered from domestic abuse, including 24/7 access to trained staff.
- **Lodi House.** Located at 801 South Washington Street in Lodi, providing housing services, free professional counseling, and mentorship programs to women and children.

Farmworkers

Farmworkers traditionally are defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farmworkers work in the fields, processing plants, or support activities on a year-round basis. When workloads increase during harvest periods, the labor force is supplemented by seasonal or migrant labor. Farmworkers' special housing needs typically arise from their limited income and the unstable, seasonal nature of their employment, according to the California Institute for Rural Studies. Because of these factors, farmworker households have limited housing choices and are often forced to double up to afford rents.

According to the 2021 ACS five-year estimates, 1,733 Lodi residents (representing 5.9% of the workforce) were employed in farming, forestry, fishing, and mining occupations.[3] This percentage is slightly lower than previous data for 2016, which reported 6.6 percent. Although there does not appear to be a large resident farmworker population, Lodi is located within the larger agricultural region of San Joaquin County. The most-recent U.S. Department of Agriculture data (Table 42) indicates that there are 1,707 farms in the county employing 19,741 workers.

Table 42 Farmworkers- San Joaquin County

Category	Number
Farms	1,707
Hired Farm Labor	19,741

Source: U.S. Department of Agriculture, 2017 Agricultural Census.

Table 43 shows the migrant worker student population in Lodi. This group is characterized as children whose parents are migrant workers in agriculture and other related industries and have moved in the past three years. Both the Lodi Unified School District and San Joaquin County schools saw a decrease in migrant worker students from the 2019-2020 to 2020-2021 school year. Lodi Unified School District has seen a further decrease in migrant student population since then, while the San Joaquin County has had a steady increase in the last two years.

Table 43 Migrant Worker Student Population

Jurisdiction	2019-2020	2020-2021	2021-2022	2022-2023
Lodi Unified School District	353	301	271	197
San Joaquin County	1,059	949	972	990

Note: This data accounts for children whose parents are migrant workers in the agriculture/dairy/lumber/fishing industries and has moved in the past three years.

Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Annual Enrollment Data (Academic Years 2019-2020, 2020-2021, 2021-2022, 2022-2023).

Housing Characteristics and Conditions (Statewide)

According to the UC Merced Farmworker Health Study (FWHS), published in 2023, farmworkers in California were most likely to be renters (92 percent) than owners, to live in single-family homes (55 percent), and very few renters relied on employers to pay any or all of their rent (2 percent). The research suggests that farmworkers generally experience substandard housing (e.g., older homes, apartments, mobile homes, motels, garages, or other similar spaces), often requiring repairs such as new roofs, plumbing, heating and cooling systems, and termite clean-up. Poor ventilation and crowded spaces put farmworkers at increased risk for respiratory illnesses such as asthma and infectious diseases like tuberculosis and COVID-19.

[3] *U.S. Census Bureau, ACS 16-21 (5-year Estimates), Table S2403.*

The FWHS also found that farmworkers statewide faced issues related to the built environment of their homes. More than one-third (37 percent) reported a "taste of water at home" that was either very bad (24 percent) or bad (13 percent) — an indicator of poor water quality and possibly health risks. More than one in three also experienced problems keeping a house cool (39 percent) or warm (36 percent), issues that will only increase in time as climate change exacerbates the temperature extremes. Farmworkers also encountered problems related to water and moisture—such as rotting wood (16 percent), mold (14 percent), water damage (13 percent), and water leaks (12 percent).

Regarding households characteristics, FWHS respondents lived in large, overcrowded households with low incomes and several household problems, arrangements associated with decreased mental health. Farmworkers households were larger than the California average (3.0 persons per household), with a median household size of four persons. Over one-fourth (29 percent) of farmworkers' households had six or more persons. More than half (55 percent) of farmworkers reported that two persons (including themselves) slept in their room—a figure somewhat less than the percent married (67 percent)—but more than one-fourth (25 percent) slept in a room with three or more persons indicating overcrowding.

Of statewide respondents to the FWHS, more than two-thirds (70 percent) of farmworkers lived in households with one or more children under the age of 18. The median number of children per household was two, and more than two in five (42 percent) households had three or more children. Only two percent of farmworkers lived in households with children who worked.

Farmworker Housing Resources

The Harney Lane Migrant Center houses migrant (seasonal) workers across various industries (winery, cannery, trucks, etc.) from May to October, or longer if needed. According to a phone conversation with the center, the state's Office of Migrant Services (OMS) owns the property and hires a property management company. Recently, OMS hired Roberts Family Development Center, a nonprofit, to manage the property. The Housing Authority of San Joaquin (HASJC) previously managed the property for approximately 30 years. The State allocates new funds each year in August for the following year.

HASJC offers programs to assist extremely low- to moderate-income households with their housing costs, including the Section 8 rental assistance program, public housing, and migrant farmworker housing. Specifically, HASJC manages five public housing projects and three migrant farm labor housing developments throughout San Joaquin County. In addition, HASJC provides the Family Self-Sufficiency Program as well as supportive services centers, which provide a range of services to help people become financially self-sufficient.

Through Program 1.5, the City will pursue State and Federal grant funding in support of farmworker housing within the planning period.

Extremely- and Very Low-Income Households

Extremely low-income households are defined as households that make less than 30 percent of AMI, which equates to $24,867 for a family of four. Approximately 2,930 households in Lodi are extremely low-income households, which includes 850 homeowners and 2,080 renters (see Table 30). The City currently estimates that there is a need for 458 additional housing units for extremely low-income households in the current planning

period, which is 50 percent of projected very low-income housing needs (see Table 58). Most, if not all, extremely low-income households will require rental housing. The extremely low-income households will likely face housing problems such as overpaying, overcrowding, and/or accessibility issues as a result of their limited incomes. Also, many of the extremely low-income households will fall within a special needs category (disabled, seniors, large families, or female-headed households) and require supportive housing services.

Resources for Very Low- and Extremely Low-Income Households

Public and Assisted Housing

The City does not own or operate any public or assisted housing. The Housing Authority of the County of San Joaquin has four public housing sites, none of which are in Lodi. There are currently five assisted projects in Lodi. (See Section 2.7: Analysis of Assisted Housing Projects At Risk for a discussion of at-risk status.)

Tenant-Based Housing Assistance

The Housing Choice Voucher Program (formerly known as Section 8) provides vouchers that assist low-income households with housing costs. The program is administered countywide by the Housing Authority of the County of San Joaquin. Housing Choice Vouchers provide a monthly subsidy paid to the owner/landlord on behalf of low- to moderate-income families renting market-rate units. The Housing Authority administers 4,469 vouchers throughout the county as of August 2023.

People Experiencing Homelessness

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term.

Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances.

Individuals or families that are homeless have a variety of special needs, including emergency shelter, counseling, job training, transitional housing, and permanent supportive housing, among others. Lodi has approximately 208 sheltered and unsheltered homeless persons in 2022. [4]

Table 44 shows San Joaquin County's unhoused population categorized by race. In the county, white residents make up most unhoused persons (63.1 percent), followed by Hispanic/Latino residents (31.3 percent). In Lodi, white residents (83 percent) similarly make up the majority of unhoused persons, followed by Hispanic/Latino (29 percent). Lodi has a total unhoused population of 208 individuals. This is a 50 percent increase from its 2019 number of 139 people. Lodi's unhoused population makes up 15 percent of the county's unsheltered count.

[4] *San Joaquin Continuum of Care, 2022 Point in Time Count, accessed June 2023.*

Table 44 Homelessness by Race and Ethnicity

Race/Ethnicity	Number of Unhoused Persons in San Joaquin County	Percent of Unhoused Persons in San Joaquin County	Number of Unhoused Persons in Lodi	Percent of Unhoused Persons in Lodi
Black/African American	519	22.4%	10	5.0%
White	1,463	63.1%	173	83.0%
Multiple Races	196	8.5%	16	7.5%
American Indian/Alaska Native	49	2.1%	4	2.0%
Native Hawaiian/Pacific Islander	26	1.1%	1	0.5%
Asian American	66	2.8%	4	2.0%
Total	2,319	100.0%	208	100.0%
Hispanic/Latino	726	31.3%	60	29%

Source: U.S. HUD, CoC Homeless Assistance Programs Homeless Populations and Subpopulations Reports (2022); U.S. Census Bureau, ACS 2021 (1-Year Estimate), Table DP05.

Transitional and Supportive Housing

For many jurisdictions there is a significant need for transitional housing, long-term rental assistance, and/or low-income rental units. Transitional housing is usually in buildings configured as rental housing developments, but operated with State programs that require the unit to be cycled to other eligible program recipients after some pre-determined amount of time. Supportive housing has no limit on length of stay and is linked to on-site or off-site services that assist the resident in retaining the housing, improving health status, maximizing ability to live independently and, when possible, work in the community.

Transitional housing programs provide extended shelter and supportive services for homeless individuals and/or families with the goal of helping them live independently and transition into permanent housing. Some programs require that the individual/family transition from a short-term emergency shelter. The length of stay varies considerably by program but is generally longer than two weeks and can last up to 60 days or more. In many cases, transitional housing programs will provide services for up to two years or more. The supportive services may be provided directly by the organization managing the housing or by other public or private agencies in a coordinated effort with the housing provider. Transitional housing is generally provided in apartment style facilities with a greater degree of privacy than short-term homeless shelters; may be provided at no cost to the resident; and may be configured for specialized groups within the homeless population, such as people with substance abuse problems, homeless mentally ill, homeless domestic violence victims, and veterans or homeless people with AIDS/HIV.

Need for Shelters

The San Joaquin Continuum of Care (SJ CoC) adopted the Community Response to Homelessness Strategic Plan in 2020 to address its unsheltered crisis. This document identifies demographics within the unhoused population, evaluates the current homelessness programs, and outline goals to address the issue for 2020 to 2025.

The San Joaquin CoC has prioritized the need for available homeless shelters. The community has expressed concern over an increasing number of people experiencing homelessness without shelter, as there is a lack of low-barrier facilities in the area. There are few organizations that receive government funding, which makes it difficult to coordinate across shelters. In response, the SJ CoC has identified three goals to fully address the situation:

- Create a cross-jurisdictional system to coordinate, plan, and respond to the unhoused community. This includes establishing a strong network that makes communication between areas and access to the Homeless Management Information System (HMIS) easier.
- Make shelters more accessible and help people transition into permanent housing. The SJ CoC aims to increase the quantity of low barrier shelters, provide additional rental assistance, and lower the number of people returning homeless after leaving transitional housing.
- Establish more permanent housing options, including testing new, non-conventional housing options and increasing the rehousing stock.

Chronically Homeless

Chronic homelessness is defined as someone who has been homeless for at least a year, both consecutively or over the past 3 years, and has a disability. People considered chronically homeless often have experienced substantial trauma and require intensive service needs.

According to the 2020 San Joaquin “Point-in-Time” count, there were 809 chronically homeless individuals in Lodi, making up 34.9 percent of the county’s unhoused population. Among those counted, 81.1 percent were unsheltered and had no place to sleep.

Families with Children

According to the US HUD 2022 CoC data, there was only one household with only children that was unsheltered in San Joaquin County. The majority of the unsheltered homeless population are people over 24 years old, followed by 32 people who were between the ages of 18 and 24. While there is no count available on the number of sheltered homeless households with children on a given night, Lodi House and Hope Harbor combined offer approximately 74 beds for homeless women and children. It is common for these facilities to have a waitlist. Unfortunately, single fathers with children have limited opportunities for shelter, as only the Salvation Army’s emergency shelter has three small apartments available.

There is a need for transitional housing for homeless families with children in Lodi. Women leaving abusive situations need resources for rental deposits, utilities deposits, and the like. Families leaving shelters have this same need; it is one of the most significant problems with which case managers deal.

Veterans

According to the US HUD 2022 CoC data, approximately 90 unsheltered and 36 sheltered homeless identified as veterans. This is 5.4 percent of the unhoused population. San Joaquin County does not appear to have a very large number of homeless veterans, which is generally the case in larger metropolitan areas. [5]

Unaccompanied Youth

During the 2022 HUD CoC count, 33 unsheltered unaccompanied youth were counted in Lodi. Many youths run away, and in turn become homeless, due to problems in the home, including physical and sexual abuse, mental health disorders of a family member, substance abuse and addiction of a family member, and parental neglect. In some cases, youth are asked to leave the home because the family is unable to provide for their specific mental health or disability needs. Others are pushed out of their homes because their parents cannot afford to care for them.

Youth who have been involved in the foster care system are more likely to become homeless at an earlier age and remain homeless for a longer period of time. Youth aging out of the foster care system often have little or no income support and limited housing options and are at higher risk of ending up on the streets. Youth who live in residential or institutional facilities often become homeless upon discharge. In addition, very few homeless youths are able to seek housing in emergency shelters due to the lack of shelter beds for young people and because of shelter admission policies.

Some youth become homeless when their families fall into difficult financial situations resulting from lack of affordable housing, difficulty obtaining or maintaining a job, or lack of medical insurance or other benefits. These youth become homeless with their families, but later can find themselves separated from them and/or living on the streets alone, often due to shelter or child welfare policies.

Youth transitioning from expiring foster care and other programs need help learning independent living skills such as how to live on their own within a budget and training for jobs and in life skills, as well as affordable housing with supportive services.

Resources for Persons Experiencing Homelessness

Services and facilities available for the homeless are coordinated in Lodi and San Joaquin County as a "continuum of care." The City of Lodi, with other jurisdictions and agencies in San Joaquin County, developed a Continuum of Care Plan to identify gaps in services for the homeless in the two counties and to apply for available funding for homeless services. The continuum of care begins with a point of entry to assess the needs of a homeless individual or family. Once a needs assessment is completed, the person or family may be referred to permanent housing or transitional housing where supportive services are provided to prepare them for independent living. The goal of a comprehensive homeless service system is to ensure that homeless individuals and families move from homelessness to self-sufficiency, permanent housing, and independent living.

Two facilities in Lodi provide shelter to those experiencing homelessness. The Salvation Army's Hope Harbor has 56 shelter beds for men and 28 beds for women and children. It has an additional three small units with 3 beds per unit for women or men with children over the age of 10. Most evenings, the Salvation Army's shelter is able to accommodate all the homeless that come to its doors. If needed, they can expand into an additional room to

[5] *San Joaquin Continuum of Care, 2022 Point in Time Count, accessed June 2023.*

accommodate more guests. Lodi House has 26 beds for women and children. In total, these facilities accommodate about half of the homeless in Lodi (57%).

Additionally, a total of approximately 50 transitional housing beds are provided by the Salvation Army (16 persons), Lodi House (three units at approximately 4 persons each), and Central Valley Low-Income Housing Corporation (21 persons).

The Salvation Army, Lodi House, and other service organizations provide the following services to homeless individuals and families:

- REACH utility assistance
- Care utility assistance
- Rental assistance
- Emergency food pantry
- Transportation assistance
- Lodi Memorial Medical Clinic
- Clothing assistance
- Community dining hall
- Drug and alcohol rehabilitation program placement
- Mental health support group
- Leadership training
- Culinary arts training

Table 45 below shows the available resources for those experiencing homelessness in Lodi.

Table 45 Homeless Assistance Programs

Organization	Provider	Phone	Address
Seniors			
Adult Protective Services (APS)	San Joaquin County Human Services Agency	(209)468-3780	333 E. Washington Street, Stockton, CA 95202
Brown Bag Program (food distribution)	San Joaquin County Human Services Agency/ Second Harvest of the Greater Valley	(209)239-2091	1120 Vanderbilt Circle, Manteca, CA 95337
Meals on Wheels	San Joaquin County Human Services Agency	(209) 468-1104	-
Senior Lunch Program (Congregate Meals)	San Joaquin County Human Services Agency/ Loel Foundation	(209)369-1591	105 S Washington St, Lodi, CA 95240
Persons with Disabilities			
Adult Day Care	Adventist Health Lodi Memorial	(209) 369-4443	125 S Hutchins St # A, Lodi, CA 95240
Employment Services			

CalWorks	San Joaquin County Human Services Agency	-	333 E. Washington Street, Stockton, CA 95202
Welfare to Work (WTW)	San Joaquin County Human Services Agency/ CalWORKS	-	900 E. Oak Street, Stockton, Ca 95202
Center for Employment Opportunity (WTW services)	San Joaquin County Human Services Agency/ CalWORKS	-	1044 N. El Forado Street, Stockton, CA 95202
Family Resource & Referral Center (WTW services)	San Joaquin County Human Services Agency/ CalWORKS	-	1035 W. Robinhood Drive, Suite 102, Stockton, CA 95207
El Concilio Council for the Spanish Speaking (WTW services)	San Joaquin County Human Services Agency/ CalWORKS	-	1330 S. Ham Lane, Lodi, 95242
Food Distribution			
In-Home Support Services	San Joaquin County Human Services Agency	(800)491-1996	102 S. San Joaquin Street, Stockton, CA 95201
CalFresh	San Joaquin County Human Services Agency	(209) 468-1000	333 E. Washington Street, Stockton, CA 95202
Food For You	San Joaquin County Human Services Agency	(209)953-3663	Multiple locations[1]
Women, Infants, Children (WIC Program)	San Joaquin County Human Services Agency	(209) 468-3280	-
St. Mary's Dining Room	-	(209) 467-0703	545 W. Sonora Street Stockton, CA 95203
Housing Services			
Central Valley Low Income Housing Corporation (CVLIHC)	CVLIHC	(209)472-7200	2431 W. March Lane #350 Stockton, CA 95207
Shelters			
Hope Harbor Shelter	The Salvation Army	(209) 367-9560	622 N. Sacramento Street, Lodi, CA 95240
Lodi House		(209) 334-6346	801 S. Washington Street, Lodi, CA 95240
General			
General Assistance (loan service)	San Joaquin County Human Services Agency		333 E. Washington Street, Stockton, CA 95202
Lodi Access Center (information and basic needs, including food, shelter clothing, hygiene, mobile showers, restrooms, laundry services, phone charging, and storage)	Inner City Action	(800) 466-7205	710 North Sacramento Street, Lodi, CA, 95240

Literacy Services			
St. Mary's Dining Room	-	(209) 467-0703	545 W. Sonora Street Stockton, CA 95203
Mental Health Services			
St. Mary's Dining Room	-	(209) 467-0703	545 W. Sonora Street Stockton, CA 95203
Youth			
Community Partnership For Families of San Joaquin (CPFSJ)	CPFSJ	(209) 444-5555	2044 Fair St, Stockton, CA 95206

[1] Food For You has many pickup locations, with Calvary First Assembly of God, Lincoln Presbyterian Church, and The Bridge at Stockton being the closest to Lodi.

Assisted Housing Units

Assisted housing units are those that are restricted for use by occupants with limited household incomes. These units are assisted under federal, State, and/or local programs, including HUD programs, State and local bond programs, former redevelopment agency (RDA) programs, density bonus, or direct assistance programs.

Public and Assisted Housing

The Housing Authority of the County of San Joaquin has 13 public housing sites, with Creekside South Apartments located in Lodi. It consists of five buildings and 40 units and provides affordable housing for senior citizens.

Table 46 provides a comprehensive list of the affordable housing in Lodi, which includes transitional and permanent supportive housing opportunities.

At-Risk Housing Units

The California Housing Partnership maintains an affordable housing database to monitor changes in affordable housing and to identify units or housing developments that are at risk of converting to market-rate uses. Assisted units in the preservation data base are classified by the following risk categories:

- Low Risk: affordable housing units that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.
- Moderate Risk: affordable housing units that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.
- High Risk: affordable housing units that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.

Table 46 Deed Restricted Affordable Housing Developments in Lodi

Housing Complex	Address	City	Affordable Units	Total Units	Active Program(s)	Expiration Date	Risk Level
Creekside South Apartments	601 Wimbledon Dr.	Lodi	39	40	HUD	2/23/2035	Low
Tienda Drive Senior Apartments	2245 Tienda Dr.	Lodi	79	80	LIHTC; CalHFA	2069	Low
Hotel Lodi	7 South School St.	Lodi	74	75	LIHTC	2053	Low

Source: California Housing Partnership, 2023; City of Lodi, 2023.

Preservation of At-Risk Units

California housing element law requires all jurisdictions to include a study of low-income housing units which may at some future time be lost from the affordable inventory by the expiration of some type of affordability restrictions. Table 46 above provides an inventory of public assisted housing in Lodi with data on the estimated affordability expiration. As shown, during the 2023-2031 housing element planning period there are no units at risk of conversion to market rate.

Preservation And Replacement Options

To maintain the existing affordable housing stock, the City can either preserve the existing assisted units or facilitate the development of new units. Depending on the circumstances of at-risk projects, different options may be used to preserve or replace the units. Preservation options typically include (1) transfer of project to nonprofit ownership; (2) provision of rental assistance to tenants using non-federal funding sources; and (3) purchase of affordability covenants. In terms of replacement, the most direct option is the development of new assisted multifamily housing units. These options are described below.

Transfer of Ownership

Transferring ownership of an at-risk project to a nonprofit housing provider is generally one of the least costly ways to ensure that at-risk units remain affordable for the long term. By transferring property ownership to a nonprofit organization, low-income restrictions can be secured indefinitely, and the project would become potentially eligible for a greater range of governmental assistance.

Rental Assistance

Project-based Section 8 rent subsidies can be used in combination with Low-Income Housing Tax Credits (LIHTC) to leverage private capital in areas where the market rent exceeds the maximum rents under the LIHTC program. Under Section 8, the US Department of Housing and Urban Development (HUD) pays the difference between what tenants can pay (defined as 30% of household income) and what HUD estimates as the fair market rent on the unit. This difference between the market rent paid by the Section 8 program and the underlying rent used by the affordable housing industry to estimate the capacity of property to pay debt service is called the Section 8

increment. This additional debt may be used for renovation of existing affordable housing and production of new rental housing affordable to very low-income households.

Purchase of Affordability Covenants

Another option to preserve the affordability of an at-risk project is to provide an incentive package to the owner to maintain the project as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance and/or supplementing the Section 8 subsidy received to market levels. The feasibility of this option depends on whether the complex is too highly leveraged. By providing lump sum financial incentives or ongoing subsidies in rents or reduced mortgage interest rates to the owner, the City can ensure that some or all of the units remain affordable.

Construction and Conversion of Replacement Units

The construction of new affordable housing units is another means of replacing the at-risk units should they be converted to market-rate units. The cost of developing housing depends on a variety of factors, including density, size of the units (i.e., square footage and number of bedrooms), location, land costs, and type of construction. Assuming an average development cost per housing unit of $250,000, it would cost approximately $10 million to construct 40 new assisted units.

With the high cost of new construction, the City is working with sweat-equity affordable housing developers. Under this model, homeowners and neighbors help build the housing, along with volunteers, to help reduce the cost of construction.

As an Entitlement Community, Lodi now will look to HCD for HOME Program funds. Through the Neighborhood Services Division of the City's Community Development Department, which administers the Community Development Block Grant (CDBG) Program, the City of Lodi intends to pursue funding opportunities for new rental construction projects and rental rehabilitation projects with both nonprofit and for-profit developers.

Organizations Interested in Preserving Assisted Rental Housing

The preservation of affordable rental housing at risk of conversion to market-rate housing can be assisted by nonprofit organizations with the capacity and interest to acquire, manage, and permanently preserve such housing. The California Department of Housing and Community Development maintains a list of interested nonprofit organizations. A number of organizations have expressed an interest in preserving affordable rental housing in San Joaquin County, including:

- Visionary Home Builders, 315 N. San Joaquin Street, Stockton, CA 95202; (209) 466- 6811 (formerly ACLC)
- California Coalition for Rural Housing, 717 K Street, Suite 400, Sacramento, CA 95817; (916) 443-4448
- Christian Church Homes of Northern California, Inc, 303 Hegenberger Road, Suite 201, Oakland, CA 94621; (510) 632-6712
- Domus Development, 594 Howard Street, Suite 204, San Francisco, CA 94105; (415) 856-0010
- Eden Housing, Inc, 22645 Grand Street, Hayward, CA 94541; (510) 582-1460
- Eskaton Properties, Inc, 5105 Manzanita Avenue, Carmichael, CA 95608, (916) 334- 0810

- Foundation for Affordable Housing, Inc, 30950 Rancho Viejo Road, Suite 100, San Juan Capistrano, CA 92675; (949) 443-9101
- Housing Corporation of America, 6265 Variel Avenue, Woodland Hills, CA 91367
- Mercy Housing California, 2512 River Plaza Drive, Suite 200, Sacramento, CA 95833; (916) 414-4400
- Rural Community Assistance Corporation, 3120 Freeboard Drive, Suite 201, West Sacramento, CA 95691; (916) 447-2854
- Satellite Affordable Housing Associates, 1521 University Avenue, Berkeley, CA 94703- 1422; (540) 647-0700
- Stockton Shelter for the Homeless, 411 South Harrison Street, Stockton, CA 95203; (209) 465-3612

Funding Sources for Assisted Housing

HUD Section 8 Program

Under the HUD Section 8 program, which is administered by HACA, participating building owners are entitled to receive HUD Fair Market Rents (FMRs) for units with Section 8 contracts. For Section 8 units, HUD makes up the difference between 30 percent of a household's monthly income and the FMRs.

Low Income Housing Tax Credit (LIHTC)

Created in 1986 by the Federal government, the LIHTC program offers tax incentives to encourage the development of affordable housing. The LIHTC is jointly administered by the IRS and State Housing Credit Agencies (HCA) and has funded over eight billion annual tax credit units nationwide. California's HCA is the State Tax Credit Allocation Committee (TCAC).

California Housing Finance Agency (CalHFA)

CalHFA uses approved private lenders and purchases loans that meet CalHFA standards to support very low, low, and moderate income assisted units. CalHFA partners with jurisdictions, developers, and other organizations to provide a variety of resources including loan assistance programs for homebuyers and renters aimed at increasing housing opportunities for low- and moderate-income residents.

Opportunities to Promote Sustainable Development

Energy costs directly affect housing affordability through their impacts on the construction, operation, and maintenance of housing. There are many ways in which the planning, design, and construction of residential neighborhoods and structures can foster energy conservation to reduce this cost impact and at the same time produce an environmental benefit. Techniques for reducing energy costs include construction standards for energy efficiency, energy-saving community design alternatives, the layout and configuration of residential lots, and the use of natural landscape features to reduce energy needs. Sustainable development also encompasses the preservation of habitat and species, improvement of air quality (particularly important in this region), and conservation of natural resources, including water and open space.

Residential Construction Standards

The State of California has adopted building standards for energy efficiency that apply to newly constructed dwellings and residential additions. Title 24 of the California Code of Regulations sets forth mandatory energy efficiency standards that can be achieved through prescriptive means or through compliance with a maximum "energy budget." Prescriptive means include the use of appliances, building components, insulation, and mechanical systems that meet minimum energy efficiency ratings. Local governments implement state energy standards as part of their building code enforcement responsibilities.

Resources for Energy Conservation

The City of Lodi operates its own electric utility, Lodi Electric Utility, which provides residential, commercial, and industrial electric service, and allows flexibility and control over energy sources. In 2019, the city's average power mix included less renewable energy (29.9) compared with the statewide average (31.7%) and less coal (0%) than the statewide average (3.0%). Lodi's use of renewable energy (29.2%) in 2019 was greater than in 2013 at 20%.6 In addition to sustainability efforts in energy sources, the Lodi Electric Utility offers several programs to reduce residential energy use, including:

- Residential Energy Efficiency Program, which helps residents install energy and water saving products free of charge.
- Residential Products Rebate Program, which provides rebates on the purchase of new, energy-efficient appliances.
- Energy Efficient Home Improvement Program, which offers rebates on other types of energy efficient residential systems (fans, space conditioning, insulation, thermostats, windows, etc.).
- California First-PACE (Property Assessed Clean Energy) Program, which allows property owners to finance the installation of energy and water improvements in homes or businesses, which can then be paid back as a line item on a property tax bill.
- Home Energy Renovation Opportunity (HERO) Financing Program, which is a type of PACE program that allows property owners to fund energy efficiency, water efficiency, and renewable energy projects with little or no upfront costs. With PACE, residential and commercial property owners living within a participating district can finance up to 100% of their project and pay it back over time as a voluntary property tax assessment through their existing property tax bill. A local provider can be found at energycenter.org.

Pacific Gas & Electric Company (PG&E), which provides gas to the city, offers a variety of energy conservation services for residents and also participates in several other energy assistance programs for lower-income households, which help qualified homeowners and renters conserve energy and control electricity costs. The California Alternate Rates for Energy (CARE) Program provides a 20 percent monthly discount on natural gas rates and a 30-35 percent discount on electric rates to income-qualified households below the CARE income limits.[7] The

[6] *Lodi Electric Utility 2019 Power Content Label, Accessed August 2023.*

[7] *California Alternate Rates for Energy (CARE) Program, California Public Utilities Commission, accessed August 2023, https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/california-alternate-rates-for-energy.*

Relief for Energy Assistance through Community Help (REACH) Program provides one-time energy assistance to customers who have no other way to pay their energy bills. The intent of REACH is to assist low-income customers, particularly the elderly, disabled, sick, working poor, and the unemployed, who experience severe hardships and are unable to pay for their necessary energy needs.

3. Zoning for a Variety of Housing Types

State Housing Element Law (Government Code Sections 65583 and 65583.2) requires local governments to analyze the availability of zoning for a variety of housing types to promote a diverse housing stock (i.e., price, style, size). Having a variety of housing types contributes to neighborhood stability by offering more affordable housing options that meet the needs of different households. This section describes the zoning and availability of sites for a variety of housing types in Lodi.

Density Bonuses

California Government Code Sections 65915-65918 require local governments to provide density bonus provisions to projects that comply with specific standards. In 2020, the State approved new legislation that increased the maximum density bonus amount for very low-, low-, and moderate-income housing, and how maximum densities shall be calculated. Additionally, local governments are required to provide one or more incentives for qualifying projects and are required to accept an incentive proposed by a developer unless the incentive proposal is found to cause environmental harm, a health and safety issue, a detriment to historical property, or otherwise contrary to the law. Both density bonuses and incentives are granted based on the number of affordable units present in each project.

The City of Lodi currently establishes density bonus provisions in Chapter 17.36.050 (Residential Density Bonus). Developments containing five or more units may qualify for a density bonus and at least one other incentive if the developer does one of the following:

1. Agrees to construct and maintain at least five percent of the units dedicated to very low income households;
2. Agrees to construct and maintain at least ten percent of the units dedicated to lower income households;
3. Agrees to construct and maintain at least ten percent of the units in a common interest development (as defined in Section 1351 of the California Civil Code) dedicated to Moderate Income households, provided that all units in the development are offered to the public for purchase;
4. Agrees to construct and maintain a senior citizen housing development as defined in Section 17.36.040 of this chapter;
5. Includes a qualifying child care facility as described in Section 17.36.030 of this chapter in addition to providing housing as described in subsections (D)(1)—(D)(3) of this section.

Under existing provisions, a density bonus of up to 35 percent can be granted for qualifying developments. Density bonuses available by income level and type include:

- Very Low Income: If at least 5% of the total units of a housing development are restricted for very low income households the permitted density bonus is 20 to 35 percent, with an additional 2.5 percent

increase for each additional one percent increase in very low income units above the initial five percent threshold.

- Low Income: If at least 10% of the total units of a housing development are restricted for low income households the permitted density bonus is 20 to 35 percent, with an additional 1.5 percent density bonus increase for each additional one percent increase in low income units above the initial 10 percent threshold.
- Moderate Income: If at least 10 percent of the total dwelling units in a common interest development are restricted for persons/families of moderate income, the permitted density bonus is five to 35 percent, with an additional one percent density bonus increase for each additional one percent increase in moderate income units above the initial ten percent threshold.
- Senior Housing: A 20 percent increase in density in permitted for senior housing developments.
- Child Care: If a child care facility is incorporated as part of a project that is eligible for a density bonus, an additional density bonus (up to 35 percent) may be permitted as determined by the direction.

A housing development qualifying for a density bonus may be entitled to at least one incentive. Incentives may include, but are not limited to:

- A reduction in site development standards such as:
    - Reduced minimum lot sizes and/or dimensions;
    - Reduced minimum lot setbacks;
    - Reduced minimum outdoor and/or private outdoor living area;
    - Increased maximum lot coverage;
    - Increased maximum building height and/or stories;
    - Reduced on-site parking requirements;
    - Reduced street standards.
- A reduction in architectural design requirements.
- A density bonus greater than the amount required by this chapter.
- Other regulatory incentives proposed by the developer or the city, which result in identifiable, financially sufficient, and actual cost reductions.
- If an applicant qualifies for a density bonus pursuant to this chapter, the applicant may request, in addition to any requested incentive(s), a reduced parking requirement be applied to the project in place of the city's current parking requirements. The parking requirement is inclusive of handicapped and guest parking for the entire housing development, but shall not include on-street parking spaces in the count towards the parking requirement.

The City's density bonus provisions do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Because of this, the City is not currently in compliance. Program 1.1 commits the City to amend the Municipal Code for compliance with California Government Code Sections 65915 through 65918.

Multifamily Residential Housing

Multifamily residential developments are permitted by-right in the RMD and RHD zoning districts. The RMD zone allows for a residential density range of 8 to 20 units per acre and the RHD zone district allows for a density range of 15 to 35 units per acre. Multifamily residential units are permitted by-right in all mixed-use zones including the DMU, MCE, and MCO districts. The DMU zone district allows for a density range of 8 to 35 units per acre and a floor area ratio (FAR) of 3.0. The MCE zoning district allows for densities of 8 to 35 units per acre with a FAR of 1.0. The MCO zoning district allows densities of 2 to 35 units per acre and a FAR of 1.2.

Manufactured (Factory-Built) Homes

Manufactured housing can serve as an alternative form of affordable housing in low-density areas where the development of higher-density multifamily residential units is not allowed. California Government Code Sections 65852.3 and 65852.4 requires jurisdictions to allow the installation of manufactured homes on a foundation in the same manner and zones as all lots zoned for conventional single-family residential dwellings, with the exception of some architectural requirements including roof overhang, roofing material, and siding material.

Lodi's Municipal Code defines a manufactured home as a structure, transportable in one or more sections, that is built on a permanent chassis and is designed for use with or without a permanent foundation when attached to the required utilities. The code is consistent with State law as manufactured homes that are placed on permanent foundations are, like houses that are built of standard construction, permitted by right in any zoning district allowing single-family homes that are permitted by right. In non-residential zoning districts, a single-family residence requires a conditional use permit, whether the proposed residential unit is of standard construction or is a manufactured home.

Mobile Homes and Mobile Home Parks

Section 69852.7 of the California Government Code specifies that mobile home parks shall be an allowed use on "all land planned and zoned for residential land use." However, local jurisdictions are allowed to require use permits for mobile home parks. Chapter 17.36.070 of Lodi's Municipal Code describes the city's regulations of mobile home parks. According to Lodi's Municipal Code, mobile homes are only allowed under conditional use in the RHD zoning district. Mobile homes must be attached to a foundation system in compliance with all applicable building regulations and subject to review. Program 1.1 commits the City to update the Development Code to allow mobile home parks in all residential zones in compliance with Government Code 69852.7.

Farmworker / Agricultural Employee Housing

California Health and Safety Code Sections 17021.5, 17021.6, and 17021.8, relating to employee housing and labor camps supersede any ordinance or regulations enacted by local governments. Specifically, Section 17021.5

mandates that "employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use designation." Additionally, farmworker employee housing, as described above, cannot be subject to conditional use permits, zoning variances, or other zoning clearances that are not required of any other single-family dwelling in the same zone. Under Code Section 17021.6, larger employee housing facilities featuring a maximum of 36 beds in group quarters, or 12 single-family units, are considered an agricultural use and cannot be subject to any restrictions, conditional use permits, zoning variances, fees, taxes, or other requirements not imposed on other agricultural uses in the same zone. Finally, Code Section 17021.8 requires jurisdictions to provide streamlined, ministerial review for eligible agricultural employee housing developments.

Lodi's Development Code states that farmworker housing accommodations may consist of any living quarters, dwelling, boarding house, tent, bunkhouse, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations maintained in one or more buildings, or one or more sites, and the premises upon which they are situated, including area set aside for parking of mobile homes or camping of five or more employees by the employer. The Development Code treats permanent housing for farmworkers who live in Lodi year-round the same as other permanent housing (i.e., single family or multifamily) in compliance with California Health and Safety Code Section 17021.5.

The Development Code currently allows the production of crops in the RLD, RMD, and RHD zones, but does not specify that employee housing up to 36 beds or 12 single family units are allowed in these zones, as required by Code Section 17021.6. Further, the City has not adopted a streamlined review process for farmworker housing related to Code section 17021.8. Program 1.1 commits the City to revising the Development code for compliance with State law.

Supportive and Transitional Housing

Supportive housing is permanent rental housing linked to a range of support services designed to enable residents to maintain stable housing and lead fuller lives. Typically, a part of the housing is targeted to people who have risk factors such as homelessness, or health challenges such as mental illness or substance addiction. Supportive housing comes in all shapes and sizes from renovated motel offering furnished single-room occupancy (SRO) apartments; a multifamily development where tenants with disabilities live alongside other families with low incomes; a small, more service-intensive building; or scattered-site apartments. Whatever the configuration, supportive housing allows tenants to access support services that enable them to live as independently as possible.

Transitional housing is similar to supportive housing in that it is housing linked to a range of support services, however, transitional housing has a limited term for assistance for tenants. The Lodi Development Code defines transitional housing the same as California Government Code Section 65582 as "buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance."

State law requires local jurisdictions to permit transitional and supportive housing as a residential use in all zones allowing residential uses, subject only to restrictions imposed on similar residential dwellings (i.e., single-family, multifamily) of the same type in the same zone. The City of Lodi allows transitional and supportive housing in all zones allowing residential uses without additional restrictions beyond those imposed on similar residential dwellings, in compliance with State law.

Recent changes to State law add further requirements related to supportive housing. AB 2162 (Chapter 753, statutes of 2018) streamlines and expedites the approval of supportive housing to better address the need of Californians experiencing homelessness. The legislation requires a local government to approve, within statutory timelines, a supportive housing development that complies with specified criteria. Requirements include:

- Supportive housing shall be a use by right in zones where multifamily and mixed uses as defined by Government Code Section 65583.2(i).
- A local government is required to notify the developer whether the application is complete within 30 days of receipt of an application to develop supportive housing.
- After the application is complete, local governments shall complete its review of the application within 60 days for smaller projects (50 or fewer units) and 120 days for larger projects (more than 50 units).
- Local governments shall not impose any minimum parking requirements for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop.

The City is not currently in compliance with changes to State law related to AB 2162.

Single-Room Occupancy Units

Single-room occupancy (SRO) units can provide affordable private housing for lower-income individuals, seniors, and persons with disabilities. An SRO unit usually is small, between 200 to 350 square feet. These units can serve as an entry point into the housing market for formerly homeless people.

State law requires local jurisdictions to identify zoning and development standards that allow and encourage new SRO construction and include programs in their housing elements that commit to the preservation and rehabilitation of existing residential hotels and other buildings for SROs (i.e., zoning and permitting procedures, regulatory or fiscal assistance, educational programs). The City of Lodi treats SROs the same as any group residential use, including boarding houses and dormitories, but does not list group residential or any of these individual uses as an allowed use in any zones. Program 1.14 commits the City to evaluate and revise development standards to allow, encourage, and incentivize the development of SRO housing types.

Emergency Shelters

State law requires local jurisdictions to strengthen provisions for addressing the housing needs of homeless persons, including the identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use permit. Zone(s) where emergency shelters are allowed as a permitted use without a

conditional use or other discretionary permit must also have sufficient capacity to accommodate the need for emergency shelter. AB 139 requires the need for emergency shelter to be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time (PIT) count.

State law also states that emergency shelters "may only be subject to those development and management standards that apply to residential or commercial development within the same zone" along with a list of specific objective standards that may be made. Local governments that already have one or more emergency shelters within their jurisdiction or "pursuant to a multijurisdictional agreement" that accommodates that jurisdiction's need for emergency shelter are only required to identify a zone or zones where new emergency shelters are allowed with a conditional use permit. Further, State law dictates that parking requirements for emergency shelters be no more than is sufficient to accommodate all staff working in the facility.

Further, Assembly Bill 2339 (2022) expands the definition of emergency shelters to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care. AB 2339 also requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit must allow residential uses. This could include zones that allow mixed uses that permit residential.[8]

Under the current Municipal Code, emergency shelters are permitted by right in the General Commercial (GC) zone. This zone was selected based on access to transit, public facilities, and commercial services. GC sites are all located primarily in downtown Lodi and along Cherokee Lane (a major commercial street with transit access, located adjacent to the eastern residential neighborhoods). Additionally, emergency shelters are allowed with a conditional use permit in the Industrial (M) District. Currently, there are five vacant GC sites ranging from 0.24 to 23.06 acres in size that could accommodate emergency shelters. In sum, available land and existing structures would accommodate the estimated homeless population of 208 sheltered and unsheltered persons in 2022.

The GC zone, however, does not permit residential uses and is therefore not in compliance with the Government Code amendments related to AB 2339. To ensure compliance with Government Code 65583(a)(4), Program 1.15 commits the City to updating the Development Code to:

- allow emergency shelters by right (without a conditional use or other discretionary permit) in a zone(s) allowing residential uses that:
    - has sufficient available capacity to meet the local need; and
    - is in proximity to transportation and services.
- provide objective development standards for emergency shelters that remove constraints and comply with State law;
- revise parking standards for emergency shelters to require no more than is sufficient to accommodate all staff working in the emergency shelter.

[8] Department of Housing and Community Development (HCD), *Memo: Assembly Bill 2339 – Legislation Effective January 1, 2023*, https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf, accessed July 2023.

Low Barrier Navigation Centers

With the passage of Assembly Bill 101 in 2019, a Low Barrier Navigation Center (LBNC) shall be a use that is permitted by-right in zones in mixed use zones and nonresidential zones permitting multi-family. A LBNC is defined as a service-enriched shelter providing temporary living facilities, with the low-barrier component allowing persons to be admitted as they are with as few entry restrictions as possible. The City currently has three mixed use zones: Downtown Mixed Use (DMU), Mixed Use Center (MCE), and Mixed Use Corridor (MCO). The City does not currently allow LBNCs by-right in mixed use zones. Program 1.1 commits the City to revising the Municipal Code to include LBNCs as a by-right use in mixed use zones and as a permitted use in all other districts that allow residential uses.

Residential Care Facilities

The city has 26 licensed residential care facilities: 10 adult residential care, nine residential care facilities for the elderly, three adult day care facilities, three residential small family homes, and one active home care agency.9 Residential care facilities are licensed by the State of California to provide permanent living accommodations and 24-hour supervision for persons in need of personal services, supervision, protection, or assistance for sustaining the activities of daily living. Licensed residential care facilities include hospices, nursing homes, convalescent facilities, sanatoriums, and group homes for minors, persons with disabilities, and people in recovery from alcohol or drug addiction. Under State law, jurisdictions are required to permit licensed residential care facilities that serve six or fewer persons by right in all residential districts. Additionally, the California Department of Housing and Community Development (HCD) finds that the subjective nature of the typical conditional use permit process constraints the development of care facilities serving seven or more. The City currently permits care facilities of six or less as single-family uses in all residential zones, in compliance with State law, but requires a conditional use permit for care facilities that serve seven or more. Program 1.1 commits the City to permit residential care facilities serving seven or more residents with objectivity and certainty in all residential zones, subject only to the requirements of residential uses of similar form in the same zone.

Accessory Dwelling Units (Second Dwelling Units)

An accessory dwelling unit (ADU), formerly and still commonly referred to as a second dwelling unit, is an additional self-contained living unit, either attached to or detached from the primary residential unit on a single lot. It has cooking, eating, sleeping, and full sanitation facilities. These units can be an important source of affordable housing since they can be constructed relatively inexpensively and have no associated land costs. ADUs can also provide supplemental income to the homeowner, allowing the elderly to remain in their homes or moderate-income families to afford houses.

To encourage establishment of ADUs on existing developed lots, State law requires local jurisdictions to either adopt an ordinance based on standards set out in State law authorizing creation of ADUs in residentially-zoned areas, or where no ordinance has been adopted, to allow ADUs on lots zoned for single-family or multifamily use

[9] *California Department of Social Services, Care Facility Search, https://www.ccld.dss.ca.gov/carefacilitysearch/Search/, accessed June 2023.*

that contain an existing single-family unit subject to ministerial approval ("by right") if they meet standards set out by State law.

In recent years, the State has passed several laws to further encourage ADU development. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by-right in at least some areas of a jurisdiction, and reduced parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days and remove lot size and replacement parking space requirements. AB 68 allows an ADU and a junior ADU (JADU) to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered permit fee structure for ADUs based on their size and location, and prohibits fees on units of less than 750 square feet. In addition, AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals.

In 2022, two laws were passed that affect ADU law and came into effect in 2023. SB 897 increases the existing height limit for attached and detached ADUs that meet certain conditions. AB 2221 clarifies existing ADU law to close procedural and permitting loopholes for approving ADUs, including the requirement for approving or denying applications within 60 days of application submittal and providing a full set of comments and remedies to applicants with denied applications. Additionally, AB 2221 adds front setbacks to the list of local development standards that local governments cannot impose if they would preclude construction of an attached or detached ADU of at least 800 square feet, which is at least 16 feet in height and that has at least four-foot side and rear yard setbacks.

The Lodi Municipal Code Section 17.36.130 defines requirements for Accessory Dwelling Units. The City updated the Accessory Dwelling Unit ordinance in 2021 for compliance with recent changes to State law. Under the updated ordinance, the City approves by ministerial action up to one attached or detached accessory dwelling unit and one junior accessory dwelling unit on a single parcel in all zones that allow residential uses, in compliance with State law.

4. Constraints

Several factors may constrain the development of housing, particularly housing affordability. These factors can generally be divided into "governmental constraints," or those that are controlled by federal, state, or local governments, and "nongovernmental constraints," factors that are not generally created or affected by governmental controls. Nongovernmental constraints are determined by market factors including land prices, construction costs, materials costs, labor costs, availability of financing, and interest rates.

Analyzing governmental and nongovernmental constraints can help to develop policies and programs that lessen constraints to residential development and ensure that local housing needs are met.

Nongovernmental Constraints

Mortgage and Rehabilitation Financing

The availability of financing affects a person's ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race/ethnicity of the applicants. This applies to all loan applications for home purchases and improvements, whether financed at market rate or with government assistance.

Financing for affordable housing projects and programs are available through Federal, State, and local funding sources. Funding through these programs can help developers, local governments, and non-profit organizations offset the cost to build new affordable housing units, preserve or rehabilitate existing affordable housing, and fund programs that offer homebuyer assistance to low-income households.

Mortgage interest rates have a large influence over housing affordability. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in a lower cost and lower monthly payments for the homebuyer. As shown in Figure 2 in the past 10 years, mortgage rates across the United States remained relatively steady (between 3.5 and 4.8 percent through 2019, then dropped below three percent between 2020 and 2021). During 2022, mortgage rates increased significantly, reaching a high of 7.08 percent for a 30-year fixed-rate mortgage (FRM) at the end of 2022. In 2023, mortgage rates started to decline slightly, but still remain high compared to rates over the past 10 years, making it difficult for households to purchase a home.

When interest rates rise, the market typically compensates by decreasing housing prices. Similarly, when interest rates decrease, housing prices begin to rise. There is often a lag in the market, causing housing prices to remain high when interest rates rise until the market catches up. Lower-income households often find it most difficult to purchase a home during this period.

Figure 2 Historical Mortgage Rates in the United States (2013-2023)

Source: Freddie Mac Primary Mortgage Market Survey

Interest rates are determined by national policies and economic conditions and there is little that a local government can do to affect these rates. However, to extend home buying opportunities to lower-income households, jurisdictions can offer interest rate write-downs. Additionally, government insured loan programs may be available to reduce mortgage down payment requirements.

Beginning in 2022, the Federal Reserve began raising interest rates to attempt to control inflation. Where financing is available, construction capital seems to be directed at the best transactions, particularly those with large, established, and well-capitalized sponsors. Given recent trends of increasing interest rates, the availability of financing is likely to be more of a constraint on new housing construction during this Housing Element planning period than it has been in recent years.

Cost of Land

The cost of land can be a major impediment to the production of affordable housing. Land costs are influenced by many variables, including land scarcity and developable density (both of which are indirectly controlled through governmental land use regulations), location, site constraints, and the availability of public utilities. For example, current listed land prices for parcels that are ten acres or more cost $36,222 per acre in Lodi. In comparison, large parcels in San Joaquin County on average cost $28,044 per acre. This is often because sites have access to utilities and/or occupied by existing uses that generate revenue to property owners. As shown in Table 1 and Table 2, smaller sites (under 10 acres) have a much higher cost-per-acre than larger parcels.

Table 47 shows the average listed land prices in Lodi for large and small sites in May 2023. The table considers four small sites and nine large sites and provides the average cost per acre. The properties range from 0.28 acres for $310,000 ($1,107,142 per acre) to 212 acres for $3,776,670 ($17,747 per acre). The average price per acre for all listed land is $273,164.

Table 47 Lodi Land Prices (Listed)

Lot Size	Average Price per Acre (Listed)
Less than 10 acres	$509,529
10 or more acres	$ 36,800
Average $/acre	$273,164

Source: Zillow, Inc., 2023.

Table 48 shows the average land prices sold between July 2022 and July 2023 in Lodi for large and small sites. The table considers nine land sale prices within Lodi, ranging from 0.08 acres for $150,000 ($1,875,000 per acre) to 42.2 acres for $1,736,400 ($41,118 per acre). The land prices based on properties sold are significantly higher than the listed prices when considering parcels less than 10 acres. The majority of small parcels sold during this period were less than a quarter of an acre and are centrally located, resulting in a high price per acre ($1,065,503) compared to land prices for larger sites ($31,733). The average sale price per acre for all land sold was $720,913.

Table 48 Lodi Land Prices (Sold)

Lot Size	Average Price per Acre (Sold)
Less than 10 acres	$1,065,503
10 or more acres	$31,733
Average $/acre	$720,913

Source: Homes.com, July 2023.

Construction Costs

Single-Family Homes

Various factors can affect the cost of building a single-family house, including the type of construction, custom versus tract development, materials, site conditions, finishing details, amenities, square footage, and structural configuration. These factors create a wide variation in construction costs. A single-story, 1,950-square-foot home could be constructed in Lodi for $257,400, including land cost, permit and development impact fees, site preparation, and other miscellaneous costs, excluding developer fee or profit.[10]

Multifamily Homes

Contacts with multifamily housing developers in the Lodi region indicate that construction costs for multifamily housing units, including land and site preparation costs, materials and labor, fees, and related expenses, are discouraging for new construction. The estimated construction costs for a 1,000-square-foot unit in a 12-unit development is approximately $250,000 (per unit) which includes land cost, permit and development impact fees, site preparation, and other costs, excluding developer fee or profit.[11]

[10] *Housing Authority of San Joaquin County, Personal Communication, July 21, 2023.*
[11] *Housing Authority of San Joaquin County, Personal Communication, July 21, 2023.*

Construction and Approval Times

State law requires that the Housing Element include discussion of the length of time between project approval and requests for a building permit. Recent multifamily projects have taken less than a year from SPARC approval to apply for building permits. For example, the Benjamin Apartments received SPARC approval in December of 2020 and applied for a building permit in June 2021. Permits and approvals are good for two years. Additionally, the approval body may grant an application for renewal of a use permit.

Governmental Constraints

Local policies and regulations impact the price and availability of housing and subsequently the provision of affordable housing. Land use controls, site improvement requirements, fees and exactions, permit processing procedures, and other factors can constrain the maintenance, development, and improvement of housing. This section discusses potential governmental constraints, as well as policies that encourage housing development in the city.

The City of Lodi adopted its Development Code on December 7, 2022. The analysis below is based on the standards set out in the Development Code.

General Plan Designations and Permitted Densities

The General Plan Land Use Element was updated as part of the comprehensive General Plan update in 2010. The Element sets forth the City's development policies. These policies, as implemented by the Development Code (Title 17 of the Lodi Municipal Code), establish the amount of land allocated for residential and other uses within the city. The Land Use Element establishes 14 land use designations in total, including six that allow residential uses: Low-Density Residential, Medium-Density Residential, High-Density Residential, Downtown Mixed-Use, Mixed-Use Corridor, and Mixed-Use Center, and some limited residential use in Commercial, Industrial, and Overlay Districts (see Table 49). The 2010 General Plan emphasizes a dense, mixed-use downtown as well as mixed-use development along the city's major corridors: Kettleman and Cherokee lanes and Lodi Avenue.

Table 49 Development Standards, by Land Use Designation

Land Use District	Residential Density (du/ac)/ Floor Area Ratio (FAR)	Corresponding Zoning District
Residential	–	–
Low-Density Residential	2–8	RLD
Medium-Density Residential	8–20	RMD
High-Density	15–35	RHD
Mixed-Use	–	–
Downtown Mixed-Use	8–35 / 3.0	DMU
Mixed-Use Center	8–35 / 1.0	MCE
Mixed-Use Corridor	2–35 / 1.2	MCO
Commercial	–	
Community Commercial	FAR 0.4	CC
General Commercial	FAR 0.6	GC
Office	FAR 0.6	O
Industrial		
Industrial District	FAR 0.6	M
Business Park	FAR 0.4	BP
Overlay	–	–
Planned Development	–	PD

Source: Lodi Development Code, Adopted December 2022.

Medium- and high-density residential, as well as the mixed-use designations, all allow multifamily housing by right. The Mixed-Use Corridor designation permits 100 percent residential development except along Cherokee Lane and Lodi Avenue, where 25 percent and ground-floor frontage should be commercial active uses, respectively. Likewise, the Downtown Mixed-Use designation requires ground-floor active uses. Still, the range of districts that permit residential development and the densities they offer (2–35 units per acre) allow for a variety of housing types and therefore do not serve as a constraint to housing development.

Smart Growth and Transit-Oriented Development

Both the General Plan, adopted in April 2010, and the Transit-Oriented Design (TOD) Guidelines for Downtown prioritize locations for high-density development. The first guiding principle of the General Plan seeks to maintain the city's compact form, with virtually all new development located within three miles of downtown. Lodi's downtown and major transit and commercial corridors (including Lodi Avenue, Cherokee Lane, and Kettleman Lane) are priority areas for high-density and mixed-use with primarily residential development in order to capitalize

on access to transit, public facilities, and services. New growth areas are focused on mixed-use centers that envision a range of housing choices (including high-density development, appropriate for below-market-rate housing). Three new schools and several parks are intentionally located next to mixed-use centers and the highest residential densities to promote walkability and access to services. The General Plan and TOD Design Guidelines serve to remove constraints on affordable housing by supporting all housing choices, including high-density.

Zoning Standards and Permitted Housing Types

The Development Code regulates the type, location, density, and scale of residential development and exists to protect and promote the health, safety, and general welfare of residents. In addition, the Development Code serves to preserve the character and integrity of existing neighborhoods.

The development standards contained in the City's Development Code are consistent with other cities of Lodi's size and character. Examples include maximum lot coverage from 45% to 60% and floor area ratios (FAR) ranging from 0.6 to 3. There are also height limits of 35 feet in low- and medium-density designations and 60 feet in high-density zones. Table 53 summarizes these development standards.

The City anticipates issuing an RFQ in 2023 for the creation of objective residential design standards, expansion of housing typologies to include the "missing middle" and implementation of a streamlined ministerial approval process.

Zoning and Fee Transparency

As required by State law, the City has posted the existing Development Code and fee schedule on the City website.

Development Standards

Table 50 shows the development standards and residential uses permitted by zoning district. Symbols in the table represent the following: A – allowed use; UP – use permit required; MUP – minor use permit required; X – use not allowed. In the Planned Development district, the development standards will vary depending on the requirements of the underlying zoning district.

Table 50 Residential Development Standards and Permitted Housing Types

Zoning Standards	Zoning District									
	RLD	RMD	RHD	DMU	MCE	MCO	GC	O	M	PD
Max Density (du/ac) / Floor Area Ratio	8	20	35	FAR 3.0	FAR 1.0	FAR 1.2	FAR 0.60	FAR 0.60	FAR 0.60	varies
Min Lot Size (sq ft) – single family1	5,000	5,000	4,000	None	None	8,000	8,000 sq. ft.	8,000 sq. ft.	10,000	varies
Min Lot Width (ft)2	50	50	50	None	None	50 wide by 100 deep	75	75	75	varies
Front Yard Setback (ft)	15	15	15	None	None	10	10	10	10	varies
Side Yard Setback (ft)	5	5	5	None	None	5	None	None	None or 20 if adjacent to residential	varies
Rear Yard Setback (ft)	10	10	10	None, or 10 if residential	None or 10 if residential	10	None or 10 if residential	10	None or 20 if adjacent to residential	varies
Building Coverage (%) / Floor Area Ratio	45	50	60	3	1	1.2	FAR 0.60	FAR 0.60	FAR 0.60	varies
Max Building Height (ft)	35	35	60	75	75	60	35	35	70	varies
Parking (spaces/unit)	Varies, see discussion below.									
Permitted Housing Types										
Single-Family Dwelling	A	UP	UP	X	X	UP	X	X	X	varies
Two-Family Dwellings (duplex)	X	A	A	X	X	A	X	X	X	varies
Multifamily (3 or more dwelling units)	X	A	A	A	A	A	X	X	X	varies
Accessory Uses	A	A	A	A	A	A	X	X	X	varies
Caretaker Quarters	X	A	A	X	X	X	X	UP	X	varies

Zoning Standards	Zoning District									
	RLD	RMD	RHD	DMU	MCE	MCO	GC	O	M	PD
Home Occupations	MUP	MUP	MUP	MUP	MUP	MUP	X	X	X	varies
Live/Work Projects	X	UP	UP	A	A	A	X	X	X	varies
Seasonal Farmworker Housing	X	A	A	X	X	X	X	X	X	varies
Transitional/Supportive Housing	A	A	A	A	A	A	X	X	X	varies
Accessory Dwelling Units (ADUs)	A	A	A	A	A	A	X	X	X	varies
Residential Shelters							A	X	UP	varies
Mobile Homes/RV Park	X	X	UP	X	X	X	X	X	X	varies

Source: Lodi Development Code, Adopted December 2022.

Yards and Setbacks

Yard and setback requirements are consistent with permitted densities in residential zones: 15 feet in front, 10 feet in rear, and five feet on each side. Yard and setback requirements within the other zoning districts are typical in comparison with most jurisdictions.

Building Coverage

The City's building coverage standards are reasonable related to the density provisions in each residential zone. In residential zones, permitted building coverage ranges from 45 percent in the RLD zone (low density) to 60 percent in the RHD zone. Building coverage pertains to the primary (main) building, any accessory structures, and front driveway.

Lot Size and Lot Area per Dwelling Unit

In zones designated for residential low- and medium-density, minimum lot size is 5,000 square feet. Zones allowing high-density residential development have a minimum lot size of 4,000 square feet.

Building Height

Permitted building heights range from 35 feet in low- and medium-density zones to 60 feet (four stories) in the high-density zone. Residential uses are allowed in the General Commercial and Office zones, which have a maximum building height of 35 feet. In the industrial zone, the maximum building height increases to a maximum of 70 feet. In the city's mixed-use districts (DMU, MCO, and MCE), the maximum building height ranges from 60 (five stories) to 75 feet (six stories). Lodi's Development Code includes a provision for exceptions to standard height limitations for non-habitable architectural elements and structures.

In the RMD zone, structure height in limited to 35 feet, which poses a potential constraint to achieving maximum density. Program 1.11 commits the City to revising development standards to allow three story residential uses in the RMD zone.

Parking Standards

Lodi's minimum parking requirements are based on the gross floor area of a use. Where a site has multiple tenants, the minimum number of parking spaces is based on the aggregate number of parking spaces required for each separate use.

The minimum parking requirements are two spaces within a garage for a single-family home and two covered spaces per unit for a duplex. The requirements for a multifamily dwelling are one covered space per one-bedroom unit or two spaces per two-bedroom unit, plus one uncovered guest space for every two units. For senior housing projects require a minimum of 0.75 spaces for each unit with half the total spaces covered, plus one guest parking space for each ten units. Few parking spaces are required for senior congregate care facilities, which requires 0.5 space for each residential unit, plus one space for each four units for guests and employees. The City's parking ratios are reasonable in relation to the likely demand for parking from different residential uses.

The City allows variations to these parking requirements. When two or more adjacent nonresidential uses have distinct and different peak parking usage periods, a reduction in the required number of spaces may be allowed. Other reductions in parking may be allowed through granting of a use permit so long as the justification for

needing fewer parking spaces is well documented, the parking reduction will not adversely affect the other adjacent businesses or uses, and the modified parking is consistent with other uses of similarly intensity.

Parking for Emergency Shelters

Regarding emergency shelters, State law limits parking requirements to no more than is sufficient to accommodate all staff working in the shelter, provided that the standards do not require more parking than other residential or commercial uses within the same zone. The Development Code does not specify parking standards for emergency shelters separate from other multifamily uses and is currently out of compliance with State law. Program 1.15 commits the City to adopting parking standards for emergency shelters that meet State requirements.

Cumulative Impact of Land Use Controls

When considered cumulatively, development standards related to setbacks, height, lot coverage, and parking for high density and mixed use zones do not constrain a developer's ability to achieve the maximum density in the zone. This is due to the combination of generous height and lot coverage requirements in these zones. However, limiting development in the medium density residential zone to two stories and 50 percent lot coverage is a potential constraint to achieving the maximum allowed density of 20 dwelling units per acre. In response to this potential constraint, Program 1.1 commits the City to updating the Development Code to allow three story residential development in the RMD zone.

Design Guidelines

The City provides a list of residential design guidelines in the Development Code to assist project designers and property owners in understanding and implementing the City's goals for attaining high quality residential development. These guidelines are also intended to help preserve the traditional character of the city's historic neighborhoods. The primary goals of the Lodi residential design guidelines are to encourage well designed residential neighborhoods that residents enjoy living in, which:

- Reduce the visual dominance of the automobile;
- Promote pedestrian activity;
- Create variety and interest in the appearance of residential streets;
- Provide community open space; and
- Protect significant features of the natural environment.

The Design Guidelines, adopted in 2013, are detailed and include illustrations to assist project designers. However, many of the guidelines are subjective and lack the clarity and approval certainty required to avoid delays in the approval process. In response to this potential constraint, the City is committed to adopt objective design standards for affordable multifamily development (Program 1.1) and a ministerial review process for affordable housing developments eligible for streamlined processing under SB 35 and SB 330 (Program 4.5).

Development Standard Conclusion

To overcome potential constraints, the City should adopt parking requirements for emergency shelters in compliance with State law, allow three story residential use in the RMD zone, and adopt objective design standards for by right multifamily uses.

Development Process

Growth Management Allocation Ordinance

In 1991, the City adopted a Growth Management Allocation Ordinance (GMAO) to regulate the location, amount, and timing of residential development. The ordinance establishes a residential density allocation system, with the goal of promoting designated percentages of the mix of housing types listed in Table 51. These percentages were derived from the breakdown of existing housing units in Lodi when the ordinance was first conceived in 1989.

Table 51 Growth Management Ordinance Breakdown by Density

Housing Type	Units/ Acre	Percentage	2022 Growth Management Allocation Units
Low-Density	<8	44	216.0
Medium-Density	8.1 to 20	28	137.5
High-Density	15 to 35	28	137.5
Total	-	100	491

Source: Lodi Development Code, Adopted December 2022.

As stated in Chapter 15.34 of the Municipal Code, the maximum number of housing units approved each year by the City reflects a two percent increase in population. Unused permits rollover to the next year (for up to three years) and there is no annual limit on the number of resulting permits that may be used.

The allocation for a given year is calculated in the following manner: Lodi's Department of Finance (DOF) population estimate x 0.02 ÷ Lodi's DOF estimate of persons per household = number of allocations. For example, the city population was 66,305 in 2022, and new DOF numbers show Lodi at 2.7 persons per household in 2022. Calculate two percent of the city's current population: 66,305 x 2% = 1,326.1. Divide 1,326.1 by the average number of persons per household: 1,326.1 / 2.7 = 491.1, meaning that, for the year 2022, 491 new allocations became available. To calculate allocations by density, divide these 491.1 (491) units into the three housing types: 44 percent low-density; 28 percent medium-density; 28 percent high-density. This breakdown by density establishes an upper limit for the number of permits each year, which potentially constrains the City's ability to meet the lower income RHNA.

Assuming that Lodi's population continues to grow at between one and two percent, development permits for approximately 3,928 units may become available between 2023 and 2031. These allocations slightly exceed the RHNA for the planning period, which is 3,909.

Table 52 summarizes currently available allocations and potential allocations that may become available during the planning period, as discussed in the previous paragraph. As of 2023, 763 allocations remain for low density, 399 remain for medium density, and 478 remain for high-density. Considering the estimates in Table 52, more than 5,000 total allocations may be available for development, however because allocations are only maintained for three years, many of the current 1,640 available allocations, as well as those issued early in the planning period,

may expire during the planning period. Although the estimated number of total allocations exceeds the RHNA for the planning period, because allocations expire after three years, the GMAO is considered a potential constraint to the City's ability to meet the RHNA.

Table 52 Remaining Growth Management Allocation

Housing Type	2023 Remaining Allocations	2023-2031
Low-Density	763	1,728
Medium-Density	399	1,100
High-Density	478	1,100
Total	1,640	3,928

Source: Lodi Development Code, Adopted December 2022; Mintier Harnish, 2023.

SB 330

Signed into law in 2019, SB 330 restricts a jurisdiction from reducing residential zoning, enforcing new subjective design standards, imposing a moratorium on residential development, or limiting the number of approvals/permits that can be issued. Regarding the restrictions on limits to the number of approvals or permits issued, the bill provides exceptions as follows,

> *"an affected county or affected city may enforce a limit on the number of approvals or permits or a cap on the number of housing units that can be approved or constructed if the provision of law imposing the limit was approved by voters prior to January 1, 2005, and the affected county or affected city is located in a predominantly agricultural county. For the purposes of this subparagraph, "predominantly agricultural county" means a county that meets both of the following, as determined by the most recent California Farmland Conversion Report produced by the Department of Conservation:*
>
> *(i) Has more than 550,000 acres of agricultural land.*
>
> *(ii) At least one-half of the county area is agricultural land.*

The GMAO was passed in 1991, prior to the January 1, 2005, threshold identified in the above provision. Additionally, the most recent California Farmland Conversion Report determined that, of the 912,600 total acres in San Joaquin County, agricultural land accounts for 747,944 acres, or approximately 82 percent of the county. Because the GMAO was passed by voters before 2005, and the city is located in a predominantly agricultural county, the City is exempt from SB 330's restriction growth management allocations. Provisions of SB 330 related to restrictions on downzoning, enforcing subjective design standards, and imposing moratoriums on residential development, however, still apply to the City.

Exemptions from the GMAO

In recognition of potential constraints, the following are exempt from requirements for Growth Allocations:

- Commercial and industrial projects.

- Senior citizen housing.
- Construction of a new or replacement of a single-family home.
- Reconstruction of any residential unit that was originally constructed with a Growth Allocation.
- Residential project of four (4) units or less, including attached and detached units.
- Accessory Dwelling Units.
- Emergency Housing.

Further, between 2021 and 2023, the City amended the GMAO to address potential constraints and streamline procedures for processing applications. These amendments included, but were not limited to, the following:

- Allowing applications for Growth Allocations to be accepted at any time of year, replacing the prior once-a-year application process.
- Allowing applications for Growth Allocations to proceed directly to City Council, rather than first being reviewed by the Planning Commission and then being forwarded to the City Council for approval.
- Allowing for the City Council to issue Growth Allocations early in the process for projects on lands that are not yet annexed into the City, subject to their successful annexation.

Conclusion

The City has worked to overcome potential constraints imposed by the GMAO, including exempting accessory dwelling units, senior housing, emergency housing, and small residential projects from the allocation system. Additionally, the City provides an approval process without subjective findings for approval and approves allocation requests as applications are received, rather than annually. Finally, the City offers future allocations to be assigned to larger projects that are expected to take longer than three years to develop and would otherwise have to apply for an extension.

Despite these efforts, the Growth Management Allocation Ordinance presents potential constraints to development during this planning period related to the three-year expiration of allocations. Although there may be more than enough available allocations to meet housing demand, because allocations expire, this is not guaranteed.

To address potential constraints, Program 1.2 commits the City to amend the Growth Management Allocation Ordinance to exempt housing units affordable to extremely low-, very low-, or low-income households with long-term affordability restrictions, as well as to provide a staff-level ministerial process for approving extensions to existing allocations. Amendments to the Growth Management Allocation Ordinance are to take place within one year of adoption of the 2023-2031 Housing Element and an evaluation of implementation is to take place by the end of the planning period.

Development Review Process

A city's development review process—the steps and the time that it takes to review and make a decision on a development application—can serve as a constraint to residential development. This section explains the City of Lodi's development review practices.

Administrative Deviations

Minor deviations from the provisions of Lodi's Development Code are approved through the processing of an administrative deviation. This process requires the submittal of an application and involves review and approval by Community Development and Public Works and Electric Utility Department staff only or can be referred to the Planning Commission and can be submitted for land located within any zoning district. Administrative deviations are issued only because of special circumstances such as location, shape, size, surroundings, topography, or other constraints that obstruct development of a site. Lodi's Development Code identifies the only modifications for which an administrative deviation can be issued. These modifications include off-street parking requirements, setback requirements, area and width requirements, height requirements, and landscaping requirements. Modifications are only allowed up to a certain percentage of the standard requirements.

Site Plan and Architectural Approval

The development review process includes site plan and architectural approval for certain development projects by the Site Plan and Architectural Review Committee (SPARC). The purpose of this review is to ensure compliance with the Development Code and promote orderly development. Projects required to obtain site plan and architectural approval for sign permits, site plan and architectural approval for multiple single-family homes, and site plan and architectural approval for commercial and industrial buildings. More specifically, SPARC review is required for the following:

- More than five single-family detached homes developed as a subdivision in the RLD zoning district. Multifamily dwellings in the RMD and RHD zoning districts. Temporary structures that will be removed within one year.
- Substantial additions and alterations in the RMD and RHD zones. Nonresidential development containing up to 10,000 square feet of total gross structure area. Nonresidential development containing 10,000 square feet or more of total gross structure area.

Site plan and architectural review is facilitated by the SPARC, which was established to assist the Planning Commission in reviewing site plans and architectural drawings. Four of the five members are appointed by the mayor, while the SPARC is appealable to the Planning Commission. The Planning Commission is the final regulatory authority that issues decisions on most developments within the city. SPARC meetings are open to the public and are publicly noticed.

Applicants are required to submit the following information to the committee:

- A site plan;
- Proposed landscaping, fencing, and/or screening;
- Location of ingress and egress;
- Off-street parking and loading facilities; and
- Drawings or sketches of the exterior elevations.

These requirements are relatively easy to meet and do not add significantly to the cost or time required for site plan review since these elements are already required for planning and building approval processes and proceed in parallel. The SPARC meets twice monthly. The review process proceeds as follows:

Planning staff reviews site plan and architectural review applications to determine if projects require discretionary approval from the Planning Commission in addition to site plan and architectural review. Discretionary approval

may be required if a project needs a use permit or variance. Condo conversions would trigger a use permit, however, there has been no interest in development of condos in recent years due to market conditions.

If it is determined that discretionary approval is required, the application in question is sent to the Planning Commission for review of the issue directly relating to the use permit or variance.

If the application falls into one of the categories requiring site plan and architectural review (but does not require discretionary approval), it is reviewed by the SPARC.

The approval body, whether the Planning Commission or the SPARC, has the power to approve or disapprove the application or to approve the application subject to compliance with modifications or conditions to comply with the City's Municipal Code and other applicable laws and regulations. Findings for SPARC approval are contained within Municipal Code Section 17.40.020 and are listed below.

17.40.020(E) Findings and Decision. *The applicable review authority may approve a site plan and architectural approval application only after first finding that:*

1. The design and layout of the proposed project would:

a. Be consistent with the development and design standards/guidelines of the applicable zoning district;

b. Not interfere with the use and enjoyment of neighboring existing or future developments, and not create traffic or pedestrian hazards;

c. Maintain and enhance the attractive, harmonious, and orderly development contemplated by this development code; and

d. Provide a desirable environment for its occupants, neighbors, and visiting public through good aesthetic use of durable materials, texture, and color.

2. The proposed development:

a. Would not be detrimental to the public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity; and

b. Has been reviewed in compliance with the California Environmental Quality Act (CEQA) and the Lodi Environmental Review Guidelines.

The required findings outlined above work to ensure consistency with the General Plan and Municipal Code and create a safe and healthy built environment. Many of the findings, however, are subjective and potentially constrain approval certainty. Program 1.1 commits the City to revising findings 17.40.020(E)(1)(b), (c) and (d) to remove subjective criteria.

The SPARC's decision may be appealed to the Planning Commission. Appeals must be filed in writing, with a $300 fee, within 10 days of the SPARC's decision. Beginning in 2024, the appeals fee will increase to $969.Development Review Time Frame

The development review time frame is affected by several factors. Some of these factors, such as the amount of time it takes to (a) determine the completeness of an application, (b) determine if environmental review is necessary, and (c) approve or disapprove a project from the date environmental review is complete or determination of categorical exemption is made, are within the control of jurisdictions. Other factors, such as the time it takes to gather application materials or complete an environmental document, are largely in the hands of

developers. Still other factors such as the availability of project financing are dependent upon the state of the economy.

The City complies with State law by taking only five to 10 days to determine whether an application is complete and five to 10 days to determine if environmental review is required (the State allows up to 30 days for both of these steps) as well as only 180 days when an EIR is required or 60 days when a negative declaration is made (or the project is exempt from CEQA) to approve or disapprove a project (see Table 53). However, typically, project approvals take longer because of the factors discussed above that are out of the City's control as well as additional steps such as conditional use permits and construction permits that may be required.

A typical large single-family subdivision will require a residential allocation, tentative and final tract map, environmental review (negative declaration or EIR), Planning Commission review, City Council review (if a Planning Commission decision is appealed), and construction permits (building, grading, etc.). From start to finish, the process will typically take six to 12 months. A large or complex project, particularly one triggering state or federal environmental mandates, can take longer. A typical multifamily development will require a residential allocation, environmental review (negative declaration or EIR), SPARC review, and construction permits (building, grading, etc.). From start to finish, the process will typically take four to six months.

One to four single family homes, Accessory Dwelling Units (ADUs), and small multifamily structures of two to four units are only required to obtain building permits.

Table 53 Development Review Process Time Frame

Timeframe for Review (Maximum number of days to approve)					
Type of Development	**Type of Approval**	**Approving Authority**	**To Determine Completeness of Application**	**To Determine Environmental Review**	**To Approve/Disapprove Project**
ADUs and Single-family (4-unit subdivision or less)	Over the counter approval.	-	-	-	-
Single-Family (5+ unit subdivision)	Permitted by right	Planning Division	5–10 business days	5–10 business days	180 days if EIR required (only 90 if 49% or more units are affordable); 60 days if a negative declaration required or exempt from CEQA
Multifamily (no zone change)					
Multi-Family (PD zone change)					
Affordable Housing					
Senior Housing					
State-Defined Large Licensed Residential Care	Use Permit	Planning Commission	5–10 business days	5–10 business days	6–12 weeks

Source: City of Lodi 2023.

Constraints to Housing for Persons with Disabilities

Given that persons with disabilities frequently have difficulty finding housing that meets their needs, the State requires special analysis of governmental constraints to housing for persons with disabilities.

Zoning and Land Use Policies and Practices

Lodi's Development Code permits certain detached and attached accessory uses and various projections into yards and setbacks. While the Development Code does not specifically indicate that facilities for access by persons with disabilities are permitted, accessory uses such as ramps or lifts for handicapped accessibility are similar to the permitted uses that are specified. Requests for reasonable accommodation are approved administratively (without the requirement for a public hearing or other special review) unless the nature of the request triggers a major design review, which is unlikely. The City has defined family as "one or more persons occupying a premises and living as a single housekeeping unit, as distinguished from a group occupying a lodging house or hotel," which complies with State law requirements.

Ordinance no. 1916 was passed November 4, 2015. It provides a procedure to request reasonable accommodation for persons with disabilities seeking fair access to housing under the Federal Fair Housing Act, Americans with Disabilities Act, and the California Fair Employment and Housing Act (the Acts) for the provision for relief from land use, zoning, or building regulations that may constrain the housing for persons of disabilities. As stated in Chapter 17.67 of the Municipal Code, a request for reasonable accommodation may be made by any person with a disability, their representative, or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A request for reasonable accommodation may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability fair access to housing of their choice. Requests are reviewed by the Director of Community Development, or designee, with a written determination given no more than 45 calendar days later. The City does not charge a separate fee for such consultation. Reasonable accommodations requests are subject to a building permit. A procedure for appeals is described in the ordinance.

The written decision to grant or deny a request for reasonable accommodation is based on consideration of the following factors:

1. Whether the housing, which is the subject of the request, will be used by an individual defined as disabled under the acts.
2. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability as defined under the acts.
3. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the city.
4. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a city program or law, including but not limited to land use and zoning.
5. Potential impact on surrounding uses.
6. Physical attributes of the property and structures.
7. Alternative reasonable accommodations which may provide an equivalent level of benefit.

Imposing subjective requirements related to impacts on surrounding uses and the physical attributes of the property and structure are constraints to approval certainty. Program 1.1 includes an action to remove subjective criteria for approving reasonable accommodation requests that constrain approval certainty, including findings 17.67.050(A)(5) and (6).

On- and Off-site Improvement Standards

Site improvements are an important component of new development and include roads, water and sewer, and other infrastructure necessary to serve the development. Improvement requirements are regulated by the City's Subdivision Ordinance. Within the existing city limits, off-site improvement requirements are typically limited because the infrastructure needed to serve infill development is already in place. Where off-site improvements are required, they typically relate to local improvements to existing facilities to accommodate higher-density development or to repair or replace aged infrastructure.

Street Improvements

Street improvement standards can have a significant impact on housing cost. The cost of providing streets for new residential developments, in turn, is primarily influenced by the required right-of-way width, pavement width, and pavement improvement standards. Table 54 summarizes Lodi's right-of-way and pavement requirements for the hierarchy of streets. Minimum pavement widths of 50 feet or more for collector streets and 40 feet of more for residential streets are common among local jurisdictions. Lodi's Subdivision Ordinance includes a provision for reimbursement to developers for excess widths of street construction, more than 68 feet for construction of new streets, and widening in excess of half of the adjacent side of the right-of-way.

Related to infill development, infill areas are adequately served by existing infrastructure. Typical residential infill projects are only required to complete improvements along the street frontage. Required street improvements include curbs, gutters, sidewalks, and driveways. The minimum sidewalk improvement standard of 5.5 feet is consistent with accessibility requirements for persons with disabilities and is adequate for ensuring pedestrian access in residential areas. Planting strips equaling 2 percent of the 5.5-foot swath are also required.

Table 54 Street Standards

Street Type	Required Right of Way (ft)	Required Pavement Width (ft)
Minor Residential	50	36
Standard Residential	55	40
Minor Collector	60	44
Major Collector	68	52
Secondary Arterial	80	64
Minor Arterial	94	78
Major Arterial	118	102

Source: City of Lodi Department of Public Works, Public Improvement Design Standards, 1991.

Typical street improvements and estimated costs are listed below. Costs related to typical street improvements comprise a nominal percentage of total construction costs and are not a constraint to development.

- Curb and Gutter – Curb: 7.5 inches wide; 6 inches high; gutter: 24 inches wide. Value: $38 per linear foot.[12]
- Sidewalk – 5.5 feet wide, with slight variations by location. Value: $9.00/sf.[13]
- Sewer Lateral – Minimum 4-inch PVC or Ductile Iron Class. Value: $3,434.[14]
- Water Service – Minimum 1-inch polyethylene (PE) pipe, meter, meter box. Value: $4,941.[15]

Energy Conservation

Energy conservation is encouraged in new subdivisions. Designs of new subdivisions must provide for future passive or natural heating/cooling systems.

Drainage

Lodi requires that developers of residential subdivisions prepare a grading plan and a master storm drainage plan for the area associated with the tentative map. Grading plans must show the elevation and drainage direction a minimum of 100 feet outside the boundary of the proposed map/area. It is required to include erosion and sediment control measures. No inter-lot or cross drainage is permitted so all water should drain to the public street or public drainage facility. Upon completion of the grading, the applicant must provide an as-built grading plan. Storm drains must conform to the City's master storm drainage plan. Any facilities within the subdivision that are not part of the City's master plan are the developer's responsibility. However, the City Council has the ability to grant credits to developers for storm drain lines and manholes that developers construct. Payment of mitigation for drainage impacts is included in the City's development impact fee.

Landscaping and Lighting

Residential subdivisions must have landscaping, including street trees, landscaping with irrigation in common areas or open space areas, and any additional landscaping required by the reviewing authority. To the extent possible, plant materials should be drought-resistant or drought-tolerant. Streetlights must also be installed, pursuant to City policy and approved by the Utility Department.

Sanitary Sewers

Each parcel in the subdivision should be provided connection to public utilities including electricity, gas, water, wastewater, and telecommunications. With each subdivision, a master sanitary sewer plan must be created by the applicant to comply with the City's design standards and master sanitary sewer plan. Installation is required to comply with the current City policies and standards. In the event that developers are asked to construct oversized facilities, the City of Lodi has established a mechanism by which the developer is reimbursed for excess

[12] City of Lodi Public Works Department, Fee Schedule, 2024.
[13] City of Lodi Public Works Department, Fee Schedule, 2024.
[14] City of Lodi Public Works Department, Fee Schedule, 2024.
[15] City of Lodi Public Works Department, Fee Schedule, 2024.

improvements. As part of the development impact fee paid by developers, funding, in part, for construction, operation, and maintenance of citywide sanitary sewer facilities is provided.

Potable Water

Internal water transmission pipelines and appropriate off-site connection facilities are required for all proposed development. The applicant must submit a master water plan that conforms to the current City master water plan. Similar to the process for sanitary sewers, in the event that developers are asked to construct oversized facilities, the developer is reimbursed for excess improvements. The City also levies a development impact fee that is used, in part, to construct, operate, and maintain citywide water system facilities.

Community Improvement (formerly Code Enforcement)

The Building Department provides assistance to applicants and owners in meeting state and local codes by publishing compliance forms, handouts, and worksheets and through the plan check process. The City's Community Improvement (formerly Code Enforcement) Unit within the Community Development Department administers the code enforcement program that works to bring substandard homes into compliance with all applicable building and health and safety codes. The unit works closely with the Lodi Improvement Committee in developing improvement programs. The City institutes a code enforcement tool through its website, allowing community members to report violations and track progress in rectifying the program. This tool assists in increasing reporting of violations, as well as increasing accountability for the City in issuing violations or warnings and for property owners to bring their properties into compliance.

Planning and Development Fees

Development Impact Fees

The City of Lodi levies development impact fees for all the various municipal facilities and services under the City's jurisdiction. Although requiring developments to either construct site improvements and/or pay pro rata shares toward the provision of infrastructure and public services is common practice, these requirements nonetheless result in increases to the cost of housing development and in turn, the final sale price or rent of housing. Despite the initial cost that impact fees impose on new homes, such fees are necessary to protect the public health and safety.

Calculating Fees: Residential Acre Equivalent

Development impact fees can serve as a constraint to affordable housing development. Lodi's current fee program shown in Table 55 incentivizes development through a reduced fee schedule, as well as incentivizes multifamily development by decreasing fees as density increases.

Table 55 Development Impact Mitigation Fees ($/unit)

Fee Category	Land Use Category		
	Low-Density	Medium-Density	High-Density
Water Meter	$300	$300	$300
Water	$3,124	$3,124	$3,124
Wastewater	$4,597	$4,597	$4,597
Storm Drain Zone 1	$1,937	$969	$781
Storm Drain Zone 2	$6,002	$3,000	$2,419
Transportation	$1,048	$569	$569
Police	$883	$744	$620
Fire	$558	$470	$392
Community Park	$5,664	$4,770	$3,975
Neighborhood Park	$3,944	$3,321	$2,768
General City	$988	$832	$693
Electric	$323	$323	$323
Art in Public Places	$$112	$94	$78
Wastewater Trunk Line	$1,748	$1,472	$1,227
Non-Potable Water	$764	$619	$523
Total (per dwelling unit)	$20,298	$17,411	$15,975

Note: Fees shown here reflect 2023 values, see Public Works for updated yearly fees.

Source: 2023 Lodi Planning Fee Schedule, accessed June 2023.

Planning Fees

The Community Development Department collects the fees listed in Table 56. Many of the fees include a base fee as well as an hourly charge for staff time. The department operates on an hourly basis. The fee is a deposit against expected time and cost to complete. The deposit amounts listed are averages, and more complex projects require additional funds.

Table 56 Planning Fees

Fee Category	Fee Amount
Planning and Application Fees	
Administrative Deviation	$350
Annexation	$10,000-$20,000 + Hourly
Appeals	$646-$1,291
General Plan Amendment	$5,000 + Hourly
Home Occupation	$81
Nonresidential Condominium Conversion	$2,000 + Hourly
Rezone	$6,200 + Hourly
Site Plan and Architectural Review	$4,843
Staff Consultation	$161
Use Permit	$4,036
Variance	$1,291
Subdivision	
Lot Line Adjustment	$807
Tentative Parcel Map	$4,843
Tentative Subdivision Map	$5,000-$20,000 + Hourly
Environmental	
Preliminary Environmental Assessment	$290
Environmental Impact Report	$10,000 + Consultant Cost
Negative Declaration	$2,500 + Hourly

Notes: Any services not identified above may be subject to an hourly charge at the Planning Department's blended hourly rate at the discretion of the Community Development Director.

Source: City of Lodi User Fee Study, June 2023.

Total Fee Estimates and Comparisons

As discussed above, the minimum cost of developing a single-story 1,950-square-foot single-family home would be an estimated $525,102, including land acquisition, finished lot expenses (curb/sidewalk), construction, and fees (Lodi and other agencies combined). Based on data provided by local developer FCB Homes, A typical single-family home would necessitate $18,948 in development impact fees, $11,468 in building fees, and $8,000 in planning fees. Therefore, City fees represent about 5.8 percent of the development costs.

A multifamily 1,000-square-foot unit in a 12-unit development would require development impact fees estimated at $15,000 to 20,000 per unit and a range of $1,700 to $6,000 in planning and building fees. The cost of developing

such a unit is estimated at $250,000 including land acquisition, finished lot expenses (curb/sidewalk), construction, and fees (Lodi and other agencies combined). Based on these estimates, the City's total fees are estimated to be approximately 10 percent of total development costs.

A review of planning fees from neighboring cities reveals that Lodi's fees are in line with, if not lower than, those charged in other San Joaquin County jurisdictions. While it is difficult to do a direct comparison of fees collected across jurisdictions because the types of fees jurisdictions levy vary somewhat, Table 57 compares several common fees. Parcel map and use permit fees are lower in Lodi compared to most nearby jurisdictions. Annexations, appeals, general plan amendments, negative declaration, and rezone fees are all in line with those charged in the surrounding jurisdictions. Given this information, the City's planning fees are not seen as a constraint to residential development.

Table 57 Comparison of Fees Across Jurisdictions

Fee Category	Lodi	Elk Grove	Galt	Tracy	Stockton	Manteca
Annexation	$10,000-$20,000	$18,800	$10,299	14,602	$20,000	$10,300
Appeals	$646-$1,291	$3,000	$909	$358	$522	$3,083
General Plan Amendment	$5,000	$1,000	$6,931	Hourly	$5,225	$13,172
Negative Declaration	$2,500	$2,500	$2,800	$1,841	$1,568	$3,150
Rezone	$6,200	$1,000	$6,287	$3,241	$5,225	$9,295-$15,605
Tentative Parcel Map	$4,843	$5,875	$5,420	$9,464	$3,135	$5,420
Use Permit	$4,036	$8,800	$2,202-$10,4876	$6,871	$3,135	$9,247

Source: City of Lodi User Fee Study, June 2023.

Inclusionary Housing Ordinance

Inclusionary housing ordinances require developers to reserve a certain percentage of units for very low- and low-income households as a way to ensure new development incorporates affordable housing. The City of Lodi does not have an inclusionary housing ordinance.

Affordable Housing Streamlined Approval Process

Senate Bill (SB) 35 requires a streamlined, ministerial review process, or objective design standards, for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate-income housing or have failed to submit an annual progress report as required under State law; or (2) 50 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for below moderate-income housing. Additionally, the Housing Element must describe the City's processing procedures related to SB 35. Although the City of Lodi processes SB 35 applications in compliance with State law, the City has not codified processing procedures in the Development Code. City practices comply with State law, however the City has not

amended the Development Code to formally codify the process of reviewing SB 35 projects. Program 4.5 commits the city to update the Development Code to include a streamlined approval process in accordance with SB 35.

Short-Term Housing Rentals

Short-term housing rental ordinances regulate the number of residential units that can be converted to short-term vacation rentals in a jurisdiction. Jurisdictions are not required to adopted short-term housing rental ordinances, however, in areas with high demand for vacation rentals, jurisdictions often adopt such policies to ensure that the existing housing stock is not diminished and that housing options are maintained throughout the community.

The City of Lodi currently does not have a short-term rental ordinance. Based on an internet search in July 2023, there were 92 active VRBO and Airbnb rentals in the city. Short-term rentals can be found throughout the city but are mostly concentrated in the Downtown area. The concentration of units in this area may constrain long-term rental housing availability in this neighborhood. As a result, short-term rentals may contribute to an increase in rental prices.

Request to Develop Below Identified Densities

Development below identified densities as prescribed by zoning regulations reduces residential capacity in a region and may lead to further housing insecurity. Government Code 65583(h)(6) requires that the City report all requests to develop housing opportunity sites with capacity for lower income housing at densities lower than reported in the Housing Element. During the previous planning period, the City received no requests to develop identified Housing Opportunity sites below the minimum density described in the sites inventory.

Community Improvement (formerly Code Enforcement)

Building codes and their enforcement can increase the cost of housing and impact the feasibility of rehabilitating older properties that must be upgraded to current code standards. In this manner, building codes and their enforcement can act as a constraint on the supply of housing and its affordability.

The California Building Standards Code, Title 24, serves as the basis for the design and construction of buildings in California. State law prohibits the imposition of additional building standards that are not necessitated by local geographic, climatic, or topographic conditions, and requires that local governments making changes or modifications in building standards must report such changes to the California Department of Housing and Community Development (HCD) and file an expressed finding that the change is needed.

The provisions set forth in the 2022 California Building Code, Volumes 1 and 2, Division II, Appendix I and J, are adopted as the Building Code of the City of Lodi with no local amendments, and copies of the same are maintained by the City Building Official and area available for review in the Community Development Department. The Building Code of the City of Lodi applies to all matters pertaining to the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, occupancy, equipment, use, height, area, and maintenance of buildings or structures in the city of Lodi.

Environmental, Infrastructure, and Public Service Constraints

Environmental factors, including a lack of necessary infrastructure or public services, can constrain residential development in a community by increasing costs and reducing the amount of land suitable for housing. As discussed below, the City's water, sewer, and storm drain facilities are adequate to accommodate the existing and future development of Lodi. The following discussion addresses the potential constraints that may by imposed by environmental and infrastructure issues in Lodi.

Historically, the city has grown in increments, which has ensured the availability of public services for new development while avoiding adverse impacts to levels of service to existing residents. New development is assessed a development impact mitigation fee, which in part, funds the incremental improvements to the water, sewer collection and disposal, and drainage systems. One of the City's major goals, identified in the General Plan, is to maintain an adequate level of service in the city's infrastructure to meet the needs of existing and projected development.

Lodi has adopted the San Joaquin County Local Hazard Mitigation Plan (LHMP) to manage and eliminate long-term risks to human life and property from natural hazards. Hazard mitigation aims to reduce losses from future disasters by identifying hazards, analyzing the people and facilities at risk, and developing mitigation actions to reduce or eliminate hazard risk. The 2023 LHMP presents planned hazard mitigation work for the next five years.

Storm Drainage and Flood Control

The City of Lodi has two documents that address stormwater quality: the City of Lodi Stormwater Management Plan Program and the Stormwater Development Standards Plan. Based on revised flood risk evaluations prepared by the Federal Emergency Management Agency (FEMA) for the City of Lodi and San Joaquin County, effective October 19, 2009, flood hazards are a constraint to development only in two areas of the city: the area immediately adjacent to the Mokelumne River along the city's northern boundary, and the area around the White Slough Water Pollution Control Facility. No new development is planned within either of these areas.

Levees or berms along the Mokelumne River protect the city from flood events. As long as levees are not overtopped and maintain their structural integrity, flooding is considered to be very unlikely. Should a major storm event cause levees to be overtopped or if a levee fails, flooding would occur. Flooding also can occur when runoff exceeds the capacity of local systems and cannot drain adequately. The city's existing stormwater system functions well, with no substantial flooding problems. With new stormwater improvements, the City does not have any constraints to the sites identified in this Housing Element.

Based on the City's incremental approach to annexation and the extension of the public facilities and services through the payment of development fees, Lodi does not anticipate that residential development will be impeded in infill areas or the areas to be annexed due to drainage or flood control issues.

Water Service

Since its construction in 2012, Lodi's surface water treatment plant has provided approximately 50 percent of Lodi's drinking water. Twenty-five computer-controlled wells, located throughout the City, provide high quality groundwater. The wells operate automatically on water pressure demand so that when water use increases, more wells are started. Additionally, nine wells are equipped with Granular Activated Carbon (GAC) filtration units to ensure high quality water.

The City, working with regulatory agencies and potentially responsible parties in a cooperative manner, is pursuing a resolution to a groundwater contamination problem in the north and central Lodi area. While no operating wells are out of compliance with any State or Federal drinking water standards, the contamination is a serious threat. PCE (Tetrachloroethylene) and TCE (Trichloroethylene) have been detected in samples taken in soils and groundwater. The City's consultants have developed a computer model of the groundwater, which will enable the City to optimize the number, size and location of wells to accomplish the cleanup in an efficient manner.

The City of Lodi 2020 Urban Water Management Plan (UWMP), as required by the California Department of Water Resources (DWR), provides a comprehensive plan to addressing Lodi's water system, the regional water characteristics, its water use, climate change impacts on water supply, current water supply measurements, and the regions water supply reliability, among other topics. According to this document, the Lodi public water system consisted of 26,230 municipal connections in 2020 providing a volume of 13,978 acre-feet (AF). Estimated water supply for the year 2025 is 21,000 AF which should exceed the expected demand of 19,409 AF.[16]

The City's General Plan projects that Lodi would have a long-term, reliable water supply of 30,860 acre-feet per year available from its current and future safe yield of groundwater and surface water supplies, meeting 100 percent of the estimated demand. During dry years, the reliable water supply is estimated at 25,310 acre-feet. As a result, potential water shortage at full development could be 4,040 acre-feet in a dry year, meeting 86 percent of demand.

The City of Lodi also has a Water Meter Retrofit Program, which focuses on installing water meters on all unmetered properties in its service area. This is in accordance with California Assembly Bill 2572, which requires the installation and use of water meters throughout the state. To date, nearly 11,500 residential water meters have been installed as part of the program. This is in addition to the existing 1,600 commercial and industrial meters.

As discussed above, the city's desire to grow incrementally is addressed through the implementation of a Growth Management Allocation Ordinance and the levying of a development impact mitigation fee. Development that occurs within annexed areas will provide internal water transmission facilities and pay fees as appropriate for necessary off-site infrastructure. Therefore, water service will not be a constraint to the City's ability to meet future housing needs.

Sewer Service

The City of Lodi owns and operates the municipal wastewater system, which collects all domestic and limited industrial wastewater flows within the city limits. The City also owns and operates a wastewater treatment plant, the White Slough Water Pollution Control Facility (WSWPCF), located six miles south of the city. The WSWPCF has

[16] City of Lodi California, 2020 Urban Water Management Plan, published August 2021.

an average dry weather flow (ADWF) capacity of 11.8 million gallons per day (mgd) and peak wet weather flow (PWWF) of 22.6 mgd. The ADWF flow to the WSWPCF for 2019 was 8.5 mgd.[17] The infrastructure assessment for the General Plan determined that capacity expansion of the WSWPCF would be required in the early stages of Phase 1.

Wildfire Mitigation Plan

The Wildfire Mitigation Plan is managed by the Lodi Electric Utility (LEU) and was updated in November 2022. LEU serves 28,000 active accounts, of which 22,600 are residential accounts.[18] The Wildfire Mitigation Plan describes the programs, practices, and measures in-place, which effectively reduce the probability that LEU's electric supply system could be the origin or contributing source for the ignition of a wildfire. LEU identifies extended drought, high winds, and low humidity as the primary risk drivers for wildfire in Lodi. Fire risks due to drought and windy conditions are low within LEU's service territory. Lodi is recognized as a well-developed urban area with over 50 percent underground high voltage circuitry. Based on the 2018 California Public Utilities Commission (CPUC) Fire Threat Map, Lodi is considered a tier-1 low-threat region.[19]

Agriculture and the Williamson Act

Nearly all of the soils in the Lodi area are classified, by the US Department of Agriculture, as prime agricultural soils, some requiring frequent irrigation. Historically, various parcels within this area have been subject to Williamson Act compliance.[20] Potential residential annexation areas, defined by Phase 1 of the General Plan, include 73 acres of land covered by active Williamson Act contracts. Of these acres, 68 acres are designated for Low Density Residential and five acres for Medium Density Residential. The City does not need this land in order to accommodate its share of the RHNA (specifically the below-market-rate units) and does not intend to pursue annexation until those contracts have expired and the market is ready for urban development.

Protection of Habitat and Species

The San Joaquin County Multi-Species Conservation and Open-Space Plan (SJMSCP) is a 50-year habitat conservation plan that seeks to protect agriculture, open space, habitat, and wildlife, in order to address the impacts of urban development and conversion of open space land. In 2001, the City of Lodi adopted the SJMSCP, thereby allowing project applicants to use this plan to mitigate open space conversions while satisfying CEQA requirements. As stated in Chapter 15.68 of the Lodi Development Code, project applicants may pay an in-lieu fee that mitigates cumulative impacts; dedicate habitat lands as conservation easement or fee title; purchase mitigation bank credits from a mitigation bank approved by SJMSCP; or propose an alternative plan, consistent with the SJMSCP goals and equivalent in biological value. It should be noted that there are no known protected species in areas encompassed by the housing sites listed in this document.

[17] *City of Lodi, Sewer System Management Plan, 2019.*
[18] *Lodi Electric Utility, Wildfire Mitigation Plan, Adopted November 2022.*
[19] *State of California Public Utilities Commission, CPUC Fire Threat Map, Adopted January 2018.*
[20] *The Williamson Act is a mechanism by which agricultural land is preserved for a specified period of time.*

5. Sites Inventory and Analysis

State law requires every jurisdiction to undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate regional housing needs.[21] A jurisdiction must demonstrate in its Housing Element that its land inventory is adequate to accommodate its share of the region's projected growth. This section details the Site Inventory process for the City of Lodi.

Regional Housing Needs Allocation (RHNA)

This Housing Element covers the planning period of December 2023 through December 2031 (also referred to as the 6th cycle Housing Element update). The San Joaquin Council of Governments (SJCOG) is responsible for distributing the RHNA among jurisdictions in the region based on recent growth trends, income distribution, and capacity for future growth. This methodology must align with state objectives, including but not limited to:

- Promoting infill, equity, and environmental protection
- Ensuring jobs-housing balance
- Affirmatively furthering fair housing

The process to allocate the San Joaquin County region's housing needs among the seven cities and the unincorporated county and was completed in September 2022 with the adoption of the Final Regional Housing Needs Plan.[22] Each jurisdiction's share of the regional housing need is allocated based on recent growth trends, income distribution, and capacity for future growth. The RHNA methodology uses weighted indicators such as access to opportunity and job proximity to allocate housing units affordable to households of different income categories. SJCOG is required to allocate units across income categories with the goal of reducing the concentration of lower-income households in historically lower-income communities. The RHNA for each jurisdiction is distributed into four income categories based on the Area Median Income (AMI)[23]:

- Very low-income (less than 50 percent of AMI)
- Low-income (50-80 percent of AMI)
- Moderate-income (80-120 percent of AMI)
- Above moderate-income (more than 120 percent of the AMI)

As part of the Housing Element update, each jurisdiction must identify adequate land with appropriate zoning and development standards to accommodate its assigned share of the region's housing needs. Lodi's 6th cycle RHNA is 3,909 total units. These units are distributed across four income categories within each jurisdiction, as shown below in Table 58. In addition to reporting the RHNA, jurisdictions must estimate the number of extremely low-income units needed in the eight-year housing element cycle. The City estimates that there is a need for 470

[21] *Government Code section 65100 – 65763, Article 10.6. Housing Elements*
[22] *San Joaquin Council of Governments (SJCOG). 2022. Final Regional Housing Needs Plan. https://www.sjcog.org/DocumentCenter/View/7222/SJCOG-RHNP-62422-Draft*
[23] *The Area Median Income of San Joaquin County is $74,962 for a household in 2021.*

additional housing units for extremely low-income households in the current planning period, which is 50 percent of projected very low-income housing needs (see Table 58).

Table 58 San Joaquin County Regional Housing Needs Determination Allocation

Jurisdiction	Total RHNA Allocation	Very Low-Income Allocation		Low-Income Allocation		Moderate-Income Allocation		Above Moderate-Income Allocation	
	Units	Units	Percent of Total RHNA	Units	Percent of Total RHNA	Units	Percent of Total RHNA	Units	Percent of Total RHNA
Escalon	367	90	0.17%	56	0.11%	66	0.13%	155	0.29%
Lathrop	8,402	2,386	4.53%	1,498	2.84%	1,342	2.55%	3,176	6.02%
Lodi	3,909	941	1.78%	591	1.12%	706	1.34%	1,671	3.17%
Manteca	8,306	2,246	4.26%	1,409	2.67%	1,381	2.62%	3,270	6.20%
Ripon	1,423	347	0.66%	218	0.41%	255	0.48%	604	1.15%
Stockton	12,673	2,465	4.68%	1,548	2.94%	2,572	4.88%	6,088	11.55%
Tracy	8,830	2,994	5.68%	1,879	3.56%	1,175	2.23%	2,782	5.28%
Unincorporated County	8,808	1,824	3.46%	1,145	2.17%	1,734	3.29%	4,105	7.79%
Total	52,719	13,293	25.21%	8,344	15.83%	9,231	17.51%	21,851	41.45%

Source: SJCOG, 2022. Final Regional Housing Needs Plan.

Meeting the RHNA

Each jurisdiction must identify adequate land with appropriate zoning and development standards to fulfill its required RHNA. Jurisdictions can use planned and/or approved projects, estimated accessory dwelling unit (ADU) production, and vacant and/or underutilized sites to accommodate the RHNA. In some cases, rezoning must occur to ready sites for future residential development.

Once the City has demonstrated that it has the development capacity to accommodate the RHNA, it has two obligations:

1. Maintain a "no net loss" policy of its residential development capacity over the housing element planning period, meaning that sites listed in the adopted Housing Element land inventory may not be down-zoned to a lower-density residential zone or rezoned to a nonresidential zone, unless the City up-zones or rezones alternative sites prior to the density reduction or rezone on the inventoried site.
2. Continue to allocate available funding resources to and facilitate the development of affordable housing, as it has done frequently in the past. The City is not obligated to ensure construction of low-income housing on any particular site within its city limits.

RHNA Credits

The City may use anticipated production of accessory dwelling units (ADUs) and units in approved and/or permitted residential developments which will be completed within the planning period as credit towards fulfillment of its RHNA.

Accessory Dwelling Units

The City adopted an ADU Ordinance in late 2021. Based on an analysis of ADU production in Lodi over the last five years (2018 through 2022), the City has prepared a projection of the estimated ADU production in the upcoming eight-year Housing Element cycle.

The City issued an average of seven building permits for ADUs per year over the last five years. Extrapolated over the eight-year Housing Element planning period, the City can safely project the production of approximately 56 ADUs during the 2023-2031 planning period. The City anticipates that this projection conservatively accounts for consistent ADU production in the upcoming years. ADUs reported from 2018 to 2022 were reported as above-moderate income units, therefore all anticipated ADUs were assigned to the above moderate-income category. Table 59 shows the number of ADU permits issued each year. As of December 2023, the City permitted 25 ADUs, with 10 permits issued since the 6th cycle projection period (June 30, 2023).

Table 59 Accessory Dwelling Unit Production, City of Lodi

Reporting Year	ADU Building Permits Issued
2018	0
2019	3
2020	2
2021	7
2022	25
Total	37
Annual Average	7

Pending or Approved Projects

Residential developments approved and permitted, but not yet built ("pipeline projects") can be credited towards the City's RHNA for the 6th cycle Housing Element provided it can be demonstrated that the units can be built by the end of the 6th cycle planning period. Similarly, units that are under construction but have not yet received a certificate of occupancy as of June 30, 2023, can also be credited towards the RHNA. Affordability (the income category in which the units are counted) is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. The city currently has one pipeline project that can count toward the City's 6th cycle RHNA. This project is located in East Lodi on Central Avenue and consists of 12 low-income housing units on a 0.34-acre site. The project was able to make all units affordable for low-income residents through tenant-based vouchers. The project is located in the mixed-use corridor zone which allows a maximum density of 35 units per acre, resulting in a maximum unit capacity of approximately 11 units on

the site. This project was developed with 12 units and achieved 109 percent of allowable density through a density bonus.

Summary of RHNA Credits

After accounting for projected ADU development and pipeline projects, the City has satisfied approximately two percent of its total RHNA allocation for the 2023-2031 planning period. The City must demonstrate the availability of sites with appropriate zoning and development standards that allow and encourage the development of an additional 3,841 units. This total includes 941 very low-income, 591 low-income, 706 moderate-income, and 1,671 above moderate-income units, as shown on Table 60.

Table 60 Credits Towards RHNA

	Very Low-Income Units	Low-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total
Total RHNA Allocation	941	591	706	1,671	3,909
Pipeline Projects	0	12	0	0	12
Accessory Dwelling Units	0	0	0	56	56
Remaining RHNA After Subtracting Credits	941	579	706	1,615	3,841

Site Selection Methodology

Based on anticipated ADU production and pipeline projects during the planning period, the City must evaluate sites zoned for housing the remaining RHNA (3,841 total units) by identifying sites currently zoned for housing.

In accordance with State law, land suitable for residential development must be appropriate and available for residential use within the planning period. Sites used in the inventory can be a parcel or group of parcels that meet the following criteria:

- Vacant sites zoned for residential use
- Vacant sites zoned for nonresidential use that allow residential development
- Residentially zoned sites that are capable of being developed at a higher density (nonvacant sites, including underutilized sites)
- Sites owned or leased by a local government
- Sites that can be rezoned residential use, including a program to rezone the site to permit residential use

To identify sites suitable for additional residential development, geospatial data was used to identify vacant and nonvacant but underutilized properties within the city.

Density and Parcel Size Requirements for Lower-Income Housing

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. State law has established "default" density

standards for the purpose of estimating potential units by income range. A density standard of 20 or more units per acre (primarily for higher density multi-family developments) would facilitate the development of housing in the low- and very low-income category.

In addition to default density standards, HCD established that parcels intended to support the development of units appropriate for lower-income households should be between 0.5 and 10 acres. Parcels smaller than 0.5 acres, even when zoned for high densities, may not facilitate the scale of development required to access the competitive funding resources that facilitate affordable housing projects. Conversely, affordable housing developers may be unable to finance the scale of project necessitated by parcels greater than 10 acres. Therefore, parcels appropriate for lower-income housing were selected within the 0.5-to-10-acre size requirement. For parcels larger than 10 acres with zoning that allow 20 or more units per acre, up to 10 acres were allocated to the lower-income category with the remaining capacity allocated to the above moderate-income category.

Development Trends

Establishing development trends provides an understanding of the type of housing development that is feasible during the planning period, by estimating the density (dwelling units per acre) that could be assumed on individual sites. The following analysis identifies these development trends, which inform assumptions made for the Site Inventory section included in this Housing Element.

Eight recently developed and planned residential developments in Lodi were reviewed to determine the characteristics of feasible housing projects in the region. Out of the selected projects, most were developed or will be developed on vacant land. Development statistics from these 8 projects indicate that on average, residential development projects in Lodi realize 88 units on six acres of land, with an average density of 15.21 dwelling units per acre. On average, projects achieved 55 percent of the maximum density allowed on the property. The following development characteristics were analyzed:

- The previous uses of redeveloped sites
- Parcel sizes
- Parcel locations
- The density achieved by the project

This section provides a description of the 8 residential projects that represent recent development trends in Lodi.

Cranes Landing

APN	027-410-24, 027-410-25	**Group**	Eden Housing, Inc.
Address	2245 Tienda Drive	**Year Built**	2017
Current Use	Senior Home - Multifamily	**Previous Use**	Vacant
Parcel Size	3.76 ac	**FAR**	0.26

The Cranes Landing development is located in the West Lodi neighborhood, just west of Target, and north of Kettleman Lane. Located on previously vacant land, this 80-unit senior housing complex was developed in 2017. This project is in the mixed-use corridor zone which allows a maximum density of 35 units per acre. At this density, up to 131 units could have been developed on the site. The 80-unit project achieved 61 percent of the allowed density.

Revel Lodi

APN	058-650-28	**Group**	Wolff Company
Address	2923 Reynolds Ranch Pkwy	**Year Built**	2018
Current Use	Senior Home - Multifamily	**Previous Use**	Vacant
Parcel Size	5.73 ac	**FAR**	0.32

This development is located on the corner of Reynolds Ranch Parkway and Lebaron Boulevard in the South Lodi neighborhood on previously vacant land. This 142-unit senior living complex was built in 2018 and is located in a planned development zone with a commercial general plan designation with no assigned density. However high-density housing was developed here, making the site subject to a maximum density of 35 units per acre. At this density, up to 200 units could have been developed on the site. The 142-unit project achieved approximately 71 percent of the maximum allowable density.

Rubicon at Reynolds Ranch

APN	058-650-30	**Group**	–
Address	2951 Reynolds Ranch Pkwy	**Year Built**	2018
Current Use	Multifamily Residential	**Previous Use**	Vacant
Parcel Size	8.81 ac	**FAR**	0.21

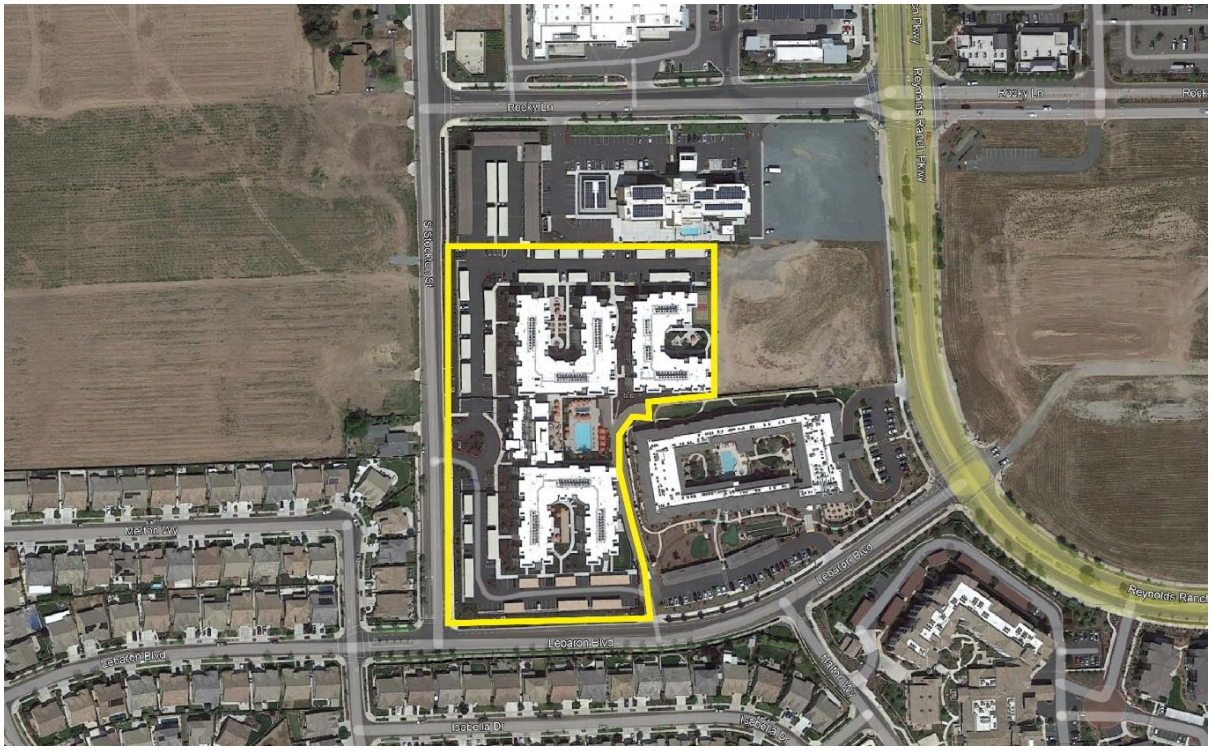
This development is located south of Reynolds Ranch Parkway in the South Lodi neighborhood. Located on previously vacant land, this 156-unit multifamily complex was developed in 2018 and is located in a planned development zone with a high density residential general plan designation, making the site subject to a maximum density of 35 units per acre. At this density, up to 308 units could have been developed on the site. The 156-unit project achieved approximately 51 percent of the maximum allowable density.

Oakmont of Lodi

APN	058-650-33	**Group**	–
Address	2905 Reynolds Ranch Pkwy	**Year Built**	2020
Current Use	Senior Home - Multifamily	**Previous Use**	Vacant
Parcel Size	3.96 ac	**FAR**	0.31

Oakmont of Lodi is located on the northern corner of Reynolds Ranch Parkway and Lebaron Boulevard the South Lodi neighborhood. Located on previously vacant land, this 80-unit 55+ community was built in 2020 and is located in a planned development zone with a commercial general plan designation with no assigned density. However high-density housing was developed here, making the site subject to a maximum density of 35 units per acre. At this density, up to 138 units could have been developed on the site. The 80-unit project achieved approximately 58 percent of the maximum allowable density.

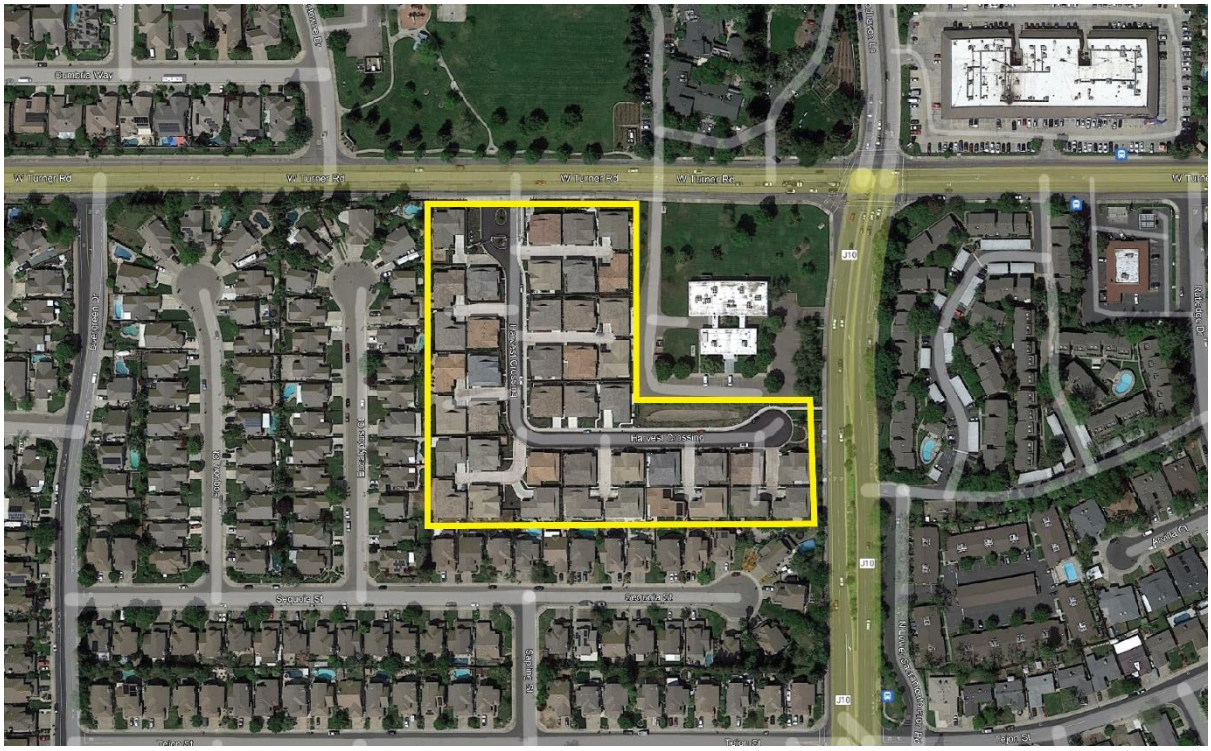
La Vida at Reynolds Ranch



APN	058-650-34	**Group**	–
Address	2890 S Stockton St	**Year Built**	2021
Current Use	Senior Home - Multifamily	**Previous Use**	Vacant
Parcel Size	6.37 ac	**FAR**	0.27

La Vida at Reynolds Ranch is located on the northern corner of South Stockton Street and Lebaron Boulevard the South Lodi neighborhood. Located on previously vacant land, this 150-unit 55+ community was built in 2021 and is located in a planned development zone with a commercial general plan designation with no assigned density. However high-density housing was developed here, making the site subject to a maximum density of 35 units per acre. At this density, up to 222 units could have been developed on the site. The 150-unit project achieved approximately 67 percent of the maximum allowable density.

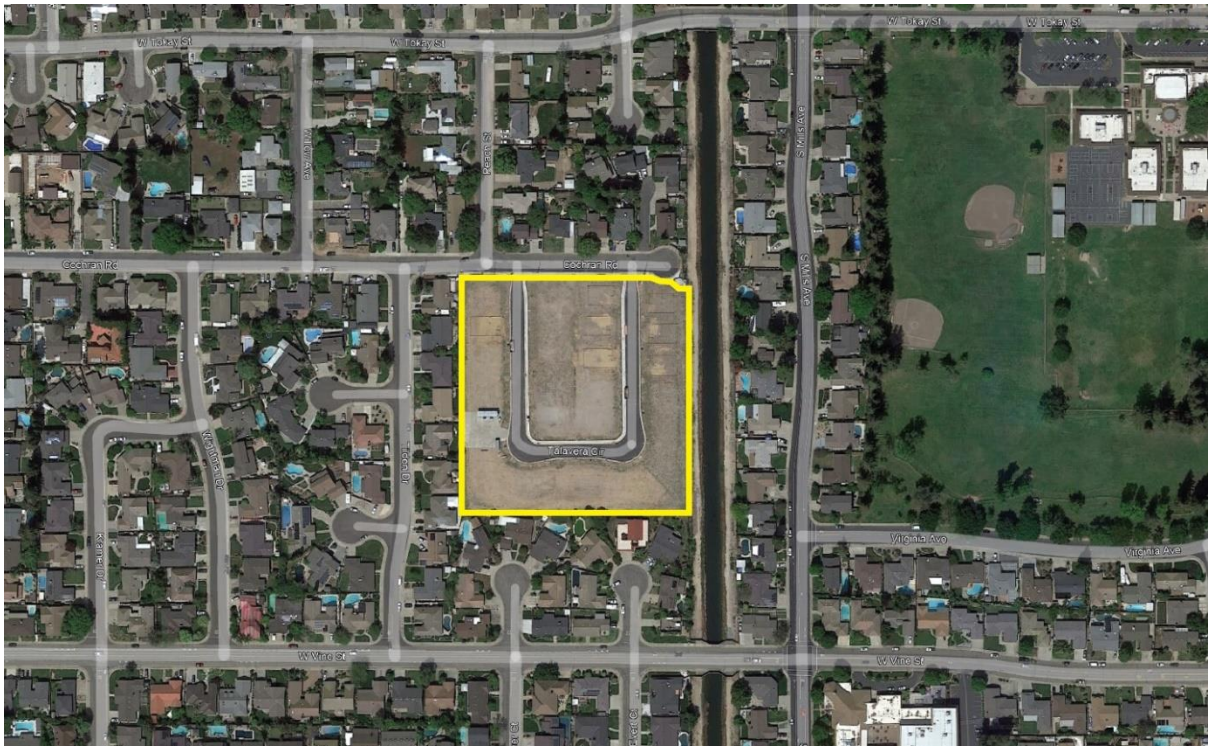
Harvest Crossing



APN	029-570-01 through 029-570-43	**Group**	–
Address	West Turner Road & North Lower Sacramento Road	**Year Built**	2019
Current Use	Single Family Residential	**Previous Use**	Vacant
Parcel Size	6.75 ac	**FAR**	0.44

Harvest Crossing is in West Lodi neighborhood at the intersection of West Turner Road and North Lower Sacramento Road. Located on previously vacant land, this 42-unit community was developed in 2019 and is located in a medium density zone that allows for a maximum density of 20 units per acre. At this density, up to 135 units could have been developed on the site. The 42 units project achieved 31 percent of the maximum allowable density.

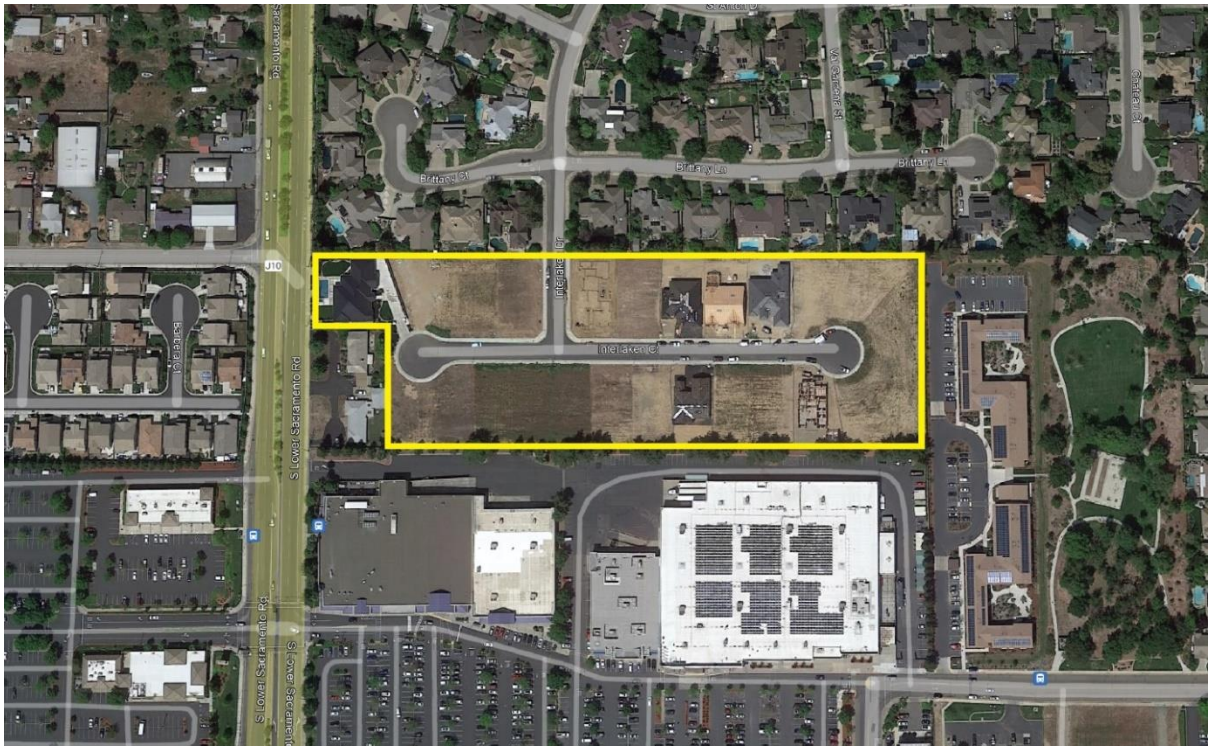
Twin Arbors



APN	027-310-13 through 027-310-40	**Group**	–
Address	2040 Cochran Road	**Year Built**	Under Construction
Current Use	Single Family Residential	**Previous Use**	Vacant
Parcel Size	5.44 ac	**FAR**	–

Twin Arbors is in the West Lodi neighborhood, west of South Lower Sacramento Road on Cochran Road. This site is currently vacant and will develop 27 single family units. This project is in a low-density residential zone with a density of 8 units per acre. At this density, up to 43 units could have been developed on the site. With 27 units under construction, the project will achieve 62 percent of its allowable density.

Interlaken



APN	027-480-01 through 027-480-25	**Group**	–
Address	Interlaken Court	**Year Built**	Under Construction
Current Use	Single-Family Residential	**Previous Use**	Vacant
Parcel Size	8.48 ac	**FAR**	–

Interlaken is in the West Lodi neighborhood, west of South Lower Sacramento Road and due north of the Target off Kettleman Lane. These 25 single family homes are on a mostly vacant site, with a few homes under construction and zoned for low density residential. This zone allows for a maximum density of 8 units per acre. At this density, up to 67 units could have been developed on the site. With 25 units under construction, the project will achieve 37 percent of its allowable density.

Summary of Development Trends

Development characteristics in the region indicate that most residential projects developed, or will develop, on vacant land. Out of the selected sites, none included housing affordable to very low- and low-income households. The densities of these projects range from 2.95 to 24.78 dwelling units per acre. The average density of projects with affordable units is approximately 15 dwelling units per acre, and the projects typically achieved 55 percent of the maximum density allowed on the site. Projects located in low density residential zones on average achieved 49 percent of the maximum density allowed, projects located in medium density residential zones achieved 31 percent of the maximum density allowed, and projects located in high density residential zones achieved 61 percent of the maximum density allowed. Table 61 summarizes the allowable density and achieved density for each project.

Table 61 Development Trends for Recent Projects

Project Name	Total Units	Site Acreage	Achieved Density (du/ac)	Zoning District	Allowable Density (du/ac)	Number of Units Allowed	Percent Density Achieved
Cranes Landing	80	3.76	21.28	Mixed Use Corridor	35	131.6	61%
Revel Lodi	142	5.73	24.78	Planned Development (39)	35	200.55	71%
The Rubicon at Reynolds Ranch	156	8.81	17.71	Planned Development (39)	35	308.35	51%
Oakmont of Lodi	80	3.96	20.20	Planned Development (39)	35	138.6	58%
La Vida At Reynolds Ranch	150	6.37	23.55	Planned Development (39)	35	222.95	67%
Harvest Crossing	42	6.75	6.22	Medium Density Residential	20	135	31%
Twin Arbors	27	5.44	4.96	Low Density Residential	8	43.52	62%
Interlaken	25	8.48	2.95	Low Density Residential	8	67.84	37%
Average	87.75	6.16	15.21		26.38	156.05	55%

Realistic Development Capacity

To demonstrate capacity to accommodate the remaining RHNA, the City has identified sites with zoning suitable for housing development. Pursuant to Government Code Section 65583.2(c), the City is required to calculate the realistic number of units (or, realistic development capacity) of the sites identified. The Sites Inventory includes parcels in six zoning districts with varying allowable densities and development standards. The City's Zoning Code classifies each site into the following zones:

- Low-Density Residential (RLD) allows single family residential uses and related activities at a maximum allowable density of 8 dwelling units per acre.
- Medium-Density Residential (RMD) allows multi-family residential uses and related activities at a maximum allowable density of 20 dwelling units per acre.
- High-Density Residential (RHD) allows multi-family residential uses and related activities at a maximum allowable density of 35 dwelling units per acre.
- Downtown Mixed Use (DMU) allows multi-family residential uses and related activities at a maximum allowable density of 35 dwelling units per acre.
- Mixed Use Corridor (MCO) allows multi-family residential uses and related activities at a maximum allowable density of 35 dwelling units per acre.
- Planned Development (PD) allows for a variety of uses and densities which are determined by the parcel's General Plan Land Use Designation.

The Housing Element employs a comprehensive and iterative methodology to estimate dwelling unit capacity on a given parcel. As required by State law, the methodology must include sites that have a high potential to be developed with housing in the planning period and reflect a reasonable estimate of the dwelling unit capacity that

is informed by past trends and substantial evidence. Therefore, it is assumed that realistic development capacity of the selected sites is less than the full development capacity allowed by the parcel's zoning or land use designation. This conservative assumption is based on site-specific conditions and development standards that may reduce the development potential of a given site. Open space or parking requirements, steep slopes, and irregularly shaped parcels all impact the ability to achieve the maximum density allowed by the zoning code. Table 62 shows the maximum and realistic allowable densities including income category could be accommodated in each zone.

Table 62 Realistic Allowable Density per Zone

Zone District	Max. Allowable Density (units per acre)	Realistic Allowable Density (units per acre)	Percent of Max. Density	Assumed Income Category
RLD	8	6.4	70%	Above Moderate
RMD	20	16	70%	Moderate and Low
RHD	35	28	70%	Moderate
DMU	35	25	60%	Moderate and Low
MCO	35	25	60%	Moderate and Low

For Planned Development (PD) zones, assumed density will be consistent with General Plan Land Use Designation.

Likelihood of 100 percent Nonresidential Uses on Sites

The City identifies units in zones that allow for 100 percent nonresidential uses. In accordance with State law, the housing element must consider the likelihood of nonresidential development on sites that allow for nonresidential uses. To determine likelihood, the City reviewed development that has occurred in nonresidential zones within the last five years. During this time period, five projects have been constructed in the MCO zone. Of these projects, all have been approved for development with housing, with affordable housing available on at least three of the projects. This represents a 100 percent rate of residential development in nonresidential zones. The City is actively being approached by developers looking for vacant land to develop and rezone from commercial to medium-high density residential or single-family subdivisions within the Sphere of Influence (SOI)/annexation areas to the south and west of the city.

Table 63 lists residential uses that have been developed in Lodi's MCO zone within the past five years. Of these sites, most were vacant or developed with a single existing residence. Development in the MCO zone shows strong market trends for residential development in nonresidential zones. The Sites Inventory considers potential nonresidential development in these zones by assuming conservative realistic densities in these zones compared to past and current trends and maintaining an adequate buffer of units for all RHNA income categories.

The Sites Inventory accounts for the likelihood of nonresidential uses being developed in zones that allow both residential and nonresidential uses by providing an adequate buffer of units in all income categories. If 20 percent of the sites in the MCO zone were developed with 100 percent nonresidential uses, the Sites Inventory would still maintain a three percent buffer of lower-income units and a 30 percent buffer of moderate-income units. Additionally, the inventory conservatively assumes a realistic allowable density of 21 dwelling units per acre in the MCU zone. A maximum of 35 units per acre is allowed. The City will continue to evaluate all future mixed-use

development to determine how often development has a residential component and make adjustments, as necessary, to maintain adequate sites throughout the planning period.

Table 63 Residential Uses Developed From 2019-2023

Project Name	Location	APN	Acres	Total Units	Existing Use	Zoning Designation	Income Category	Description
Harmony Homes	301 E Lodi Ave	04306716	0.24	4	vacant	MCO	Low	Four affordable built/occupied rentals in 2022-2023 (City Financed Project/grants)
Sapphire Creek Apartments	620 S Central	04733048	0.34	12	vacant	MCO	Above moderate	Entitlements approved 2021 for market rate; not yet built – Housing Authority may purchase the project and construct it as affordable
Sunwest Commons	2115 W Kettleman Lane	02743010	0.56	12	vacant	MCO	Above moderate	Entitlements approved 2019; not yet built – unclear if moving forward. 12 zero lot line residential units
Sapphire Creek Apartments	417/421/427 Lockeford Street	03726001, 03726002, 03726003	0.94	35	vacant	MCO	Lower	Project went through predevelopment application, then interest rates went up and developer pulled out. Housing Authority in active discussions to purchase the project and construct it as 80% AMI with 30-40 DUs. Preliminary plans prepared and provided to City.
Sapphire Creek Apartments	North Side of Salas Park	N/A	3.00	110	Vacant	RHD	Lower	Entitlements (rezone/GPA)/CEQA/NEPA in process – Housing Authority – senior 30-50% affordable 110 DUs in 2 phases. Plans have been prepared; waiting on consultant to begin environmental review.

Nonvacant Sites

The housing element must analyze the extent to which existing uses may impede additional residential development. The Sites Inventory accommodates approximately 75 percent of its lower-income RHNA and 81 percent of its moderate- and above moderate-income RHNA on vacant sites. As a result of insufficient available vacant land, the City identified the remaining 21 percent of the lower-income RHNA on nonvacant sites.

Nonvacant sites selected for inclusion in the inventory were chosen because they represent the highest potential for becoming available for residential development and add significant quantities of units to the City's housing stock. Sites were identified with uses that have a high likelihood of being converted to a higher value use, such as older abandoned commercial and retail uses, excess surface parking, and single-story office and professional buildings that could support high-density residential or mixed-use projects.

Based on the market trends within Lodi, developers have expressed interest in converting land from commercial uses to medium density residential because they are struggling to find retail tenants and have had more success with medium density residential developments. Recently, the City has approved three projects that included upzoning from medium density to high density residential. These market trends indicate the desire for medium and high density residential within the city.

The city has plans to change the zoning of some parcels to further increase the opportunity for housing. There are not many vacant parcels in the DMU zone, and the City intends to utilize the Downtown Plan to expand the DMU zone around the Main Street corridor, and rezone some sites to encourage a shift from underutilized industrial land to DMU. This would encourage mixed use and high density residential in the area. The City Council has allocated $750k towards the Downtown Specific Plan, and the City anticipates offering an RFP in the coming months, with work to begin in Spring 2024, and conclude in 2026. As of now, most of the development interest has been from affordable housing developers due to increased interest rates.

Redevelopment of Existing Uses

Nonvacant sites in the downtown area were included on the Sites Inventory that have comparable predevelopment characteristics with redevelopment potential for high density residential. Of the 118 sites included in the Sites Inventory, 75 are vacant and 43 are nonvacant. The predominant existing use of sites is commercial/office (8 sites), followed by agriculture (6 sites), hotel (5 sites) and parking (5 sites). The City anticipates development of these uses, particularly in East Lodi area, to accommodate high density residential uses. The City does not consider existing uses in these areas to impede housing development. The City will continue to advocate for residential uses in these areas in line with the vision expressed in the City's General Plan and the Downtown Plan, which strongly advocate for high density residential and a variety of mixed uses in these areas.

Nonvacant Site Selection Criteria

To identify potential sites for additional development, geospatial data was used to identify vacant and nonvacant underutilized properties within the city. Nonvacant parcels were chosen as sites likely to be redeveloped during the planning period based on a number of factors:

Sites meeting Criteria 1, 2 or 3 are included in the Sites Inventory:

1. Vacant

Sites that are vacant offer the most feasibility for redevelopment.

2. Surface Parking

Large surface parking lots have potential for redevelopment as these properties have limited existing structures to impede redevelopment in the near term. Several opportunity sites are being proposed on properties with large surface parking areas.

3. Vacant Buildings

Vacant buildings have potential for redevelopment as these properties are underutilized and their redevelopment can turn the property into higher and better use may be a more feasible option. Some properties are included in the Sites Inventory because the existing conditions or design of the buildings are not meeting the needs of current trends, resulting in high vacancies or vacated buildings. Substantial improvements may be needed to turn around the profitability of the existing uses.

For sites not meeting Criteria 1, 2, or 3, they must meet at least three of the following four criteria (#4 through #7) to be included in the Sites Inventory. It should be noted that not all factors are applicable to all sites. For example, FAR is more relevant for nonresidential uses. Since the development trends and pipeline projects are all developed on vacant sites, the City has looked to its neighbor, Stockton, as a baseline for determining development on nonvacant sites. Stockton has seven residential developments recently constructed on nonvacant sites.

4. Single-Story Buildings

Parcels with existing single-story buildings offer significant potential for redevelopment and maximizing the utilization of the sites. The Sites Inventory focuses on identifying sites in commercial and industrial zones, where height maximums range from 35 feet to 70 feet. Of the development trends in Lodi's surrounding cities, a little more than half of them were developed on properties with a single-story building. The Cal Weber Apartments project in Stockton was constructed on top of an existing single-story commercial building, to create a mixed-use project.

5. Improvement-to-land value ratio (ILR)

A parcel's ILR can be used to identify potentially underutilized properties. A lower ILR indicates that the real estate market values the land itself more highly than what is currently built on that land. These underutilized parcels represent opportunities for property owners and developers to invest in further improvements that increase the overall value of the property. Due to the high cost of land, residential redevelopment routinely occurs on sites with high ILR values. For purposes of this analysis, parcels were identified as potential opportunity sites if they have an ILR of less than 1.0. ILR value for each opportunity site is included on the Table 64. The City used the 1.0 ILR metric based on review of its development trend projects, although they are all vacant. This is a development trend that has been seen throughout the valley, particularly with redevelopment in Stockton. The average ILR of the development trend projects is 0.60. Of the development trends in Lodi, one project achieved an ILR of 3.56, much higher than 1.0, indicating that development is occurring on sites with ILR values much higher than what is assumed on the Sites Inventory. All non-vacant sites selected have an ILR under 1.0.

It should be noted that the Assessor's records do not contain data for some properties, especially older properties that have not undergone a reassessment (due to a change in ownership or significant improvements). For parcels identified as vacant or surface parking but do not have information on assessed land and improvement values, it would be reasonable to assume the ILR to be zero or very close to zero.

6. Age of structure

7. The age of a structure is useful in demonstrating that a site has a higher likelihood of redevelopment. New construction on the site indicates that a property owner is unlikely to invest in additional improvements or redevelop the site in the upcoming housing cycle. Floor area ratio (FAR)

FAR values lower than what is permitted by the Zoning Ordinance indicate underutilization, especially in downtown areas or upzoned corridors. Conversely, developed sites with higher FAR are less likely to redevelop as the land and demolition costs would be high. With all of Lodi's pipeline projects and recent redevelopment projects profiled in the Development Trends section developed on vacant land, Lodi looked to Stockton's nonvacant development trends. Development trends in Stockton demonstrate an average FAR of 0.60, although the FAR value reached 0.88 for one project. Therefore, this analysis utilizes a FAR threshold on 0.60.

Potential sites were reviewed based on these criteria, as shown in **Table 64**, to eliminate those unlikely to be redeveloped in the near term.

Table 64 Nonvacant Sites Analysis

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 3 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of >1.0 (5)	Year Built of >30 years (6)	FAR (7) <0.60
2011 Harney Ln	05860010	Yes	No	No	No	Yes	7.37	1974	0.11
1606 S Lower Sacramento Rd	05814004	Yes	No	No	No	Yes	1.56	1965	0.13
1610 S Lower Sacramento Rd	05814011	Yes	No	No	No	Yes	1.72	1963	0.11
1618 S Lower Sacramento Rd	05814005	Yes	No	No	No	Yes	2.58	1948	0.09
226 N School St	04302501	Yes	No	Yes	No	No	0.00	N/A	N/A
20 W Lockeford St	04302503	Yes	No	Yes	No	No	0.06	N/A	N/A
16 W Lockeford St	04302504	Yes	No	Yes	No	No	0.00	N/A	N/A
211 W Oak St	04303209	Yes	No	Yes	No	No	0.00	N/A	
108 E ELM ST	04307101	Yes	No	No	Yes	Yes	2.71	N/A	0.43
24 1/2 N MAIN ST	04307104	Yes	No	No	No	No	4.57	1946	0.30
20 N MAIN ST	04307105	Yes	No	No	Yes	No	0.25	1946	0.40
101 E PINE ST	04307112	Yes	No	Yes	No	No	3.10	1978	0.29
8 N MAIN ST	04307114	Yes	No	No	Yes	No	7.80	N/A	0.30
100 E PINE ST	04307201	Yes	No	Yes	No	Yes	N/A	N/A	0.39
30 S MAIN ST	04307208	Yes	No	No	Yes	No	2.15	N/A	0.52

Site Address	APN	Meet Sites Requirements (1, 2, or 3), or 3 criteria (4-7)	Vacant (1)	Surface Parking (2)	Vacant Buildings (3)	Single-Story Building (4)	ILR of >1.0 (5)	Year Built of >30 years (6)	FAR (7) <0.60
22.5 S MAIN ST	04307209	Yes	No	No	No	No	5.79	1962	0.43
111 N. Stockton St.	04308407	Yes	No	Yes	No	Yes	N/A	N/A	0.60
103 E. Elm St	04308406	Yes	No	Yes	Yes	Yes	1.45	N/A	0.37
721 S Cherokee Ln	04737016	Yes	No	No	No	Yes	0.66	1926	0.25
1045 South Cherokee	04740004	Yes	No	Yes	No	Yes	0.79	N/A	0.28
1050 South Cherokee	04741001	Yes	No	Yes	No	Yes	2.56	N/A	0.21
218 N Stockton St	04308503	Yes	No	Yes	No	No	0.58	1990	0.24
543 E Pine St	04317011	Yes	No	Yes	No	No	0.00	N/A	N/A
2057 Lower Sacramento Road	05803006	Yes	No	No	No	Yes	0.45	1946	0.14
130 W Century*	N/A	Yes	No	No	No	No	N/A	N/A	N/A
875 N Stockton St	04124048	Yes	No	Yes	No	No	0.10	N/A	0.50
319 N MAIN St	04123003	Yes	No	No	Yes	Yes	1.08	N/A	0.91
341 N Main St	04123002	Yes	No	No	Yes	Yes	2.00	N/A	1.00
401 E Harney Ln**	06229037	Yes	No	No	No	No	0.74	N/A	0.11
716 E Pine St	04323025	Yes	No	No	Yes	No	0.70	1974	0.11

* Affordable Developer Visionary Home Builders is interested in redeveloping the site.
** Current agricultural use with residential land use.

Adequacy of Nonvacant Sites

Understanding the extent of the existing uses on nonvacant site and how they may impede with additional development is crucial to site selection. In considering sites, the City has identified two areas/corridors with older building and nonvacant but underutilized properties that could facilitate the development of a variety of housing types throughout the city. Housing development within the Downtown and Mixed-Use Corridors are discussed below. Both areas emphasize the development of residential and non-residential uses by encouraging mixed-use

and higher density residential projects. The majority of identified nonvacant sites are in these areas and were selected for their redevelopment potential and higher probability of turnover.

Downtown

The City of Lodi is committed to maintaining vitality and bringing redevelopment to its downtown area, a 147-acre area generally bound by Lockeford Street, Lodi Avenue, the Union Pacific Railroad, and Hutchins Street. The sites identified for redevelopment in Downtown Lodi consist of vacant buildings, parking lots, office spaces, and hotels.

The downtown area has sufficient infrastructure to serve these sites at the targeted densities. Notably, the city has numerous public parking lots throughout the downtown area. This can facilitate a substantial reduction of otherwise required on-site parking.

Downtown Lodi can be regarded as a viable location with strong potential for accommodating high-density residential uses and moderate-income housing development within the Housing Element timeframe. This viability can be attributed to low improvement-to-land cost ratios, a pedestrian-friendly environment, proximity to goods and services including transportation. Examples of developments in the downtown area include a mixed-use project on 11S. Sacramento Street and Hotel Lodi, an old hotel that was converted into Section 8 housing. Table 65 shows sites included on the Sites Inventory that are representative of all sites identified in the downtown area. As shown on Table 64 above, these sites show indicators of potential turnover and have high potential for redevelopment consistent with the City's long-range plans for the Downtown area.

Table 65 Representative Sites (Downtown)

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
226 N School St, 16 - 20 W Lockeford St	Three legal parcels with a vehicle storage yard and no permanent structures. Site is close to downtown businesses, parks, and Lockford and Church St bus stop. Downtown Mixed Use zoning allows high-density mixed-use projects.	0.52	9	
111 N. Stockton St. and 103 E. Elm St	Two consolidated parcels for a total of 1.24 acres. 111 N Stockton St is owned by the City of Lodi. The adjacent parcel 103 E Elm St is occupied by a vacant light industrial/commercial building. The site is across the street from Hale Park and close to downtown businesses and other housing in the neighborhood. Zoned Downtown mixed-use the parcels could accommodate at least 26 units.	1.24	26	

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
108 E Elm St	Vacant one-story commercial building and open space close to Downtown businesses. No year built on file. The site is zoned Downtown Mixed Use and could support the development of at least four dwelling units.	0.21	4	
101 E Pine St	Two-story mixed use building with surface parking close to Downtown businesses. No year built on file. The site is zoned Downtown Mixed Use and could support the development of at least four dwelling units.	0.21	4	

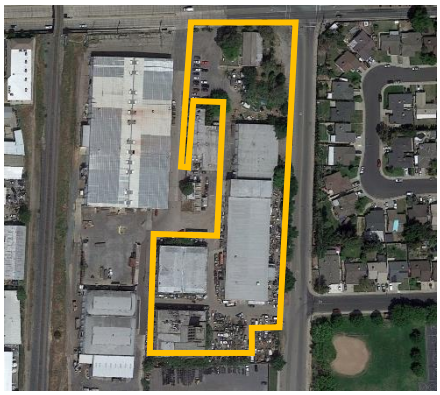
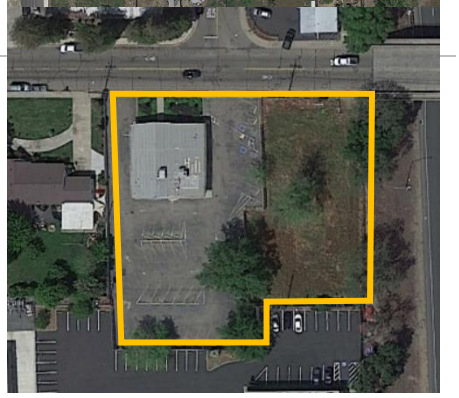
Mixed-Use Corridors

There are several mixed-use corridors throughout the city: Kettleman Lane, Cherokee Lane, and Lodi Avenue. These areas support office and general commercial uses as well as low-, medium-, and high-density residential.

While most of the sites identified in this zone are vacant, sites with older commercial buildings, vacant buildings, warehouses, and parking lots were identified for redevelopment. The non-vacant sites identified in the mixed-use corridors are underutilized sites with a low improvement to land ratio, some lots have land available that could be utilized for residential units, and some allow the adaptive reuse of the second story of a business for housing. Table **66** shows sites included on the Sites Inventory that are representative of all sites identified in the downtown area. As shown on Table 64 above, these sites show indicators of potential turnover and have high potential for redevelopment.

Table 66

Representative Sites (Mixed-Use Corridors)

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
875 N Stockton St	Currently occupied by a series of disused industrial/commercial buildings with low improvement to land value ratio. The site is currently going through receivership, as it is blighted and abandoned by out of town owners who inherited the property. Affordable Developer Visionary Home Builders is interested in redeveloping the site due to its located near other housing and amenities. Rezone to high-density residential would facilitate the development of at least 80 dwelling units.	3.58	80	
1045 South Cherokee	This 3.4 acre site is occupied by a single story commercial building with an auto-parts retailer. Both the Improvement to land area ratio and the floor area ratio are low with large surface parking lots and loading areas. The Site is zoned Mixed-Use Corridor and can accommodate approximately 71 dwelling units close to schools, housing, and other amenities.	3.40	71	
1606 - 1618 S Lower Sacramento Rd	This site comprises three residential parcels which if consolidated would total 3.14 acres. The site is currently occupied by four older single-family residences. The owner of 1618 S Lower Sacramento has expressed interested in purchasing 1606 and 1610 for the purposes of developing a medium – high density residential project.	3.14	42	
716 E Pine St	This 1.01 acre site is currently occupied by an older single-story commercial building and is currently not leased. The site has a low floor area ratio and improvement to land value ratio and a large surface parking lot. Rezoning to Mixed-Use Corridor will facilitate the development of at least 21 dwelling units in the vicinity of other multi-family housing and businesses.	1.01	21	

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
401 E Harney Ln	This 6.57 acre site currently hosts agricultural uses and no permanent structures. The site has been slated for subdivision and residential development in the past, and rezoning to High-Density Residential will facilitate the development of approximately 138 dwelling units.	6.57	138	

Sites used in Previous Planning Periods

In accordance with Government Code Section 65583, vacant parcels from both the 4th and 5th cycles and non-vacant parcels from the 5th cycle may be reused in this Housing Element to accommodate lower-income housing, provided they are rezoned to allow projects that have at least 20 percent of the units set aside to be affordable for lower-income households to be allowed by right (i.e., can be approved administratively without requiring Planning Commission or City Council approval). Five vacant or nonvacant sites identified on the Site Inventory are subject to this by-right requirement, as shown on Table 67.

Table 67 Sites Used in Previous Planning Periods

Address	APN	Acres	Land Use	Zoning	Existing Use	Total Units
604 East Pine	04323001	0.50	Mixed Use Corridor	MCO	Vacant	9
1045 South Cherokee	04740004	3.40	Mixed Use Corridor	MCO	Older commercial building	71
929 South Cherokee	04739007	1.00	Mixed Use Corridor	MCO	Vacant	21
1050 South Cherokee	04741001	1.21	Mixed Use Corridor	MCO	One-story older motel	25
Westgate Drive	02740001	19.85	Medium Density Residential	PD(42)	Vacant	277

City-Owned Sites

While the vast majority of identified opportunity sites are privately owned, four sites owned by the City have been identified as having redevelopment potential and have been included on the Site Inventory. These sites are

currently vacant, are considered highly developable, and are currently zoned to support medium- and low-density residential and mixed-use projects.

The City will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as "surplus properties" under California Law.

As of 2023, the city is actively recruiting nonprofit developers to visit and consider city-owned sites and has prepared flyers sent to targeted non-profit housing developers summarizing positive attributes that could assist in locating housing for purposes of tax credit applications or similar funding sources. The City anticipates issuing incremental RFPs in the future for available city owned sites, however, due to staff shortages, the city has not been able to move as quickly as expected.

Through program 1.16. the City intends to make these four properties available through the Surplus Land Act process over the next two years. The City shall conduct studies of each site to determine the most efficient use for housing, including engagement with local affordable housing developers to determine site constraints and potential policies to meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by 2026. The City anticipates two- years to enter into an Exclusive Negotiation Agreement (2026), and one-and-a-half additional years for land use entitlements and development agreements (2027-2028). There are no known additional barriers to development on these sites.

Table 68 lists the City-owned sites identified for redevelopment. In the event that these sites do not develop in this time frame, the City will identify alternative sites to accommodate the RHNA.

Table 68 City-Owned Sites

Address	APN	Acres	Land Use	Zoning	Existing Use	Total Units
2 East Lodi Ave	04531001	0.62	Mixed Use Corridor	PF	Vacant	13
17 East Elm St	04308204	0.79	Mixed Use Corridor	MCO	Vacant	16
2630 South Stockton St	05866015	1.53	Low Density Residential	PD(39)	Vacant	8
North Lower Sacramento Rd	05804016	4.59	Medium Density Residential	PD(41)	Vacant	64

Large Sites for Lower-Income Units

Government Code Section 65583.2 establishes that sites between 0.5 and 10 acres in size which are zoned for residential development at greater than 30 units per acre are suitable for lower-income projects. Very small parcels, even when zoned for high densities, may not facilitate the scale of development required to access competitive funding resources. No standalone parcels smaller than 0.5 acres include lower-income units. Conversely, typically lower-resource affordable housing developers may be unable to finance the scale of project necessitated by very large parcels. The Sites Inventory includes four opportunity sites with lots greater than 10-

acres and four annexation sites in the South Study Area. These sites only assume low income up to 10 acres of the site, because of the assumption that these sites will be parceled out.

To ensure the development of lower-income units on large sites, projects will require development agreements requiring city approval, since the city is given land for the purpose of affordable housing. The City will then issue RFPs to qualified affordable housing developers for those sites. The City is also pursuing funds to hire a consultant to prepare design standards for Missing Middle[24] housing types, and requirements those housing types to be integrated into newly developed residential subdivisions.

Excluding parcels listed for annexation, the Sites Inventory includes four vacant parcels larger than 10 acres that include lower-income units. These sites have an existing zoning of PD, which relies on the underlying General Plan designation for the use, which is low density residential and medium density residential and would allow for up to 8 and 20 units per acre respectively. The City anticipates that these parcels would be subdivided to accommodate a variety of housing types (02740015 and 02740001) or be parceled into individual plots for single family (05804022 and 05804025). While two sites have not received proposals to develop or divide the parcel, the City has a strong track record of developing large parcels and does not anticipate parcel size to impede residential development of these sites. The City will work with developers to include an affordable housing development on these sites.

The status of the two sites identified within current city limits to support lower-income units are detailed below. The realistic unit capacity for each site is shown on Table 69:

2800 West Lodi Avenue (02740015)

This parcel is part of the Rose Gate II subdivision, the Sites Inventory assumes nine acres of the total acreage will be dedicated to lower-income units.

Westgate Drive (02740001)

This parcel is part of the Rose Gate II subdivision, the sites inventory assumes nine acres of the total acreage will be dedicated to lower-income units.

Table 69 Large Sites

Address	APN	Acres	Land Use	Zoning	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
2800 W Lodi Ave	02740015	25.45	Medium Density Residential	PD (42)	126	92	138	356
Westgate Dr	02740001	19.85	Medium Density Residential	PD (42)	126	60	91	277

[24] *Missing Middle housing types refer to housing that has a single-family house scale but with multiple units and is compatible the scale and form of single-family homes, this form is typically seen in duplexes, townhomes, and mixed-use.*

Inventory of Residential Opportunity Sites

The Site Inventory lists all sites or parcels that are intended to accommodate residential development in fulfillment of Lodi's RHNA. The inventory is broken up into five distinct geographic areas of the city:

- North Lodi
- South Lodi
- East Lodi
- West Lodi
- Downtown

Each site listing includes the following items in the column heading order from left to right:

- Map Identification number (a unique reference number assigned by the City to reference the parcel on each map)
- Address or nearest cross street
- Assessor's Parcel Number (GC 65583.2(b)1))
- Size in acres (GC 65583.2(b)(2))
- General Plan land use designation (GC 65583.2(b)(2))
- Zoning designation (GC 65583.2(b)(2))
- Description of existing uses (GC 65583.2(b)(3))
- Improvement to land value ratio (ILV)
- Floor area ratio (FAR)
- Inventoried income level (lower, moderate, above moderate) (GC 65583.2(c))
- Total number of units realistically assumed on the site

All opportunity sites are listed by neighborhood on Table 70 and shown geographically on Figure 3.

North Lodi

North Lodi represents the area with the lowest capacity for future residential units. This neighborhood is bounded by city boundaries to the north, Lockeford Street and Victor Road to the south, Guild Avenue to the east, and the Union Pacific Railroad to the west. This neighborhood primarily consists of residential uses, with a concentration of industrial uses to the east. Of the 9 sites identified in this neighborhood, all sites are vacant. Opportunity sites in North Lodi can accommodate 34 moderate-income units, and 2 above moderate-income units.

South Lodi

The south neighborhood of Lodi has significantly higher development potential than other neighborhoods. This neighborhood is bounded by Kettleman Lane to the north, and city boundaries to the south, east, and west. South Lodi has a variety of land uses, mostly residential, with some industrial and commercial. Of the 18 sites identified in this neighborhood, 14 sites are vacant. Opportunity sites in South Lodi can accommodate 352 lower-income units, 48 moderate-income units, and 430 above moderate-income units.

East Lodi

East Lodi is bounded by Victor Road to the north, Kettleman Lane to the south, city boundaries to the east, and the Union Pacific Railroad to the west. East Lodi primarily consists of industrial uses, with low density residential uses in its western half. The City identified 36 opportunity sites in this area, of which 21 are vacant. Opportunity sites in East Lodi can accommodate 171 lower-income units, 109 moderate-income units, and five above moderate-income units.

West Lodi

West Lodi is bounded by the Union Pacific Railroad to the north, Kettleman Lane to the south, the Union Pacific Railroad and downtown to the east, and city boundaries to the west. Similar to the North Lodi neighborhood, West Lodi primarily consists of residential uses. The City identified 15 opportunity sites in this area, all vacant. Opportunity sites in West Lodi can accommodate 386 lower-income units, 177 moderate-income units, and 261 above moderate-income units.

Downtown Lodi

Downtown Lodi has significant development capacity. This neighborhood is bounded by Lockeford Street to the north, Lodi Avenue to the south, the Union Pacific Railroad to the east, and Hutchins Street to the west. Downtown Lodi primarily consists of mixed-use development and quasi-public uses. The City identified 7 opportunity sites in this area, 3 of which are vacant. Opportunity sites in Downtown Lodi can accommodate 37 moderate-income units.

Figure 3 Lodi Site Inventory

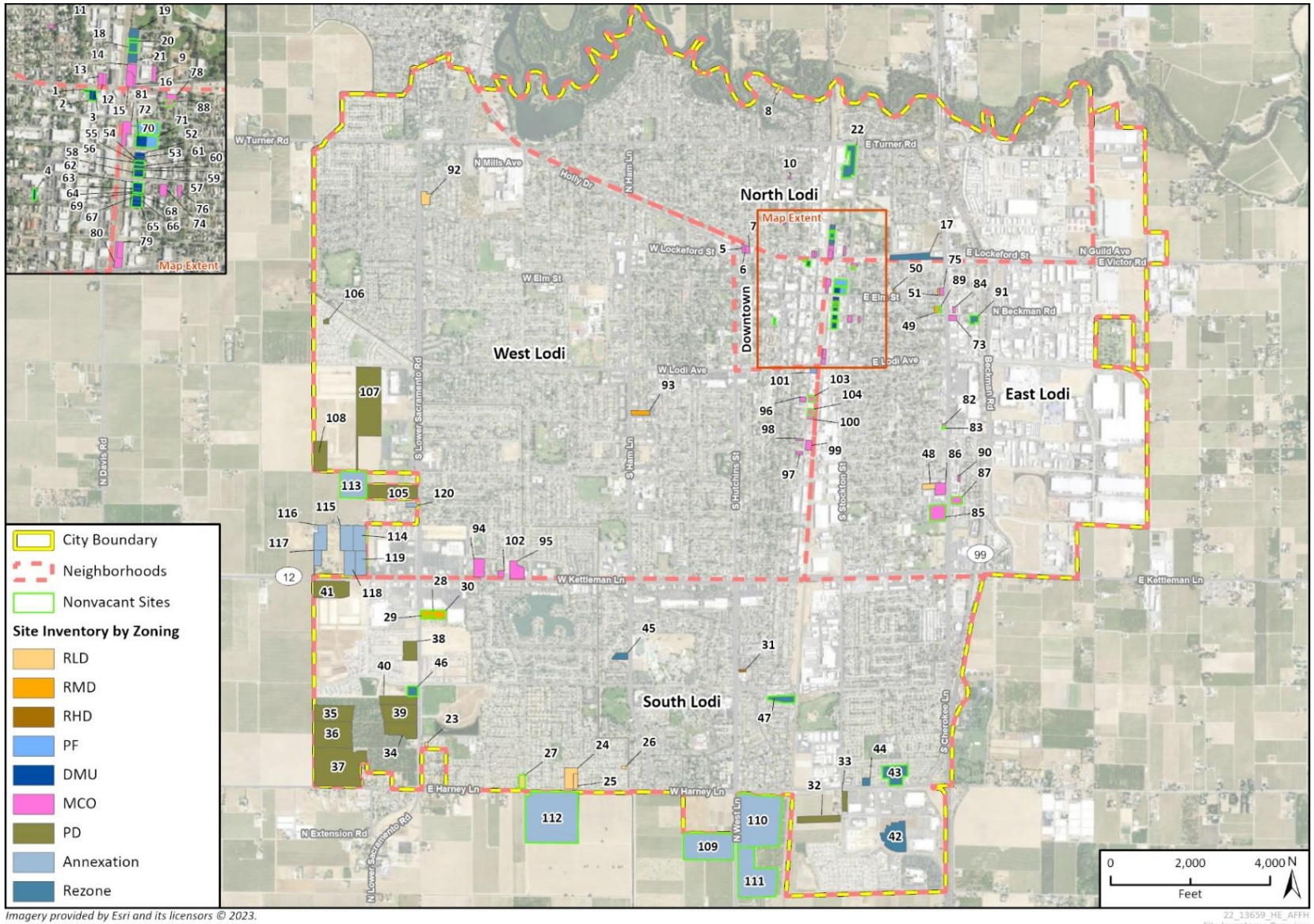


Table 70 Opportunity Sites in Lodi

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
Downtown Lodi												
1	226 North School St	04302501	0.09	Downtown Mixed Use	DMU	Parking	0.00	0.00	0	1	0	1
2	20 West Lockeford St	04302503	0.20	Downtown Mixed Use	DMU	Parking	0.06	0.00	0	4	0	4
3	16 West Lockeford St	04302504	0.23	Downtown Mixed Use	DMU	Parking	0.00	0.00	0	4	0	4
4	211 West Oak St	04303209	0.20	Downtown Mixed Use	DMU	Parking	0.00	0.00	0	4	0	4
5	427 West Lockeford St	03726001	0.33	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	6	0	6
6	427 West Lockeford St	03726002	0.19	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	3	0	3
7	427 West Lockeford St	03726003	0.42	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	8	0	8
Total									0	30	0	30
North Lodi												
8	1258 Rivergate Dr	04128025	0.37	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	2	2
9	115 East Lockeford St	04123046	0.32	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	6	0	6
10	728 North Church St	04113001	0.11	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	2	0	2
11	433 North Church St	04114011	0.08	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	1	0	1
12	3 West Lockeford St	04116505	0.20	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	4	0	4
13	5 West Lockeford St	04116513	0.27	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	5	0	5
14	301 North Main St	04123005	0.14	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	2	0	2
15	17 East Lockeford St	04123041	0.37	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	7	0	7

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
16	301 North Main St	04123042	0.09	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	1	0	1
Total									0	28	2	30
South Lodi												
23	2442 Vintage Oaks Ct	05864014	0.19	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	1	1
24	1749 West Harney Ln	05821003	2.30	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	12	12
25	1649 West Harney Ln	05821004	0.50	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	2	2
26	2548 Canal Dr	05858038	0.21	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	1	1
27	2011 Harney Ln	05860010	1.23	Low Density Residential	RLD	Residential	7.37	0.11	0	0	5	5
28	1606 South Lower Sacramento Rd	05814004	1.11	Medium Density Residential	RMD	Residential	1.56	0.13	14	0	0	14
29	1610 South Lower Sacramento Rd	05814011	0.55	Medium Density Residential	RMD	Residential	1.72	0.11	6	0	0	6
30	1618 South Lower Sacramento Rd	05814005	1.48	Medium Density Residential	RMD	Rural Residential	2.58	0.09	19	0	0	19
31	1880 South Hutchins St	06249001	0.29	High Density Residential	RHD	Vacant	0.00	0.00	0	7	0	7
32	South Stockton St	05888068	4.14	Low Density Residential	PD(39)	Vacant	0.00	0.00	0	0	23	23

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
33	2630 South Stockton St	05866015	1.53	Low Density Residential	PD(39)	Vacant	0.00	0.00	0	0	8	8
34	2375 South Lower Sacramento Rd	05804027	6.59	Low Density Residential	PD(41)	Vacant	0.00	0.00	0	0	36	36
35	Calla Dr	05804021	9.17	Low Density Residential	PD(41)	Vacant	0.00	0.00	0	0	51	51
36	Calla Dr	05804022	14.40	Low Density Residential	PD(41)	Vacant	0.00	0.00	0	0	80	80
37	Calla Dr	05804025	27.02	Low Density Residential	PD(41)	Vacant	0.00	0.00	0	0	151	151
38	1805 South Lower Sacramento Rd	05875046	3.79	High Density Residential	PD(41)	Vacant	0.00	0.00	79	0	0	79
39	North Lower Sacramento Rd	05804026	8.93	Medium Density Residential	PD(41)	Vacant	0.00	0.00	112	6	8	125
40	3025 Gala Dr	05803040	8.60	High Density Residential	PD(41)	Vacant	0.00	0.00	123	35	52	240
Total									417	48	430	894
East Lodi												
47	930 South Garfield St	04739020	0.98	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	5	5
48	539 East Pine St	04317010	0.40	Medium Density Residential	RMD	Vacant	0.00	0.00	0	5	0	5

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
49	403 East Elm St	04311327	0.20	Medium Density Residential	RMD	Vacant	0.00	0.00	0	2	0	2
50	545 East Elm St	04318001	0.20	Medium Density Residential	RMD	Vacant	0.00	0.00	0	2	0	2
51	108 East Elm St	04307101	0.21	Downtown Mixed Use	DMU	Vacant building/ community garden	2.71	0.43	0	5	0	4
52	30 1/2 North Main St	04307102	0.21	Downtown Mixed Use	DMU	Vacant	4.67	0.14	0	5	0	4
53	26 North Main St	04307103	0.10	Downtown Mixed Use	DMU	Vacant	0.00	0.00	0	2	0	2
54	24 1/2 North Main St	04307104	0.10	Downtown Mixed Use	DMU	Office/ Business	4.57	0.30	0	2	0	2
55	20 North Main St	04307105	0.10	Downtown Mixed Use	DMU	vacant building	0.25	0.40	0	2	0	2
56	101 East Pine St	04307112	0.21	Downtown Mixed Use	DMU	Older commercial building	3.10	0.29	0	5	0	4
57	8 North Main St	04307114	0.10	Downtown Mixed Use	DMU	Vacant Building	7.80	0.30	0	2	0	2
58	10 North Main St	04307115	0.10	Downtown Mixed Use	DMU	vacant land	0.00	0.00	0	2	0	2
59	14 North Main St	04307116	0.10	Downtown Mixed Use	DMU	vacant land	0.00	0.00	0	2	0	2
60	100 East Pine St	04307201	0.31	Downtown Mixed Use	DMU	Office/ Business	0.00	0.39	0	7	0	6

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
61	30 South Main St	04307208	0.21	Downtown Mixed Use	DMU	vacant building	2.15	0.52	0	5	0	4
62	22.5 South Main St	04307209	0.21	Downtown Mixed Use	DMU	Hotel	5.79	0.43	0	5	0	4
63	14 South Main St	04307212	0.10	Downtown Mixed Use	DMU	Vacant	0.00	0.00	0	2	0	2
64	111 North Stockton St.	04308407	0.62	Public/Quasi-Public	PF	City Parks & Rec (leased)	0.00	0.60	13	0	0	13
65	103 East Elm St	04308406	0.62	Downtown Mixed Use	DMU	Vacant Steel Building/ Underutilized/ Available	1.45	0.37	13	0	0	13
66	604 East Pine St	04323001	0.50	Mixed Use Corridor	MCO	Vacant	0.00	0.00	9	0	0	9
67	208 East Pine St	04307401	0.41	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	8	0	8
68	101 North Cherokee Ln	04318002	0.39	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	8	0	8
69	11 South Washington St	04307406	0.23	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	4	0	4
70	228 North Stockton St	04308502	0.31	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	6	0	6
71	207 South Main St	04306101	0.46	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	9	0	9
72	223 South Main St	04306102	0.60	Mixed Use Corridor	MCO	Vacant	0.00	0.00	3	0	0	3
73	17 East Elm St	04308204	0.79	Mixed Use Corridor	MCO	Vacant	0.00	0.00	16	0	0	16

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
74	715 South Cherokee Ln	04737015	0.14	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	2	0	2
75	721 South Cherokee Ln	04737016	0.12	Mixed Use Corridor	MCO	Commercial	0.66	0.25	0	1	0	1
76	611 East Pine St	04321032	0.23	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	4	0	4
77	1045 South Cherokee	04740004	3.40	Mixed Use Corridor	MCO	Older commercial building	0.79	0.28	71	0	0	71
78	929 South Cherokee	04739007	1.00	Mixed Use Corridor	MCO	Vacant	0.00	0.00	21	0	0	21
79	1050 South Cherokee	04741001	1.21	Mixed Use Corridor	MCO	One-story older motel	2.56	0.21	25	0	0	25
80	218 North Stockton St	04308503	0.21	Mixed Use Corridor	MCO	Warehouse	0.58	0.24	0	4	0	4
81	543 East Pine St	04317011	0.28	Mixed Use Corridor	MCO	Parking	0.00	0.00	0	5	0	5
82	916 South Cherokee Ln	04742012	0.19	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	3	0	3
Total									171	109	5	285
West Lodi												
84	630 North Lower Sacramento Rd	02906066	0.90	Low Density Residential	RLD	Vacant	0.00	0.00	0	0	2	2
85	380 South Sunset Dr	03308007	0.75	Low Density Residential	RMD	Vacant	0.00	0.00	10	0	0	10
86	2223 West Kettleman Ln	02741016	2.67	Mixed Use Corridor	MCO	Vacant	0.00	0.00	56	0	0	56
87	2100 Tienda Dr	02743007	1.40	Mixed Use Corridor	MCO	Vacant	0.00	0.00	26	0	0	26
88	431 South Sacramento St	04520136	0.43	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	9	0	9
89	801 South Sacramento St	04524014	0.30	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	6	0	6

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	ILV	FAR	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
90	713 South Sacramento St	04524007	0.21	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	4	0	4
91	728 South Sacramento St	04533001	0.89	Mixed Use Corridor	MCO	Vacant	0.00	0.00	18	0	0	18
92	514 South Sacramento St	04532016	0.33	Mixed Use Corridor	MCO	Vacant	0.00	0.00	0	6	0	6
93	2 East Lodi Avee	04531001	0.62	Mixed Use Corridor	PF	Vacant	0.00	0.00	13	0	0	13
94	2115 West Kettleman Ln	02743010	0.56	Mixed Use Corridor	MCO	Vacant	0.00	0.00	11	0	0	11
95	1055 South Lower Sacramento Rd	02705005	5.00	Low Density Residential	PD(34)	Vacant	0.00	0.00	0	0	28	28
96	68 Secret Ct	02955055	0.36	Low Density Residential	PD(42)	Vacant	0.00	0.00	0	0	2	2
97	2800 West Lodi Ave	02740015	25.45	Medium Density Residential	PD(42)	Vacant	0.00	0.00	126	92	138	356
98	Westgate Dr	02740001	19.85	Medium Density Residential	PD(42)	Vacant	0.00	0.00	126	60	91	277
Total									386	177	261	824
Lodi Total									910	392	698	2,000

Annexation Sites

Annexation is the process by which a city adds land to its jurisdictional boundaries. Following annexation, the City extends its services, laws, and voting privileges to meet the needs of residents living in the annexed area. Typically, annexation takes place in areas that are adjacent to a municipality, where the population already has expanded to densities found in urban areas. Annexation encourages orderly growth and provides standardized services to those who live in the annexed area. The annexation process is a shared procedure between San Joaquin County and the City of Lodi, overseen by the San Joaquin Local Agency Formation Commission (LAFCo).

There are currently 12 sites located within two annexation areas (South Study Area and West Study Area) that are anticipated to be made available for development during the 6th cycle. Because the City is surrounded by high-quality farmland, Lodi has traditionally constrained urban expansion beyond the city limits. However, with an increased demand for housing, newly required housing needs will need to be met through annexation of unincorporated areas within the SOI. The City's SOI/Municipal Services Review (MSR) was updated in October 2022 for this purpose, with residential land uses focused within the South and West SOI. The SOI update was broken into two phases (10 year and 30 year), with Phase 1 anticipating a 10-year development horizon projected to add 10,111 new residents, assuming 2.7 persons per household (per General Plan). By Phase 2 completion (30 year horizon) 34,895 new residents are projected (2.7 persons per household). As mentioned in Program 1.9, the City has begun pursuing annexation of land within the expanded 10-year SOI area to serve the future needs of residents and conform with the 6th Cycle RHNA.

The annexations shall be completed within the planning period and shall include the following remaining milestones:

- Board of Supervisors approval of the Annexation and Tax Sharing Agreement(s), estimated in 2024.
- City Council approval of the Annexation and Tax Sharing Agreement(s), estimated in 2024.
- LAFCO annexation approval, estimated by 2026.
- If LAFCO does not approve the annexations, the City shall continue to pursue approval through additional LAFCO hearings throughout the planning period.
- In 2027, complete a mid-cycle review of progress toward annexations and revise RHNA calculations, potentially including rezoning additional sites (by 2028) if the annexations sites are found to be infeasible for development in the planning period.
- Provide zoning in compliance with Government Code section 65583.2, subdivisions (h) and (i) on appropriate acreage within annexation sites included as lower income RHNA capacity, including a combined total of at least 16 acres within sites 109-112. Zoning will permit owner-occupied and rental multifamily uses by-right (without discretionary approval) for developments in which 20 percent or more of the units are affordable to lower income households, allow for at least 20 dwelling units per acre, at least 16 dwelling units per site, require a minimum density of 20 units per acre and up to 100 percent residential floor area in mixed use zones and require that residential uses occupy at least 50 percent of the total floor area of a mixed use project.

Parcels selected for the 6th cycle Sites Inventory are located within the first phase. To encourage development in the Phase I area, the City will continue working with developers on a strategy to identify available parcels and

annexation opportunities. A portion of the annexed properties are included in the Sites Inventory with an assumed 2,075 total units across these parcels. The City has started the annexation process with San Joaquin LAFCo and it is anticipated that these parcels will be annexed to the City and developed with residential uses by the end of the planning period. The City has worked with the property owners of these sites to commit a portion of the land to residential zoning. To ensure these parcels are available for development during the planning period, the City will continue to work with property owners and San Joaquin LAFCo to facilitate the annexation of these parcels. The City will work to identify infrastructure needs within the City's Sphere of Influence and will work with local developers and non-profit affordable housing providers to identify and pursue funding opportunities to support needed expansion of electric, water, and sewer infrastructure services in areas most appropriate for residential development with a goal of securing $8-10 million in the planning period.

Zoning will accommodate mixed-use, low-density residential, and medium-density residential development. Unit totals per income category were estimated based on the residential zoning densities anticipated for each site included in the annexation. In low density residential zones, above-moderate income units were assigned. In mixed-use corridor ones both moderate and above-moderate income units were assigned. In medium density zones, assumed units were split amongst all income categories. Table 71 shows the anticipated size and unit assumptions for each annexation and Figure 3 shows the locations of these annexation sites.

South Study Area

In the South Study area, the City is progressively meeting with multiple interested parties (developers and property owners) concerning development proposals from roughly Harney Lane/Mills Avenue termination on the west side to Harney/UP Track on the east side, to the SOI line on the south. This area includes 200-300 acres of land.

The primary issue in developing the South Study Area involves lack of utility infrastructure, including storm water outflow connections to the slough to the south and electric utility substations (2 needed). However, the developers and the City are actively meeting to come up with solutions to locate and fund infrastructure.

West Study Area

On the west side, infrastructure is generally in place and/or already planned, therefore, the annexation on the west side will occur first. A developer is actively meeting with the City regarding annexation of this area and has presented a proposed land use map for consideration.

Table 71 Annexation Sites

Map ID	Cross-Streets/ Addresses	APN	Acreage	Lower-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units
South Study Area							
99	Harney Ln and West Ln	05810004	18.81	80	95	183	358
100	Harney Ln and West Ln	05811047	30.37	80	108	292	480
101	Harney Ln and	05811037	28.57	80	67	192	339

	West Ln						
102	Harney Ln and Mills Ave	05810021	157.64	80	102	368	550
Total			235.39	320	372	1,019	1,711
West Study Area							
103	351 E Taylor Rd Lodi	2705002	10	0	0	56	56
104	306 E Taylor Rd Lodi	2705010	4.85	0	0	27	27
105	240 E Taylor Rd Lodi	2705011	5	0	0	28	28
106	68 E Taylor Rd Lodi	2705024	4.37	0	0	24	24
107	31 E State Route 12 Lodi	2705015	2	0	0	42	42
108	291 E State Route 12 Lodi	2705020	4.27	0	0	90	90
109	341 E State Route 12 Lodi	2705021	4.11	0	0	86	86
110	15511 N Lower Sacramento Rd Lodi	2706023	0.7	0	0	10	10
Total			35.3	0	0	364	364
Lodi Total			235.39	320	372	1,383	2,075

Rezone Sites

To accommodate this shortfall of capacity, the City is obligated to rezone land suitable to facilitate the development of the listed rezone sites. The City of Lodi anticipates beginning the rezone process with outreach and public hearings for all properties identified in the Sites Inventory in Spring 2023, continuing through Fall 2023. The City anticipates adoption of the rezonings by the end of 2023, prior to the start of the 6th cycle Housing Element planning period. Sites to accommodate 659 housing units will be rezoned concurrently with the adoption of this Housing Element.

The Sites Inventory includes 13 sites that will be rezoned to facilitate additional residential development. Of these 13 sites, six will be rezoned to high density residential and seven will be rezoned to mixed-use corridor, both zones have the potential maximum capacity of 35 dwelling units per acre. These sites are located in North, South, and East Lodi and the location of each site is labeled by its Map ID number on Figure 3. Table 72 summarizes the acreage and unit assumptions for sites proposed for rezoning.

Table 72 Realistic Capacity of Rezoned Sites

Map ID	APN	Location	Acres	Existing Zoning District	Proposed Zoning District	Maximum Density	Realistic Density	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
	North Lodi										
17	04320229	522 E Lockeford	3.57	M	MCO	35	21	75	0	0	75
18	04123003	319 N Main	0.33	M	MCO	35	21	0	0	7	7
19	04123001	351 N Main	0.33	M	MCO	35	21	0	0	7	7
20	04123002	341 N Main	0.11	M	MCO	35	21	0	0	2	2
21	04123004	315 N Main	0.33	M	MCO	35	21	0	0	7	7
22	04124048	875 N Stockton	3.58	M	RHD	35	21	80	0	0	80
Total								155	0	23	178
	South Lodi										
41	05865013	2940 Reynolds Ranch	8.67	PD(39)	MCO	35	21	105	31	46	182
42	06229037	401 E Harney	6.57	PD(38)	RHD	35	21	105	13	20	138
43	06229025	311 E Harney	0.5	RLD	RHD	35	21	11	0	0	11
44	06008001	1811 S Ham	1.36	PD(15)	RHD	35	21	29	0	0	29
45	05803006	2057 Lower Sacramento	1.53	PD (41)	RHD	35	21	0	0	48	48
46	N/A	130 W Century	2.50	OS	RHD	35	21	53	0	0	53
Total								302	44	114	460
	East Lodi										
83	04323025	716 E Pine	1.01	M	MCO	35	21	21	0	0	21
Total								21	0	0	21
Lodi Total			30.39					398	124	139	659

Summary of Adequate Sites

The residential Sites Inventory identified vacant and nonvacant sites in Lodi which can accommodate a total of 4,733 residential units based on residential densities per existing land use designations, zoning districts, and annexations.

Lodi anticipates meeting its RHNA requirements for the December 2023 through December 2031 planning period. The Sites Inventory shows a surplus of 188 low-income units, giving the City a 12 percent buffer over its allocated

RHNA in that income category. The results of the residential Sites Inventory are presented on Table 73. Sites are broken down by zone district.

Table 73 Adequacy of Residential Sites Inventory

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	941	591	706	1,671	3,909
Planned and Approved Units	0	12	0	0	12
ADUs	0	0	0	56	56
Remaining RHNA	941	579	706	1,615	3,841
RLD	0		0	30	30
RMD	49		9	0	58
RHD	0		7	0	7
DMU	26		59	0	85
MCO	269		124	0	393
PD(34)	0		0	28	28
PD(39)	0		0	31	31
PD(41)	314		41	378	733
PD(42)	252		152	231	635
Potential Rezone Sites	478		44	137	659
Annexation Sites	320		372	1,383	2,075
Total Units on Vacant or Underutilized Sites	1,708		808	2,217	4,733
Unit Surplus	188		102	602	892
Total % Buffer	11%		14%	36%	23%

Adequacy of Public Facilities and Infrastructure

This section addresses the adequacy of public facilities and services (i.e., water and sewer services) to accommodate planned residential growth through the end of the Housing Element planning period. All services in the City are sufficient to accommodate the number of units allocated by the RHNA.

Water

The City of Lodi Water Utility is the sole water purveyor for the City. The City's water supply relies on local groundwater from the Eastern San Joaquin Subbasin and surface water supplies from the Mokelumne River

purchased from Woodbridge Irrigation District[25]. The City's primary source of water is groundwater which is sourced from 28 groundwater production wells. The capacity of the groundwater wells range from 1.2 to 3.0 million gallons per day (mgd) and the total capacity of the 28 existing wells is 54.8 mgd.

Historically, the City solely relied on groundwater but began operating a Surface Water Treatment Facility (SWTF) in November 2012, increasing its use of surface water such that it accounts for almost half of the City's supplies. The SWTF currently has a treatment capacity of 10 mgd and is expandable to up to 20 mgd, allowing the City's capacity to expand its future surface water use demands. Since the completion of the 2015 Urban Water Management Plan, the City has built a new storage tank at Well 23 and completed additional storage tank at Well 28 in 2022[26]. These storage tanks mitigate or potentially eliminate the need to construct the new wells which the City's Water Master Plan anticipated would be needed by 2035 to meet demands. The City anticipates adequate water capacity to accommodate development on these opportunity sites.

Sewer

The City of Lodi Department of Public Works provides wastewater collection and treatment for the incorporated area of the City of Lodi. The wastewater treatment plant operated by White Slough Wastewater Pollution Control Facility has adequate capacity to treat all wastewater flows. The facility's current design capacity is 8.5 million gallons per day and the plant is currently functioning at 75-percent of capacity. The City anticipates adequate wastewater capacity to accommodate development on these opportunity sites.

Stormwater

The City of Lodi Department of Public Works provides stormwater maintenance for the incorporated area of the City of Lodi. The City maintains a gravity-based stormwater system built around a number of storm water detention basins and disposal of runoff by pumping to the Woodbridge Irrigation District (WID) Canal, Lodi Lake, or the Mokelumne River. As of 2010, the City has a total of 3,394 catch basins and 2,193 manholes in its storm water system. In 2012, the City of Lodi developed a Stormwater Management Program committed to protecting its rivers and the Delta by involving and educating residents in stormwater pollution prevention, regulating stormwater runoff from construction sites, investigating non-stormwater discharges, and reducing non-stormwater run-off from municipal operations. Lodi's stormwater basins should have adequate stormwater capacity to accommodate development within the current City limits with the adoption of a new policy. This new policy will address and identify the strain on the City's storm and sewer systems seen on the east side of Lodi due to its rate of growth.

Dry Utilities

While there is no set definition for dry utilities, it is generally accepted that the term refers to utilities that transmit either energy, such as electricity or natural gas, or data and telecommunication service, such as telephone, internet, or cable service. Pacific Gas and Electric (PG&E) is the sole natural gas service provider for the residents and businesses across the city. Data and telecommunication services are provided through a variety of service providers such as AT&T, Xfinity, and T-Mobile.

[25] 2022 Lodi Municipal Service Review and Sphere of Influence Update, June 2022. https://www.lodi.gov/DocumentCenter/View/5284/City-of-Lodi-Draft-MSR-SOI-Update-PDF

[26] 2020 Urban Water Management Plan, August2021. https://www.lodi.gov/DocumentCenter/View/4623/2020-Urban-Water-Management-Plan-PDF

Electrical service within the city is provided by the Lodi Electric Utility (LEU). LEU is a customer-owned and City-operated utility that provides electrical services for residential, commercial, and industrial customers in the city. As areas get annexed into the city, the electrical service provider will shift from PG&E to the LEU. With new residential growth in annexed areas, an expansion of distribution lines with be required and funded by the developer. The City anticipates adequate dry utility capacity to accommodate development on these opportunity sites.

Environmental Constraints

A city's environmental setting and characteristics can greatly affect the feasibility and cost of developing housing. As noted in Section 4. *Constraints,* environmental factors in Lodi include potential impacts from wildfire, drought, flood, and the Williamson Act. There are no known barriers on these sites related to shape, access, contamination, easements, property conditions, likelihood of disposition of right a ways, Williamson act, conservation easements, environmental overlays.

Wildfire

The majority of Lodi is located in an urbanized area and is not exposed to wildfire hazards, however wildfires have impacted the area surrounding Lodi and have led to increased displacement and homelessness. The potential impacts of a wildfire would not preclude development of housing in Lodi.

Drought

As for the impacts of a drought, there will be minimal impact on the physical structures of buildings and facilities across Lodi, however there may be less reliability on infrastructure. The potential impacts of a drought would not preclude development of housing in Lodi.

Flood

Flood hazards are a constraint to development only in two areas of the city: the area immediately adjacent to the Mokelumne River along the city's northern boundary, and the area around the White Slough Water Pollution Control Facility. No new development is planned within either of these areas and is not a constraint to development.

Williamson Act

Potential residential annexation areas, defined by Phase 1 of the General Plan, include 73 acres of land covered by active Williamson Act contracts. Of these acres, 68 acres are designated for low density residential and five acres for medium density residential. The City does not need this land in order to accommodate its share of the RHNA (specifically the below-market-rate units) and does not intend to pursue annexation until those contracts have expired and the market is ready for urban development.

Opportunities for Energy Conservation

LEU allows flexibility and control over energy sources, and offers programs to reduce energy use including:

- Residential Energy Survey Program helps residents identify major energy uses and how these can be reduced.
- Residential Products Rebate Program provides rebates on the purchase of new, energy-efficient appliances.
- Energy Efficient Home Improvement Program offers rebates on other types of energy efficient residential systems (fans, space conditioning, insulation, thermostats, windows, etc.).
- California First-PACE (Property Assessed Clean Energy) Program allows property owners to finance the installation of energy and water improvements in homes or businesses, which can then be paid back as a line item on a property tax bill.
- Home Energy Renovation Opportunity (HERO) Financing Program is a type of PACE program that allows property owners to fund energy efficiency, water efficiency, and renewable energy projects with little or no upfront costs. With PACE, residential and commercial property owners living within a participating district can finance up to 100 percent of their project and pay it back over time as a voluntary property tax assessment through their existing property tax bill.

Inventory of Local, State, and Federal Housing and Financing Programs

The City of Lodi utilizes local, state, and federal funds to implement its housing strategy. More than one source of public funds is typically required to construct an affordable housing development. The City of Lodi does not act as a developer in the production of market-rate or affordable units but relies primarily upon the private sector to develop new units with the assistance of these various public funding sources.

Local Agency and Administrative Resources

The City of Lodi Community Development Department and the Housing Authority County of San Joaquin (HACSJ) are the two major governmental agencies responsible for local housing programs. Additionally, the City works closely with non-profit organizations involved in affordable housing funding and programs in the city such as Eden Housing and Habitat for Humanity of San Joaquin County (HFH). This section describes the roles, funding, and programs they administer.

City of Lodi

The Community Development Departments Neighborhood Services Division is responsible for administering state and federal grants for affordable housing activity in the City of Lodi. The City relies on several sources of funding to accomplish its goals including, but not limited to Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME).

The City of Lodi is an entitlement community under the CDBG program and a participating jurisdiction under the guidelines of the HOME program. This means that the City receives funds annually; however, the allocation is based on the federal budget. The City received a total grant allocation of approximately $640,916 of CDBG funds

for the 2023-24 program year[27]. The City generally reserves 60 percent of CDBG capital improvement Funds for City-sponsored projects and 40 percent for community-based organizations. Projects benefiting from the use of these funds, from the 2023-24 program year include, but are not limited to:

- **Fair Housing Services.** Funds will provide services for fair housing counseling, fair housing testing, housing discrimination and tenant/landlord law hotline, complaint investigation, and outreach and education at community events.
- **Boys and Girls Club.** Utilizing the funds for constructing a sunshade to cover a patio area to provide sun protection to program participants.
- **Creekside South Apartments.** Utilize CDBG funds to rehabilitate the Creekside South Apartments, an affordable 40-unit property for seniors.
- **Family Resource Center.** This center will utilize the funds to provide gang prevention and wraparound services for Lodi's at-risk youth and their families. This will include assessments, case management, group counseling, and a curriculum program.
- **Second Harvest of the Grater Valley.** Funds will support the Second Harvest Food Bank's food assistance program that distributes it to low-income persons and persons experiencing homelessness.

Housing Authority County of San Joaquin

The Authority County of San Joaquin (HACSJ) was established in 1942 pursuant to the United States Housing Act of 1937 and state enabling legislation. The HACSJ is responsible for providing safe, decent, and affordable housing for low-income families, the elderly, and persons with disabilities. HACSJ offers programs to assist extremely low- to moderate-income households with their housing costs, including the Section 8 rental assistance program, public housing, and migrant farmworker housing.

HACSJ services have included educational resources such as GED preparation, financial literacy, homebuyer education, and job fairs. In addition, they have the several programs that promote self-sufficiency:

- **Family Self-Sufficiency program:** a voluntary employment and savings incentive program designed to assist families in becoming economically independent and self-sufficient while reducing and/or eliminating the need for government cash assistance.
- **Resident Opportunities Self Sufficiency program:** a program designated for public housing residents to enable increased earned income, reduce and/or eliminate the need for welfare assistance, and make progress toward achieving economic independence and self-sufficiency.

Central Valley Low Income Housing Corporation

Central Valley Low Income Housing Corporation (CVLIHC) provides both permanent supportive housing for homeless households with disabilities and transitional housing and support services for homeless families. CVLIHC's permanent and transitional programs are located at scattered sites throughout San Joaquin County, with participants having the primary responsibility for the units where they live. Supportive services include basic life

[27] 2023-24 Annual Action Plan: Community Development Block Grant Program. https://www.lodi.gov/DocumentCenter/View/6455/2023-24-Draft-Annual-Action-Plan_Website-PDF

skills training, parenting and family counseling, transportation assistance, childcare, assistance in school enrollment, and job search training. CVLIHC's programs provide housing and supportive services for about 600 households per year.

Christian Church Homes

Christian Church Homes (CCH) has been providing housing in communities since 1961. The organization was created to meet the housing needs of low-income seniors who faced limited housing choices in Northern California. CCH manages 56 facilities in six states. The majority of CCH's facilities are U.S. Department of Housing and Urban Development (HUD) subsidized and allow low-income residents to pay a maximum of 30 percent of their adjusted gross income for rent.

Community Home Builders and Associates

Community Home Builders and Associates (CHBA) is a nonprofit public benefit corporation involved in the development, construction, and management of affordable housing for individuals and families of low to moderate incomes. The organization was founded in 1990 by the Home Builders Association of Northern California. Through its sponsorship of the San José Conservation Corps' YouthBuild program, CHBA has provided employment for at-risk youth in the construction trades while helping to create opportunities for the building industry to partner with local communities in an effort to fulfill affordable housing goals.

Eden Housing

Eden Housing is a nonprofit developer that serves low-income families, seniors, persons with disabilities, the formerly homeless, and first-time homebuyers. Eden Housing has experience applying for funding through government programs, including Low-Income Housing Tax Credit, and HUD Section 202 and 811 programs. In 2017 Eden Housing developed Cranes Landing, a residential development located on Tienda Drive. This development includes 49 affordable rental units for seniors, with eight one-bedroom units set aside for formerly homeless individuals with mental illness.

Habitat for Humanity, San Joaquin County

Habitat for Humanity is a nonprofit faith-based organization dedicated to building affordable housing and rehabilitating homes for lower-income families. Habitat builds and repairs homes with the help of volunteers and partner families. Habitat homes are sold to partner families at no profit with affordable, no-interest loans. Volunteers, churches, businesses, and other groups provide most of the labor for the homes. Government agencies or individuals typically donate land for new homes. In the past, the City of Lodi has provided an allocation of HOME Program funds to the local Habitat for Humanity chapter for land acquisition to accommodate their new construction activities.

Funding Programs and Financial Resources

The City of Lodi and its non-profit partners have access to a variety of existing and potential funding sources available for affordable housing activities. The City leverages federal and local housing funds (i.e., CDBG, HOME funds) to assist non-profit developers in delivering affordable housing in the city.

Described below are programs and funding opportunities in which the City provides and/or services to the community, in relation to affordable and fair housing education/services:

- **Housing Choice Voucher.** The City will continue to support the HACSJ in its administration of the Housing Choice Voucher rental assistance program. Tenant-based Housing Choice Vouchers provide a monthly subsidy to low-income tenants renting market-rate units. Housing Choice Vouchers require an HACSJ inspection of the unit prior to move-in to ensure health and safety standards are met.
- **Non-Profit Assistance Program.** The Non-Profit Assistance (NPA) Program is designed to provide grant funding to local non-profits experiencing a financial shortfall due to the COVID-19 pandemic. Funded by the American Rescue Plan Act (ARPA), the NPA Program reimburses eligible non-profits $25,000 to $50,000 for operating capital expenses, such as payroll, insurance, lease/mortgage payments, inventory, marketing, accounting, and other supplies related to COVID-19 or documented revenue shortfall due to COVID-19 pandemic. Currently this program is undergoing its second round of applications being accepted and the City anticipates awarding up to $200,000 of ARPA funds to non-profit organizations.
- **San Joaquin Fair Housing Services**. The San Joaquin Fair Housing Association is a non-profit agency. Their services are provided to the community free of charge and funded through the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) program. Services provided by the association include information on tenant and landlord rights, mediation, training, and counseling.
- **CDBG Housing and Accessibility Rehabilitation Program (HARP).** Housing and Accessibility Rehabilitation Program (HARP) is intended to financially assist low and very low-income homeowners (owner-occupied) with home improvement needs, including accessibility, and to upgrade the quality of the housing stock within the area. The specific objectives of the program are to improve housing conditions for lower-income households; to preserve the existing housing stock when it is economically feasible; and to improve the quality, accessibility, amenities, and affordability of existing neighborhoods within the City of Lodi.

Additional State and Federal Housing Programs

In addition to the funding programs available through the City, there are several state and federal funding programs that assist first-time homebuyers, build affordable housing, and help special needs groups such as seniors and large households. In most cases other entities, including for-profit and non-profit developers, apply for funds or other program benefits. For example, developers apply directly to United States Department of Agriculture for Section 515 rural loans, to United States Housing and Urban Development for Section 202 and Section 811 loans, or to the California Tax Credit Allocation Committee for low-income housing tax credits. In general, the City of Lodi relies upon the private sector to develop new affordable units.

The following is a description of some of the most significant state and federal funding programs that are available to fund affordable housing opportunities:

- **Affordable Housing and Sustainable Communities (AHSC) Program.** This program is provided from the Greenhouse Gas Reduction Fund (GGRF), administered by the Strategic Growth Council, implemented

through the Department of Housing and Community Development (HCD), provides grants and/or loans to projects that will achieve GHG reductions and benefit Disadvantaged Communities through increasing accessibility of affordable housing, employment centers and key destinations.

- **Section 811 Program.** The Section 811 program, sponsored by HUD, provides interest-free capital advances and rental assistance funds to private, non-profit sponsors to help finance the development of housing for persons with disabilities. Public sponsors are not eligible to apply for Section 811 funds. The capital advance can cover the construction, rehabilitation, or acquisition of supportive housing. The sponsor does not have to repay the capital advance as long as the project serves the target population for 40 years. Additionally, rental assistance funds are provided for three years to cover the difference between the HUD approved operating cost for the development and the rent paid by tenants—usually 30 percent of adjusted income. These three-year contracts are renewable based on the availability of funds.
- **Section 202 Program.** The Section 202 program, also sponsored by HUD, is similar to the Section 811 Program; however, the target population for the Section 202 program is the very low-income elderly. The same capital advance and rental assistance is available to private, non-profit sponsors of affordable elderly housing. As with the Section 811 program, public sponsors are not eligible for the Section 202 program.
- **Low-Income Housing Tax Credits.** The Low-Income Housing Tax Credit (LIHTC) program was created in 1986 by the Federal Government as a method for funding affordable housing. Depending on the project, the program gives either a 4 percent or 9 percent income tax credit over a 10-year period to the housing developer to help leverage the private costs of construction and rehabilitation of affordable housing units. Since the amount of credit available to the developer often exceeds the amount that the developer can use, private investors frequently participate in the LIHTC project through a syndication process and receive Federal tax credits in return for an upfront investment. Applying for the LIHTC program is a competitive process. Projects are ranked relative to each other based on criteria in the State's Qualified Allocation Plan (QAP). The QAP considers factors such as cost, amenities, and project location, when comparing proposed projects. To qualify for the LIHTC program, projects must also meet specific minimum requirements. These requirements are as follows:
    - At least 20 percent of the residential units must be affordable to individuals whose income is 50 percent or less of the area median income; or
    - At least 40 percent of the residential units must be affordable to individuals whose income is 60 percent or less of the area median income; and
    - The housing units must remain affordable for a 30-year period.
- **Additional Private Funding.** The Community Reinvestment Act of 1977 (CRA) directs the Department of the Treasury, the Federal Reserve System, the Federal Deposit Insurance Corporation, and the Federal Home Loan Bank Board to encourage and assist the institutions they regulate to meet the credit needs of their communities. These agencies must assess the records of their member institutions when evaluating applications for a charter or other regulated transactions. As a result of the CRA, many major financial institutions have elected to actively participate in funding low- and moderate-income housing developments developed by non-profit corporations.

- **The Federal Home Loan Bank (FHLB)** provides direct project financing through its member institutions as part of its Affordable Housing Program. FHLB administers the Affordable Housing Program (AHP), which facilitates the development of affordable rental housing and homeownership opportunities, through a competitive application process, a bank provides grants or subsidized interest rates on advances to members to finance their affordable housing initiatives. The California Community Reinvestment Corporation (CCRC) was formed to pool the resources of the state's banks to assist in financing affordable housing. CCRC specializes in programs for families, seniors, citizens with special needs and mixed use developments. Finally, the Federal National Mortgage Association (Fannie Mae) provides permanent financing for affordable housing development by purchasing or securitizing the lender-originated first mortgages on mutually agreeable terms.

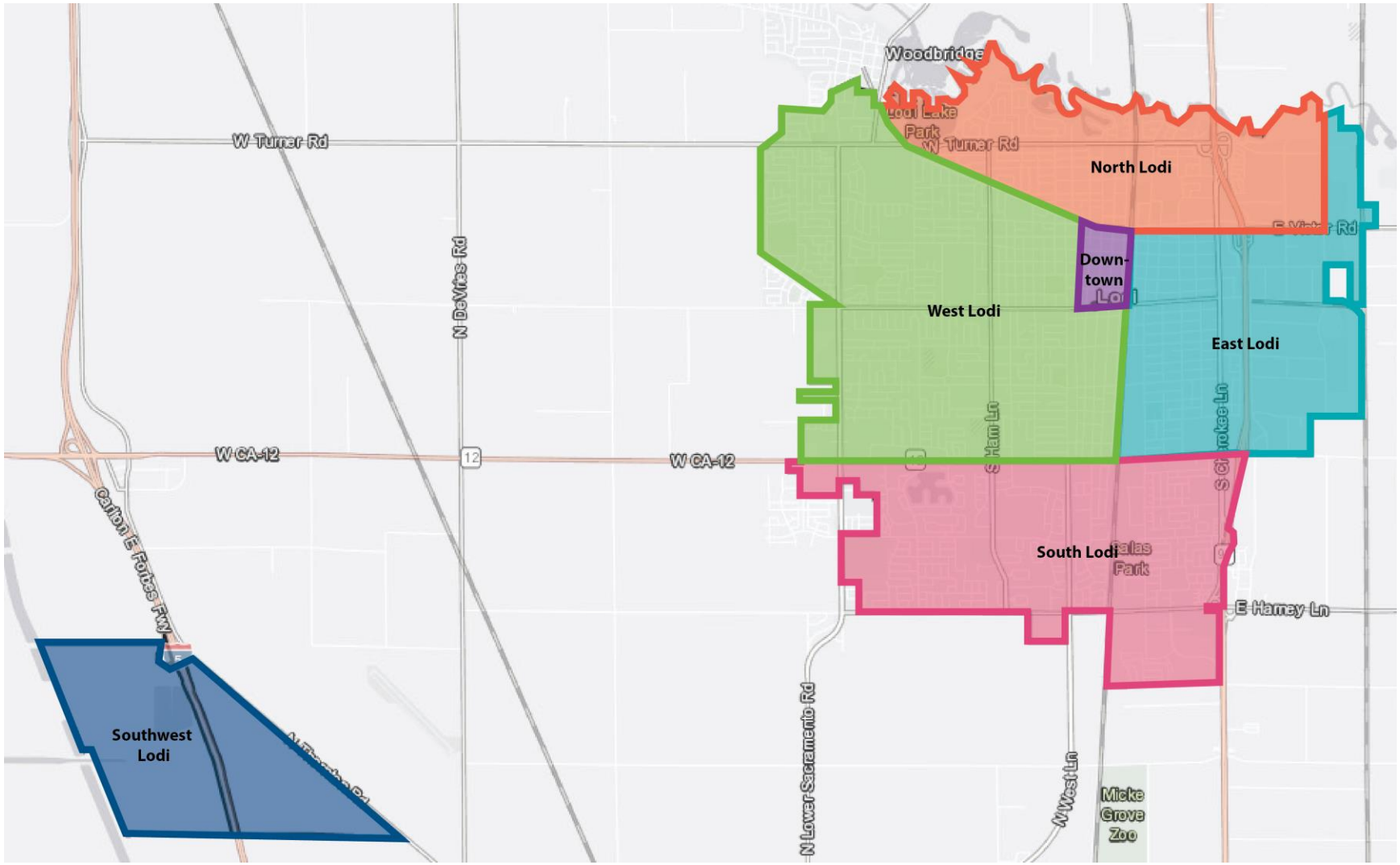
6. Affirmatively Furthering Fair Housing

California Government Code Section 8899.50 requires local agencies to affirmatively further fair housing (AFFH). Under California law, AFFH means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." Government Code Section 8899.50 stipulates that an assessment of fair housing (AFH) includes the following components:

- A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity
- An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk
- An assessment of the contributing factors for the fair housing issues identified under Government Code Section 65583 (10)(A)(ii)
- An identification of Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing
- An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in Government Code Section 65583 (10)(A)(iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved
- Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement

This AFFH analysis addresses impediments through AFFH-specific goals, and actions based on the contributing factors for each identified fair housing issue. For the purposes of this analysis, the city is divided into six neighborhoods: Downtown Lodi, East Lodi, North Lodi, South Lodi, Southwest Lodi, and West Lodi, as shown in Figure 4 below. Southwest Lodi does not include any residential uses, is entirely zoned Public/Quasi Public, and consists of the White Slough Water Pollution Control Facility. Adjacent to the White Slough Facility is City-owned land that is leased to farmers for the cultivation and harvesting of feed and fodder crops not intended for human consumption.

Figure 4 Neighborhoods in Lodi



Source: AFFH Viewer 2023.

Fair Housing Methodology

This assessment has been prepared consistent with the California Department of Housing and Community Development (HCD) Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and ensure statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

Data Sources

The analysis includes a discussion of historic land use and segregation patterns and input from sources of local knowledge, including advocates for people with special needs, housing development and advocacy organizations, housing and social services providers, and low-income residents. To conduct this analysis, the City utilized data from a variety of sources, described in the sections below.

AllTransit

AllTransit is a tool that examines access to transit. The website uses metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service, and scores communities based on those factors (the AllTransit performance score).

CalEnviroScreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. This tool, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a community has a high score for that indicator, it is more impacted by pollution burdens and population vulnerabilities compared to other communities. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts across California.

California Tax Credit Allocation Committee (TCAC) Opportunity Maps

To assist fair housing analysis, HCD and TCAC created the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies and departments to further the state's fair housing goals.[28] The California Fair Housing Task Force created Opportunity Maps to identify resources levels across the state to accompany new policies aimed at increasing access to high-opportunity areas for families with children. Opportunity Maps are made from composite scores of three different domains made up from a set of indicators data shown in Table 74. The Opportunity Maps include filters to identify areas with poverty and racial segregation, and one composite map which considers all three domains.

[28]Office of The State Treasurer (STO). 2021. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf

Table 74 Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty, adult education, employment, Job proximity, median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency, reading proficiency, high school graduation rates, student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps 2020.

Comprehensive Housing Affordability Strategy (CHAS) data, developed by the U.S. Department of Housing and Urban Development (HUD)

Each year, HUD receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households. CHAS data is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types.

Department of Housing and Community Development AFFH Data Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract-level data from an expansive collection of sources including U.S. Census Bureau American Community Survey (ACS), U.S. Department of Housing and Urban Development (HUD), California Tax Credit Allocation Committee (TCAC), Urban Displacement Project (UDP), and Comprehensive Housing Affordability Strategy (CHAS), described below. The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

Urban Displacement Project (UDP)

The UDP was developed to track neighborhood change and identify areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015 ACS. UDP indicators examine census tracts to identify areas that qualify as disadvantaged neighborhoods. Additionally, census tracts identified as disadvantaged neighborhoods by UDP's criteria are further analyzed to explore changes in the percentage of college educated residents, non-Hispanic white population, median household income, and median gross rents over time to determine levels of gentrification and displacement risk.

U.S. Census American Community Survey (ACS)

The American Community Survey (ACS), conducted by the U.S. Census Bureau, is an ongoing survey that collects information on demographic, social, economic, and housing characteristics of the U.S. population. ACS uses independent monthly samples, each with a sample size of 250,000 addresses (consisting of housing units and

group quarters), surveyed via internet, mail, telephone, and personal visit. ACS data uses 1-year and 5-year estimates. The 1-year data is collected over a period of 12 months and is useful for showing year-to-year fluctuations in data for geographic areas with at least 65,000 people. The 5-year estimates represent data collected over a period of 60 months (5 years) and are considered statistically more reliable than the 1-year estimates, particularly for less populated areas and small population subgroups.

2022 Comprehensive Housing Report for the San Joaquin Valley

In response to housing supply and affordability challenges, the San Joaquin Valley REAP Committee commissioned a study of housing trends, impediments, and best practices in the San Joaquin Valley (SJV). Funded by the Regional Early Action Planning (REAP) grant program, and with the coordination of HCD staff, the study included outreach to the eight counties in the San Joaquin Valley, stakeholders, city and county staff, Metropolitan Planning Organization (MPO) staff, and the public. Interviews with builders, developers, housing advocates, and city, county, and MPO staff led meaningful analysis of barriers to housing affordability and production in the SJV.

Key findings in the study suggest that while the region has become more diverse in the past few decades, there are existing disparities in income, poverty, and homeownership among racial and ethnic groups. Stakeholder interviews provided insight to trends and challenges in housing affordability, and also provided a list of opportunity areas for affordable housing in the eight counties that make up the SJV region: San Joaquin, Stanislaus, Merced, Madera, Fresno, Tulare, Kings, and Kern counties. This report is discussed in *Section 6.2.*

City of Lodi Analysis of Impediments

An Analysis of Impediments to Fair Housing Choice, or "AI," is a requirement for recipients of certain grants from the U.S. Department of Housing and Urban Development (HUD). The City of Lodi Analysis of Impediments to Fair Housing Choice (AI) presents a demographic profile of the City of Lodi, assesses the extent of housing needs among specific income groups, and evaluates the availability of a range of housing choices for residents. This report also analyzes the conditions in the private market and the public sector that could limit the range of housing choices or impede a person's access to housing. Although this report also assesses the nature and extent of housing discrimination, it primarily focuses on identifying impediments that could prevent equal housing access and developing solutions to mitigate or remove such impediments.

City of Lodi Consolidated Plan

As an entitlement jurisdiction under the U.S. Department of Housing and Urban Development (HUD), Lodi receives federal funds in proportion to its population size, concentration of poverty, and other socioeconomic and demographic data. Every five years, HUD requires entitlement jurisdictions to submit a Consolidated Plan that identifies needs within low-to moderate- income (LMI) communities and outlines how the City will address those needs. The City's most recent Consolidated Plan (Con Plan) covers Fiscal Years 2019 to 2023, which serves as the City's official application to HUD for Community Development Block Grant (CDBG) funds.

Fair Housing Resources

Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity is the ability of a local jurisdiction and fair housing entities to provide fair housing and tenants' rights information to community members. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, resolving issues, and conducting fair housing testing.

Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing is a technique used to uncover evidence of discrimination in rental housing. Fair housing testing involves one or more individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, state, and federal fair housing laws. If a renter encounters an issue related to fair housing laws, enforcement actions may be taken when investigations yield evidence of a pattern or practice of illegal housing discrimination. Testing may be initiated following the filing of a specific housing discrimination complaint or, as is the case when testing for discrimination against a specific class, as part of an overall effort to determine whether the discrimination is happening in a consistent systemic pattern in a city or region.

In San Joaquin County, fair housing testing is used to identify unlawful housing discrimination practices based on the real or perceived race, ethnicity, color, religion, gender identity or expression, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, and source of income of prospective renters. In addition, the City of Lodi partners with the San Joaquin Fair Housing (SJFH) and California Rural Legal Assistance (CRLA) to conduct fair housing testing, maintain the housing discrimination and tenant/landlord law hotline, investigate complaints, and complete outreach and education through public forums. According to the Consolidated Plan, City is providing CDBG funds to CRLA to conduct five audit-based tests and complaint-based testing on an as-needed basis.

Table 75 shows organizations throughout San Joaquin County that conduct fair housing assistance outreach. These organizations collaborate with San Joaquin County and other local governments, including the City of Lodi, to address housing and community needs and provide the following services:

- Fair housing testing and complaints
- Fair housing counseling and education
- Tenant/landlord counseling and mediation
- Homeless prevention program
- Rental assistance program
- Rent/deposit grant program
- Home seeking services
- Shared housing counseling placement
- Homebuyers' education learning program

Table 75 Fair Housing Organizations Active in San Joaquin County

Organization	URL	Phone Number
California Rural Legal Assistance	https://crla.org/	(800) 337-0690
Fair Housing Council of Central California (FHCCC)	http://www.fhc-cc.org/	(559) 244-2950
Housing Authority of the County of San Joaquin	https://hacsj.org/	(209) 460-5000
Resources for Independence Central Valley	http://www.ricv.org/	(209) 383-1683
San Joaquin Fair Housing	https://sjfairhousing.com/	(209) 451-3471

Sources:
California Rural Legal Assistance. https://crla.org/
Fair Housing Council of Central California (FHCCC). http://www.fhc-cc.org/
Housing Authority of the County of San Joaquin https://hacsj.org/
Resources for Independence Central Valley. http://www.ricv.org/
San Joaquin Fair Housing. https://sjfairhousing.com/

Fair Housing Council of Central California (FHCCC) partners with jurisdictions in San Joaquin County to conduct fair housing audits and testing of rental properties to assess how well rental properties conform to fair housing laws. FHCCC also provides comprehensive training and technical support to housing providers on federal and state fair housing laws and accepts complaints from residents throughout the Central Valley.

Compliance with Fair Housing Laws

The City complies with the following State and federal fair housing laws:

- **Fair Housing Act; Title VI of the Civil Rights Act of 1964** – the City complies by ensuring its actions related to housing are not discriminatory through City protocols, decision-making procedures, and adhering to non-discrimination requirements of federal funding programs.
- **Rehabilitation Act of 1973** – see Fair Housing Act; also, the City complies through its accessibility protocols, administered and enforced by the City's ADA/504 Coordinator and Building Official.
- **American Disabilities Act** – the City complies with ADA through building permit review and issuance and as described in Chapter 4 Constraints, under the heading Housing for Persons with Disabilities).
- **California Fair Employment and Housing Act (FEHA) and FEHA Regulations** – the City complies through established City protocols for hiring and decision making, mandatory trainings for City staff, and legal counsel and advisement.
- **Government Code Section 65008** – the City ensures that the City's actions are not discriminatory through training programs conducted by the City's Human Resources Department. Programs are included in this Housing Element to facilitate housing for all households, including protected classes (e.g., programs regarding residential care facilities, reasonable accommodation, and emergency shelters).
- **Government Code Section 8899.50** – Chapter 6 of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements.

- **Government Code Section 11135 et. seq.** – the City complies with anti-discrimination requirements through the City's Human Resources programs and the City's procurement protocols.
- **Density Bonus Law (Government Code Section 65915)** – the City must update its density bonus provisions in compliance with the Density Bonus Law as described in Chapter 3: Constraints and Program 1.1.
- **Housing Accountability Act (Government Code Section 65589.5)** – the City has documented compliance with the HAA as described in Chapter 3: Constraints.
- **No-Net-Loss Law (Government Code Section 65863)** – the City has documented compliance with sufficient capacity for RHNA and will ensure compliance with no net loss via programs (Program 1.4).
- **Least Cost Zoning Law (Government Code Section 65913.1)** – the City includes programs in this Housing Element to ensure that sufficient land is zoned with appropriate standards to accommodate its RHNA.
- **Excessive subdivision standards (Government Code Section 65913.2)** – the City's subdivision standards are typical or not excessive in compliance with the Government Code (see Chapter 4 Constraints, Section Governmental Constraints).
- **Limits on growth control (Government Code Section 65302.8)** – while the City's Growth Management Allocation Ordinance caps the number of housing units approved by the City at a two percent maximum increase in population annually, the Growth Management Allocation is allowed as Lodi is in a predominantly agricultural county and the ordinance was passed by voters prior to January 1, 2005. Furthermore, the estimated number of allocations to be made available over the planning period is high enough to accommodate the RHNA. Program 1.2 directs the City to revise the Growth Management Allocation Ordinance to exempt housing units affordable to extremely low-, very low-, or low-income households with long-term affordability restrictions, further ensuring that there are no limits on growth control that would discourage housing development in the city.

Ability to Address Complaints

HUD's Office of Fair Housing and Equal Opportunity (FHEO) receives complaints on housing discrimination. At the state level, the Department of Fair Employment and Housing (DFEH) maintains a record of housing discrimination complaints filed in local jurisdictions. In 2020, there was one inquiry but zero fair housing complaints in Lodi filed with DFEH.

Between 2006 and 2020, 207 complaints were filed with the FHEO in San Joaquin County. The most common basis for complaints was disability, comprising approximately 48 percent of all complaints filed in the county (48 complaints). Twenty-nine percent of cases were filed on the basis of race (60 complaints, 29 percent on a Black/African American basis (47 complaints), 16 percent on familial status (34 complaints), 13 percent on national origin (27 complaints), 11 percent on retaliation (23 complaints), 10 percent on a Hispanic national origin basis (20 complaints), and eight percent on sex (17 complaints).

From 2013 to 2022, 16 fair housing complaints were filed with FHEO in Lodi. The most common basis for complaints was national origin, comprising 25 percent of all complaints in the city (4 complaints). Three complaints were filed on the basis of race, three on familial status, one on disability, one on color, one on sex, and one on retaliation.

According to the AI, no fair housing complaints were processed by HUD and instead complaints were referred to DFEH for processing. A total of 16 complaints were recorded with DFEH from 2012 to 2015. The most common basis for complaint was disability (seven complaints). Three complaints were filed on the basis of national origin and one complaint each was filed on the basis of race, religion, marital status, association with a protected class, income, and family care. Based on feedback received during the community engagement process, many residents experience housing discrimination based on disability status.

Segregation and Integration Patterns and Trends

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, in which there is a high concentration of the characteristics described above in a specific geographic area. To adequately assess the patterns of integration and segregation, this section identifies trends at the regional scale (San Joaquin County) and at the local scale (City of Lodi). To identify socio-economic and demographic spatial trends across these jurisdictions, this analysis utilizes HCD's AFFH Data Viewer, which provides an expansive collection of data from sources including the 2015-2019 ACS, HCD, HUD, UDP, the Center for Disease Control and Prevention (CDC), and other regional and federal agencies. In its AFFH guidance document published in April 2021, HCD describes the importance of segregation and integration analysis in relation to fair housing:

- Residential segregation and exclusion, whether by race, ethnicity, disability, or income, is a result of numerous housing policies, practices, and procedures—both public and private—that have had enduring and pervasive negative impacts. Overt and covert housing discrimination through land use policy, shifting housing markets, and patterns of investment and disinvestment, have restricted meaningful fair housing choice and equitable access to opportunity, particularly for communities of color. Historic patterns of segregation persist in California despite the long-standing federal mandate, established by the Fair Housing Act of 1968 (FHA), that federal agencies and federal grantees affirmatively further the purposes of the FHA. Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems. In addition, governmental policies have subsidized the development of segregated, high-resourced suburbs in metropolitan areas by constructing new highway systems—often through lower income communities of color— to ensure access to job opportunities in urban centers. This physical and policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in California and across the country. All of these conditions persist despite the over 50-year-old obligation to prohibit discrimination and affirmatively further fair housing.29

[29] HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

Race and Ethnicity

The ethnic and racial composition of a region relates to fair housing concerns such as household size, locational preferences, and economic opportunity. Historic exclusionary governmental policies, biased mortgage lending practices, and other tactics have caused racial and ethnic segregation and spatial inequities.

Regional Trends

Within the Central Valley, the areas with the highest concentration of White residents are located in Kern County (103 block groups), San Joaquin County (56 block groups) and Fresno County (44 block groups).[30] In San Joaquin County, nearly 40 percent of foreign-born residents originate from Asian countries, which is unique compared to other parts of the Central Valley.[31]

San Joaquin County includes six incorporated cities, primarily located in the southern part of the county. The city of Stockton is located in central San Joaquin County and the city of Lodi is located in northern San Joaquin County. Areas within and near these cities have the highest percentage of non-white residents in the county Figure 5. In contrast, the northern and eastern parts of San Joaquin County, which includes the City of Lodi, contains a higher percentage of White residents.

The HCD AFFH Data Viewer identifies areas that are dominated by one racial/ethnic group and by how much. A racial/ethnic group with a predominant majority has more than a 50 percent difference between the percentage of the population in the dominant racial/ethnic group and the percentage of the population in the second most populated racial/ethnic group. A sizeable majority occurs when the difference is between 10 and 50 percent and a slim majority occurs when the difference is less than 10 percent. Figure 6 shows predominant populations throughout San Joaquin County. Only a few areas, all located near the City of Lodi, include a predominant gap (>50 percent) of White residents. Most of the central and eastern areas of the county have a sizeable majority (10 to 50 percent) of Hispanic/Latino residents. However, portions of the City of Lodi and the City of Stockton have a predominant majority (>50 percent) of Hispanic/Latino residents.

Local Trends

Lodi has a greater percentage of white residents than Stockton, but is similar to other cities in San Joaquin County. The highest percent of non-White residents are located in East Lodi (>81 percent), and the lowest percent (≤20 percent) of non-White residents are located on the portion of West Lodi that borders Downtown.

East Lodi has a predominant majority of Hispanic residents (>50 percent gap), as shown in Figure 9. A portion of South Lodi has a sizeable majority (10-50 percent gap) of Hispanic residents. A small portion of South Lodi has a slim majority of Asian residents (<10 percent gap). The rest of South Lodi and portions of North Lodi and West Lodi have a sizeable majority of White residents. Downtown Lodi and portions of West Lodi and North Lodi have a predominant majority of White residents (>50 percent).

According to the UDP, Downtown Lodi, East Lodi, and portions of North Lodi and South Lodi have a mix of Hispanic/Latino and White residents Figure 10. The rest of North Lodi and South Lodi and most of East Lodi has a

[30] Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf.
[31] Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf.

mix of Asian-American, Hispanic/Latino, and White residents. In East Lodi, the area south of Victor Road and north of Lodi Road consists of mostly Hispanic/Latino residents, indicating this in this area Hispanic/Latino residents are segregated from other racial and ethnic groups.

The population of Lodi has become more diverse since 2000, as shown in Table 76. Between 2000 and 2020, the majority of the population identified as White with the second largest portion of the population identifying as Hispanic/Latino. The percent of the White population has slowly decreased over time while the percent of Hispanic/Latino population has slowly increased. The most dramatic increase in population was for the Asian/Pacific Islander population, which has more than doubled between 2000 and 2020.

Table 76 Population by Racial Group (City of Lodi)

Race/Ethnicity	2000	2010	2020
Hispanic/Latino	27.1%	36.4%	37.8%
Not Hispanic/Latino			
White	63.5%	53.4%	45.8%
Asian/Pacific Islander	5.0%	6.8%	11.2%
Two Or More Races	3.0%	2.2%	3.6%
Black/African American	0.5%	0.6%	1.4%
American Indian and Alaska Native	0.5%	0.4%	0.1%
Some Other Race	0.3%	0.2%	0.0%

Source: U.S. Census Bureau, Table DP05, 2020.

Dissimilarity Index

HUD utilizes the racial/ethnic dissimilarity index as a measure of segregation. The racial/ethnic dissimilarity index represents the extent of which any two racial/ethnic groups differ across a defined geographical area. The index ranges from 0-100, where 0 represents perfect integration between the two racial/ethnic groups and 100 representing perfect segregation. An index value below 40 is generally considered low segregation, a value between 40 and 54 is considered a moderate level of segregation, and a value above 55 is a high level of segregation.

Regional Trends

Racial/ethnic segregation in San Joaquin County decreased slightly between 1990 and 2000 but then increased between 2000 and 2020. Asian/Pacific Islander residents are the most segregated in San Joaquin County compared to other racial and ethnic groups, followed by Black/African American residents (Table 77). These

groups experience a moderate level of segregation, with dissimilarity index scores between 40 and 54. Hispanic/Latino residents are the least segregated in the county, with a dissimilarity score below 40, indicating a low level of segregation.

Table 77 Racial/Ethnic Dissimilarity Trends (San Joaquin County)

Racial/Ethnic Dissimilarity Index	1990	2000	2010	2020
Non-White/White	25.07	22.61	25.46	28.11
Asian or Pacific Islander/White	32.79	31.74	42.75	46.26
Black/White	50.74	41.86	36.87	43.13
Hispanic/White	24.26	24.41	24.27	27.39

Source: Affirmatively Furthering Fair Housing Mapping Tool – Table 3, Version AFFHT0006, 2023.

Local Trends

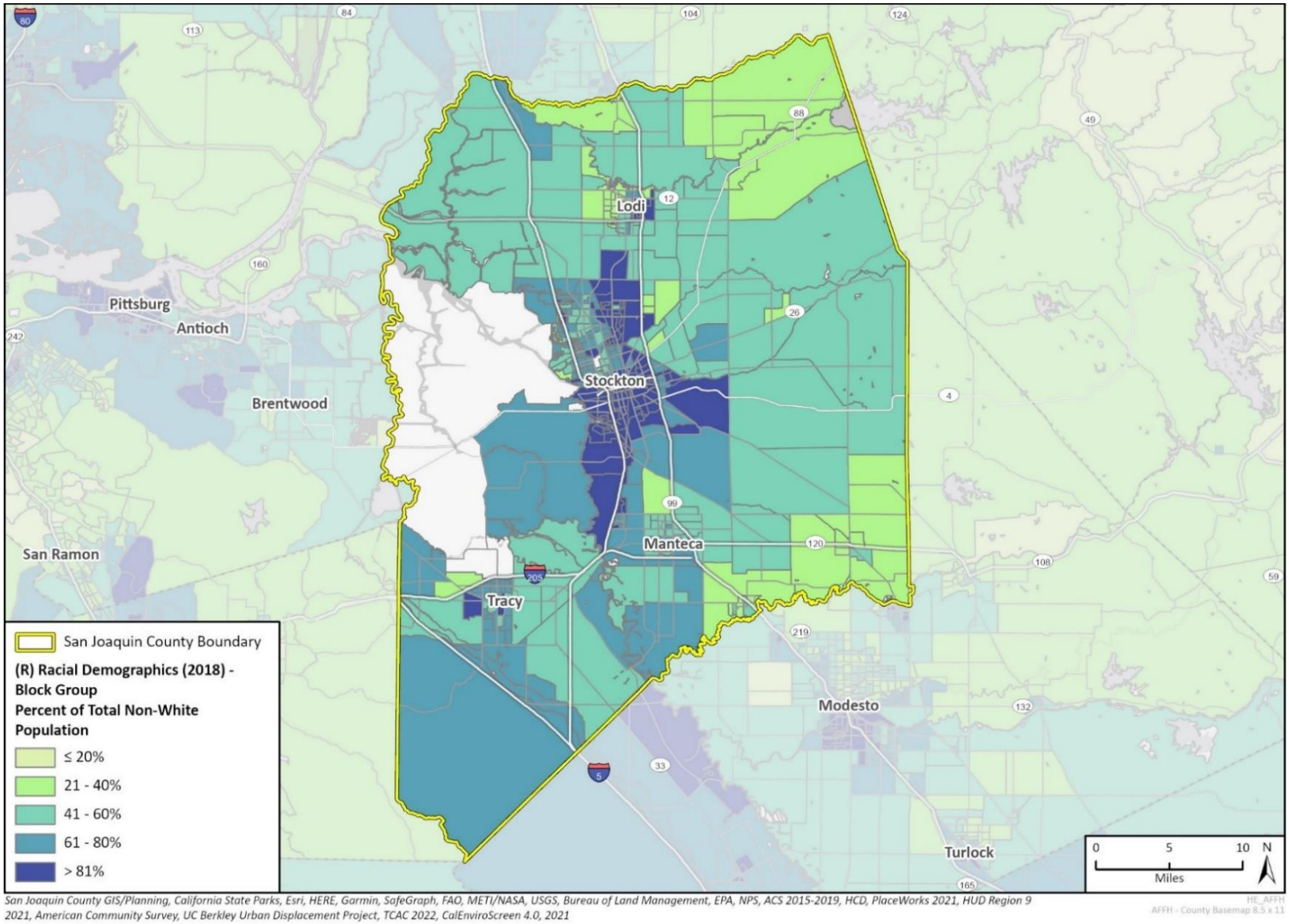
The dissimilarity index scores indicate overall segregation levels between non-White and White residents are higher in Lodi compared to San Joaquin County. Segregation levels in Lodi have generally increased between 1990 and 2020 among all racial/ethnic groups. In contrast to the county, Hispanic/Latino residents are the most segregated populations in Lodi and experience a moderate level of segregation (Table 78). Asian/Pacific Islander and Black/African American residents are less segregated and have low levels of segregation.

Table 78 Racial/Ethnic Dissimilarity Trends (Lodi)

Racial/Ethnic Dissimilarity Index	1990	2000	2010	2020
Non-White/White	29.46	32.70	36.31	41.05
Hispanic/White	34.22	39.53	39.35	43.84
Asian or Pacific Islander/White	16.16	22.54	30.95	34.82
Black/White	28.87	24.19	25.53	32.28

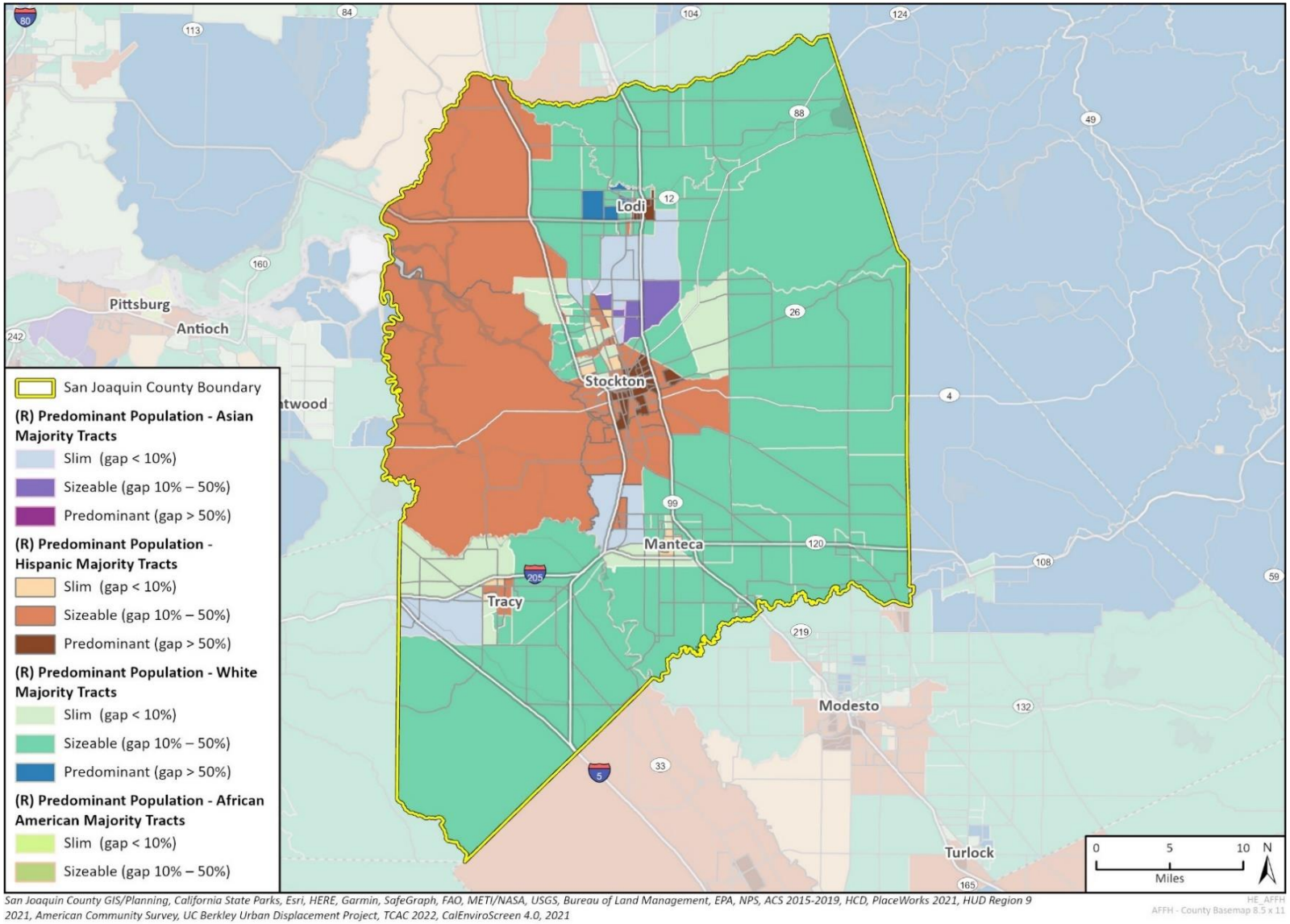
Source: Affirmatively Furthering Fair Housing Mapping Tool – Table 3, Version AFFHT0006, 2023.

Figure 5 Percent of Total Non-White Population (San Joaquin County)



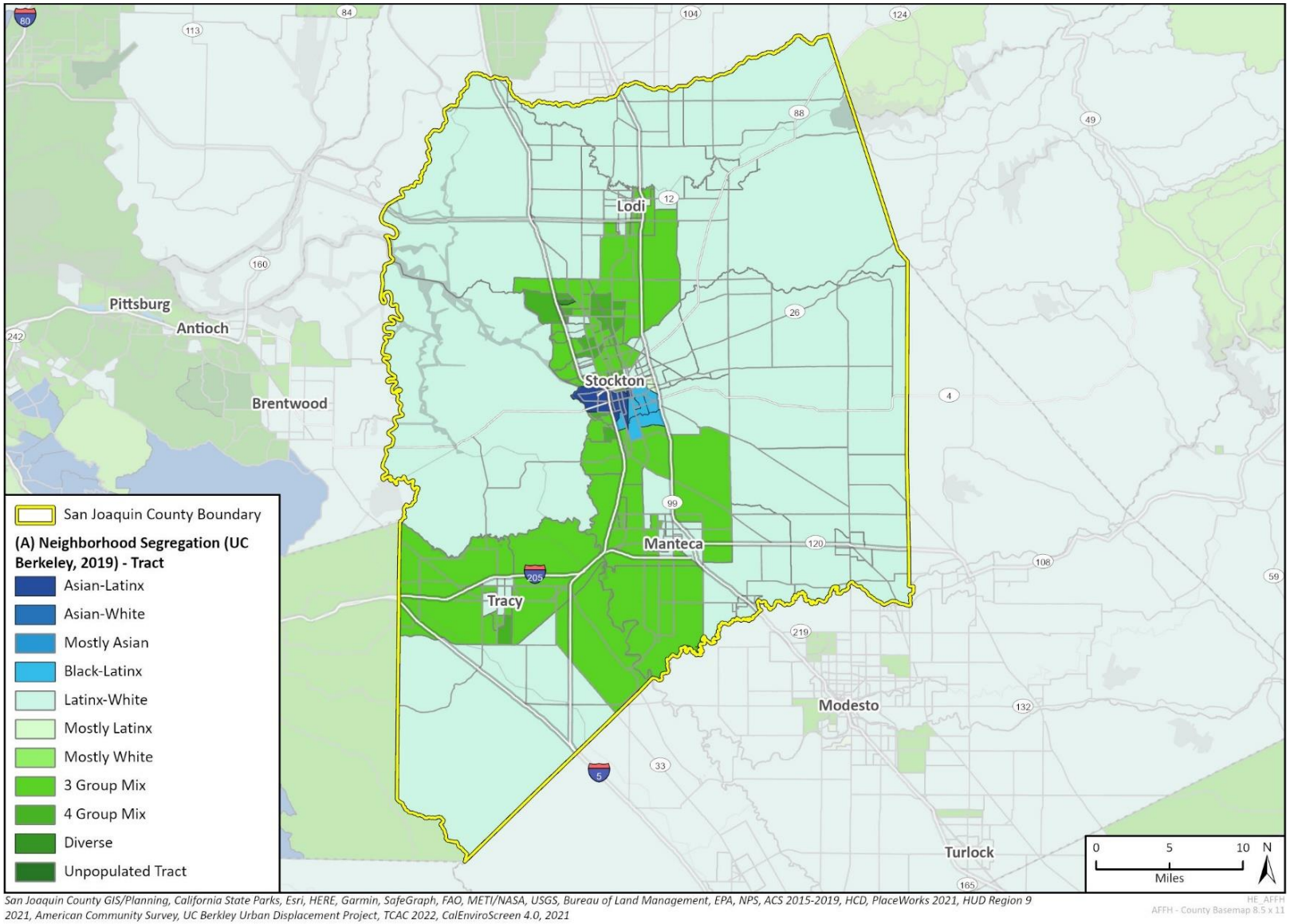
Source: AFFH Viewer 2023.

Figure 6 Predominant Populations (San Joaquin County)



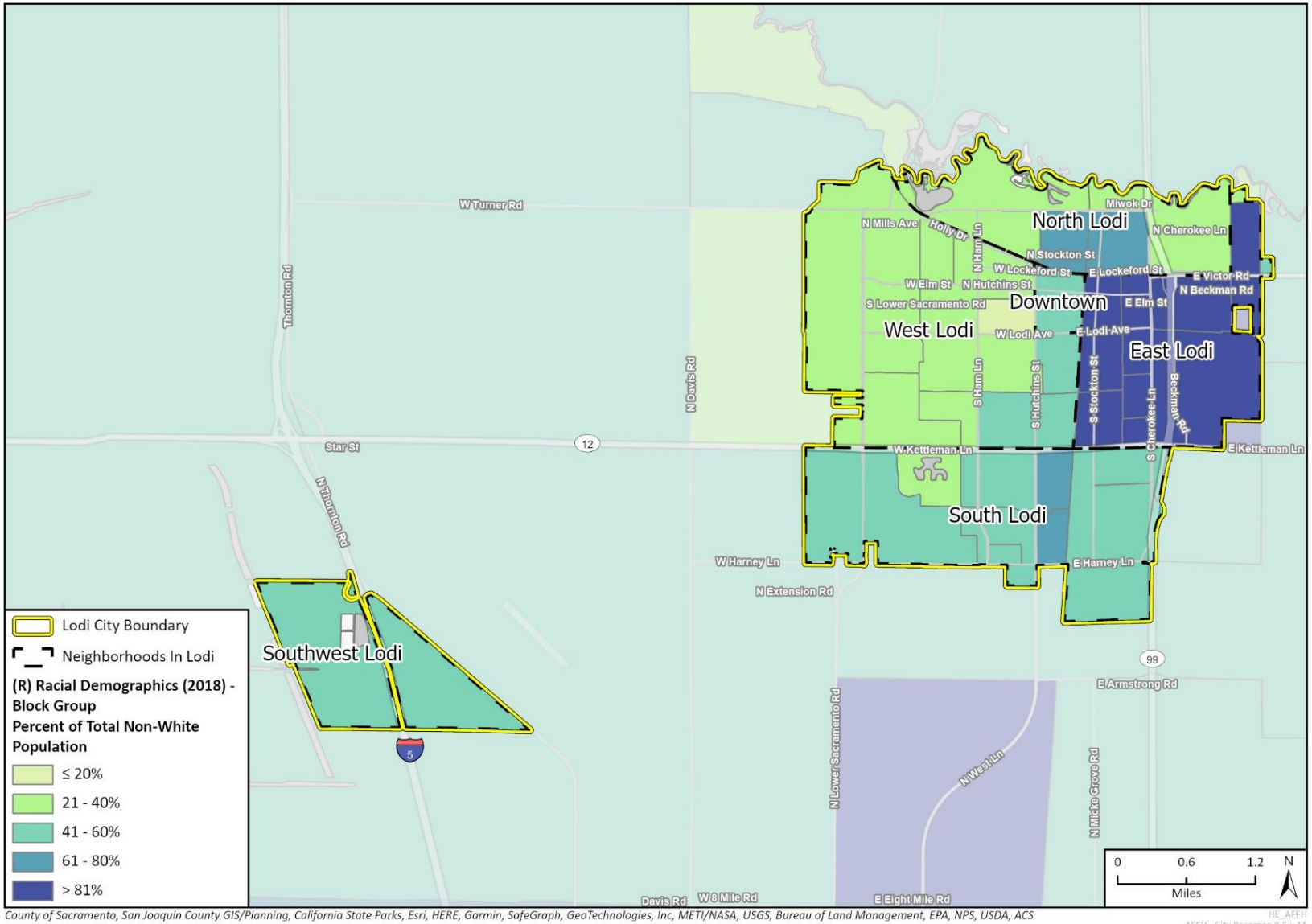
Source: AFFH Viewer 2023.

Figure 7 Neighborhood Segregation (San Joaquin County)



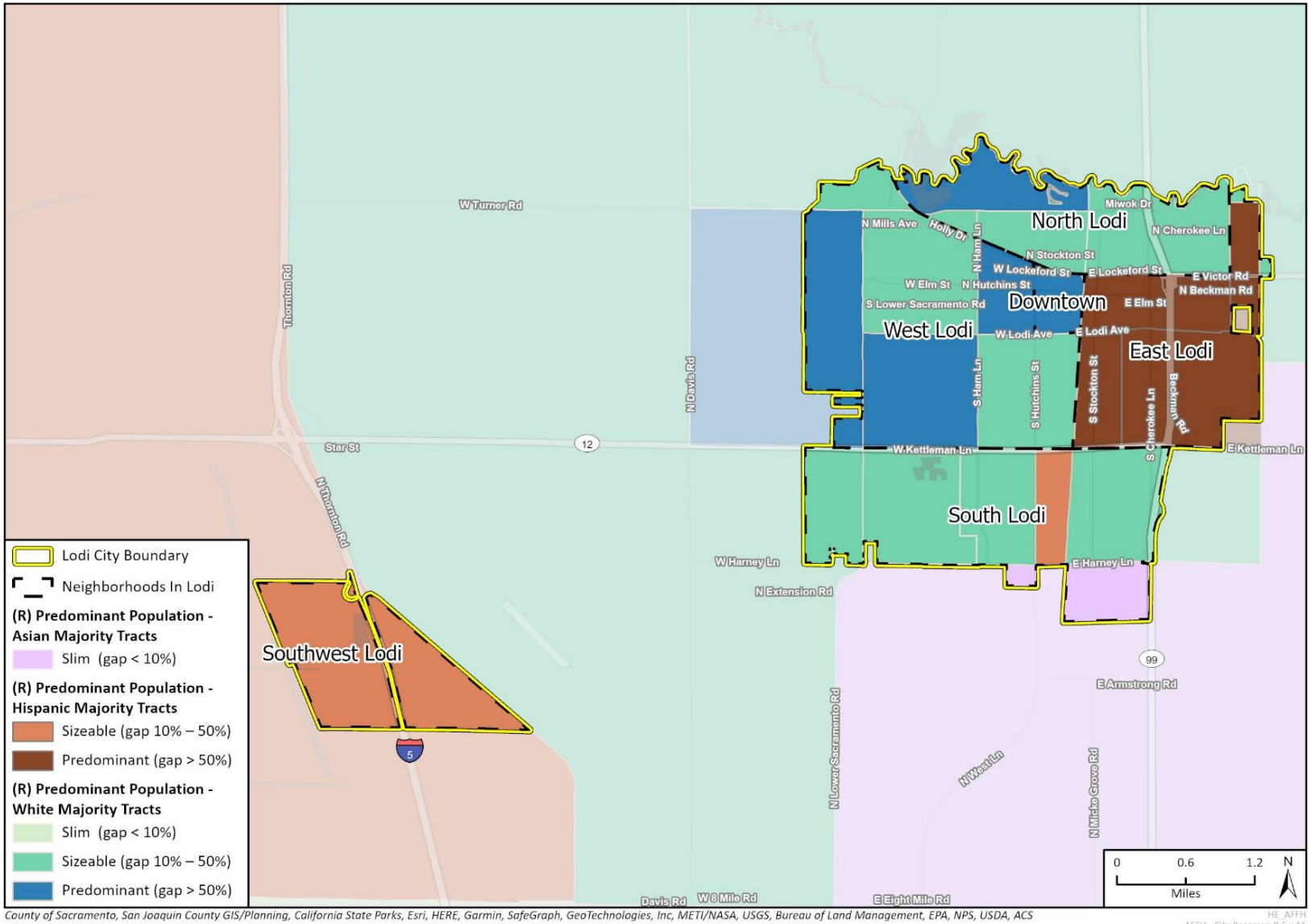
Source: AFFH Viewer 2023.

Figure 8 Percent of Total Non-White Population (City of Lodi)



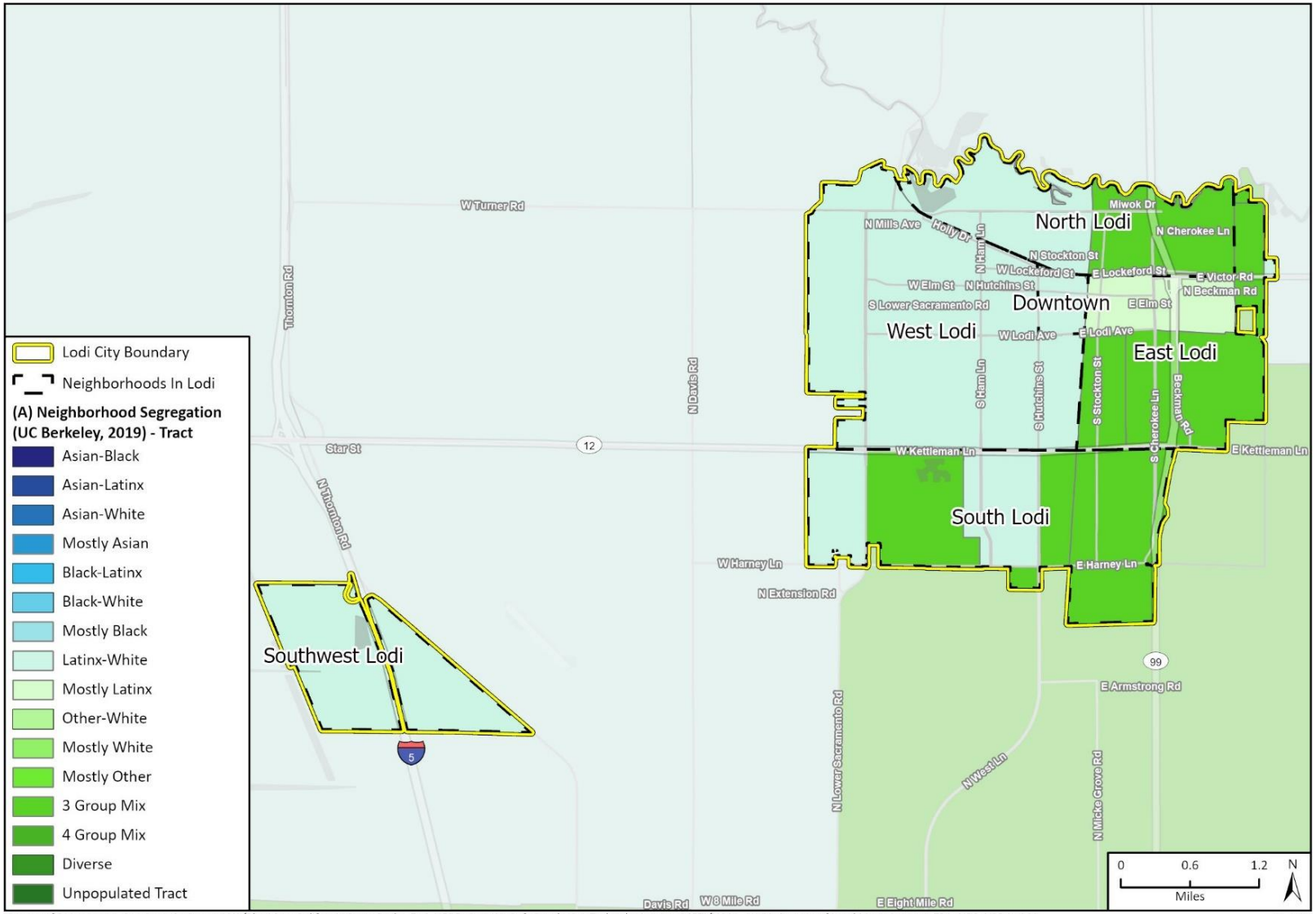
Source: AFFH Viewer 2023.

Figure 9 Predominant Populations (City of Lodi)



Source: AFFH Viewer 2023.

Figure 10 Neighborhood Segregation (City of Lodi)



Source: AFFH Viewer 2023.

Persons with Disabilities

For persons with disabilities, fair housing choice and access to opportunity includes access to housing in the most integrated setting appropriate to an individual's special needs and disability-related services as required under federal civil rights law. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice without the presence of housing units with these accessibility features.

High spatial segregation of persons with disabilities may indicate fair housing issues related to not only physical needs, but also economic disparities. According to the 2020 Annual Report on People with Disabilities in America, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty line, which is 14.5 percentage points higher than people without a disability. Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

Regional Trends

In 2021, approximately 92,581 San Joaquin County residents (12 percent of the total population) had one or more disabilities. Table 79 shows employment status by disability status estimates for San Joaquin County. Approximately six percent of the total employed population in the county has one or more disability, reflecting a slight increase from 2014. Additional discussion regarding persons with disabilities in San Joaquin County is included in the Housing Needs Assessment.

Table 79 Employment Status by Disability Status (San Joaquin County)

Disability Status	Employed 2010-2014 (Percent of Total Employed)	Unemployed 2010 -2014 (Percent of Total Unemployed)	Employed 2017-2021 (Percent of Total Employed)	Unemployed 2017-2021 (Percent of Total Unemployed)
No Disability	250,850 (95.3%)	41,457 (90.5%)	293,085 (94.2%)	21,720 (91.3%)
With a Disability	12,323 (4.7%)	4,333 (9.5%)	18,051 (5.8%)	2,057 (8.7%)
Total	263,173	45,790	311,136	23,777

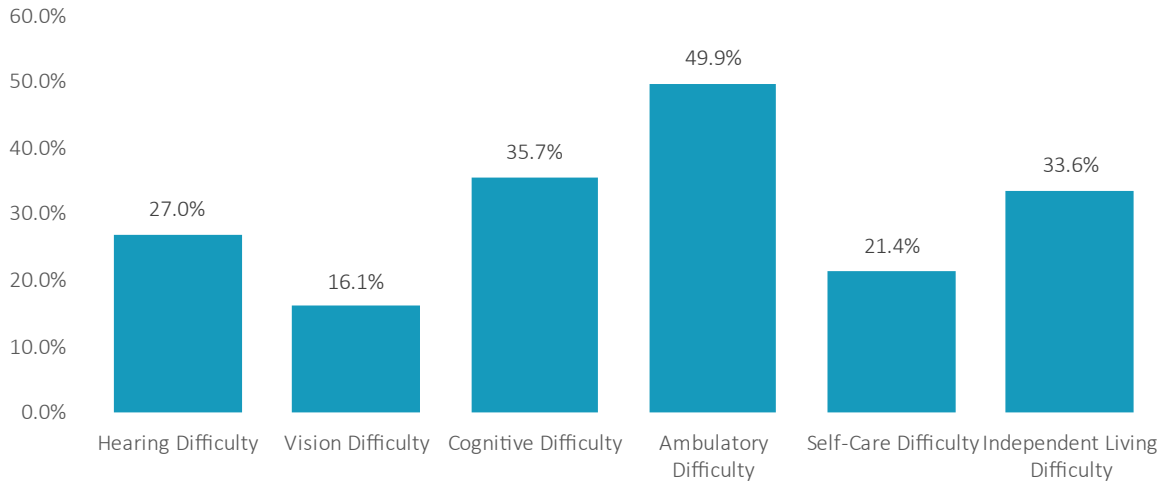
Source: U.S. Bureau of the Census, American Community Survey (ACS), Table C18120 Employment Status by Disability Status, 2010-2014, 2017-2021 Estimates.

Figure 12 shows the spatial distribution of residents living with one or more disabilities across the county. Communities located throughout the majority of the county have a low percentage of residents with disabilities (between 10-20 percent). The northeastern portion of San Joaquin County has the highest percent of residents with a disability in the county (between 20-30 percent).

Local Trends

Approximately 8,116 residents in Lodi (about 12 percent of the total population) have a disability. Similar to the county, the most common disability in Lodi is ambulatory difficulty (an impairment which prevents or impedes walking) and cognitive difficulty (Figure 11).

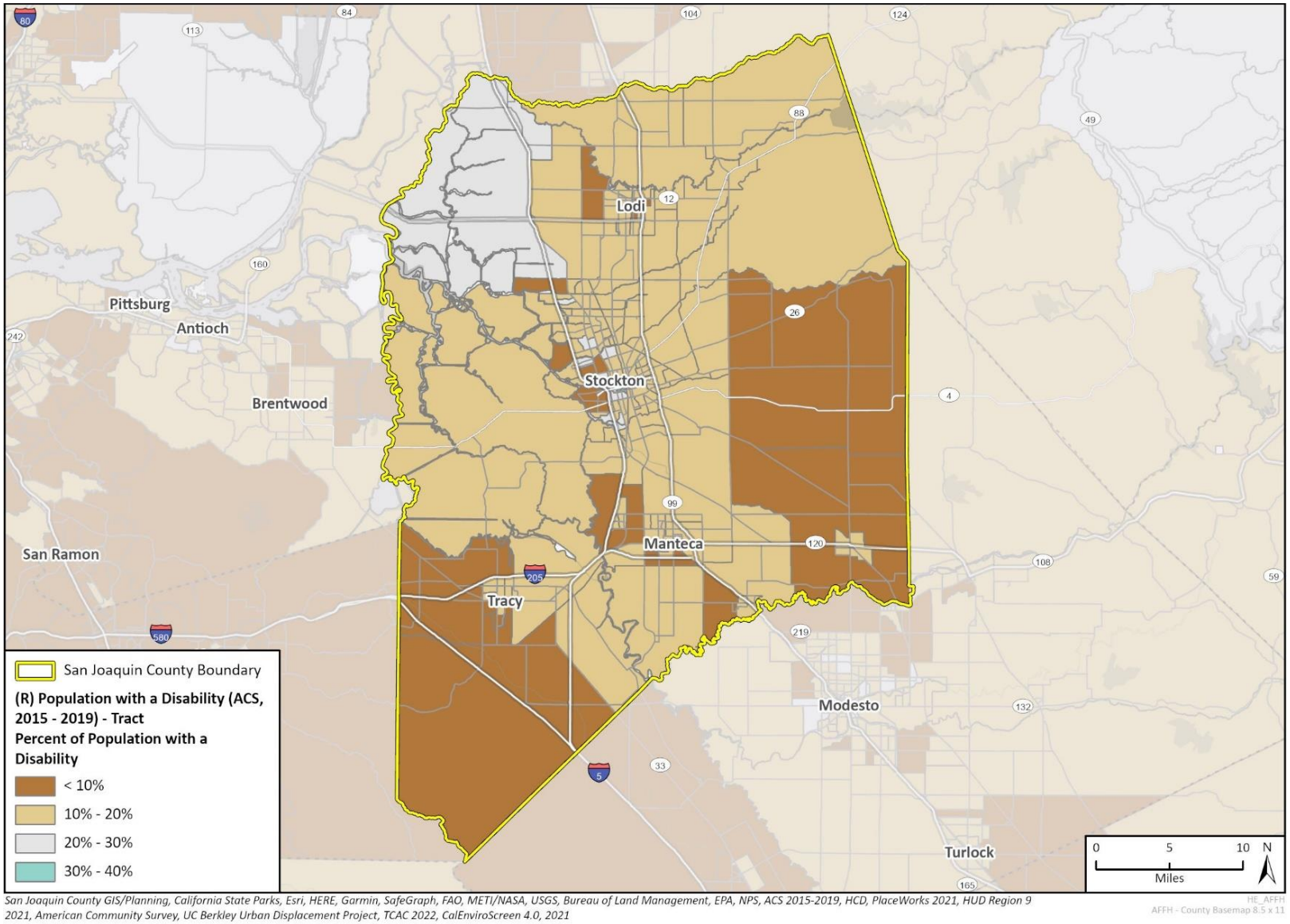
Figure 11 Disability by Type (City of Lodi)



Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B18102 - B18107.

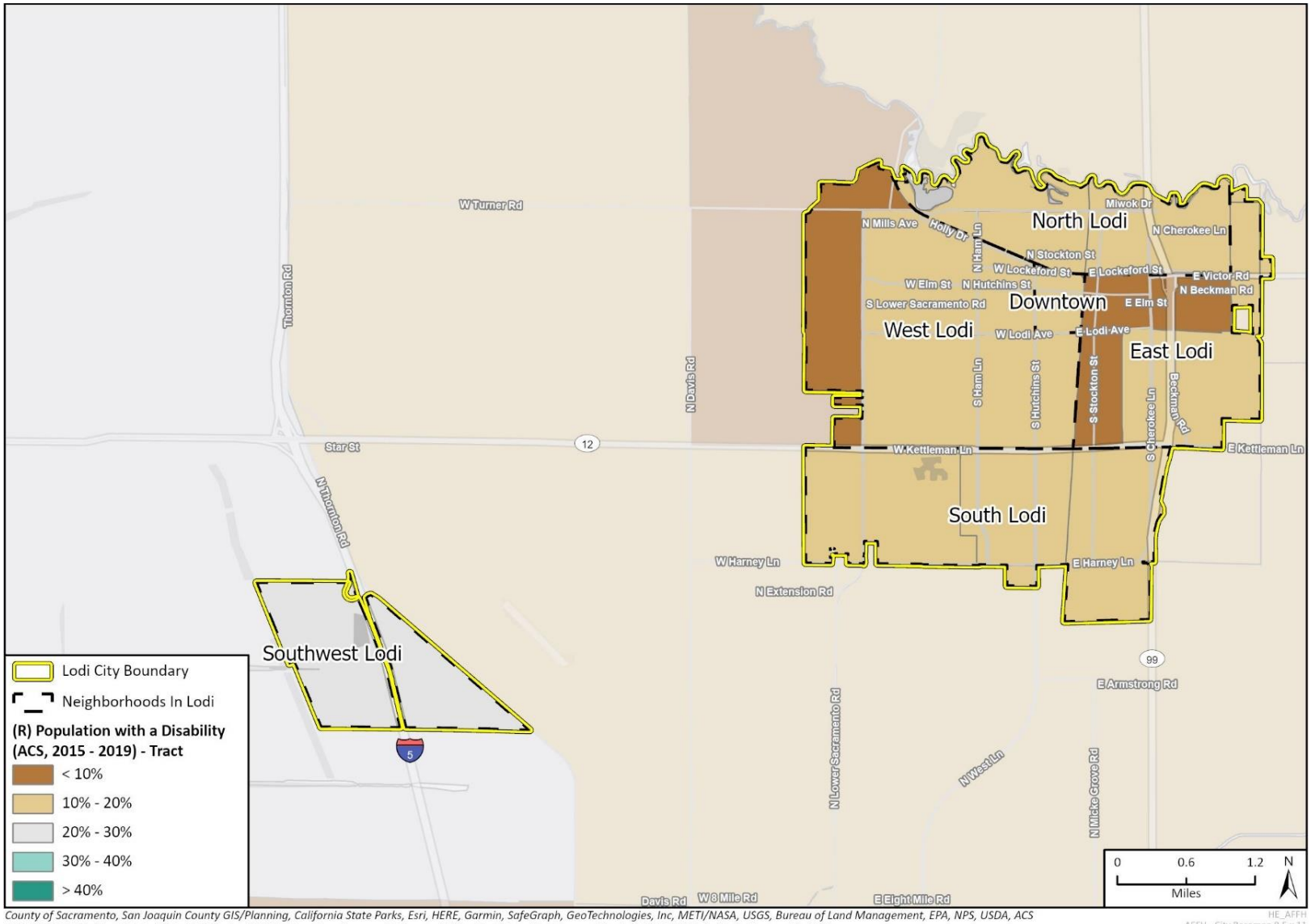
Figure 13 shows percentage of the population living with one or more disabilities in the city by census tract. Portions of West Lodi and East Lodi have the lowest proportion of residents living with one or more disabilities, with less than 10 percent of the population living with a disability. The rest of the city has a relatively low percentage of the population living with a disability, between 10 and 20 percent.

Figure 12 Percent of Population with a Disability (San Joaquin County)



Source: AFFH Viewer 2023.

Figure 13 Percent of Population with a Disability (City of Lodi)



Source: AFFH Viewer 2023.

Familial Status

Familial status refers to the presence of children under the age of 18 and the martial status of the head of the household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Examples of differential treatment include limiting the number of children in an apartment complex or confining households with children to a specific location are potentially discriminatory. Single-parent households are protected by fair housing law. A 2016 HUD study examined the effects of housing discrimination based on familial status. The study found that landlords presented households with children fewer housing options, and the units shown were generally larger, and as a result, slightly more expensive to rent.[32] Additionally, female-headed households with children require special consideration and assistance because of generally greater needs for affordable housing and accessible day care, health care, and other supportive services.

Regional Trends

In 2020, San Joaquin County had a total of 231,092 households. Households with children present comprise almost half of all households (48 percent, 111,042 households) in San Joaquin County. A larger proportion of renter households (70 percent) had children present than owner households (31 percent) as shown in Table 80. Married-couple families with children comprise the largest share of owner and renter households with children. Single-parent households, especially single-parent, female-headed households, are more likely to rent than own. Single-parent, male-headed households comprise five percent of renter-occupied households, but only two percent of owner-occupied households and single-parent, female-headed households comprise 14 percent of renter-occupied households, but only three percent of owner-occupied households.

Table 80 Tenure by Household Type and Presence of Children (San Joaquin County)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married couple family, with Children Present	34,757	26.1%	22,084	22.6%
Single-Parent, Male householder, no spouse present	2,792	2.1%	5,276	5.4%
Single Parent, Female householder, no spouse present	4,837	3.6%	13,905	14.2%
Total Households with Children Present	42,386	31.8%	68,656	70.3%
Total Households	133,381		97,711	

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure By Household Type (Including Living Alone) and Age of Householder, 2015-2019 Estimates.

As shown in Figure 14, throughout the majority of San Joaquin County, the percent of single-parent, female-headed households with children is less than 20 percent. Portions of urban communities, including large portions of

[32] *HUD. 2016. https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf.*

Stockton, as well as rural, northwest San Joaquin County include 20-40 percent of children in single-parent, female-headed households. Areas scattered throughout Stockton have between 40 and 60 percent of children living in single-parent, female-headed households and one area in Stockton, north of the San Joaquin River and east of Interstate 5, has between 60 and 80 percent of children living in single-parent, female headed households.

Local Trends

In 2020, the Lodi had a total household count of approximately 23,017. According to 2016-2020 ACS estimates, households with children present comprised approximately 34 percent (7,747) of the total households in the City of Lodi. Overall, a larger proportion of renter households (42 percent) had children present than owner households (26 percent). Similar to the county, single-parent households are more likely to rent than own. Single-parent, female headed households comprise approximately 12 percent of renter-occupied households, but only approximately 2 percent of owner-occupied households and single-parent, male-headed households comprise five percent of renter-occupied households and one percent of owner-occupied households.

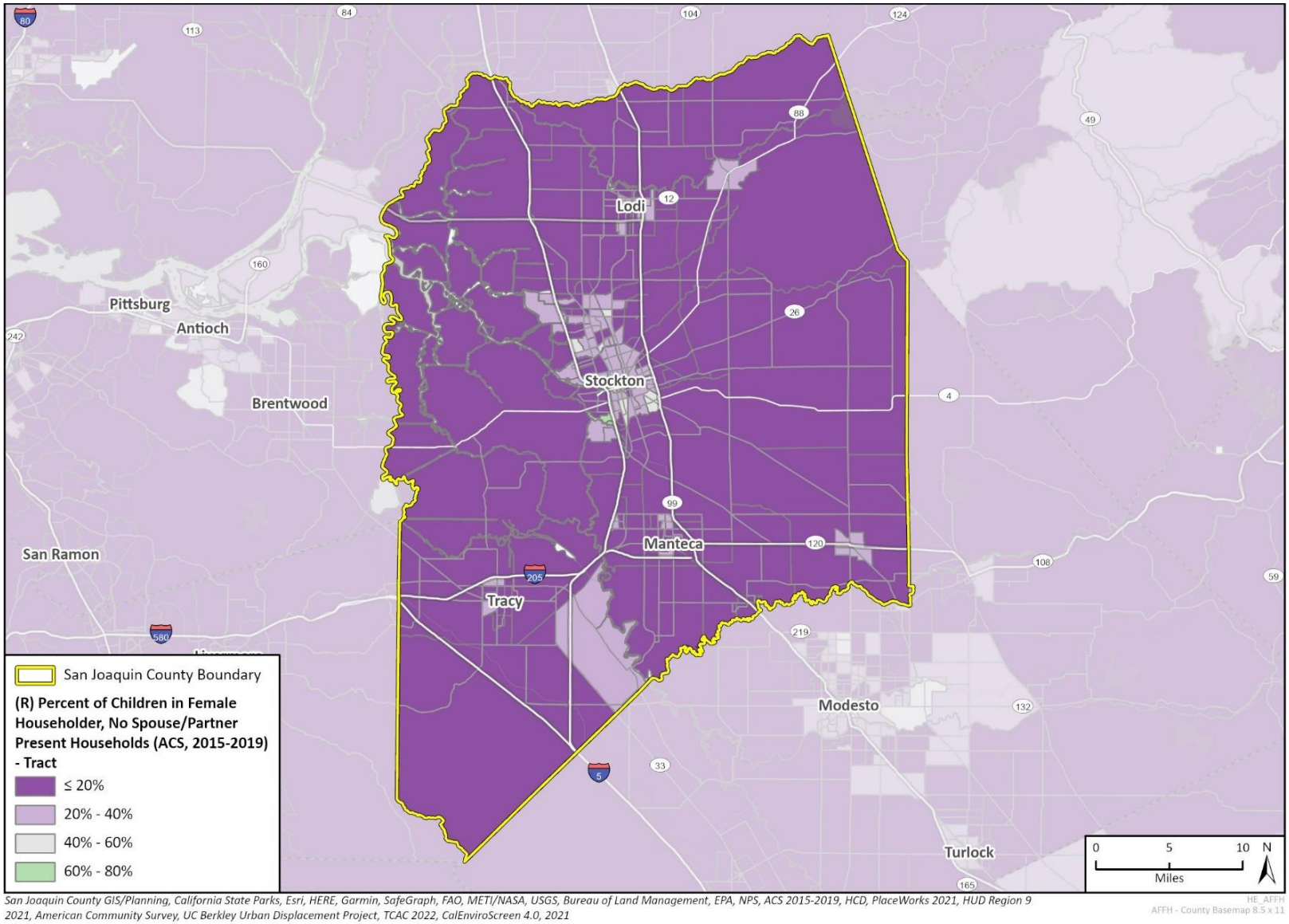
Table 81 Tenure by Household Type and Presence of Children (City of Lodi)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married couple family, with Children Present	2,810	23.1%	2,715	25.0%
Single-Parent, Male householder, no spouse present	168	1.4%	527	4.9%
Single Parent, Female householder, no spouse present	201	1.7%	1,326	12.2%
Total Households with Children Present	3,179	26.1%	4,568	42.0%
Total Households	12,163		10,854	

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure By Household Type (Including Living Alone) and Age of Householder, 2016-2021 Estimates.

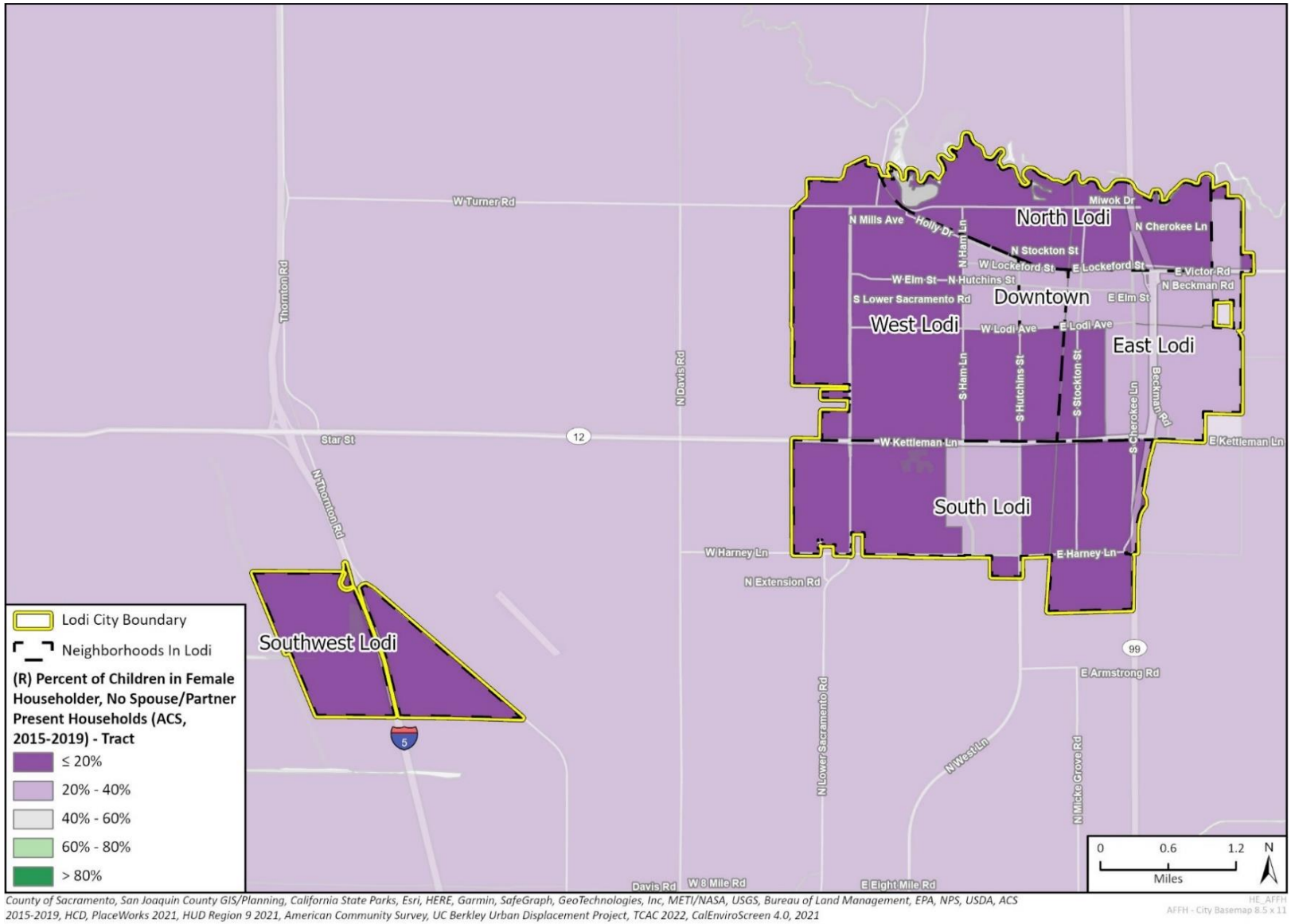
As shown in Figure 15, in Downtown, East Lodi, and a portion of South Lodi between 20 and 40 percent of children live in single-parent, female-headed households. In Southwest Lodi and large portions of North Lodi, West Lodi, South Lodi, and East Lodi, the percent of children in single-parent, female-headed households are less than 20 percent. Areas with a higher percentage of children living in single-parent, female-headed households generally overlap with areas with the highest percentage of residents living below the poverty line (Figure 24) and areas that are predominantly Hispanic/Latino (Figure 9).

Figure 14 Female Headed Households With Children, No Spouse/Partner (San Joaquin County)



Source: AFFH Viewer 2023.

Figure 15 Female Headed Households With Children, No Spouse/Partner Present (City of Lodi)



Source: AFFH Viewer 2022.

Household Income

Household income is directly connected to the ability to afford housing. Higher-income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have actual choice in housing opportunities—that is, when they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

This section identifies household income disparities using data based on median household income and low- or moderate-income (LMI) geographies. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI. The definition of low or moderate income is based on HUD income definitions of up to 80 percent of the AMI. Data for this analysis are from the HUD Low- and Moderate-Income Summary Data based on the 2011-2015 American Community Survey (most recent available data).[33]

Regional Trends

In 2020, San Joaquin County had a median household income of $68,628. Most areas of the county had a median household income that was lower than the state median household income of $87,100 (Figure 16). Areas in the eastern and central portions of the county, closest to Stockton, as well as areas surrounding the city of Lodi, have a lower median household income, less than $55,000. Most urban areas have a range of median household incomes, with the highest median household incomes located in the southeastern part of the county near the city of Tracy.

Areas in the central portion of the county as well as areas within and near the cities of Lodi, Stockton, Manteca, Tracy, and Ripon contained the highest LMI populations in the county Figure 17. LMI populations tended to be located in urban communities and areas that have a higher percentage of non-White residents (Figure 5). In contrast, rural areas have lower concentrations of LMI residents, particularly the areas north of Stockton and Lodi, south of Manteca, and south and east of Tracey. Most areas with a lower percentage of LMI residents are predominantly White (Figure 6).

Local Trends

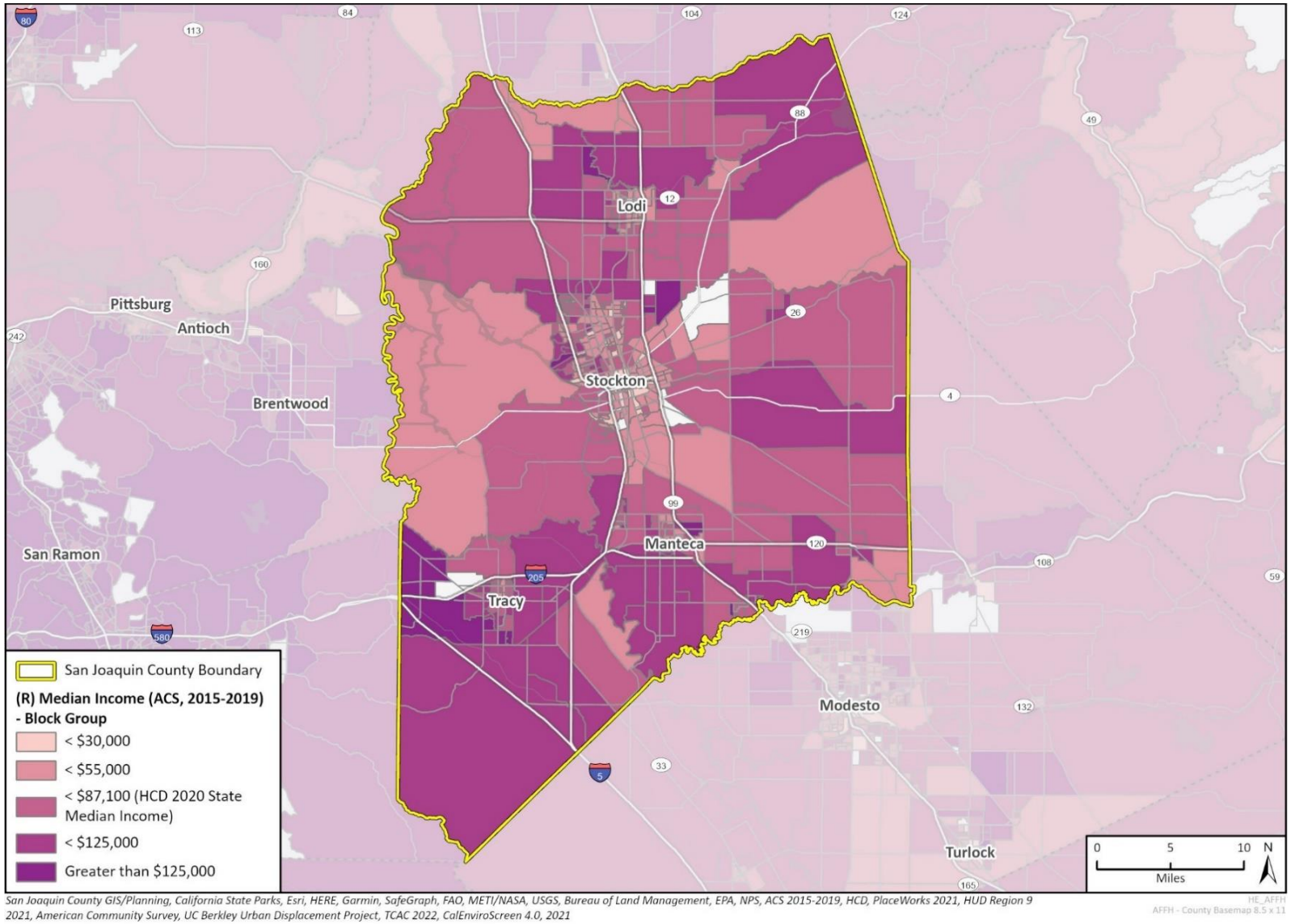
The median household income for the city of Lodi, approximately $64,153, is seven percent lower than the county's median household income and 30 percent lower than the state's median household income. The highest median household incomes are located in parts of North Lodi, West Lodi, and South Lodi, which include median household incomes more than $125,000 (Figure 18). Southwest Lodi and portions of North Lodi, West Lodi, and South Lodi also have high median incomes, between $87,100 and $125,000. The remainder of East Lodi, North Lodi, West Lodi, and South Lodi have median household incomes between $55,000 and $87,100. Downtown has the lowest median household income in the city, less than $30,000.

Figure 19 displays LMI populations by block group in Lodi. Areas of the city with the lowest concentration of LMI residents are generally located in the western half of the city, in portions of North, East, and South Lodi, where less than 25 percent of the population consist of LMI residents. In Downtown, and in portions of North, South, and East Lodi, between 50 and 75 percent of the population consists of LMI residents. The highest concentration of LMI

[33] *HUD Exchange 2021: https://www.hudexchange.info/programs/acs-low-mod-summary-data/*

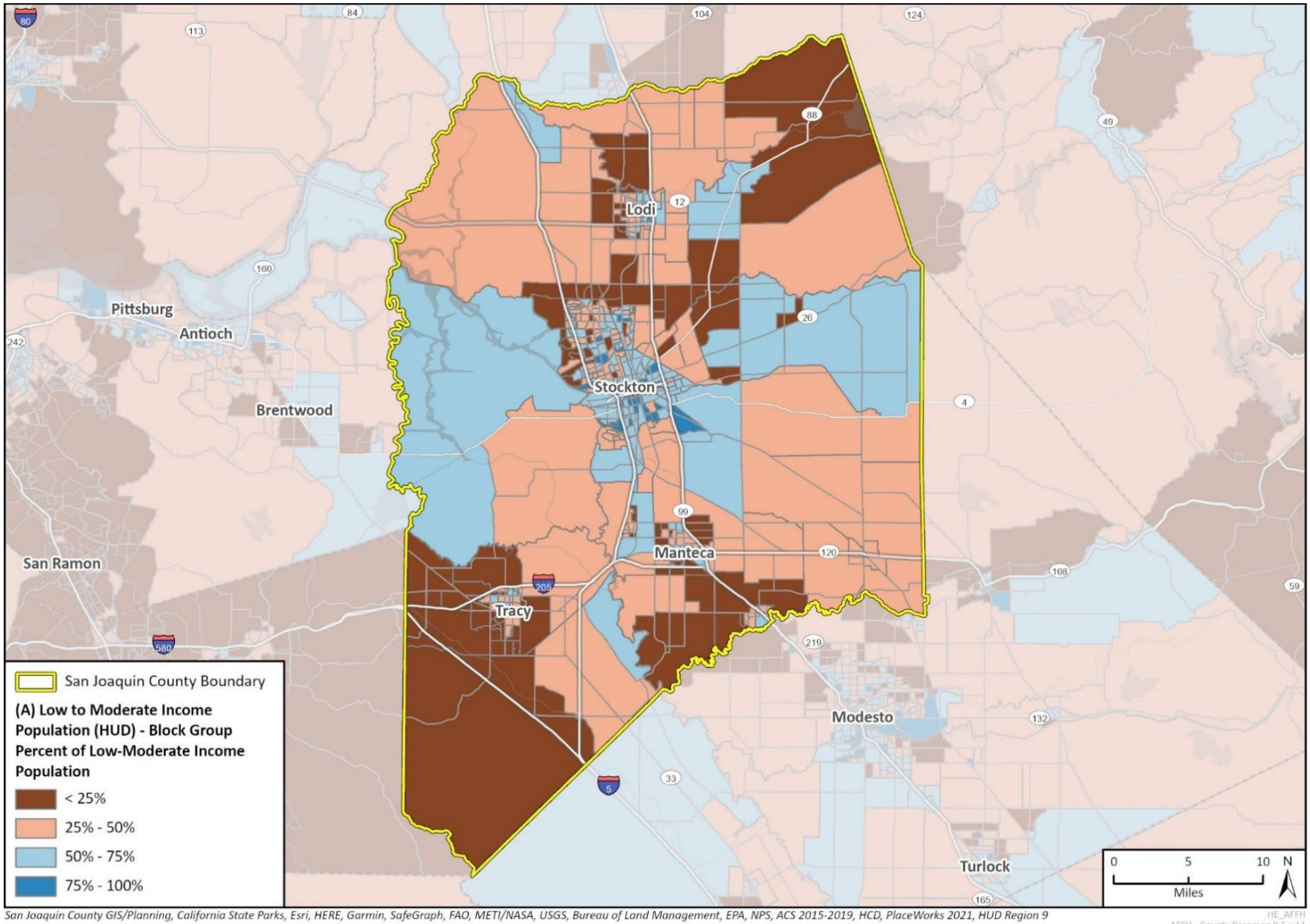
populations in Lodi are located near the intersection of Lodi Avenue and State Route 99, in western parts of East Lodi and the northeast corner of West Lodi. In these areas between 75 and 100 percent of the population consists of LMI residents. Areas with a lower percentage of LMI residents are predominantly White, while areas with a higher percentage of LMI residents are predominantly Hispanic/Latino (Figure 9).

Figure 16 Median Household Income (San Joaquin County)



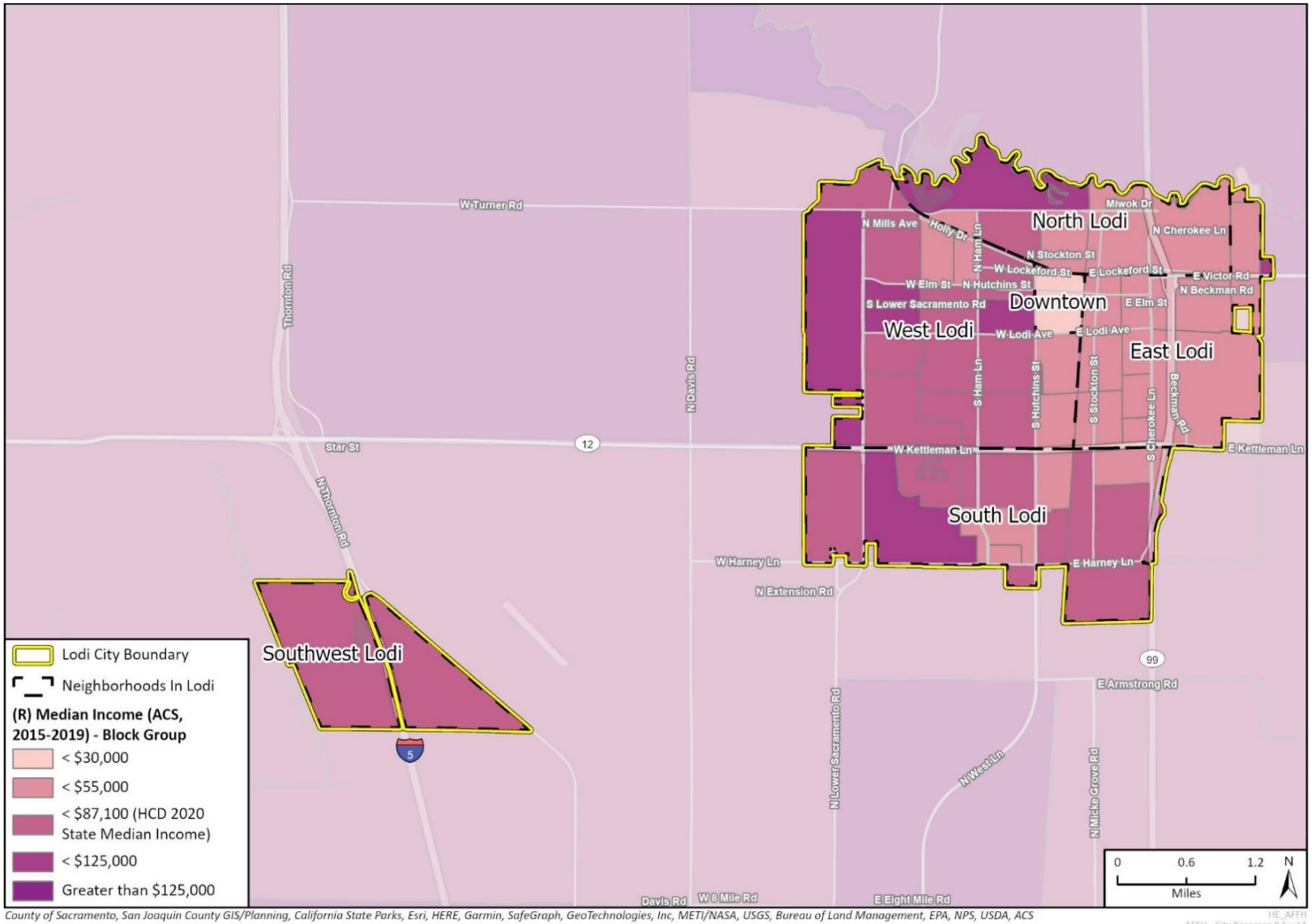
Source: AFFH Viewer 2023.

Figure 17 Low and Moderate Income Population (San Joaquin County)



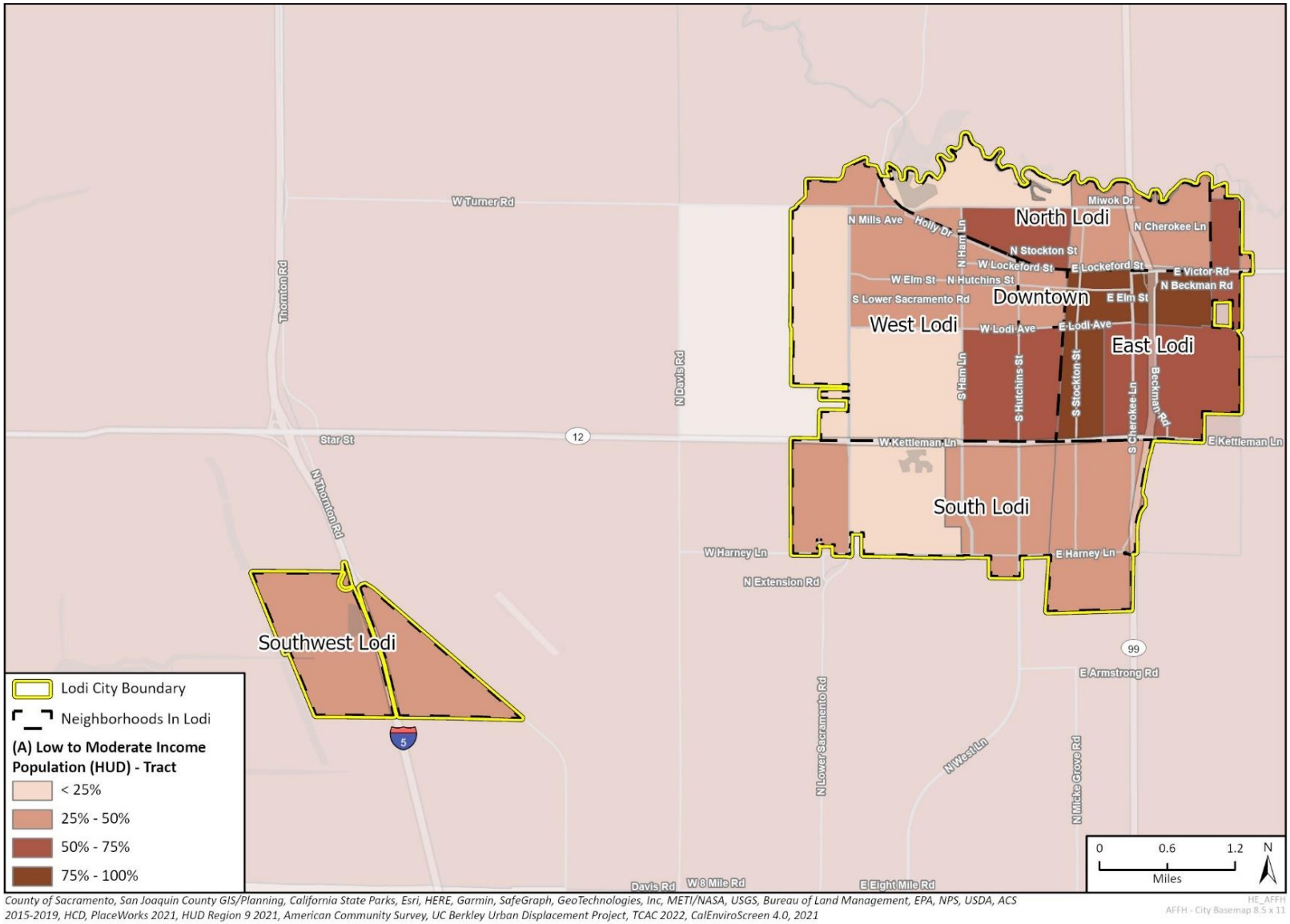
Source: AFFH Viewer 2023.

Figure 18 Median Household Income (City of Lodi)



Source: AFFH Viewer 2023.

Figure 19 Low to Moderate Income Population (City of Lodi)



Source: AFFH Viewer 2023.

Poverty and Segregation

Racially and Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-White population of 50 percent or more in metropolitan or micropolitan areas. The income threshold is based on areas of "extreme poverty," where 40 percent or more of households earn incomes at or below the federal poverty line, or where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets both thresholds for racial or ethnic concentration and "extreme poverty" is considered a R/ECAP.

Regional Trends

As shown in Figure 20, there are more than a dozen R/ECAP areas in San Joaquin County, primarily in Stockton and one R/ECAP located in Lodi. All R/ECAPs in the county are areas with a predominantly Hispanic/Latino population. In addition, areas that are predominantly Hispanic/Latino tend to have lower median household incomes than areas that are predominantly Asian/Pacific Islander or predominantly White.

TCAC categorizes census tracts that have both a poverty rate of over 30 percent and that are designated as being racially segregated (overrepresentation of people of color relative to the county) as areas of high segregation and poverty. In San Joaquin County, areas with a high concentration of segregation and poverty are located in Stockton and Lodi and mostly overlap with R/ECAP areas, as shown in Figure 21.

Figure 24 shows poverty levels across San Joaquin County. Areas within the cities of Lodi and Stockton had the highest poverty rates, while the southeastern and northwestern areas in the county had the lowest poverty rates.

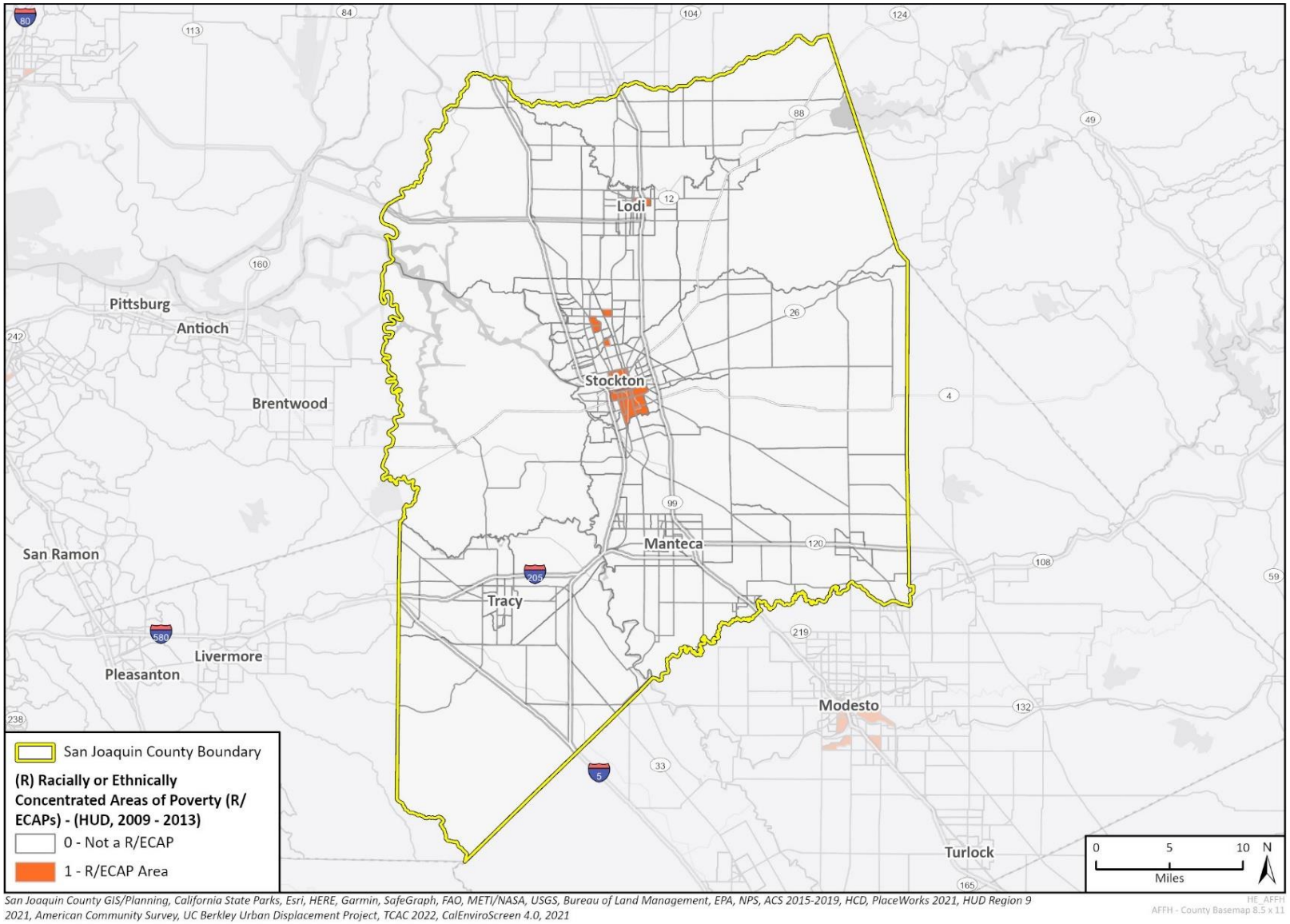
Local Trends

There is one R/ECAP within the East Lodi neighborhood, as shown in Figure 23. This area is predominantly Hispanic/Latino. Approximately 90 percent of residents in this area are non-White and 37 percent of residents in this area are living below the poverty line. The household median income of the R/ECAP area is $36,486 per year, just over half of the median income of all households in Lodi. Like most neighborhoods in the city, Lodi's R/ECAP encompasses a highway, and is divided east to west by State Route 99. However, areas east of Highway 99 consist entirely of commercial and industrial uses. The R/ECAP has less positive education, economic, and environmental outcomes and high pollution burden from diesel particulate matter, children's lead risk from housing, and groundwater threats. The R/ECAP has adequate access to parks, as it is adjacent to Hale Park and in close proximity to multiple sports fields and the Stockton Sports Complex. Chapter 7.7 *Goals, Policies, & Implementation Programs* includes a program to implement improvements to Hale Park to increase park access to the surrounding community, including removing and replacing the existing deteriorating chain link fencing and resurfacing the existing sport courts. According to the AFFH Data Viewer, Lodi's R/ECAP has the highest percentage of housing with two or more units and highest percentage of renters in the city. Lodi's R/ECAP is not physically separated from adjacent neighborhoods, however some properties along the R/ECAP boundary are bordered by wooden fencing or chain linked fences.

The R/ECAP also has a high percentage of housing units greater than 30 years old, which may indicate these units need maintenance or repair. The City's Code Enforcement staff estimate that less than one percent of housing units are in need of major repair or replacement citywide. In areas where the housing stock is older, including in the R/ECAP, staff estimate that twice as many housing units are in need of major repair or replacement (approximately 1.5 percent of housing units). The City plans to target funding for housing rehabilitation and repairs to substandard housing units in the East Lodi, which includes the R/ECAP, as described in Chapter 7.7 *Goals, Policies, & Implementation Programs*. In addition, the City is committed prioritizing capital improvement projects, including new parks and amenities in East Lodi, including in the R/ECAP, and implement plans and strategies to develop infrastructure and programming plans for these neighborhoods. The R/ECAP has similar levels of cost burden (paying over 30 percent of income on housing costs) among renter households as the rest of the city but has the highest percentage of cost burden among homeowners and a high percentage of overcrowded housing (more than 1.5 persons per room) compared to the rest of the city (see *Cost Burden* and *Overcrowding*, below). Similar to most of the eastern half of the city, low-income households in Lodi's R/ECAP are at risk of displacement (see *Displacement*, below).

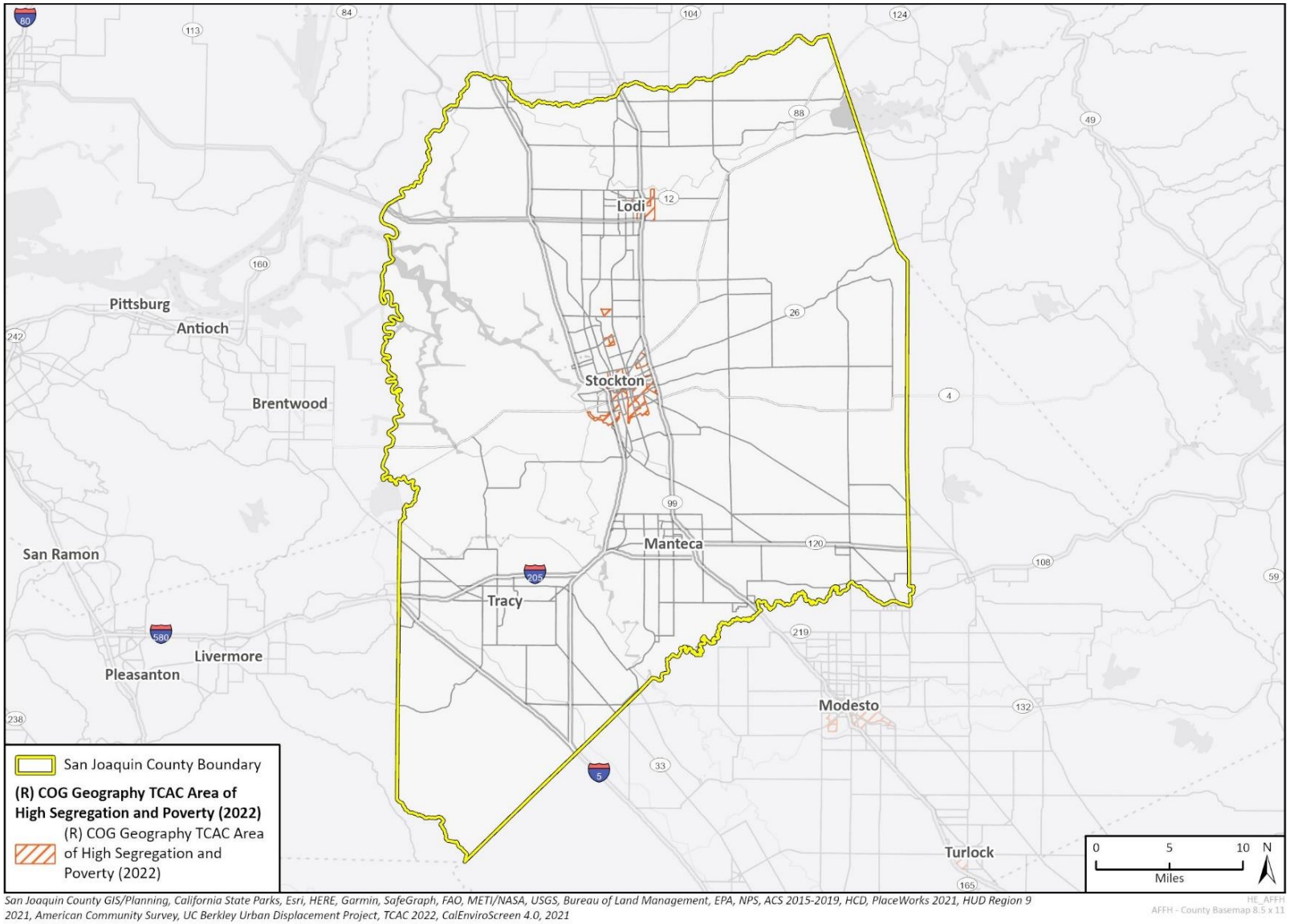
Areas of the city with the highest poverty rates are in East Lodi, where about 37 percent of residents are living in poverty (Figure 24). Portions of North Lodi, West Lodi, and South Lodi include the lowest rates of poverty in the city, less than 10 percent of the population. In Downtown, and in portions of North Lodi and West Lodi, between 10 and 20 percent of residents are living in poverty. Southwest Lodi and small portions of East Lodi and South Lodi include rates of residents living in poverty between 20 and 30 percent.

Figure 20 Racially/Ethnically Concentrated Areas of Poverty (San Joaquin County)



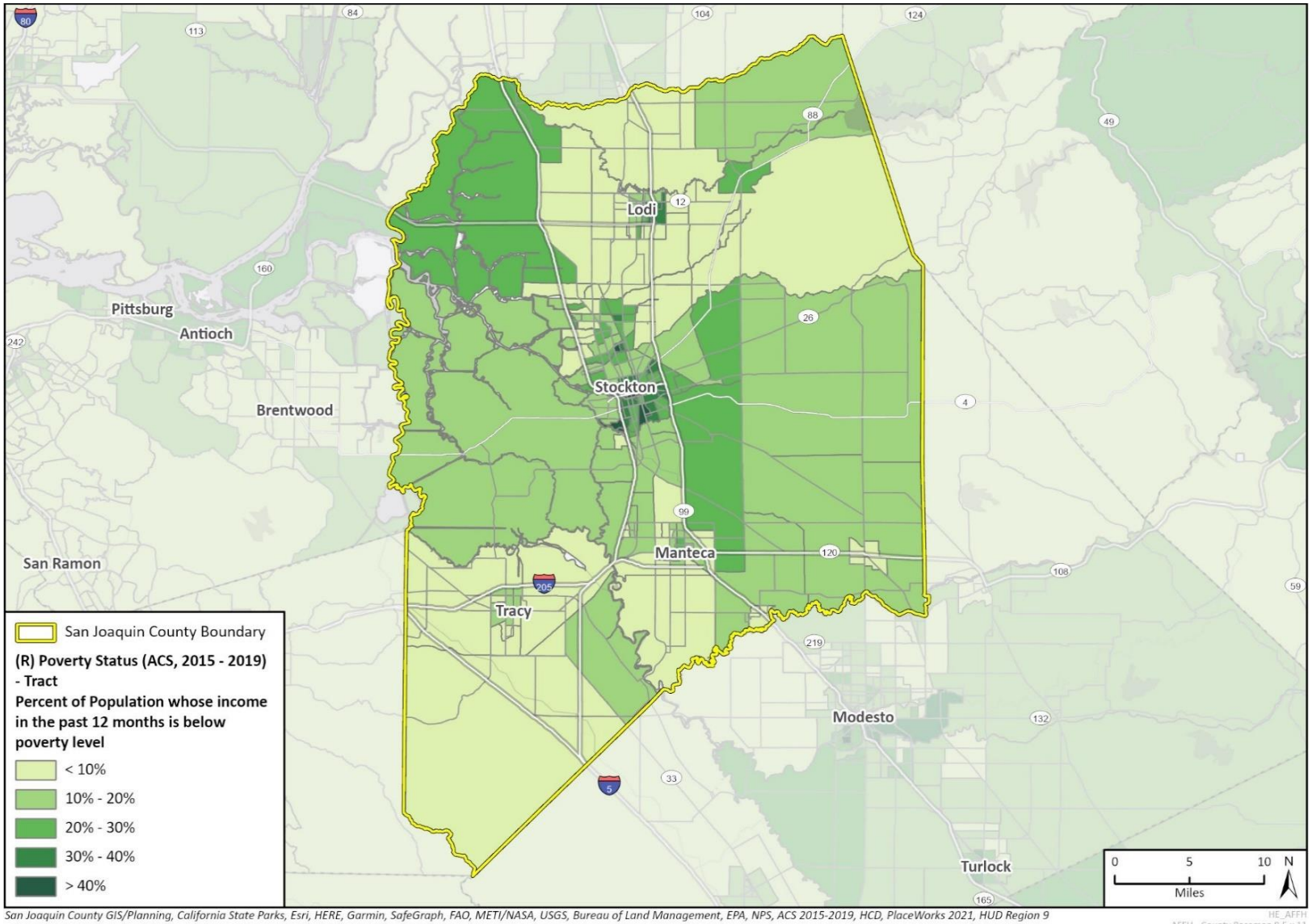
Source: AFFH Viewer 2023.

Figure 21 Areas of High Segregation and Poverty (San Joaquin County)



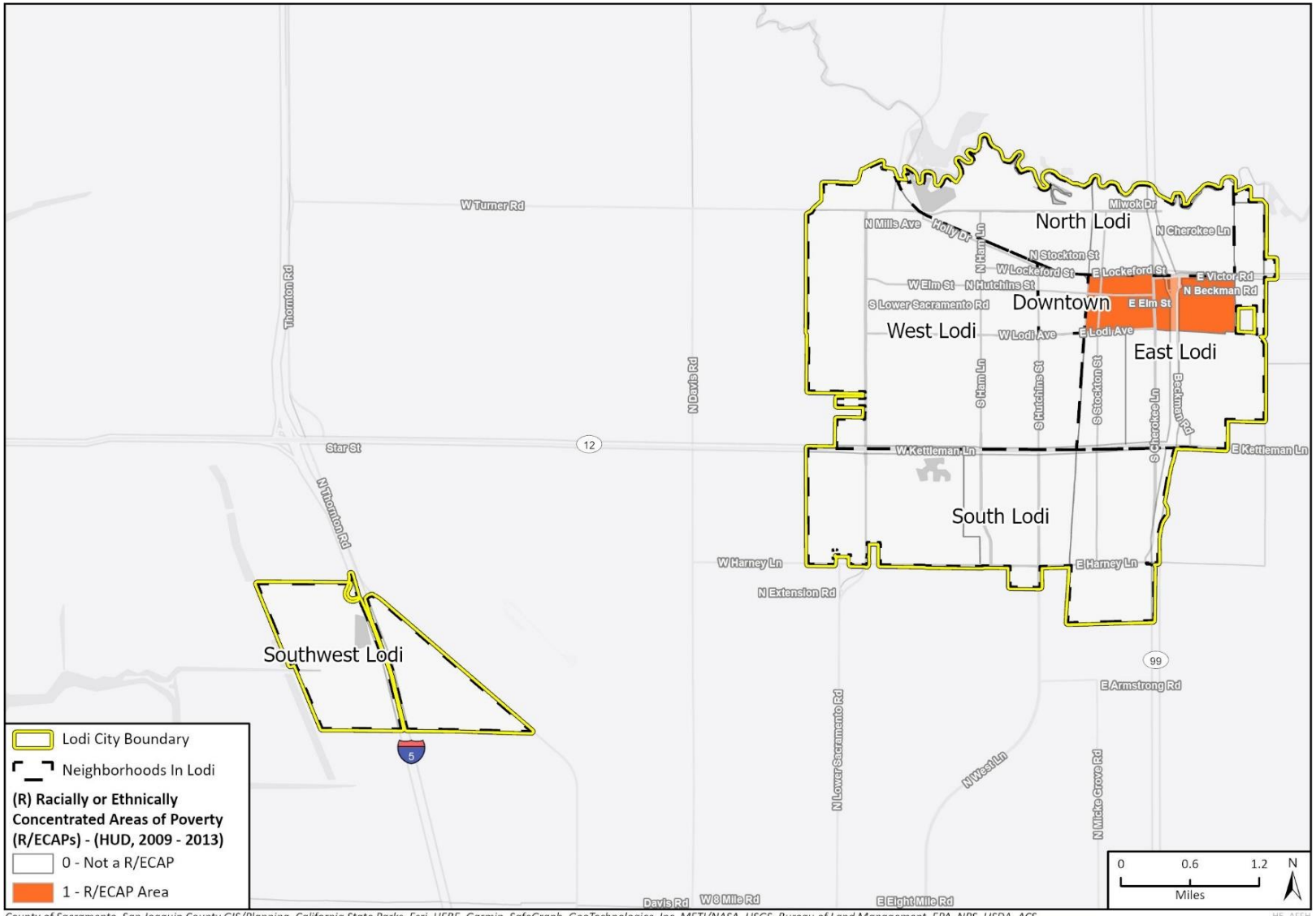
Source: AFFH Viewer 2023.

Figure 22 Poverty Status (San Joaquin County)



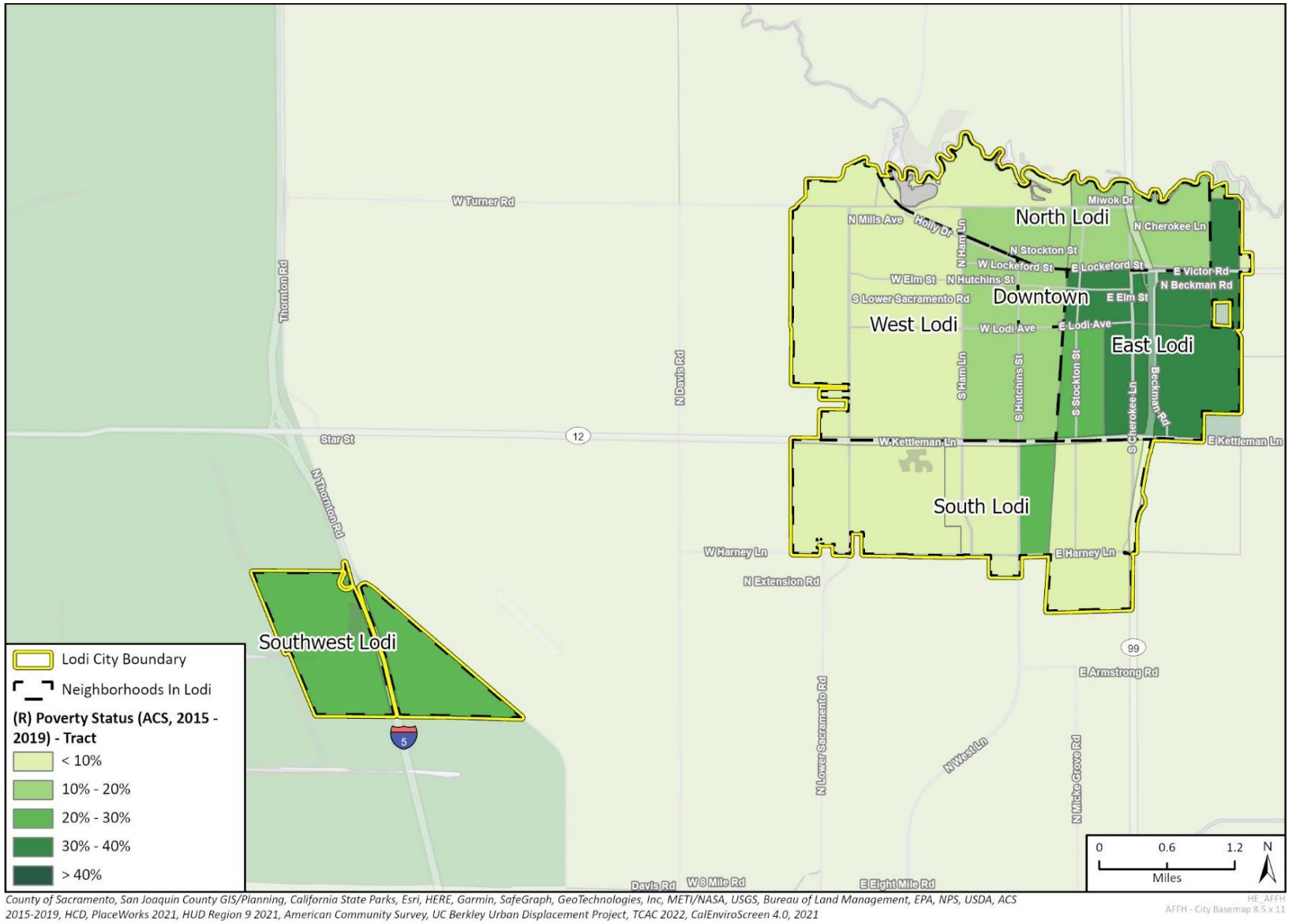
Source: AFFH Viewer 2023.

Figure 23 Racially/Ethnically Concentrated Areas of Poverty (City of Lodi)



Source: AFFH Viewer 2023

Figure 24 Poverty Status (City of Lodi)



Source: AFFH Viewer 2023

Racially and Ethnically Concentrated Areas of Affluence

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated and promote equitable access to opportunity, a key to fair housing choice. RCAAs are defined as affluent, White communities.[34] According to a policy paper published by HUD, White residents are the most racially segregated group in the United States and those communities are typically more affluent than majority non-White communities. HCD defines an RCAA as a census tract in which 80 percent or more of the population is White and has a median income of at least $125,000.[35] In addition to having a higher median income, areas of affluence experience less overcrowding, less housing cost burden on renters, and are generally less susceptible to displacement compared to LMI areas, as described in Section 4.4, *Household Income*.

Regional Trends

There are seven RCAAs scattered throughout San Joaquin County, within the cities of Stockton and Lodi and in rural areas in the southern part of the county (Figure 25). RCAAs in the county are predominantly White and primarily have a median household income between $87,100 (the State average) and $125,000. Overall, most areas in San Joaquin County with a median household income greater than the State average are predominantly white.

Local Trends

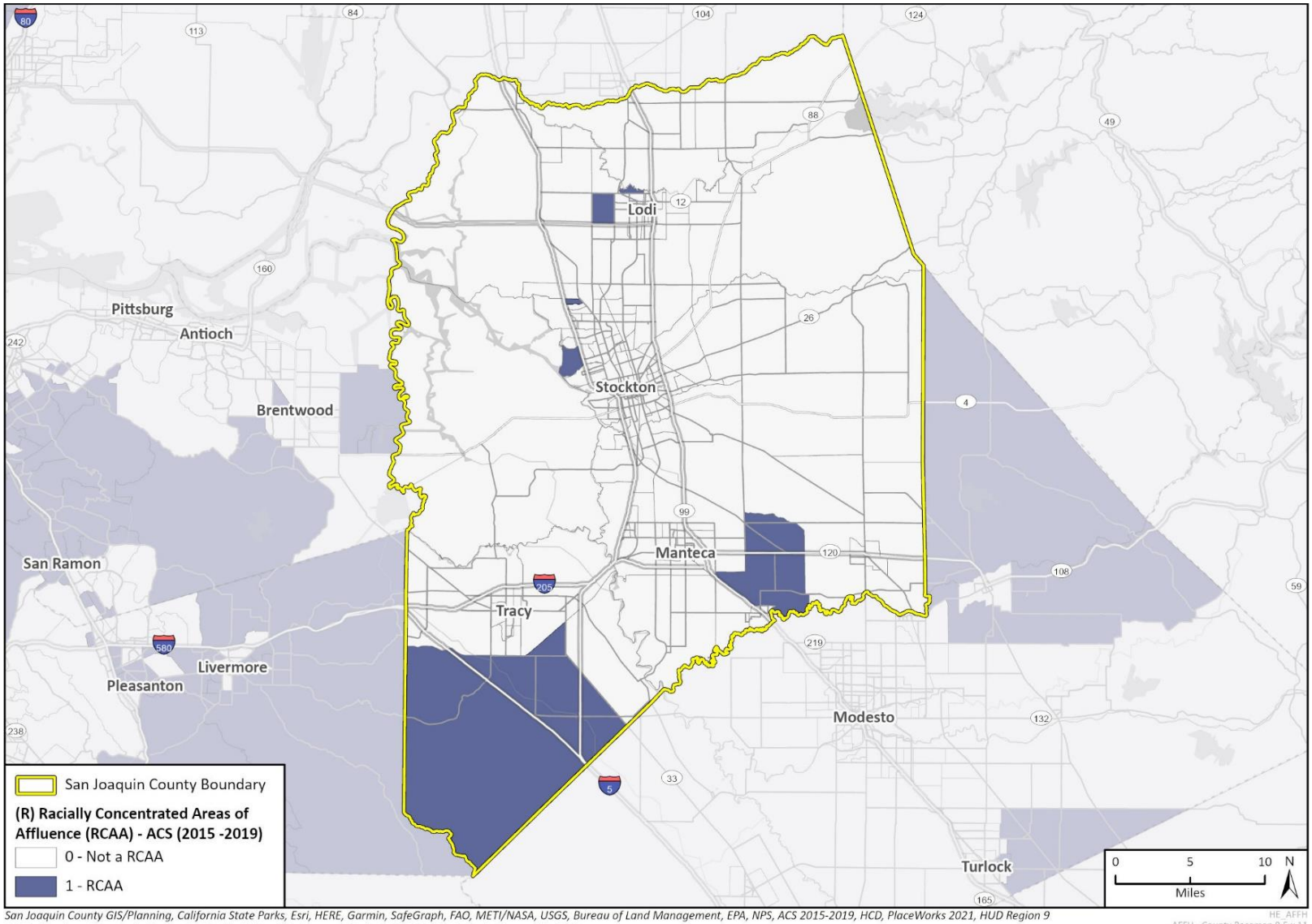
There are two RCAAs in Lodi, in North Lodi and West Lodi (Figure 26), both in the western half of the city and adjacent to the city's outer boundary. These areas have median household incomes above $100,000, almost twice the median income of the city overall, and have a predominant majority (gap >50%) of White residents. In addition, these areas have some of the lowest poverty rates in the city, with between five and seven percent of residents living below the poverty line. According to the AFFH Data Viewer, Lodi's two RCAAs have a low percentage of housing consisting of two or more units and lower percentages of older housing compared to most of the city. The west Lodi RCAA consists almost entirely of single-family subdivisions built within the last 30 years and therefore have up-to-date infrastructure and access to amenities, including sidewalks and neighborhood parks.

Both of Lodi's RCAAs have positive education, economic, and environmental scores and low levels of pollution burden and are further from any highways and major industrial uses than the rest of the city. The North Lodi RCAA is also adjacent to the Lodi Lake Wilderness area and the Mokelumne River. This RCAA contains the gated Rivergate community, gated River Pointe community, and the Lakewood neighborhood. The Rivergate community is a gated community located along the Mokelumne River that was built in the 1970s and 1980s. Some houses in the Rivergate community are large and are on larger lots with riverfront access and boat docks. The River Pointe community is a grated community located east of the Rivergate community with newer homes built around the year 2000. Most of the homes within the River Pointe community are between 2,000 to 3,000 square feet, with several larger homes of more than 4,000 square feet. The Lakewood neighborhood was built in the 1960s and 1970s and is in close proximity to outdoor amenities, including Lodi Lake and Lodi Lake Wilderness Area, which may attract more affluent residents to this neighborhood. Both the Rivergate and River Pointe communities are bordered by a stone wall and electronic gates, however the remaining housing developments in the North Lodi

[34] *Goatz, Damanio and Williams, 2019. https://www.huduser.gov/portal/periodicals/cityscpe/vol21num1/ch4.pdf*
[35] *HCD. April 2021. AFFH Guidance for all Public Entities and for Housing Elements. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*

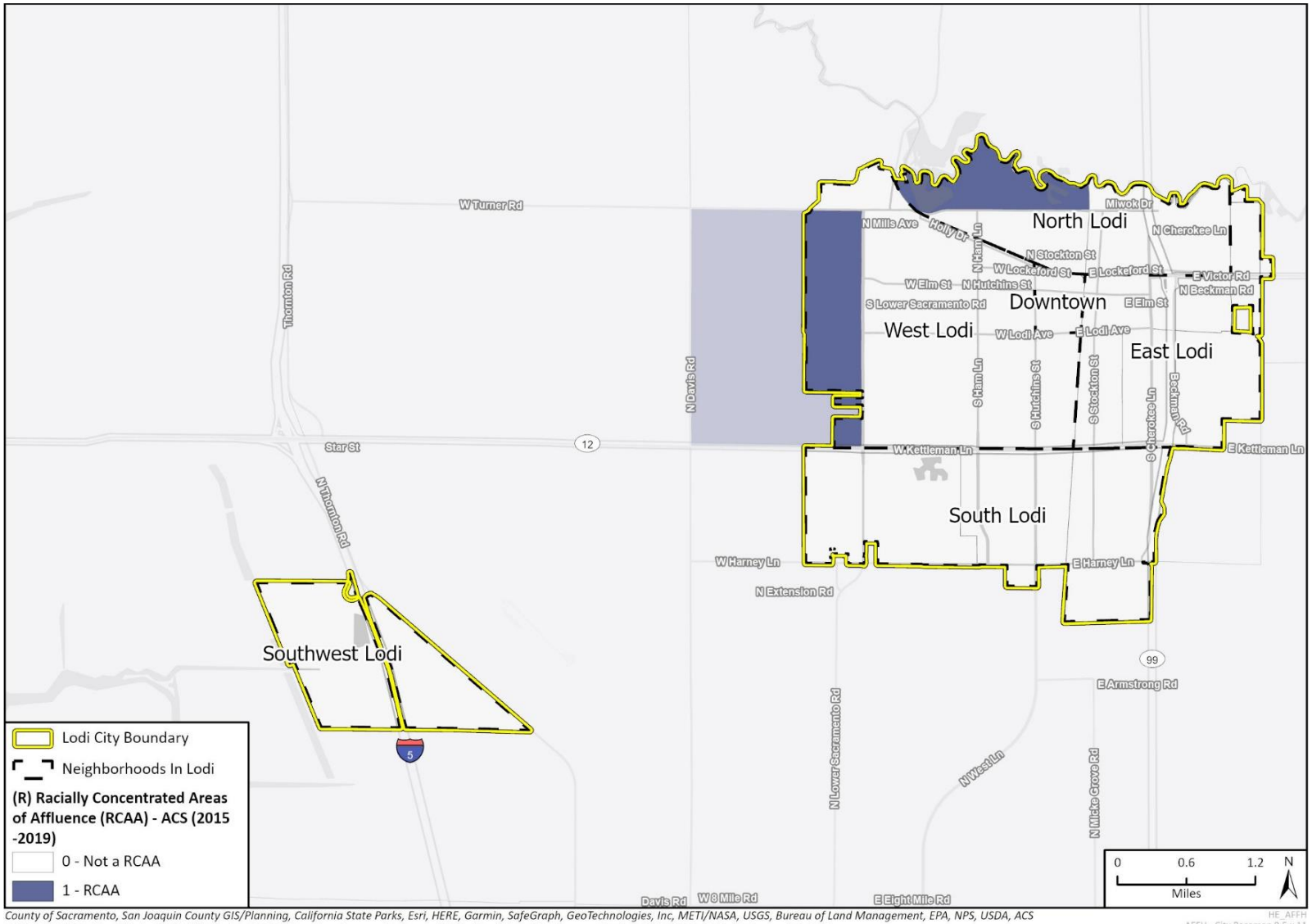
RCAA are not gated and are not physically separated from adjacent neighborhoods. The West Lodi RCAA contains several newer master planned communities with single-family neighborhoods, some of which are gated communities. Rose Gate is one of these master planned communities and contains medium to large homes that were built over the last decade with some homes still under construction. Park West and Lodi West are two residential communities in the West Lodi RCAA built during the 1980s and 1990s. These residential communities are not gated but do maintain a stone wall along the western border facing Lower Sacramento Road. The newer neighborhoods in this RCAA also have newer amenities, such as parks. Some of these newer neighborhoods are often bordered by an approximately 6-foot high stone wall, including along Lower Sacramento Road from W Lodi Avenue to W Elm Street. While some of the housing developments within the RCAAs are gated and separated from surrounding areas by stone walls, not all neighborhoods within the RCAAs are gated and some housing developments adjacent to but outside of the RCAAs are gated and have walls along their borders. Both RCAAs have low rates of overcrowding and the lowest percentage of renters in the city, although the North Lodi RCAA has a high rate of cost burden among renters (between 60 and 80 percent).

Figure 25 Racially and Ethnically Concentrated Areas of Affluence (San Joaquin County)



Source: AFFH Viewer 2023.

Figure 26 Racially and Ethnically Concentrated Areas of Affluence (City of Lodi)



Source: AFFH Viewer 2023.

Disparities in Access to Opportunities

Land use policies and urban planning impact the ability of residents to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. The limits on housing choice and access experienced by people within protected classes, such as race, sexual orientation, or disability, have far-reaching impacts on access to job opportunity, quality education, and mental and physical health.[36] This section analyzes the following place-based characteristics linked to opportunity indicators: quality education, employment, transportation, and healthy environment. The primary objective is to understand the disparity between communities in terms of access to real and potential economic benefits and quality of life.

Transit Access and Walkability

Reliable public transit access and active transportation options, such as walking and biking, are imperative for low-income residents and/or persons with disabilities to connect to employment opportunities. Lack of transportation options can impede fair housing choice and continue to reinforce barriers for low-income communities in accessing housing and employment opportunities.

Regional Trends

The following transit opportunities are available in San Joaquin County:[37]

- **Altamont Corridor Express (ACE)** – ACE offers public transit from San Joaquin County to the San Francisco Bay Area, including stations located in Vasco, Livermore, Pleasanton, Fremont, Great America, Santa Clara, and San Jose.
- **San Joaquin Regional Transit District (RTD)** – RTD offers bus rapid transit (BRT Express), Local-Stockton, Hopper, commuter, Van Go!, and Dial-a-Ride services. Each of these services offer 2-25 routes to connect Stockton to most of San Joaquin County.[38]
- **Escalon eTrans** – eTrans is Escalon's bus system and available to the general public daily between 5:00 a.m. and 10:00 p.m. The door-to-door dial-a-ride service operates within the City of Escalon and provides connection to Riverbank. Route 35 operates between the Downtown Escalon Park and Ride Lot and northwest Modesto serving Kaiser Permanente, Vintage Faire Mall and destinations on Kiernan Avenue, Dale Road, McHenry Avenue and Standiford Avenue.
- **Lodi GrapeLine** – The GrapeLine is a fixed route transit service, consists of five weekday regular routes, three weekday express routes, and four weekend regular routes, operating within the city limits.
- **Manteca Transit** – Offers a fixed-route service and a Dial-a-Ride service throughout the city of Manteca.
- **Ripon Blossom Express** - The City of Ripon Blossom Express bus operates on Tuesdays and Thursdays providing a fixed route service to stops in Ripon. Connections to eTrans (Escalon) at Dale & Veneman, Modesto, RTD (San Joaquin County) and MAX (Stanislaus County) bus lines are available.

[36] HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[37] San Joaquin Council of Governments. Transit Planning. https://www.sjcog.org/119/Transit-Planning.
[38] San Joaquin Regional Transit District. Services. https://sanjoaquinrtd.com/all-routes/.

- **Tracy TRACER** – TRACER fixed-route bus service offers five routes throughout the City of Tracy Monday through Friday from approximately 7:00am to 8:00pm and Saturdays from 9:00am to 7:00pm. All TRACER buses are ADA accessible. TRACER is starting a pilot program for on-demand bus services.
- **Greyhound** – Greyhound includes two bus stations in Stockton, which connect a specific portion of San Joaquin County to other areas of the San Francisco Bay Area and California.
- **Amtrak San Joaquins** – The San Joaquins runs multiple times daily between the San Francisco Bay Area (or Sacramento) and Bakersfield, where Amtrak Thruway buses connect you to great Southern California destinations. Additional bus stops along the way include Stockton, Modesto, Merced, Martinez, and Fresno. Easy Thruway bus connections to San Francisco are made at Emeryville.
- **ACCESS San Joaquin** – Access San Joaquin is a Consolidated Transportation Services Agency (CTSA) formed by multiple transit operators in San Joaquin County. One of the primary goals of Access San Joaquin is to improve the quality of transportation services for low-mobility groups such as seniors and people with disabilities.

San Joaquin County received an average AllTransit performance score of 3.0 which equates to a low combination of trips per week and number of jobs accessible by transit. Approximately 1.5 percent of commuters use transit in San Joaquin County.[39] Nearby counties received slightly higher performance scores than San Joaquin County, such as Sacramento County (4.8), Contra Costa County (5.0), Alameda County (7.1), and Modesto County (3.6).

Local Trends

The City of Lodi provides public transit services within the city limits and to limited adjacent areas in northern San Joaquin County via the Lodi GrapeLine. The GrapeLine is a fixed route transit service, with five weekday regular routes, three weekday express routes, and four weekend regular routes, operating within the city limits. The City also operates the VineLine and Dial-A-Ride (DAR) Service, door-to-door paratransit and shared ride demand response services for persons with disabilities and the general public. The total transit service area is approximately 19 square miles.[40] Lodi's Transit Division operates 25 vehicles for transportation, with an annual maximum peak revenue service of 16 vehicles: eight demand response and eight fixed routes.[41]

According to the City of Lodi Transit Asset Management Plan, the total annual passenger ridership for the fixed route, demand response, and ADA paratransit services in the fiscal year 2021-2022 was approximately 159,529 passengers.[42] The total annual vehicle revenue miles for fixed route, demand response, and ADA paratransit in the fiscal year 2021-2022 was approximately 275,220 miles. Prior to the COVID-19 pandemic, total systemwide annual passenger ridership in the fiscal year 2018-2019 was 284,269 and total systemwide annual vehicle revenue miles were 366,689.[43]

The city of Lodi received an average AllTransit performance score of 4.3, higher than the county, but still equating to a low combination of trips per week and number of jobs accessible enabling few people to take transit to work. According to ACS estimates, approximately, 79 percent of commuters drive alone, 11 percent carpool, less than one percent use transit, less than one percent use a bicycle, and one percent walk to work. Although AllTransit and

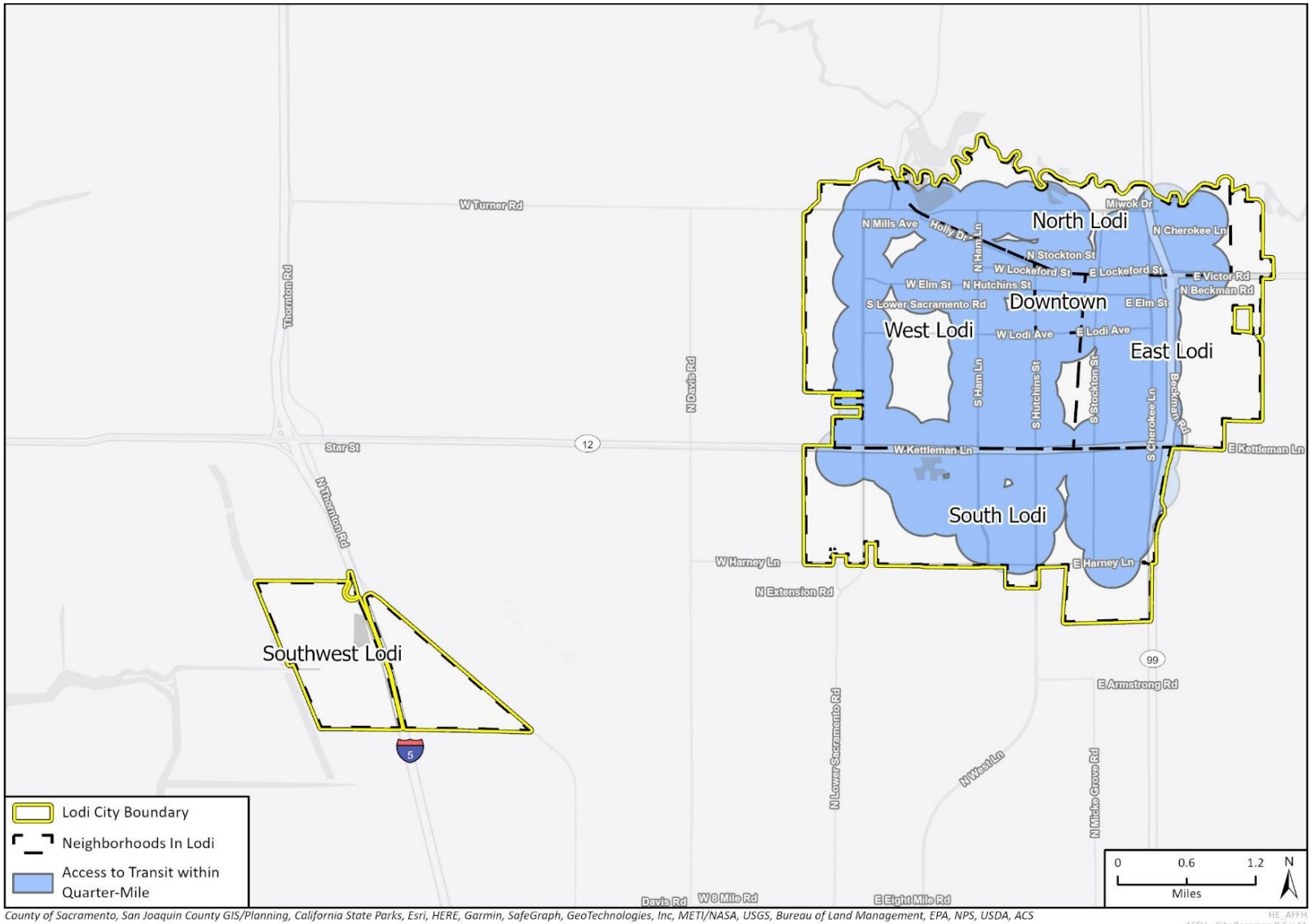
[39] All Transit. County: San Joaquin, CA. https://alltransit.cnt.org/metrics/?addr=san+joaquin+county%2C+ca.
[40] City of Lodi. City of Lodi Transit Asset Management Plan. https://www.sjcog.org/DocumentCenter/View/7672/Lodi-TAM---2022-Update-Final.
[41] City of Lodi. City of Lodi Transit Asset Management Plan. https://www.sjcog.org/DocumentCenter/View/7672/Lodi-TAM---2022-Update-Final.
[42] City of Lodi. City of Lodi Transit Asset Management Plan. https://www.sjcog.org/DocumentCenter/View/7672/Lodi-TAM---2022-Update-Final.
[43] City of Lodi. City of Lodi Transit Asset Management Plan. https://www.sjcog.org/DocumentCenter/View/7672/Lodi-TAM---2022-Update-Final.

ACS data indicates only small percentage of commuters use transit, most of the city is located within one-quarter mile of a transit stop (Figure 27). According to the AI, residents, particularly those living in East Lodi, may need to ride two or three bus lines to reach their place of employment on the western side of the city. While Figure 27 shows that Southwest Lodi has low access to transit, this area does not contain any residential uses and consists of the White Slough Water Pollution Control Facility and agricultural operations on City-owned land.

Walk Score is a private company that offers a walkability index, which measures the pedestrian friendliness of a given location by analyzing walking routes to nearby amenities and examining population density and road metrics, including block length and intersection density. According to Walk Score, Lodi has a walk score of 58 which means a moderate amount of errands require a car.[44] The Environmental Protection Agency (EPA) also has a walkability index, that ranks block groups according to their relative walkability. Figure 28 shows areas in Downtown and South Lodi are considerably above average walkability, while the rest of the city is considered below average and least walkable.

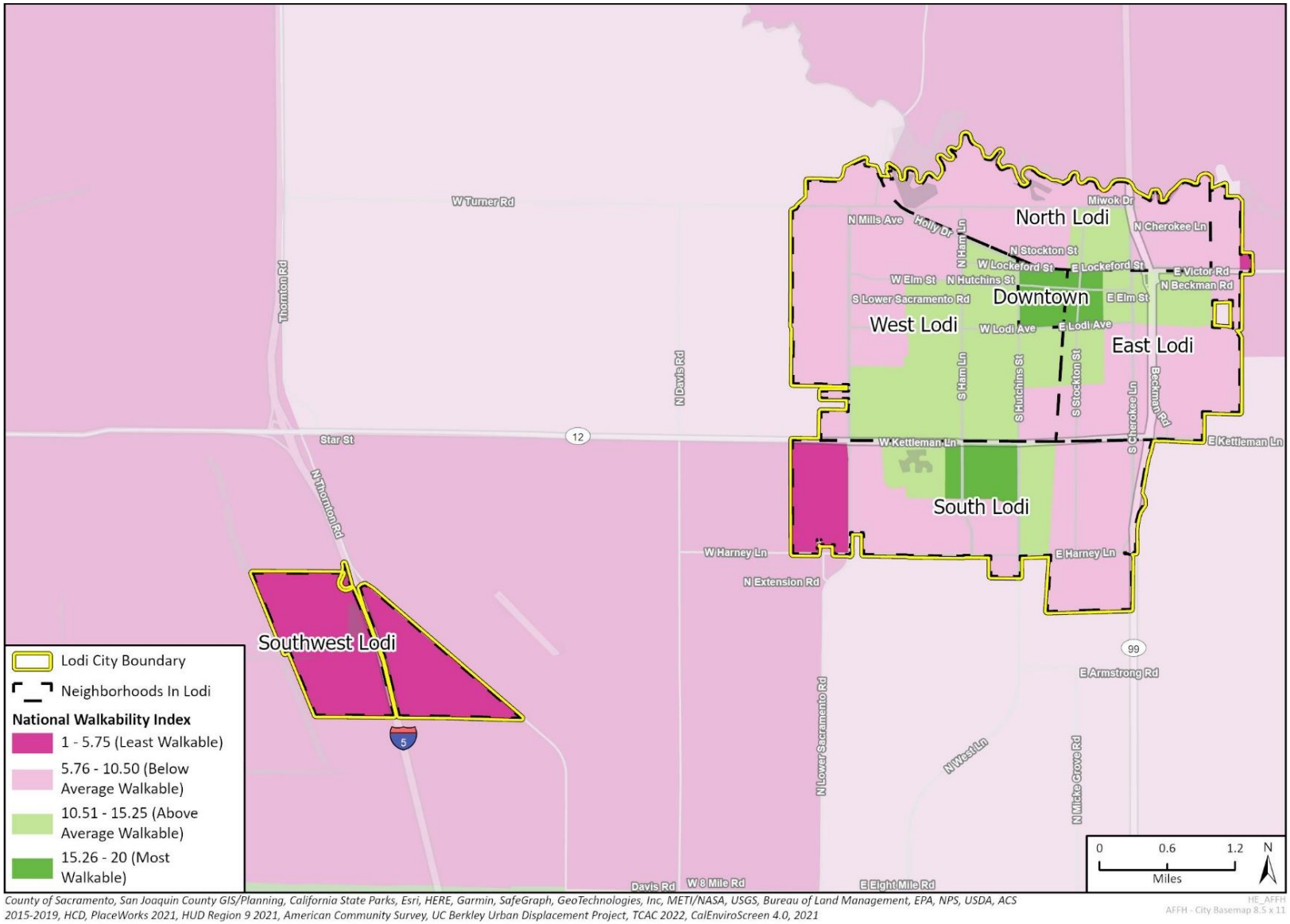
[44] Walk Score. Living in Lodi. https://www.walkscore.com/CA/Lodi.

Figure 27 Access to Transit within a Quarter Mile (City of Lodi)



Source: City of Lodi. Transit. Available at: https://www.lodi.gov/469/Transit.

Figure 28 National Walkability Index (City of Lodi)



Source: EPA National Walkability Index, 2023

Education

Economics literature has consistently found about a 10 percent increase in wages/salary with each additional year of education.[45] Therefore, educational attainment is directly linked to income and therefore housing opportunities. To assess educational opportunities by geography, this analysis uses TCAC education domain scores, which incorporate a variety of indicators including math and reading proficiency scores, high school graduation rates, and student poverty rates at the census tract level.

Regional Trends

Education outcomes vary across San Joaquin County (Figure 29). Educational outcomes in the central part of the county, near Stockton, and more rural communities in the eastern and western parts of the county generally have the least positive education outcomes. In contrast, the northern and southern parts of the county had the highest education outcomes. According to the San Joaquin County Council of Governments, San Joaquin County lags behind California and the rest of the United States in both high school graduation rates and college degree attainment. In fact, San Joaquin ranks 48th out of 58 California counties and had a high school graduation rate of 81 percent in 2021. [46] Approximately 79 percent of the population aged 25 and older is a high school graduate and 24 percent is a college graduate.

There is one private university in the county, the University of the Pacific. CSU Stanislaus Stockton Campus at University Park offers upper division courses for several undergraduate degree programs, and an accredited two-year community college, San Joaquin Delta College (SJDC), also provides undergraduate studies at two campuses in Stockton and Mountain House. At the K-12 level, San Joaquin County has more than 14 school districts, 200 schools, and 135,000 students.

Local Trends

Lodi is served by the Lodi Unified School District, which operates 49 schools which include 34 elementary schools, six middle schools, eight high schools and two alternative schools. Lodi Unified School District has a student enrollment of approximately 30,727 students, grades kindergarten through 12th grade.[47] According to the AI, Lodi Unified School District has been designated a Program Improvement (PI) district, due primarily to lower test scores. PI schools are schools that have not met the Adequate Yearly Progress testing goals for two or more years and are required to provide afterschool tutoring and educational programming to all students who are eligible for the free or reduced lunch program operated through the district.

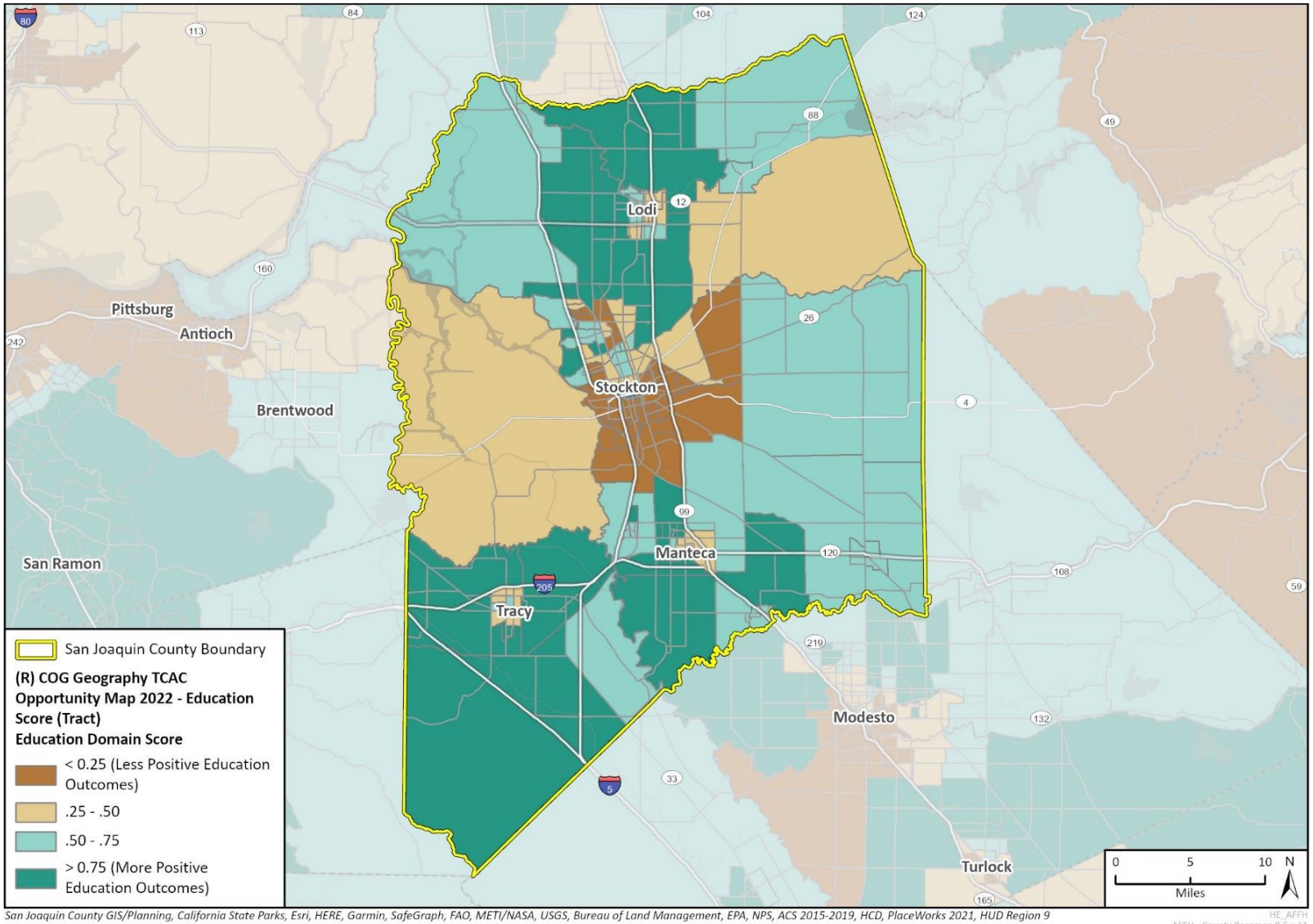
Figure 30 shows TCAC scores for education outcomes in Lodi. Areas of North Lodi, East Lodi, and South Lodi had less positive education outcomes, while West Lodi and South Lodi had more positive education outcomes.

[45] Annual Disability Statistics Compendium, 2020. https://disabilitycompendium.org/annualreport

[46] San Joaquin Council of Governments California. Education – School Facts. https://www.sjcog.org/241/Education#:~:text=San%20Joaquin%20County%20Graduation%20Rates&text=In%20fact%2C%20San%20Joaquin%20ranks,attended%20at%20least%20some%20college

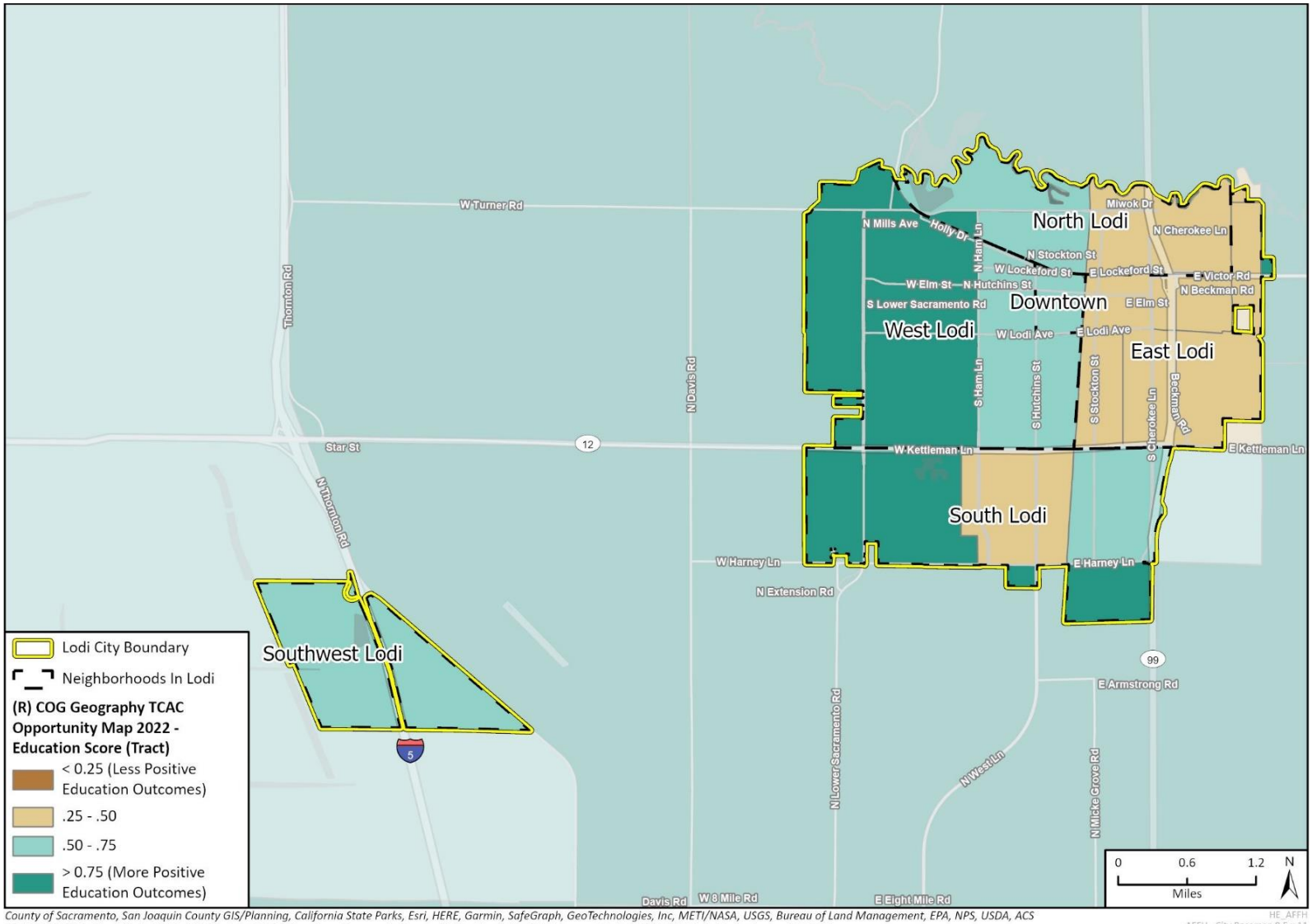
[47] Ed-Data. 2023. Lodi Unified. http://www.ed-data.org/district/San-Joaquin/Lodi-Unified

Figure 29 TCAC Opportunity Areas – Education (San Joaquin County)



Source: AFFH Viewer 2023.

Figure 30 TCAC Opportunity Areas – Education (City of Lodi)



County of Sacramento, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021

HE_AFFH
AFFH - City Basemap 8.5 x 11

Source: AFFH Viewer 2023.

Economic Outcomes

Housing opportunities and economic opportunities are closely linked. Access to high quality employment close to desired and affordable housing results in more housing opportunities and shorter commute times. The analysis for economic opportunities uses TCAC economic indicators, employment participation data from the ACS and the HUD Jobs Proximity Index.

TCAC measures economic opportunities by census tract. The scores consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes. The HUD Jobs Proximity Index assesses the accessibility to job opportunities at the census block group level.

Regional Trends

Economic outcomes vary across San Joaquin County. Areas with more positive economic outcomes are located in the southern, central, and eastern parts of the county and near the cities of Tracy, Lodi, and Stockton (Figure 31). In contrast, northwestern and central areas of the county have the lowest economic outcomes in the county.

San Joaquin County has a labor force participation rate of 60 percent. Estimates from the California Employment Development Department show that the average salary in San Joaquin County in 2022 was $54,245. Management, healthcare professionals and technical occupations, and legal occupations have the highest average salary in the county, more than $60,000 higher than the county average salary (Table 82). Occupations related to healthcare support, personal care and service, food preparation and serving, and farming, fishing, and forestry occupations have the lowest average salary, at less than $40,000. The largest industries in San Joaquin County in terms of employment include educational services, and health care and social assistance, agriculture, forestry, fishing and hunting, and mining, and retail trade. Most jobs in these industries have lower average salaries.

Table 82 Mean Salary by Occupation (San Joaquin County)

Occupation	Average Salary
Management Occupations	$115,955
Healthcare Practitioners and Technical Occupations	$114,974
Legal Occupations	$113,928
Architecture and Engineering Occupations	$89,624
Computer and Mathematical Occupations	$88,847
Business and Financial Operations Occupations	$76,977
Life, Physical, and Social Science Occupations	$75,016
Educational Instruction and Library Occupations	$70,561
Protective Service Occupations	$66,842
Community and Social Service Occupations	$66,780
Construction and Extraction Occupations	$64,087
Installation, Maintenance, and Repair Occupations	$59,134
Arts, Design, Entertainment, Sports, and Media Occupations	$57,529
Office and Administrative Support Occupations	$48,484
Transportation and Material Moving Occupations	$46,087
Sales and Related Occupations	$45,176
Production Occupations	$44,049
Building and Grounds Cleaning and Maintenance Occupations	$41,171
Healthcare Support Occupations	$38,900
Personal Care and Service Occupations	$38,325
Food Preparation and Serving Related Occupations	$35,649
Farming, Fishing, and Forestry Occupations	$34,670
All Occupations	$54,245

Source: California Employment Development Department, Occupational Wage data, 2022.

Local Trends

Economic outcomes vary across the city. East Lodi and the eastern half of North Lodi have the lowest economic opportunity scores (Figure 32). The highest economic opportunity scores are located in the western half of the city. Areas with less positive economic outcomes overlap with areas with a higher percentage of non-white residents (Figure 8) as well as areas with lower household median incomes (Figure 19).

Job proximity, defined as accessibility to employment in terms of distance to job locations, is highest in the eastern half of the city and lowest in the northwestern areas of the city (Figure 33). Areas with higher job proximity include large areas zoned for industrial, business park, and commercial uses. Areas with the lowest job proximity, in northwest Lodi, are zoned primarily Low Density Residential, with very few areas that are zoned for uses that accommodate employment opportunities. Major employers in Lodi include Pacific Coast Producers (agricultural processing plant), Lodi Unified School District, Adventist Health Lodi Memorial (nonprofit healthcare provider), and Blue Shield of CA (one of 17 Blue Shield offices in California) (Table 83).

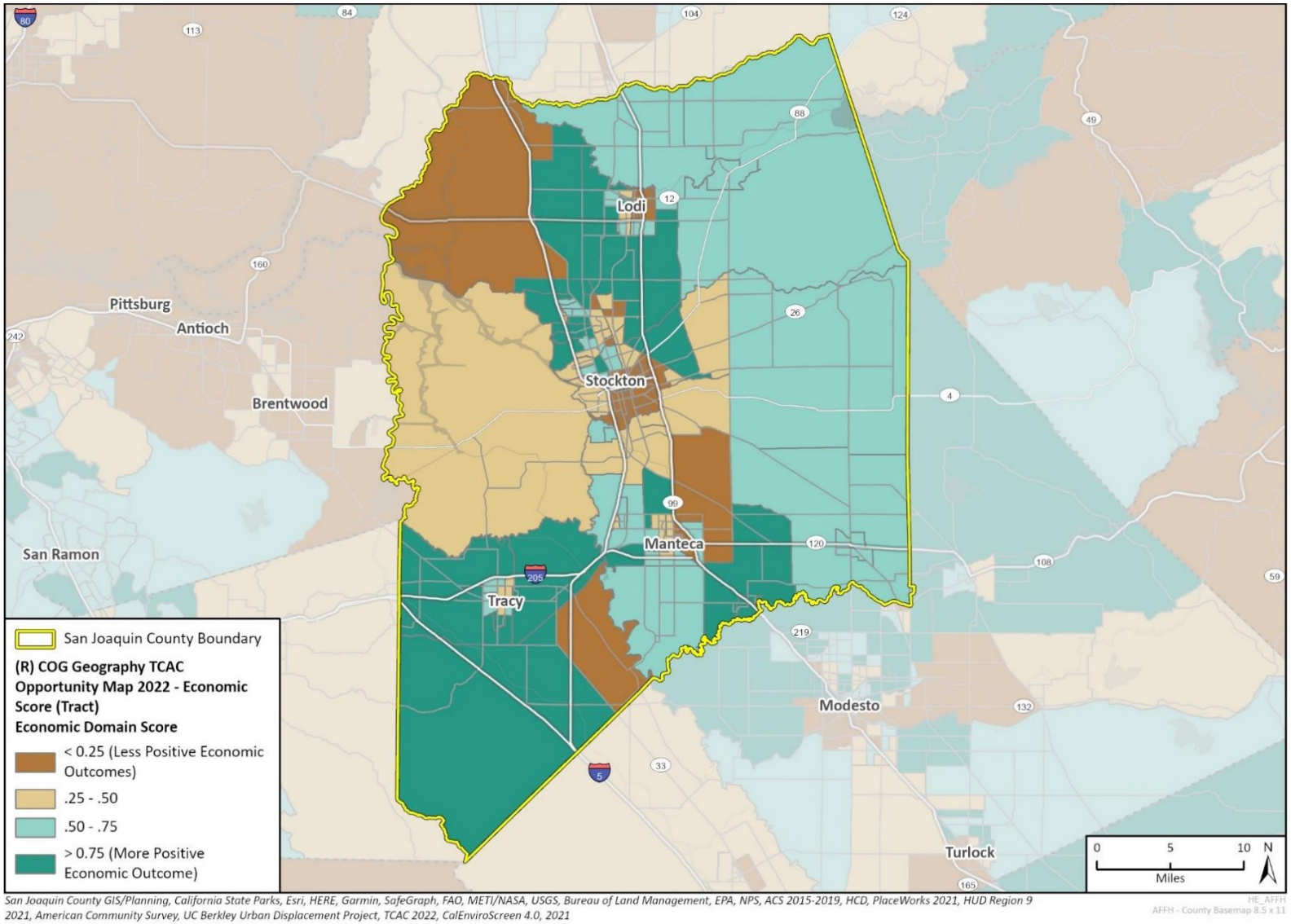
Table 83 Major Employers (City of Lodi)

Name of Employer	Number of Employers	Percent of Total City Employment
Pacific Coast Producers	1,486	4.82%
Lodi Unified School District	1,363	4.43%
Adventist Health Lodi Memorial	1,242	4.03%
Blue Shield of CA	1,084	3.52%

Source: City of Lodi. 2022. 2021-2022 Annual Financial Report https://www.lodi.gov/ArchiveCenter/ViewFile/Item/558.

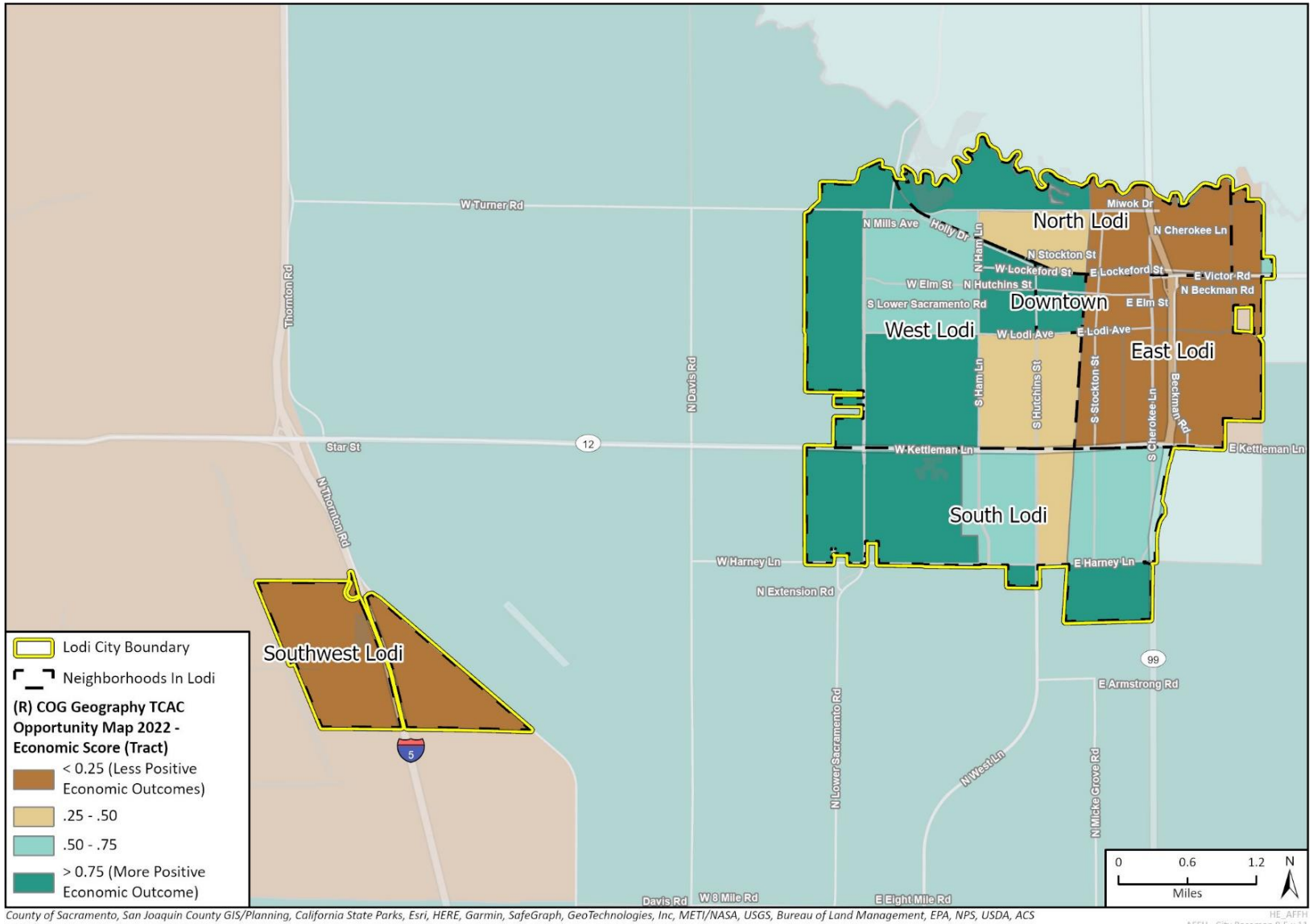
In 2021, Lodi had a labor force of 50,418 of persons 16 years and over and a labor force participation rate of 65 percent. The largest employment industries in Lodi educational services, and health care and social assistance (23 percent of employed population), construction (10 percent of employed population); and retail trade (10 percent of employed population). Educational services, and health care and social assistance and retail trade are also the two largest industries in San Joaquin County.

Figure 31 TCAC Opportunity Areas – Economic (San Joaquin County)



Source: AFFH Viewer 2023.

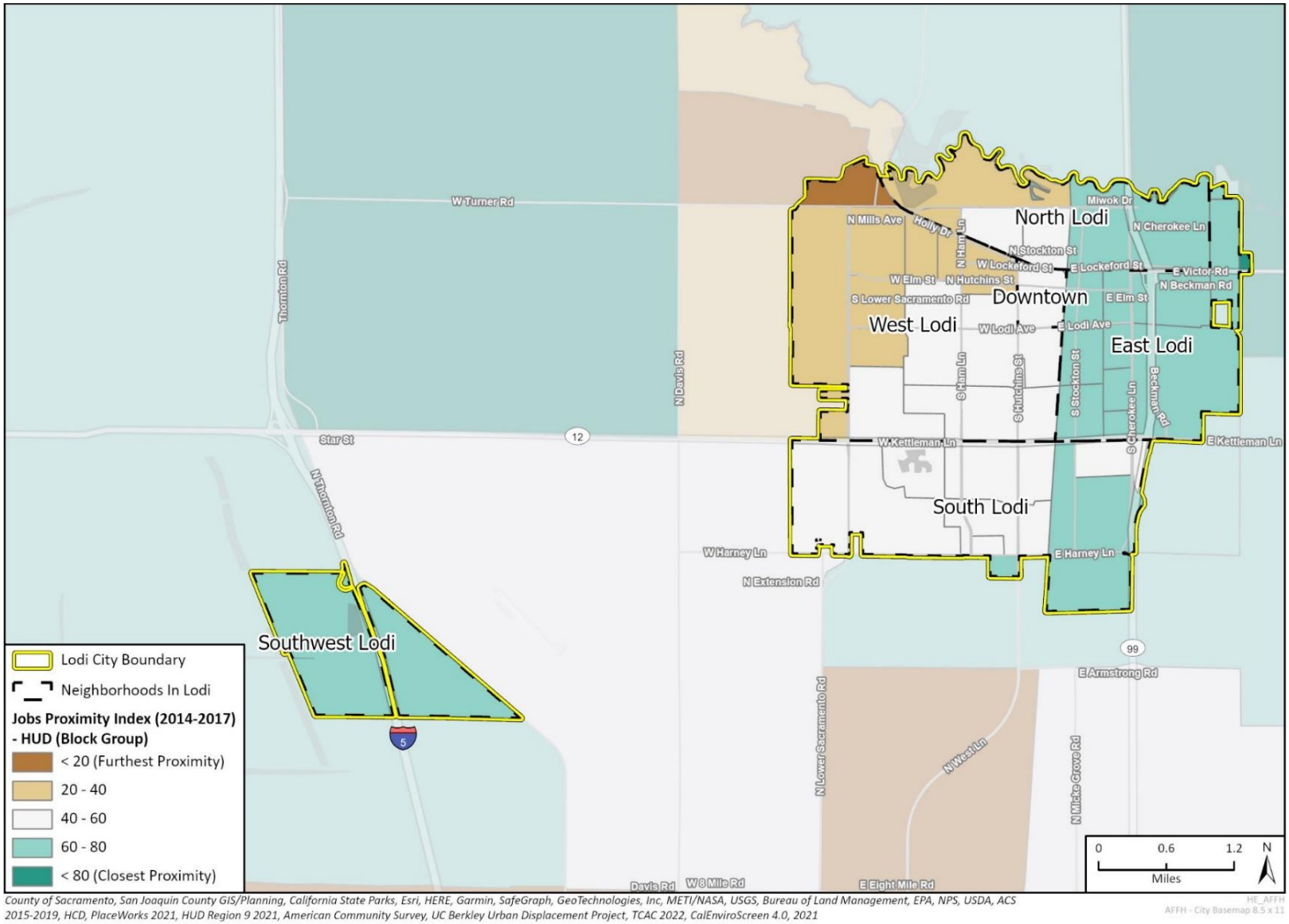
Figure 32 TCAC Opportunity Areas – Economic (City of Lodi)



County of Sacramento, San Joaquin County GIS/Planning, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, ACS 2015-2019, HCD, PlaceWorks 2021, HUD Region 9 2021, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021

Source: AFFH Viewer 2023.

Figure 33 Jobs Proximity Index (City of Lodi)



Source: AFFH Viewer 2023.

Healthy Environment

Healthy Environment in AFFH addresses disparities in access to environmentally healthy neighborhoods by protected class groups. An assessment of environmentally healthy neighborhoods can include air and water quality, safety, environmental hazards, social services, and cultural institutions. Federal and state regulations require jurisdictions to analyze environmental justice in an effort to ensure people have equal access to safe and healthy housing. The California Office of Environmental Health Hazard Assessment developed CalEnviroScreen, a mapping tool that uses spatial data collected by various regulatory agencies (e.g., air quality indicators from California Air Districts, monitored chemical releases into the air or water table from Environmental Protection Agency, HUD socio-economic indicators, etc.). The dataset uses a methodology to identify communities disproportionately burdened by exposures to pollution, environmental effects of existing pollutants in communities, among other indicators of sensitive populations or socioeconomic factors. Residents in census tracts with high CalEnviroScreen scores as compared to other California census tracts (shown as percentiles) are disproportionately burdened by pollution and are more vulnerable to related effects. CalEnviroScreen identifies communities in the highest 25 percent of census tracts across California and CalEnviroScreen percentile scores of 75 or higher as "disadvantaged communities."

Regional Trends

The CalEnviroScreen map for San Joaquin County identifies the degree to which communities are considered burdened by pollution. Areas with the highest degree of pollution burden were concentrated in East Lodi and throughout Stockton and Lathrop (Figure 35). CalEnviroScreen disadvantaged communities are concentrated in central and western parts of the county, as well as within the cities of Stockton, Lodi, Tracy, Lathrop, and Manteca.

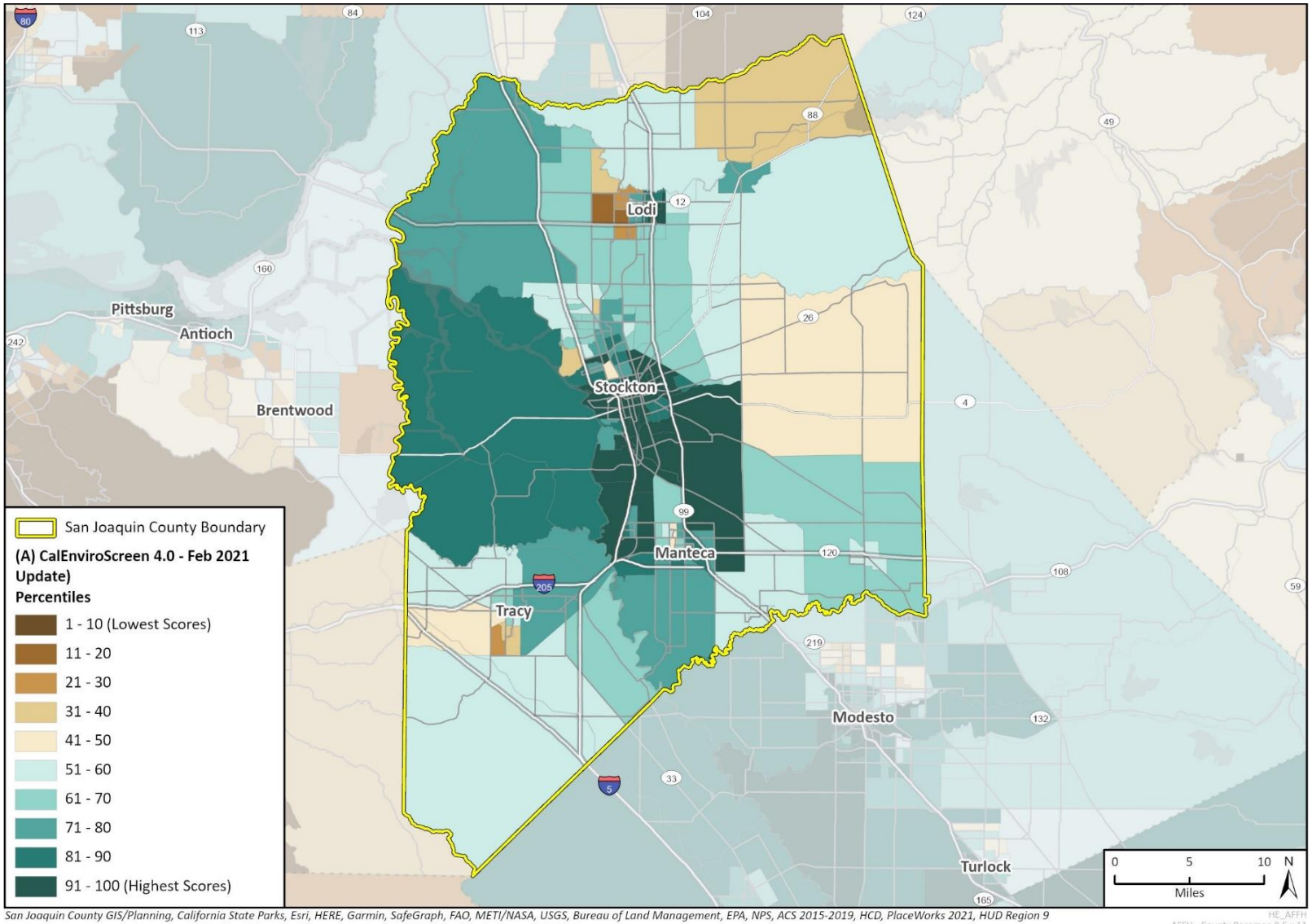
TCAC's environmental scores for San Joaquin County are similar but less severe than the CalEnviroScreen map. Overall, the majority of San Joaquin County includes less positive environmental outcomes. The southern and central parts of the county have the least positive environmental outcomes, most notably in the most rural portions of the county (Figure 36). The northeastern and southwestern areas surrounding the cities of Tracy and Lodi, and a few small areas in the central part of the county have more positive environmental outcomes.

Local Trends

Lodi has a high variation in environmental outcomes throughout the city. The western portion of the community, including large portions of North Lodi, West Lodi, and South Lodi have a lower pollution burden, with CalEnviroScreen percentiles less than 30 (Figure 37). East Lodi and the eastern half of North Lodi have the highest pollution burden, ranging from the 83rd to 94th percentile. Areas with the highest pollution burden are most affected by pollution from diesel particulate matter, children's lead risk from housing, hazardous waste, impaired waters, and proximity to solid waste sites. Pollution burden from groundwater threats were high in central areas of the city. The eastern half of North Lodi and East Lodi are considered SB 535 disadvantaged communities (Figure 37).

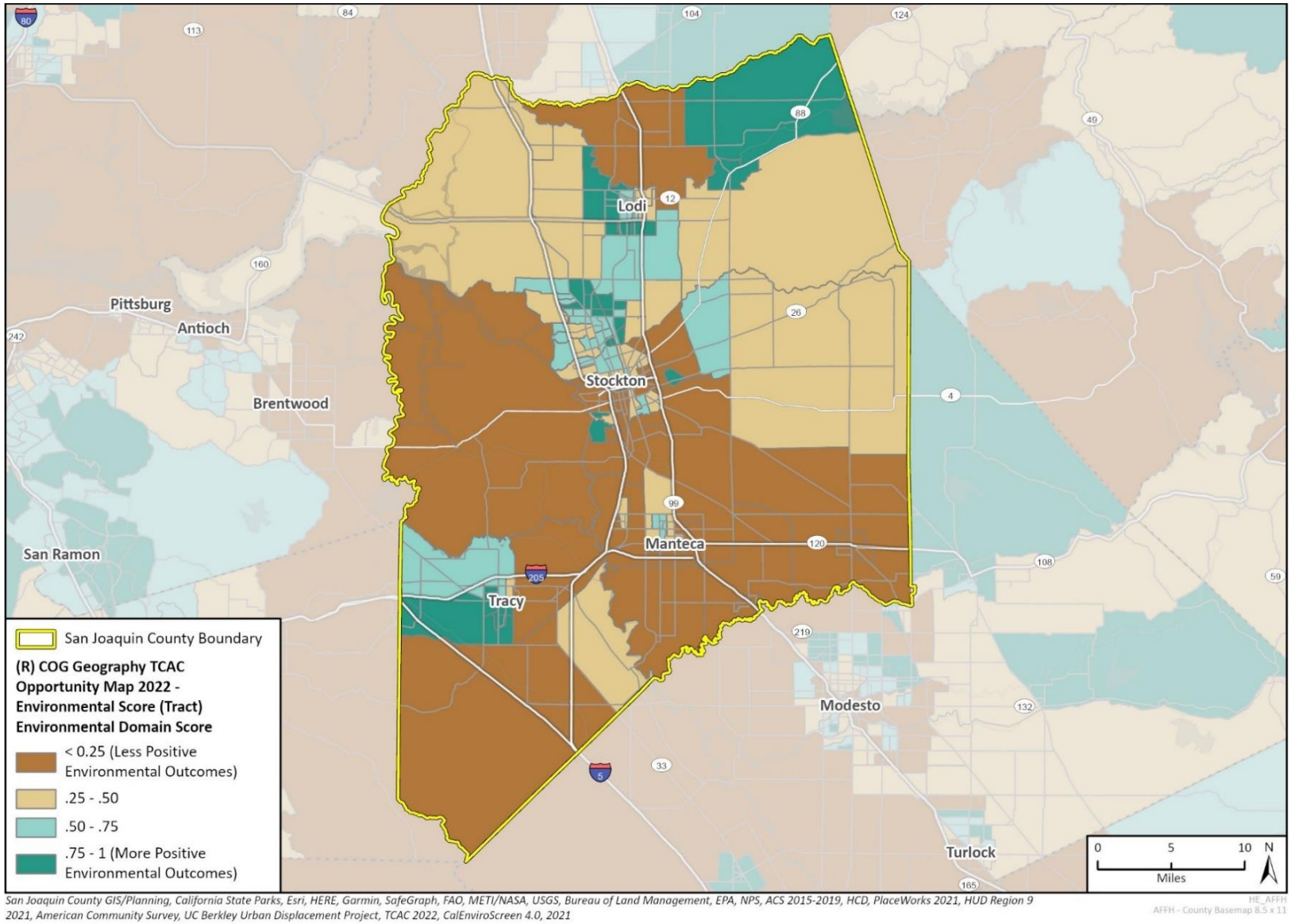
Similar to the CalEnviroScreen map, TCAC environmental outcome scores are less positive in in the eastern part of North Lodi and East Lodi (Figure 36). The rest of the city had positive environmental outcomes. Western Lodi and Southern Lodi had the most positive environmental outcomes in the city.

Figure 34 CalEnviroScreen 4.0 Percentile Scores (San Joaquin County)



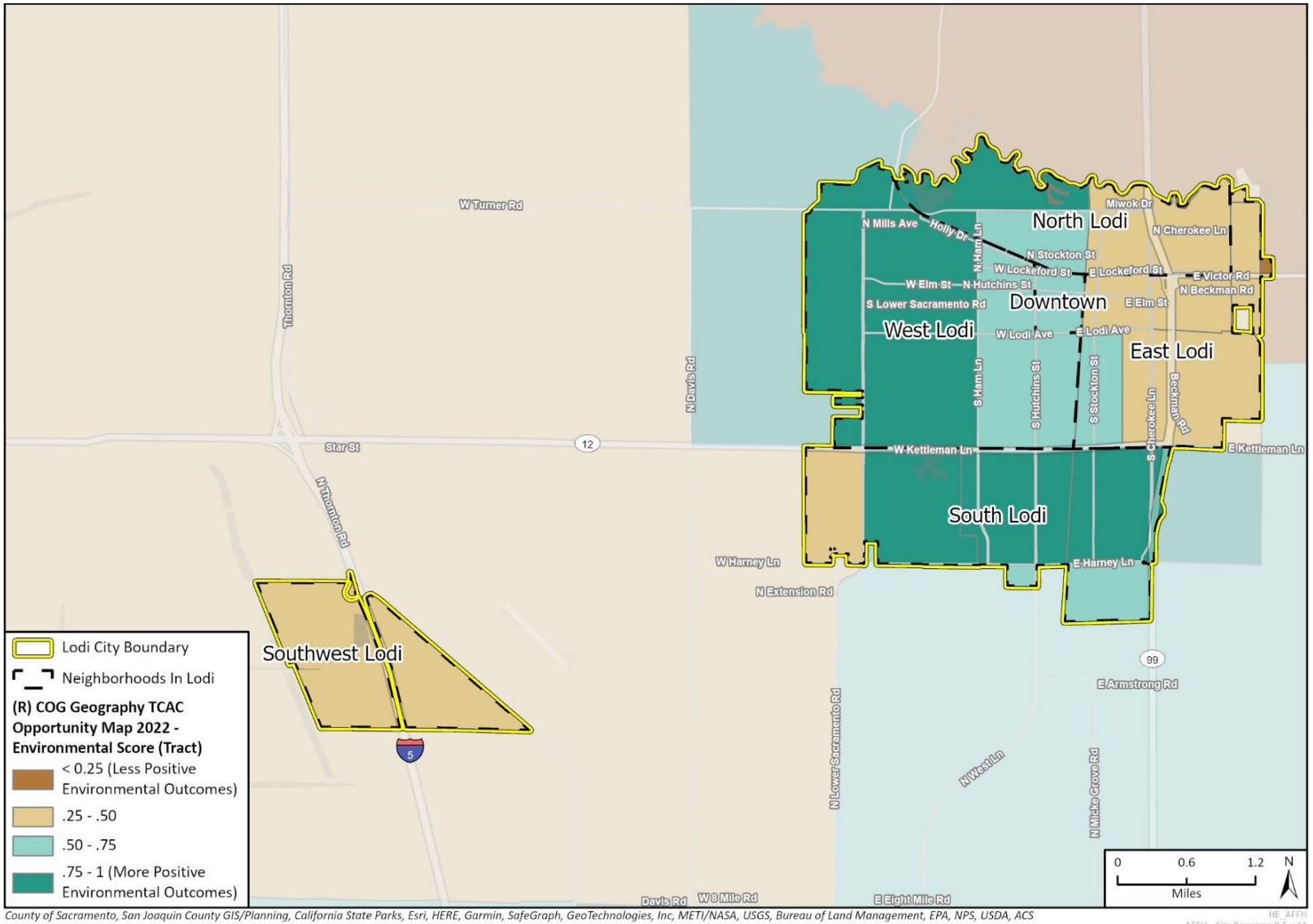
Source: AFFH Viewer 2023.

Figure 35 TCAC Opportunity Areas – Environmental (San Joaquin County)



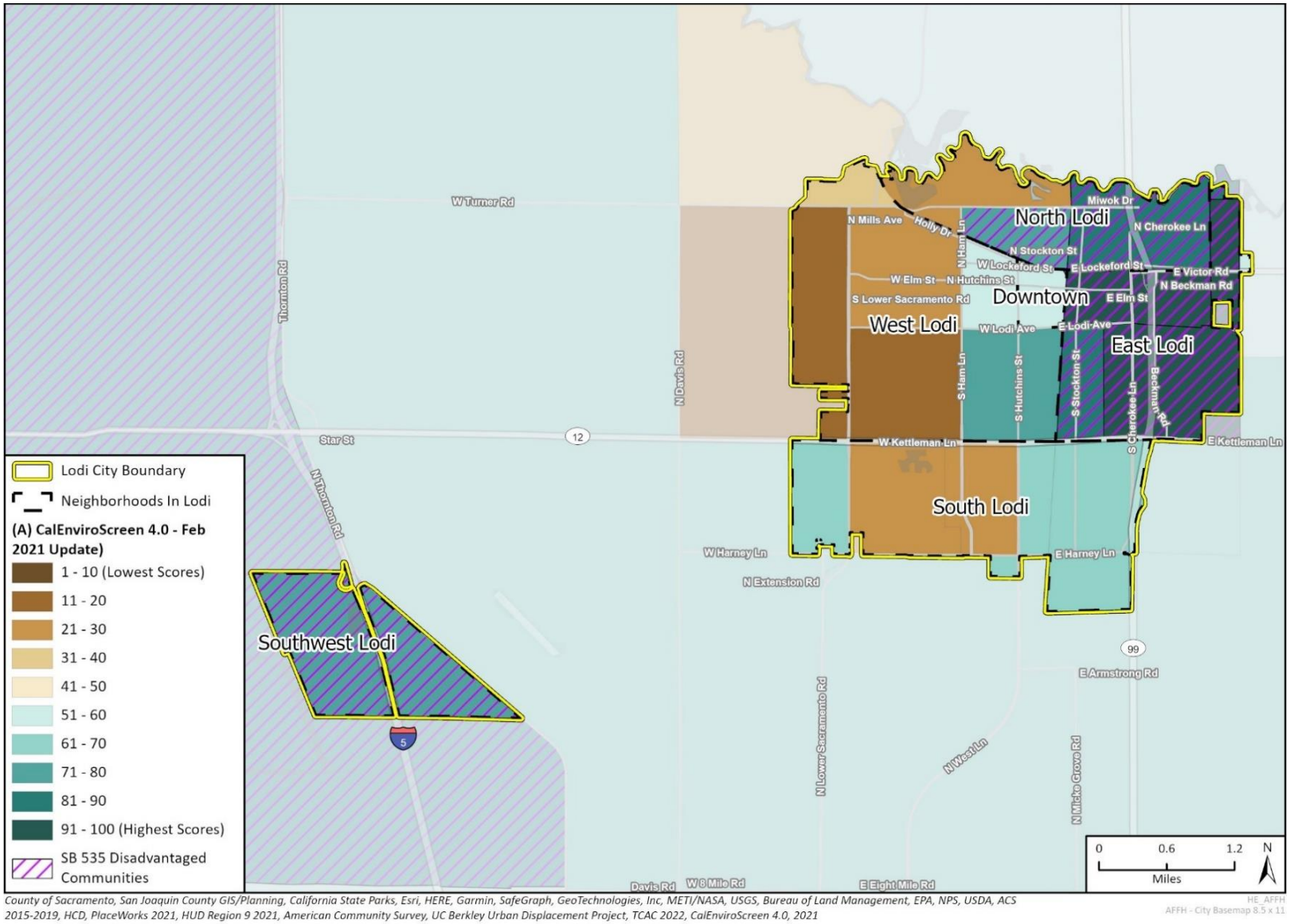
Source: AFFH Viewer 2023.

Figure 36 TCAC Opportunity Areas – Environmental (City of Lodi)



Source: AFFH Viewer 2023.

Figure 37 CalEnviroScreen Disadvantaged Communities (City of Lodi)



Source: AFFH Viewer 2023.

Disproportionate Housing Needs

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

Housing Problems

Housing Condition

HUD considers housing units to be "standard units" if they are in compliance with local building codes. Many federal and state programs use the age of housing as a factor to determine a community's housing rehabilitation needs. Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Typically, housing over 30 years old is more likely to have rehabilitation needs that may include replacing plumbing, roof repairs, foundation work, and other repairs. Housing units built before 1978 may have health risks such as lead-based paint and asbestos. Housing issues prompted by disrepair such as mold may elevate health conditions such as asthma.

Regional Trends

A housing unit is considered substandard if it lacks complete plumbing or kitchen facilities. ACS estimates indicate less than one percent of housing units (3,372 housing units) in San Joaquin County are considered substandard housing units.

Approximately 42 percent of total households in San Joaquin County experienced housing problems (units having incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and households with a cost burden greater than 30 percent).

Local Trends

Approximately 43 percent of total households in Lodi experienced housing problems (Table 84). Renter-occupied housing units experience housing problems at a higher rate than owner-occupied housing units.

Approximately two percent of housing units (541 housing units) are considered substandard in Lodi. The majority of substandard housing units (82 percent) lacked complete kitchen facilities. Forty percent of the housing stock in Lodi was constructed prior to 1990 and is more than 30 years old. These units are potentially in need of repair and modernization improvements. According to 2017-2021 ACS estimates, housing lacking complete plumbing is concentrated in East Lodi in the area north of East Lodi Avenue, where almost three percent of housing units lack complete plumbing. Housing lacking complete kitchen facilities are highest the southwestern part of West Lodi, where approximately nine percent of housing units lack complete kitchen facilities and in the western part of North Lodi (west of State Route 99), where between three and eight percent of housing units lack complete kitchen facilities. Areas with a higher percentage of housing units lacking complete plumbing and kitchen facilities correspond with areas with a higher percentage of older structures and a higher percentage of multi-family units

and renter-occupied housing. Older structures are typically more likely to have rehabilitation needs due tot lack of maintenance and upkeep. Multi-family housing units are generally occupied by renter households who cannot directly perform maintenance and repair activities since they do not own the unit. Turnover of rental units can lead to deferment of repairs as tenants may not want to report substandard housing conditions in fear of increased rent or retaliation. In addition, landlords do not always respond to maintenance/repair requests.

Housing Cost Burden

Housing cost burden is defined as the proportion of a household's total gross income spent on housing costs. Households that spend at least 30 percent of their total gross income on housing costs (rent, mortgage, utilities, and other housing-related costs) are considered "cost burdened," and households spending over 50 percent on housing costs are considered "severely cost burdened." The higher the housing cost burden, the more likely residents are to live in overcrowded and substandard conditions and are less likely to afford to relocate. Low-income households and persons in protected classes disproportionately experience severe housing problems.

Regional Trends

Cost burden (spending more than 30 percent of household income on housing costs) is widespread for renters and homeowners throughout San Joaquin County. Rates of cost burden among renters is higher in in urban parts of the county compared to rural parts of the county (Figure 38). In areas throughout the cities of Lodi, Stockton, and Manteca up to 60 to 80 percent of renters are cost burdened. The area west of Lodi and west of Stockton have the lowest rates of cost burden among renters in the county, less than 20 percent. Similar to cost burden among renters, the rate of cost burden among homeowners is higher in urban areas than rural areas, and is highest in the city of Stockton (Figure 39). In several areas in Stockton, more than 80 percent of homeowners are cost burdened. Throughout many urban areas as well as rural areas in the eastern part of the county, between 40 and 60 percent of homeowners are cost burdened. In most rural areas in the eastern part of the county, between 20 and 40 percent of homeowners are cost burdened. Areas in and surrounding the cities of Stockton, Lodi, Manteca, and Tracy have the highest rates of cost burden by renters and homeowners, corresponding with areas that experienced higher rates of poverty (Figure 22), predominantly Hispanic population (Figure 6), and larger LMI populations (Figure 17).

Local Trends

Similar to the county, cost burden is widespread issue among homeowners and renters throughout Lodi. Approximately 38 percent of households in Lodi are cost burdened and 16 percent are severely cost burdened (Table 84). Generally, as household income increases, rates of cost burden decrease. Approximately 82 percent of extremely low-income households (0 to 30 percent AMI) are cost burdened while only approximately 14 percent of moderate (80 to 120 percent AMI) are cost burdened. Renters experience greater rates of cost burden than home owners. Approximately 50 percent of all renter households are cost burdened and 25 percent are severely cost burdened, while 27 percent of all owner households are cost burdened and 11 percent are severely cost burdened.

Cost burden among renters is high throughout Lodi. Areas with the highest percentage of cost burdened renters are in North Lodi, Downtown Lodi, and East Lodi (Figure 40) where 60-80 percent of renters are cost burdened. Throughout most of the city, between 40 and 60 percent 0of renters are cost burdened. Cost burden among homeowners is slightly less prevalent than cost burden among renters. East Lodi has the highest percentage of cost burdened homeowners, up to 52 percent in the northern part of East Lodi (Figure 41). Areas with the lowest rate of cost burden among homeowners are in North Lodi.

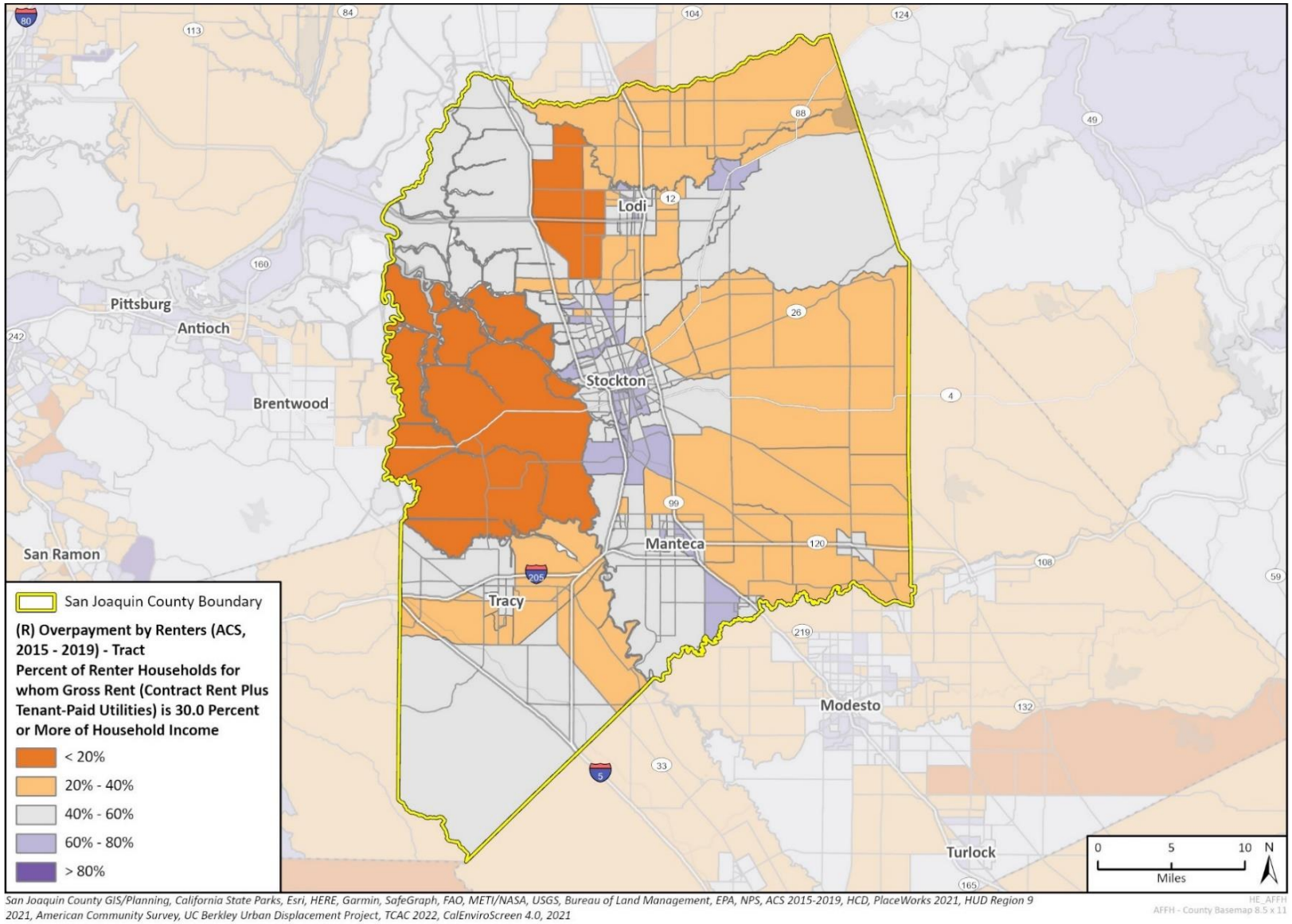
Table 84 Assistance Needs of Lower-Income Households (2015-2019)

Household by Tenure, Income,	Renters		Owners		Total Households	
and Housing Problem	Number	Percent	Number	Percent	Number	Percent
Extremely low-income (0-30% AMI)	2,080		850		2,930	
With any housing problem	1,780	85.6%	720	84.7%	2,500	85.3%
With cost burden >30%	1,745	83.9%	710	83.5%	2,455	83.8%
With cost burden >50%	1,460	70.2%	490	57.6%	1,950	66.6%
Very low-income (31-50% AMI)	2,145		1,010		3,155	
With any housing problem	2,035	94.9%	625	61.9%	2,660	84.3%
With cost burden >30%	1,915	89.3%	595	58.9%	2,515	79.7%
With cost burden >50%	970	45.2%	310	30.7%	1,280	40.6%
Low-income (51-80% AMI)	2,590		1,810		4,400	
With any housing problem	1,800	69.5%	990	54.7%	2,790	63.4%
With cost burden >30%	1,495	57.7%	900	49.7%	2,395	54.4%
With cost burden >50%	200	7.7%	180	9.9%	380	8.6%
Moderate & Above Income (>80% AMI)	4,185		8,470		12,655	
With any housing problem	665	15.9%	1,285	15.2%	1,950	15.4%
With cost burden >30%	350	8.4%	1,105	13.0%	1,455	11.5%
With cost burden >50%	60	1.4%	110	1.3%	170	1.3%
Total Households	11,000		12,145		23,140	
With any housing problem	6,280	57.1%	3,620	29.8%	9,900	42.8%

With cost burden >30%	5,505	50.0%	3,310	27.3%	8,820	38.1%
With cost burden >50%	2,690	24.5%	1,090	8.9%	3,780	16.3%

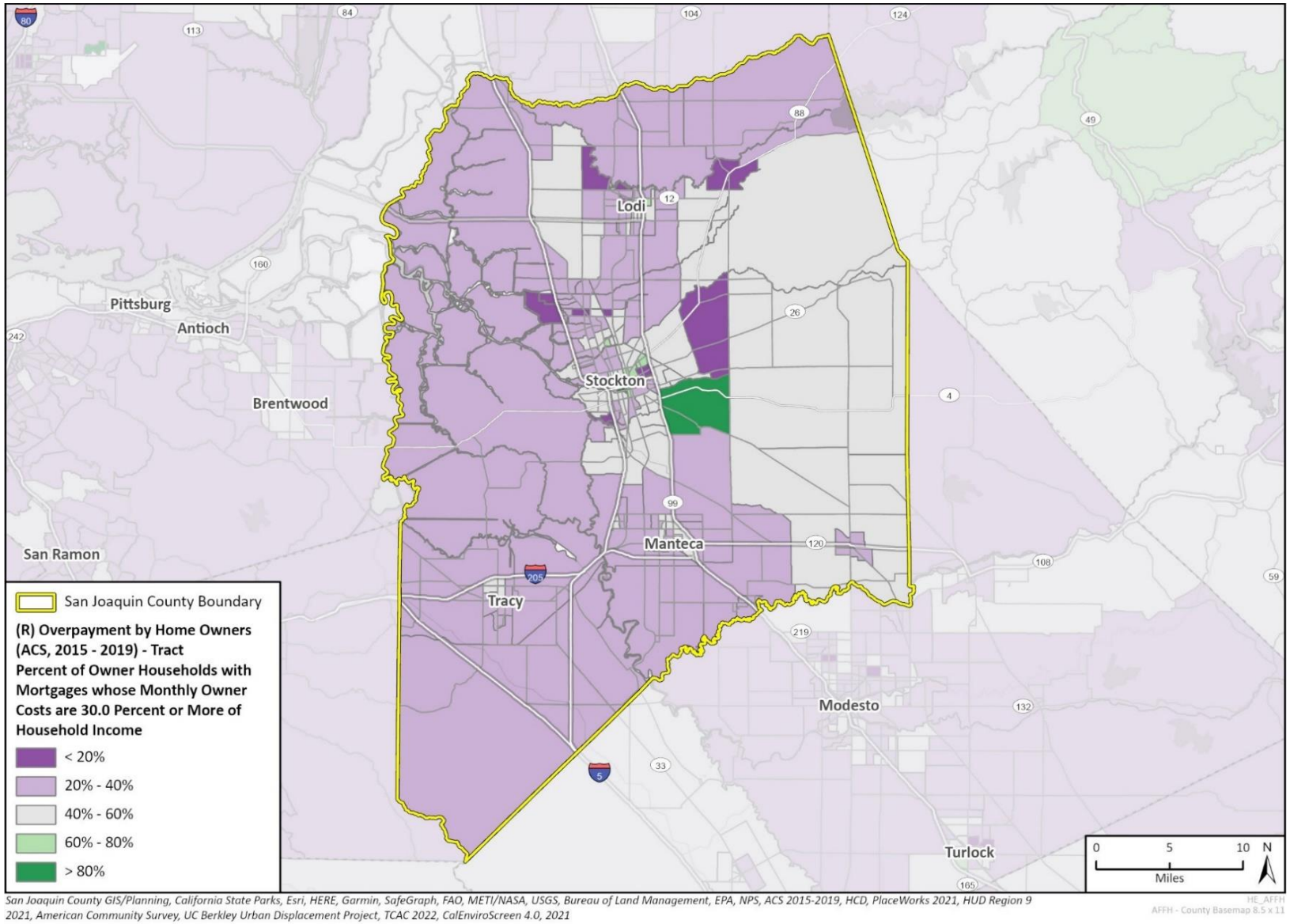
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2015-2019 release.

Figure 38 Housing Cost Burden By Renters (San Joaquin County)



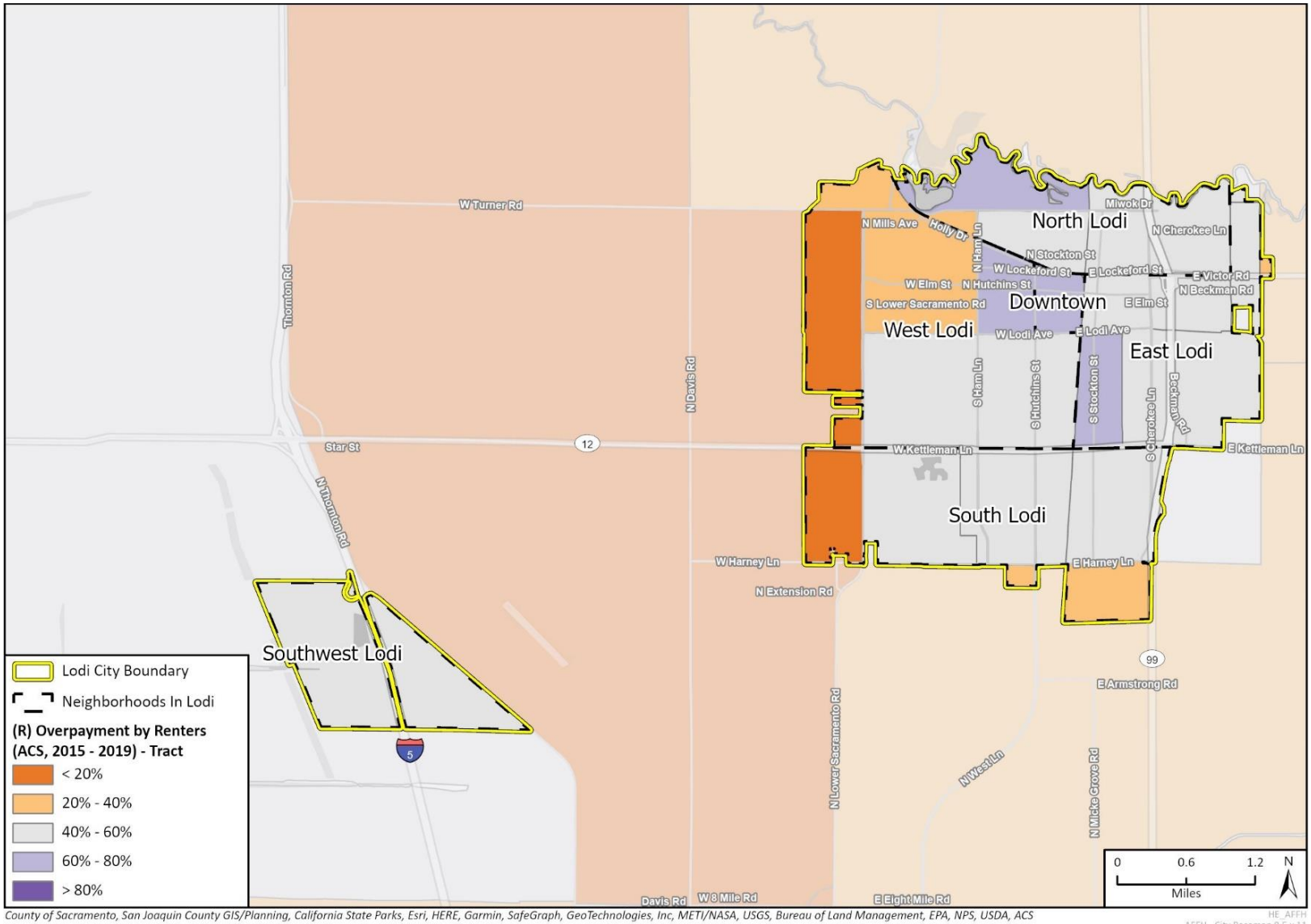
Source: AFFH Viewer 2023.

Figure 39 Housing Cost Burden By Home Owners (San Joaquin County)



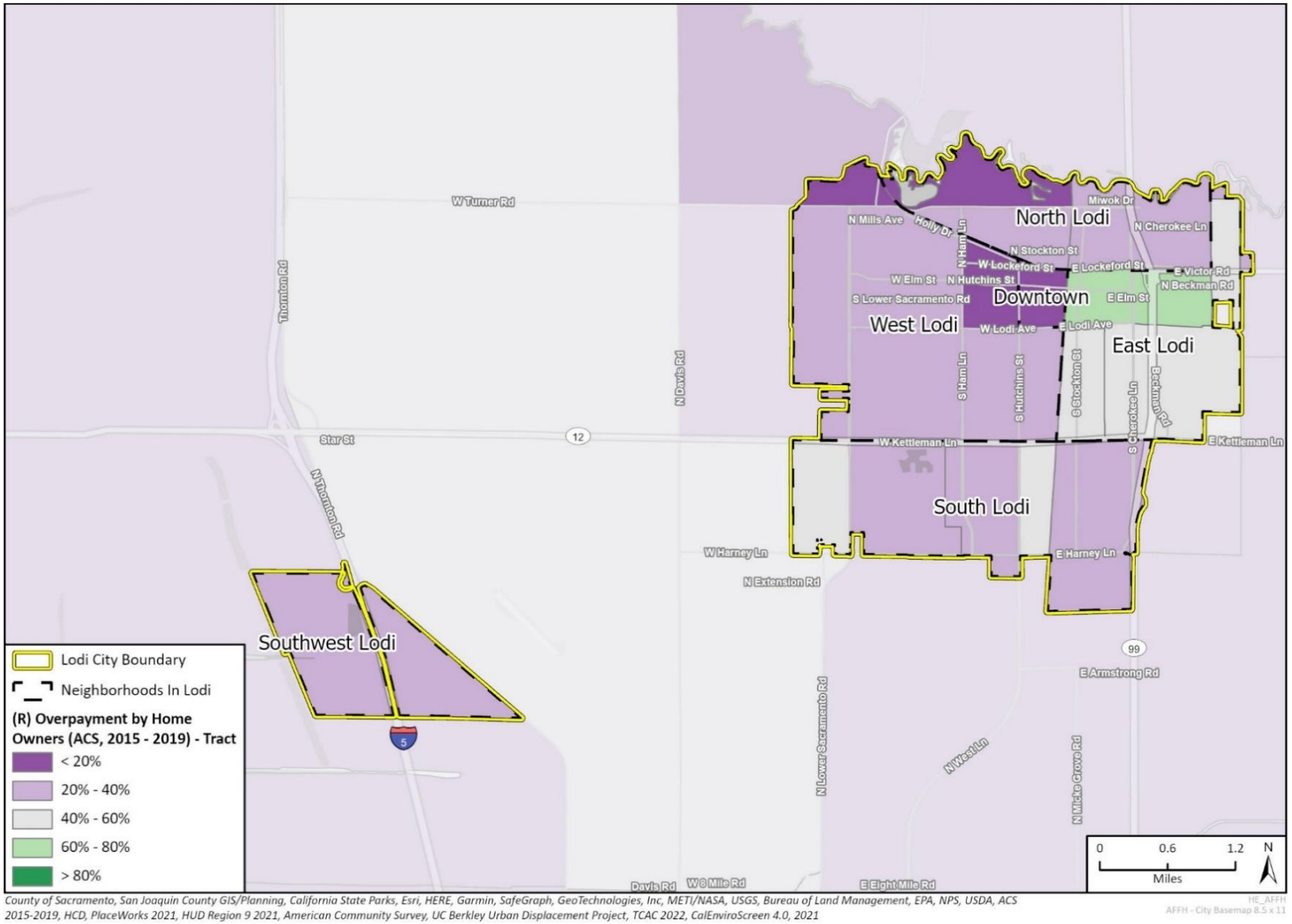
Source: AFFH Viewer 2023.

Figure 40 Housing Cost Burden By Renters (City of Lodi)



Source: AFFH Viewer 2023

Figure 41 Housing Cost Burden By Home Owners (City of Lodi)



Source: AFFH Viewer 2023.

Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen) while severe overcrowding refers to more than 1.5 persons per room. Overcrowding is a measure to understand the needs of large families where there are five or more persons per household. Generally, large households have special housing needs due to lower per capita income and the need for housing with three or more bedrooms.

Some large households may not be able to accommodate high cost burden for housing and accept housing with too few rooms. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding. Household overcrowding reflects various living situations, including housing units that are inadequately sized to meet a household's needs; the necessity or desire to have extended family members reside in an existing household; or unrelated individuals or families that share a single housing unit.

Not only is overcrowding a potential fair housing concern, but it can also potentially strain electrical systems in older housing that have not been updated or contribute to a perceived shortage of parking. As a result, some property owners/managers may be more hesitant to rent to large households, thus making access to adequately sized housing even more difficult. According to local fair housing service providers and property managers, addressing the issue of large households is complex as there are no set of guidelines for determining the maximum capacity for a unit. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with different preferences for housing size and/or ability to pay according to the household size standards identified.

Regional Trends

Approximately eight percent of households are overcrowded in San Joaquin County. Overcrowding was low throughout most parts of San Joaquin County (Figure 42). Western areas of the county and parts of the cities of Stockton, Lodi, and Tracy experienced greater rates of overcrowding compared to central and eastern parts of the county. Areas with greater rates of overcrowding correspond with areas that are predominantly Hispanic/Latino (Figure 6).

Local Trends

Similar to the county, approximately eight percent of households in Lodi are overcrowded (Table 85). Southwest Lodi, Downtown, and portions of North Lodi, West Lodi, and South Lodi have the least amount of overcrowding (approximately 8 percent). Portions of North Lodi and South Lodi have a higher rate of overcrowding with approximately 15 percent. East Lodi has the highest rate of overcrowding with approximately 20 percent of households that are overcrowded (Figure 43).

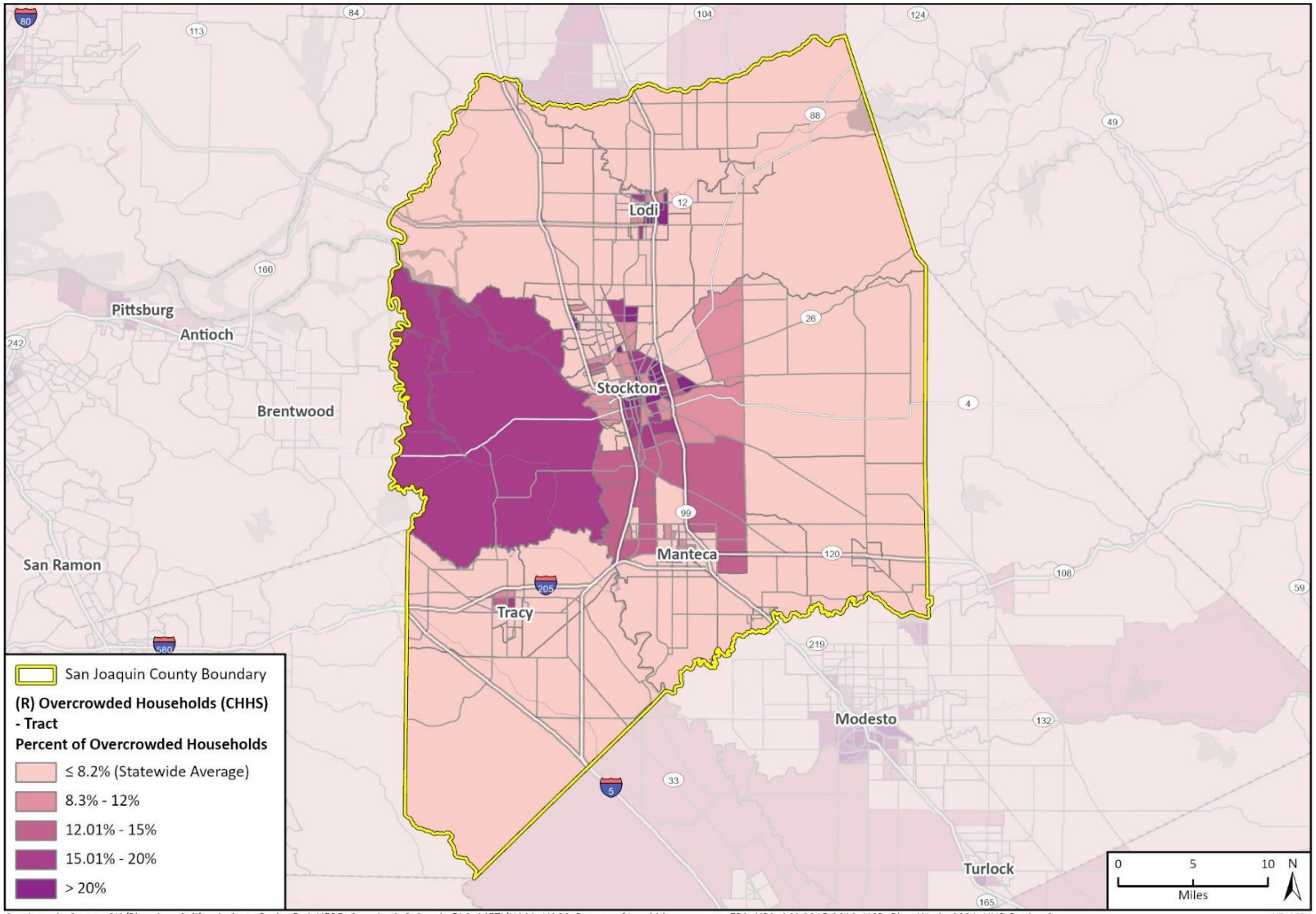
The rate of overcrowding is higher amongst renter households than homeowner households. Overcrowding among owner households increased from 2010 to 2019; while overcrowding decreased among renter households during that same time period (Table 85). The number of overcrowded renter- and owner-occupied households decreased between 2010 and 2020.

Table 85 Household Overcrowding (City of Lodi)

Overcrowding	Owner-Occupied Households		Renter-Occupied Households		Total Households	
	Number	Percent	Number	Percent	Number	Percent
Year (2010)	11,783		9,765			
Total Overcrowded (>1.0 person/room)	540	4.6%	1,319	13.5%	1,859	8.6%%
Severely Overcrowded (>1.5 persons/room)	124	1.1%	304	3.1%	428	2.0%
Year (2020)						
Total Overcrowded (>1.0 person/room)	489	4.0%	1,342	12.4%	1,831	8.0%
Severely Overcrowded (>1.5 persons/room)	119	1.0%	430	4.0%	549	2.4%

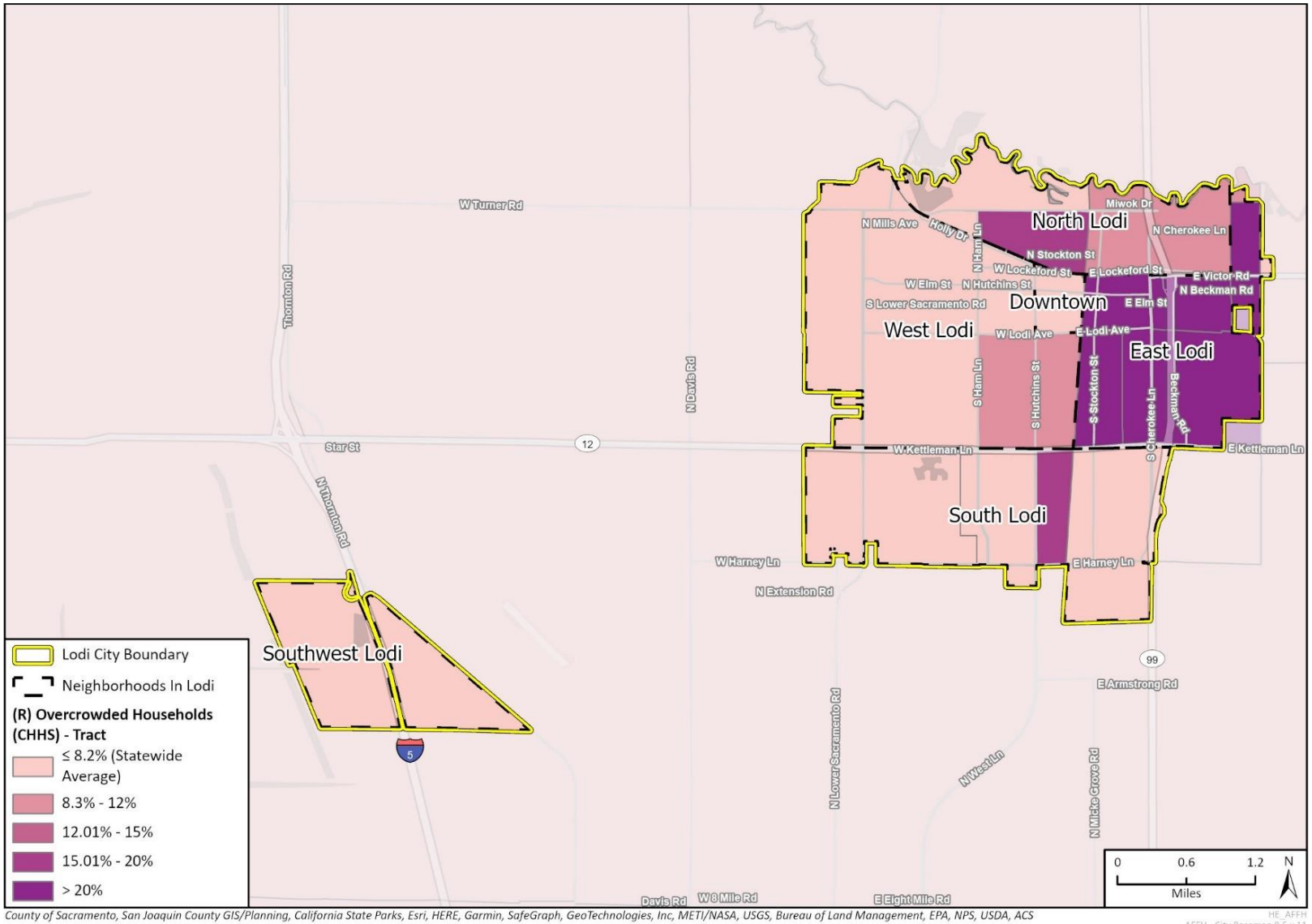
Source: Bureau of the Census, 2000 Census; American Community Survey, 2006-2010 and 2016-2020, Table B25014.

Figure 42 Overcrowded Households (San Joaquin County)



Source: AFFH Viewer 2023.

Figure 43 Overcrowded Households (City of Lodi)



Source: AFFH Viewer 2021.

Homelessness

State law (Section 65583(a)(7)) requires municipalities to address the special needs of persons experiencing homelessness within their boundaries. "Homelessness," as defined by HUD, describes the condition of an individual, who is not imprisoned or otherwise detained, who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
- A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Regional Trends

The San Joaquin Continuum of Care (SJCoC) conducted a Point-in-Time (PIT) Count in January 2022 in San Joaquin County. A total of 2,319 people were identified as experiencing homelessness in San Joaquin County, a 13 percent decrease from the previous PIT in 2019 in which 2,629 homeless individuals were identified.[48] However, the PIT report attributes this decrease to the decrease in the number of volunteers conducting the PIT and the lack of a count in Lathrop, Ripon, Escalon, and the unincorporated areas of the county as was done in 2019.

The majority (66 percent, 893 individuals) of homeless individuals identified in San Joaquin County were located in Stockton. Approximately 15 percent of homeless individuals were in Lodi, 10 percent in Manteca, and nine percent in Tracy. The only community that experienced increased homelessness was Lodi, which increased by 50 percent compared to 2019. Both Stockton and Lodi had an overrepresentation of the county's homeless individuals compared to their share of the total county population (Stockton has 42 percent of total county population and Lodi has nine percent of the total county population).

White residents comprised the largest share of the homeless population in San Joaquin County (69 percent), followed by Hispanic/Latino residents (30 percent), and Black/African American residents (20 percent) (Table 86).Black/African American residents were significantly overrepresented in the county's homeless population, comprising 20 percent of the county's homeless population and only one percent of the total population. Every other racial and ethnic group was comparatively or underrepresented in the county's homeless population.

[48] San Joaquin Continuum of Care. San Joaquin Continuum of Care Report on the Point in Time Count of the Sheltered and Unsheltered Homeless. 2022. http://www.sanjoaquincoc.org/wp-content/uploads/2022/06/PIT-Count-Report-2022-FINAL.pdf

Table 86 Race/Ethnicity of Homeless Population and Overall Population (San Joaquin County)

Race/Ethnicity	Total Population	Homeless Population
Hispanic/Latino	38%	30%
White	64%	69%
Asian/Pacific Islander	11%	3%
Black/African-American	1%	20%
American Indian and Alaska Native	<1%	2%
Two Or More Races/Some Other Race	4%	6%

Source: San Joaquin Continuum of Care. 2022. 2022 San Joaquin Continuum of Care Point in Time Count Local Report.

Local Trends

According to the SJCoC 2022 PIT Count, 208 individuals experiencing homelessness were identified in Lodi, a 50 percent increase since the previous PIT Count in 2019 (139 homeless individuals were identified in Lodi in 2019). Lodi is the only community that experienced increased homelessness. As referenced above, Lodi has an overrepresentation of the county's homeless population, with 15 percent of the county's total homeless population and only nine percent of the county's total population. The 2022 PIT Count did not breakdown characteristics of homeless individuals identified in Lodi. The City's 2023 Analysis of Impediments to Fair Housing Choice states that homelessness has increased in Lodi over the past five years. Black/African American and single female-headed households remain prevalent among the homeless population.

The largest homeless encampment in Lodi is by the Mokelumne River, which runs along the northern edge of the city. This is in part due to the reduced cleanup activities near the river by the Police Department and the Safety Ambassador Program, which patrol the city (primarily the downtown area) to prevent homeless individuals from loitering. In addition to cleanup activities from the Police Department and Safety Ambassador Program throughout the city, the California Department of Transportation has been conducting major regular cleanups on the State Route 99 corridor. This is causing smaller encampments to pop up throughout the City. The City's Access Center and Emergency Shelter is at capacity most nights and usually has a wait list, which means many homeless individuals are left unsheltered overnight.

Resources for homeless individuals are concentrated in areas along State Route 99. There are two facilities in Lodi that provide shelter to those experiencing homelessness, the Salvation Army's Hope Harbor (56 beds for men, 28 beds for women and children, and three small units with 3 beds per unit for women or men with children over the age of 10) and Lodi House (26 beds for women and children). In addition, there is a total of approximately 50 transitional housing beds available in the city, provided by the Salvation Army (16 persons), Lodi House (three units at approximately 4 persons each), and Central Valley Low-Income Housing Corporation (21 persons).

Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. Movement of people, public policies, and investments, such as capital

improvements and planned transit stops, and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, and insufficient market-rate housing production. Decades of disinvestment in low-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionally impact people of color, as well as lower income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness.[49]

For the purpose of AFFH analysis, "displacement is used to describe any involuntary household move caused by landlord action or market changes."[50] Contributing factors to displacement include rising housing costs, rising income inequality and stagnant wages, and insufficient market-rate housing production.[51] Neighborhoods can experience displacement for a variety of reasons:

- Disinvestment-driven displacement occurs when lower-income communities which receive less public sector investment deteriorate. Evaluating access to opportunity, including access to transit, high performing schools, parks, and other services/amenities can identify areas that lack investment in infrastructure improvements and are considered low resource.
- Investment-driven displacement generally occurs after a period of disinvestment, when the market encourages a flood of public and private investment lead to real estate speculation and infrastructure improvements.
- Disaster-driven displacement occurs when housing is destroyed or compromised by disasters and the result is that the housing is not rebuilt. Lower-income households who tend to rent (and therefore lack control over whether their homes are rebuilt) or lower-income home owners have fewer financial resources to rebuild their homes are most at risk of this type of displacement.

Regional Trends

The Urban Displacement Project identifies areas where lower-income residents are at an elevated risk of displacement based on characteristics such as share of renters, share of very low-income rent-burdened residents, and other demographic and housing market characteristics. Communities are designated sensitive if the share of very low-income residents is greater than 20 percent and have any of the two following characteristics:

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

In San Joaquin County, sensitive communities are concentrated in the northwestern part of the county as well as in the cities of Stockton, Lodi, Manteca, and Tracy (Figure 44). There are no sensitive communities in the eastern

[49] HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[50] California Department of Housing & Community Development, Affirmatively Furthering Fair Housing for All Public Entities and for Housing Elements, 2021, 40.
[51] Been, V., Ingrid, E., & O'Regan, K. 2019. Supply Skepticism: Housing Supply and Affordability. Housing Policy Debate, 29(1), 25-40

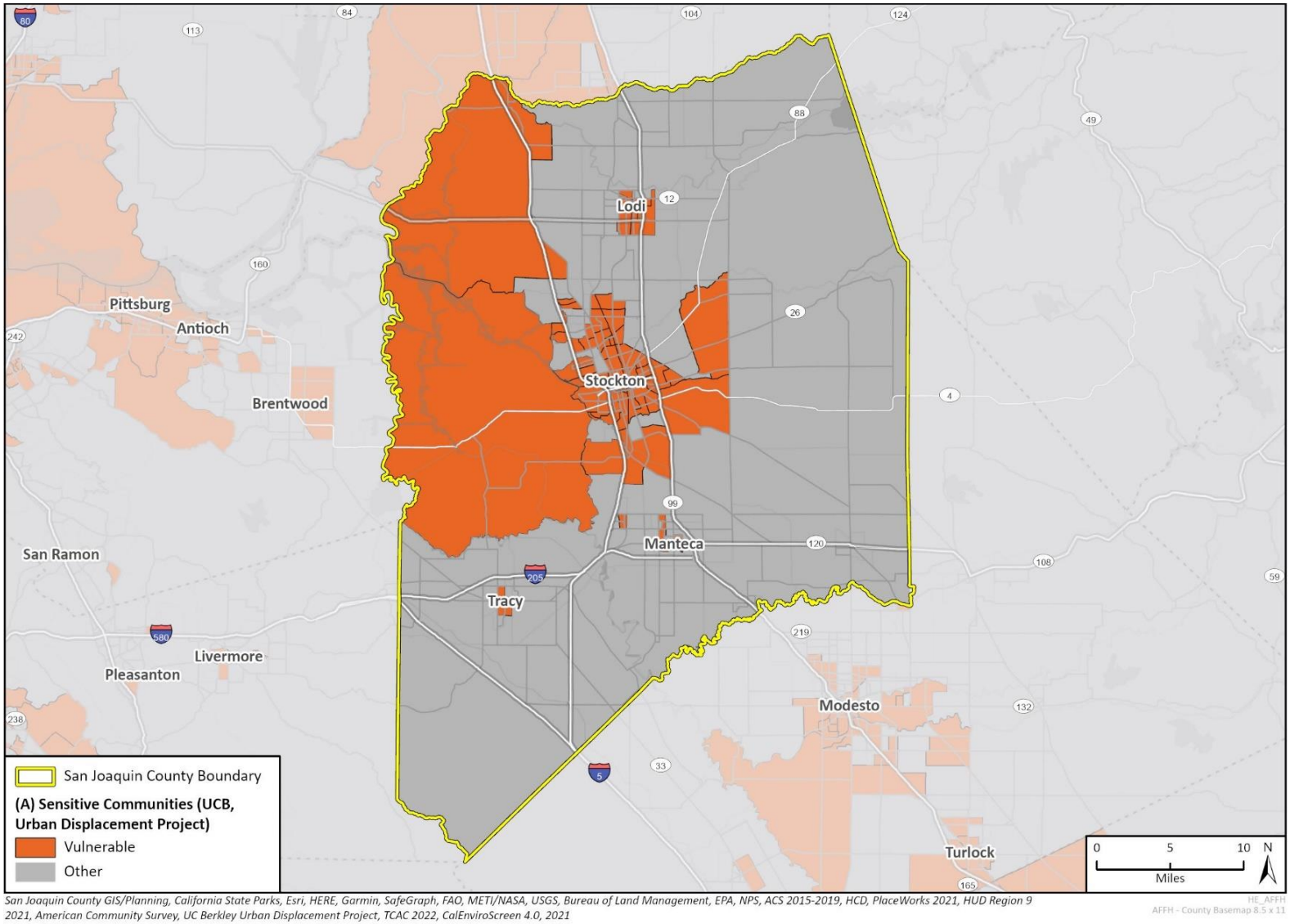
portion of the county and few sensitive communities in the southern part of the county. Communities that are considered sensitive correspond to areas that are predominantly Hispanic/Latino (Figure 6).

Local Trends

Large portions of Lodi are considered sensitive communities. East Lodi, Downtown Lodi, and portions of South Lodi, North Lodi, and West Lodi are considered sensitive communities that are vulnerable to displacement (Figure 45). Sensitive communities in Lodi correspond to areas that have a higher percentage of non-White residents.

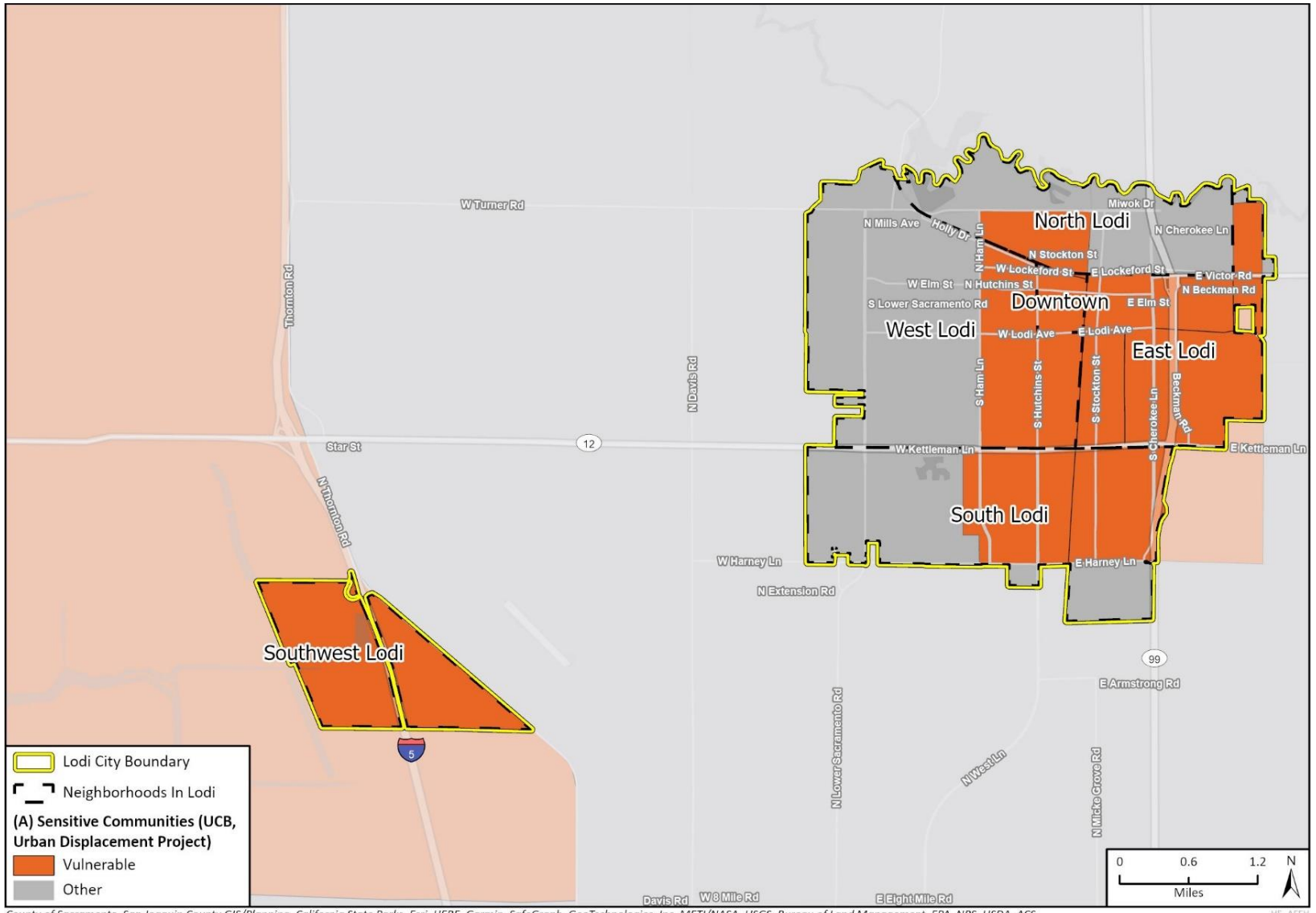
According to the UDP, low-income residents in East Lodi and a small area east of North Guild Avenue in North Lodi are at an elevated risk of displacement. Areas at an elevated risk of displacement have the highest percentage of renter households in the city, with between 60 and 80 percent of all households, and are predominantly Hispanic/Latino (Figure 9).

Figure 44 Sensitive Communities (San Joaquin County)



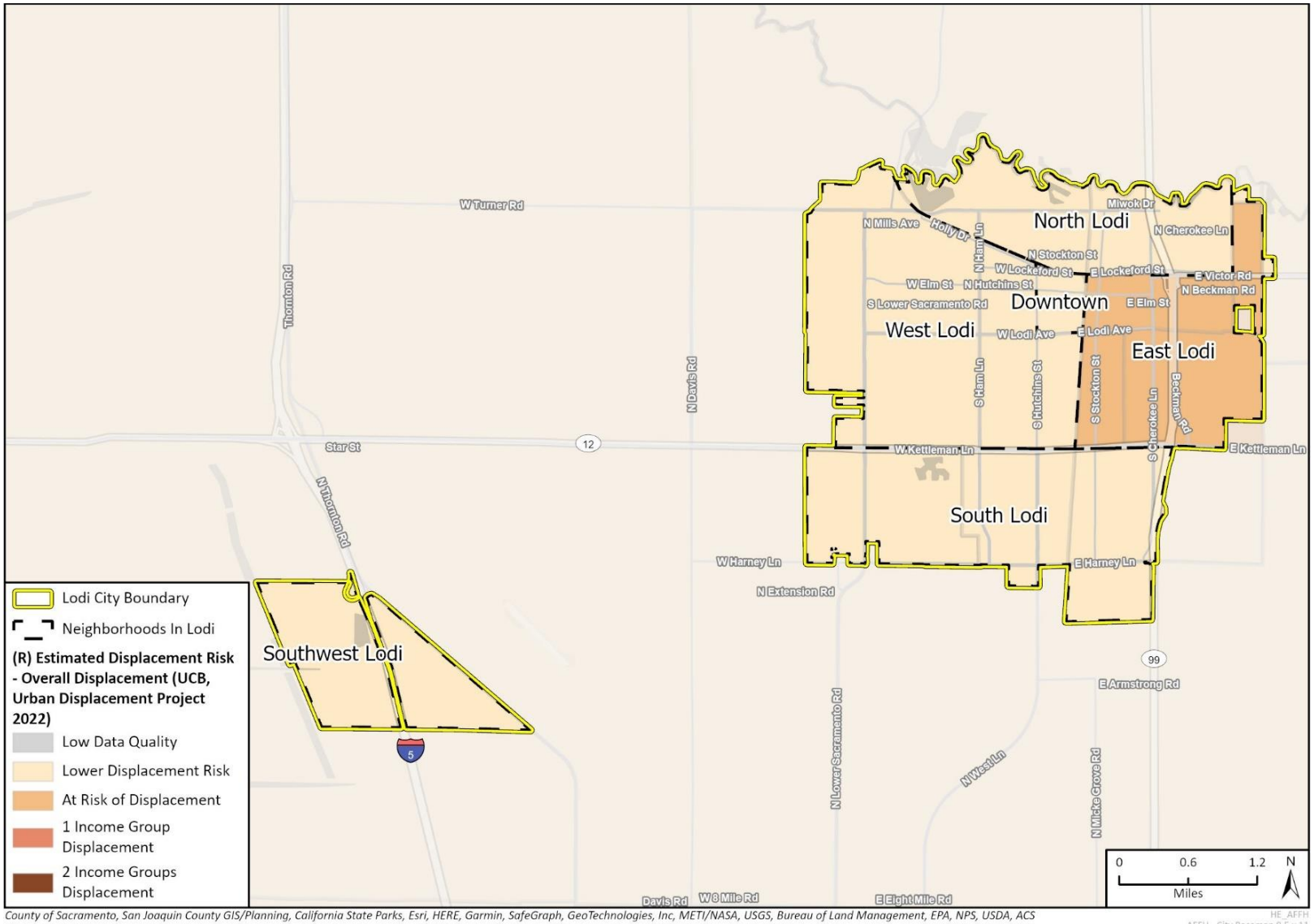
Source: AFFH Viewer 2023.

Figure 45 Sensitive Communities (City of Lodi)



Source: AFFH Viewer 2023.

Figure 46 Households by Displacement Risk and Tenure (City of Lodi)



Source: AFFH Viewer 2023.

Local Area Knowledge

Historic Patterns of Segregation

Regional

Patterns of racial segregation are the byproduct of local and federal policies, private housing discrimination, and community prejudice. To understand present challenges to fair housing, it is necessary to review the history of actions that have led regional patterns of segregation.

The first inhabitants in the San Joaquin Valley and San Joaquin County were the Yokut-speaking tribes, composed of approximately 50 groups who spoke various dialects. Each tribe consisted of approximately 300 members and tribal boundaries generally followed natural barriers. The Yokuts were semi-sedentary, building their villages on low mounds to keep their homes above floods and living in single-family dwellings.[52][53] The Yokuts were hunter-gatherers whose diet primarily consisted of acorns, berries, roots, deer, small mammals, birds, and fish.[54]

Mexican ranches and American settlers gain prominence in the San Joaquin Valley during the 1800s and raised animals. After the U.S. annexed California in 1848, the federal government sold vast tracts of land to the Southern Pacific Railroad Company as well as large-scale timber, ranching, and farming interests, ignoring, and overriding the property rights of Mexican and Indigenous landholders. Many Native American tribes were forced to give up their land and live on reservations.[55] When gold was discovered in 1948, thousands of prospectors came to the San Joaquin Valley and with them, they brought diseases that quickly decimated the Native American population.[56]

Chinese immigrants were the first non-White settlers to arrive in the San Joaquin Valley in the 1850s, following the discovery of gold in California. Many Chinese immigrants passed through Stockton on their way to the Sierra Nevada's. Nearly all Valley cities including Lodi, Stockton, Modesto, Turlock, Merced, Madera, Fresno, Visalia, Tulare, and Delano developed strict land use policies to segregate and contain the immigrants to one "undesirable" side of town.[57]. Chinese immigrants in Stockton first lived in a settlement consisting of numerous shacks near the Hotel French, located on Bridge Palace between Hunter and El Dorado Street. This was their primary living area until 1854, when the shacks caught on fire. They then moved to the Mormon Channel west of Center St, where they remained for many years until a gradual move to Washington Street. Once the Gold Rush ended many Chinese immigrants found themselves with limited opportunities for employment and therefore began farming. By the late 1850s, many were successfully farming potatoes and garden crops in the San Joaquin area.[58]

A secondary migration of Chinese immigrants occurred in 1865, due to the labor force required by Central Pacific Railroad to build the Trans-Continental Railroad. Resentment towards Chinese and Japanese immigrants grew, especially by jobless white residents, leading to farms recruiting Black/African Americans from the southern U.S.

[52] *City of Lodi. 2010. Lodi General Plan. https://www.lodi.gov/DocumentCenter/View/199/Final-General-Plan---Entire-Document-PDF*
[53] *City of Stockton. 2016. History A Look into Stockton's Past. http://www.stocktongov.com/discover/history/hist.html*
[54] *Javier Powell. 2023. Those Before Us: the Yokuts People. https://losbanosenterprise.com/community/history/2023/those-before-us-the-yokuts-people/*
[55] *PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California. https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf*
[56] *Tule River Indian Tribe of California. 2018. Tule River History. https://tulerivertribe-nsn.gov/history/*
[57] *Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf*
[58] *San Joaquin Magazine. 2023. History: San Joaquin's Chinese in the 1800s.*

to replace them as farm laborers. Many Black/African Americans began by working in the fields and vineyards and eventually transitioned from farm labor to living in the cities and towns.[59]

In the 1930s, nearly half a million people migrated to Southern California and the Central Valley from across the United States during what was known as the "Dust Bowl." Many of these people moved to California in hopes of working in the agricultural industry, but were forced to take temporary and transient work, leaving them with little choice but to form makeshift camps near roadsides and ditches, without access to housing, clean water, and sanitation. These conditions reinforced existing desires by the white population, generally, for economic and racial segregation, leaving migrant farmworkers without access to medical treatment and education. When World War II created a need for manufacturing labor, many of the white "Dust Bowl" workers relocated to other cities in California, such as San Francisco, Los Angeles, and San Diego, leaving a gap in farm labor.[60] Japanese, Punjabi, and Filipino people, as well as Black/African Americans from cotton regions, filled the void. Japanese residents, however, were forcibly relocated to internment camps from 1942 to 1946.[61]

In 1942, the federal government initiated the Bracero program, which enabled growers to replenish their labor supply with workers imported from Mexico. While the Bracero program ended in 1964, growers continue to rely on Mexican nationals to work California's lucrative "factories in the fields." Migrants today confront multiple social, environmental, and access issues, including affordable, safe, and sanitary housing.[62] Tragically, in 1942, after the bombing of Pearl Harbor, the United States government ordered that all Japanese families must be removed from their homes and businesses and sent to internment camps.[63] Most Japanese families in the San Joaquin Valley were detained in the San Joaquin County, Tulare County, and Fresno County fairgrounds and then dispersed to out-of-state internment camps where they would be held without rights for the subsequent two years.

Increasingly after the first World War, to circumvent the US Supreme Court ban on outright racial zoning, local governments implemented other forms of exclusionary zoning that avoided direct mention of race but kept low-income people of color out by marshalling land use regulations against them. Through residential zoning that mandates larger parcel sizes for single-family homes, typically unaffordable to people of color, wealthier households established and maintained mostly white neighborhoods throughout California. The federal government subsidized white homeownership and wealth-building and excluded people of color.

Throughout the state, but particularly concentrated in inland areas, cities have used their annexation power to reinforce patterns of racial exclusion and segregation. Since the 1960s, as cities expanded and selectively annexed land, they deliberately bypassed and grew around communities of color in unincorporated neighborhoods, the very places people of color were relegated to by restrictive covenants. This selective annexation process has left hundreds of disadvantaged unincorporated places, disproportionately of color, without the most basic elements of a healthy, safe community, such as utilities, sanitation, safe drinking water, and other critical community services. Restrictive covenants, exclusion, and racial violence pushed Black/African American and low-income people of color to settle outside of towns. In places throughout the San Joaquin Valley and on the fringes of cities such as

[59] Michael Eissinger. 2009. The Transplantation Of African Americans And Cotton Culture To California's Rural San Joaquin Valley During The Nineteenth And Twentieth Centuries.
https://meissinger.com/uploads/3/4/9/1/34919185/transplantation_of_african_americans_and_cotton_culture_to_californias_rural_san_joaquin_valley.pdf
[60] Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives.
https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf
[61] History.com. Japanese Internment. https://www.history.com/topics/world-war-ii/japanese-american-relocation
[62] Christy Gavin, California State University, Bakersfield. California Odyssey: Dust bowl migration archives.
https://www.csub.edu/library/_files/DB_files/OkieHealth.pdf
[63] Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf.

Fresno, Bakersfield, Stockton, Tulare, and Modesto, such communities of color were left unincorporated and without access to incorporated areas' tax revenues or infrastructure.[64] Exclusionary post-war development started moving further from city centers, and within time, these communities often created their own civic and utility districts, which redistributed investment away from cities, in a movement known as "White Flight."

Across the United States, redlined and marginalized communities faced a higher propensity for environmental hazards that affects current populations. Residents of historically redlined neighborhoods located in cities with oil and gas production have disproportionately high exposure to oil and gas wells, compared to higher graded neighborhoods. Exposure disparities have implications for community environmental health, as the presence of active and abandoned (i.e., postproduction) wells have been shown to contribute to ongoing air pollution.

Local

Lodi first developed along the Oakland-Sacramento Central Pacific Railroad. The city was founded in1869 when the Central Pacific Railroad chose constructed a train station for its new route. The railroad connected Lodi to Sacramento to the north and Oakland and Stockton to the south. Commercial businesses developed on the west side of the railroad and a flour mill on the east side of the railroad. Residential areas developed in piecemeal in between the commercial core and the outlying agricultural lands.[65] On March 21, 1874, the town's name was changed from Mokelumne to Lodi.[66] In 1878 Lodi's population is 450. At this time, San Joaquin County was divided into five townships (now called Districts) with Lodi in the 4th, called Elkhorn Township. In 1887 a fire destroyed downtown area along the west side of the block of N. Sacramento Street, between Pine and Elm Streets.[67]

In 1885, Japanese immigrants settled in the area to work on ranches, over time purchasing lands and growing grapes. Japanese immigrants, who constituted the largest ethnic group at the time, formed vibrant ethnic enclaves called Nihonmachi in Lodi, Stockton, Visalia, Fresno, Fowler, Livingston, and Cortez.[68] These neighborhoods, adjacent to or entwined in the earlier Chinatowns, became commercial hubs for the multiracial ethnic communities and centers for community cohesion and culture.[69] The Japanese immigrants (unlike the Chinese prior to them) settled in the United States primarily as family units and were thus more able to establish roots and history in their new communities. As previously described, established Japanese communities in San Joaquin County were gravely impacted by Japanese internment camps. The once bustling and prosperous ethnic neighborhoods in Lodi, Stockton, Fresno, and Visalia became virtual ghost towns as cities and counties condemned the abandoned homes and boarded up former Japanese businesses.[70] Farmers, who at the time relied primarily on Japanese agricultural labor, struggled to find sufficient workers and had one of the worst crop yields in history. After failed attempts to convince the federal government to allow the Japanese to return to the farms as imprisoned day laborers, farmers advocated heavily for a new source of labor.[71]

By 1900, Lodi had over two million grape vines. Many grape growers and wineries were established in Lodi through the late 1800s and early 1900s and these enterprises continued to prosper through the Prohibition Era. Lodi's

[64] PolicyLink. Facing History, Uprooting Inequality: A Path to Housing Justice in California. https://www.policylink.org/sites/default/files/pl_report_calif-housing_101420a.pdf
[65] City of Lodi. 2010. Lodi General Plan. https://www.lodi.gov/DocumentCenter/View/199/Final-General-Plan---Entire-Document-PDF
[66] Lodi Historical Society. Lodi Historical Society. https://www.lodihistory.org/
[67] Lodi Historical Society. Lodi Historical Society. https://www.lodihistory.org/
[68] Japantown Atlas. The Sanborn Library, LLC http://japantownatlas.com/index.html
[69] Leonard, Karen Isaksen. Making Ethnic Choices: California's Punjabi Mexican Americans. Temple University Press, Philadelphia 1992. Print.
[70] Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf.
[71] Shiamoto, Chiyo. "The Japanese in San Joaquin County Past and Present". San Joaquin Historian. Vol 6 No 4 (winter 1992).

economic foundation was concentrated in agriculture and manufacturing, due to the naturally fertile soils, low cost of electricity, access to transportation routes and facilities, and central location amongst the western United States markets. Today, the city's economy is centered on grapes, processed foods, nuts, fruit, and milk. Most agricultural uses operate outside the city limits, however the wine industry contributes to growing tourism within to the region and the city itself.

Community Input

The City hosted two hybrid (in-person and virtual) community workshops on March 23, 2023 and April 13, 2023 in support of planning efforts for the Housing Element update. Feedback was obtained and recorded. Fair housing-related concerns raised by participants throughout the community workshops included the following:

- Concentrating lower-income housing in the southern or eastern portions of the city
- Provide affordable housing for farmworkers

Other Relevant Factors

Other factors that have not been previously discussed relating to fair housing include housing costs in relation to the Bay Area, the location of affordable housing in Lodi, the availability of affordable housing, and the availability to housing choice vouchers.

Zoning and Land Use

Most residential areas of the city are zoned Low Density Residential, with zones allowing multifamily residential uses (Medium and High Density Residential and mixed use zones) concentrated in Downtown Lodi and areas of East Lodi along State Route 99. Zones with the highest maximum densities are the High Density Residential and mixed use zones and are concentrated on the eastern half of the city. Mixed use zones have a maximum FAR ranging from 1.0 to 3.0 and most allow 100 percent residential uses, which equates to an allowed density comparable or greater than the High Density Residential zone. Mixed use zones are concentrated in Downtown Lodi, and along State Route 99, Lodi Avenue, and Kettleman Lane. There is little land zoned High Density Residential and these areas are scattered around the city.

Affluent residential neighborhoods are often distanced from commercial and industrial uses, as these land uses can generate unwanted noise, odors, and other undesirable qualities. Proximity to these areas generally decreases home values and therefore, low-income residents are often disproportionately concentrated near commercial and industrial uses. These land use patterns are present in Lodi. Most commercial and industrial zones are on the eastern half of the city, adjacent to Medium and High Density Residential and mixed use zones. West Lodi and South Lodi have very little land zoned for commercial or industrial uses.

Housing Costs in Relation to the Bay Area

According to the San Joaquin Valley Fair Housing and Equity Assessment, the North Valley (particularly San Joaquin County) will likely continue to see an influx of commuters and displaced residents from Alameda and

Santa Clara counties, unless the San Francisco Bay Area finds a way to better accommodate all of its workers.[72] This could result in an increase in demand for housing in Lodi and drive housing costs even higher, potentially displacing existing residents.

Location of Affordable Housing

According to the AI, the geographic division created by the railroad tracks and State Route 99 create an area of less-desirable real estate along the eastern side of the city. This area has a concentration of lower-income housing in part due to lower land costs. While likely not intentional, this divide has led to a concentration of low-income and non-White residents in East Lodi.

Availability of Affordable Housing

According to the AI, Lodi lacks sufficient subsidized and unsubsidized affordable housing units, especially for persons with disabilities and large households. The City of Lodi does not own or operate any public or assisted housing. Additionally, the Housing Authority of the County of San Joaquin (HACSJ) does not operate any restricted public housing projects in the city.

There are several affordable housing developments in Lodi with affordability levels accommodating extremely low-, very low-, and low-income households, with a total of 324 affordable units.

- Creekside South Apartments (39 senior units)
- Tienda Drive Senior Apartments (79 senior units)
- Hotel Lodi (74 senior units)
- LOEL Gardens (14 affordable units)
- Bethel Gardens (24 affordable units)
- Harney Lane Migrant Center (94 units for migrant workers)

There are 10,485 low-income households in Lodi, comprising 45 percent of all households in the city. Considering there are only 324 affordable housing units in the city, there is a large discrepancy between the number of low-income households and the number of housing units that are affordable to low-income households.

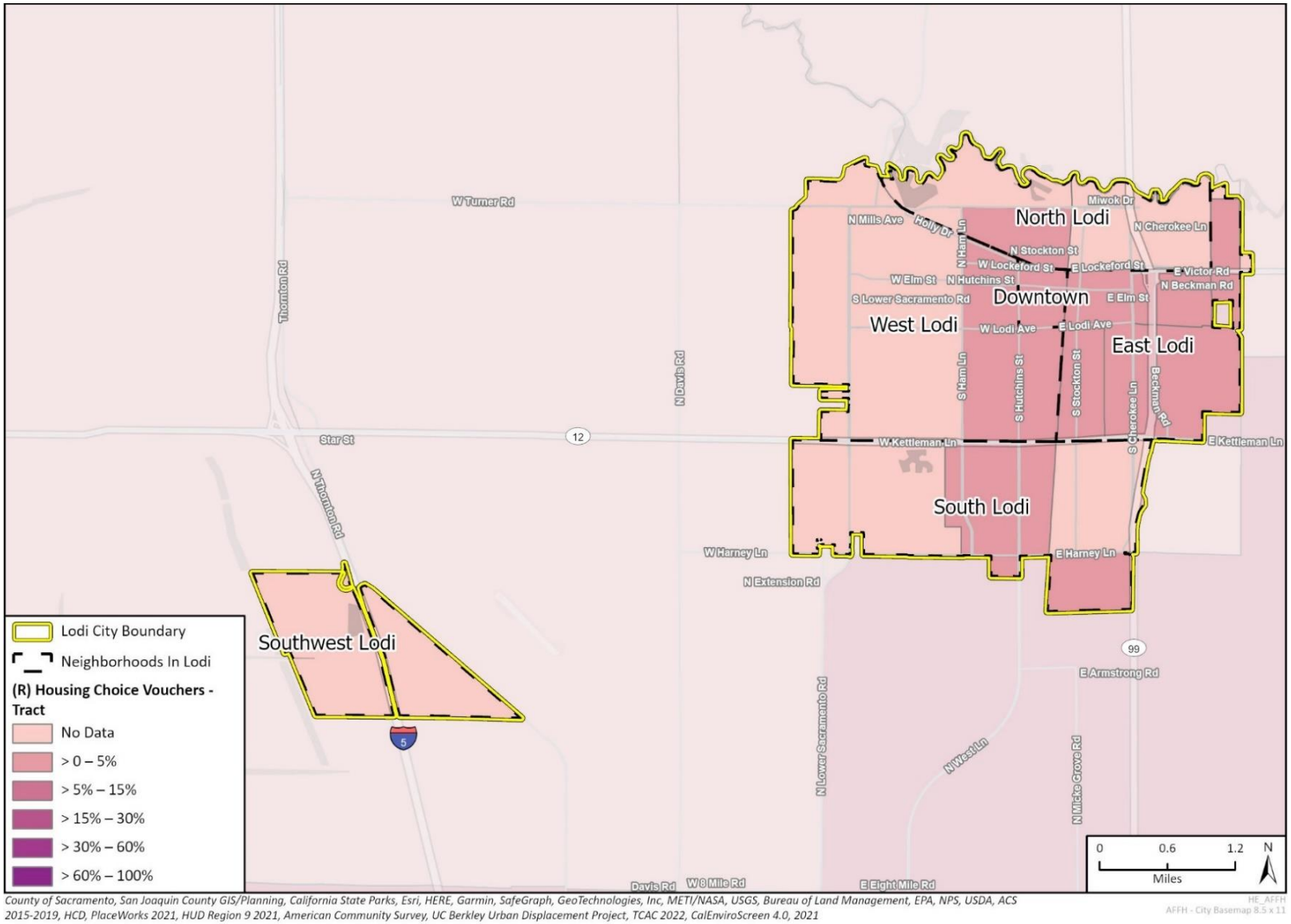
Housing Choice Vouchers

HACSJ administers housing choice vouchers (HCVs) in the city of Lodi. According to the Consolidated Plan, 148 HCVs are distributed to households in Lodi. HACSJ administers 4,651 vouchers throughout San Joaquin County, meaning approximately three percent of all vouchers are used in Lodi. Approximately 41 percent of vouchers in the county are administered to Black/African American residents, 20 percent to Hispanic/Latino residents, and 14 percent to Asian/Pacific Islander residents. Persons with disabilities account for 41 percent of county-wide voucher holders and 100 percent of voucher holders requested accessible housing, indicating a significant need for accessible and affordable housing in the county. According to the AI, it is likely that Lodi residents who are voucher holders have difficulty finding affordable housing that accepts vouchers.

[72] *Smart Valley Places. San Joaquin Valley Fair Housing and Equity Assessment. April 2014. Available at: https://www.frbsf.org/wp-content/uploads/sites/3/SJV-Fair-Housing-and-Equity-Assessment.pdf.*

The use of HCVs is highest in East Lodi, Downtown Lodi, and central portions of North Lodi, South Lodi, and West Lodi (Figure 47). In these areas, between zero and five percent of renters use HCVs.

Figure 47 Housing Choice Vouchers



Source: AFFH Viewer 2023.

Sites Inventory

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

Opportunity Areas

For purposes of evaluating fair housing, resource levels designated by TCAC/HCD denote access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. TCAC has a composite opportunity score for each census tract. Lodi contains a range of resource areas. High-resource areas are generally concentrated in West Lodi and South Lodi, while low-resource areas and areas of high segregation and poverty are concentrated in East Lodi and the eastern part of North Lodi.

Figure 48 through Figure 52 show the housing opportunity sites by TCAC-designated resource area. The housing opportunity sites are designated by income category – whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The "appropriateness" of sites for various affordability levels is dictated by state housing element law and HCD guidance and is determined by site characteristics such as allowable density, size of site, realistic capacity, existing use(s). More information about the sites and income designations is available in Appendix E, Housing Resources.

Most of the housing opportunity sites are in high- and highest-resource areas (87 percent of the proposed housing units) in Lodi, in part due to the availability of large and vacant and underutilized parcels in these areas.

A small portion of the City's share of the RHNA will be satisfied by planned and approved projects (12 of the total required 3,909 housing units). Planned and approved projects will add 12 low-income units, all of which are in low-resource areas.

Total Units by Resource Areas

Since Lodi's share of the RHNA is not evenly divided between income levels, it is helpful to review units by location as a percent of the total for each income level. There are 305 units planned in areas of high segregation and poverty and 119 units in low-resource areas (425 total). Approximately 64 percent of those units (272 units) will be lower-income units, 29 percent (125 units) will be moderate-income units, and seven percent (28 units) will be above moderate-income units. There are 138 units planned in areas designated moderate-resource and 4,095 units planned in areas of high-/highest-resource (4,233 total). Approximately 32 percent of units in moderate and high resources (1,361 units) will be lower-income units, 16 percent (683 units) will be moderate-income units, and 52

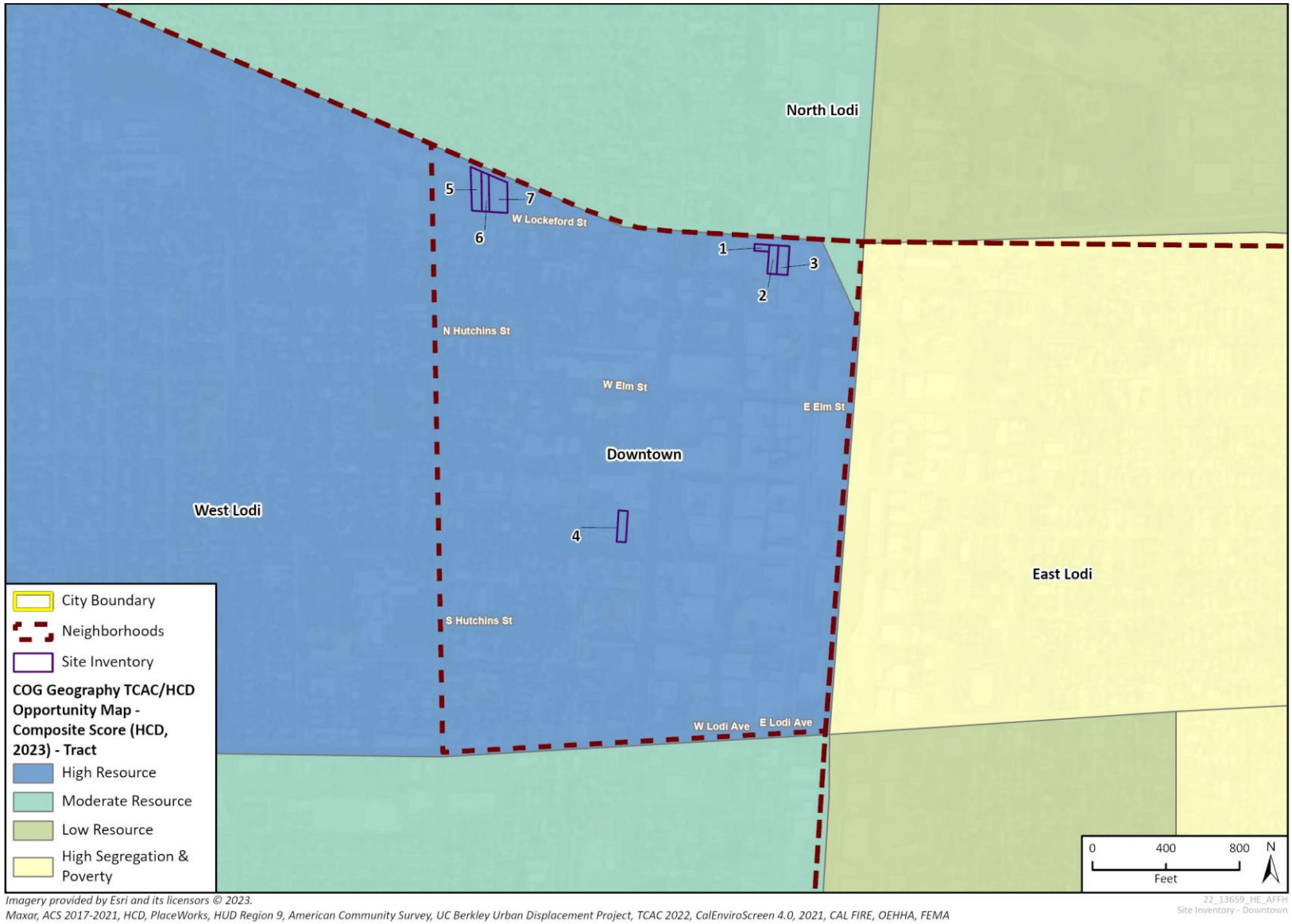
percent (2,189 units) will be above moderate-income units. Table 87 shows the number of proposed housing units by income level in each resource area.

Table 87 Proposed Housing Units by Resource Area

Income Level	Lower-Income	Moderate-Income	Above-Moderate Income	Total Units
Areas of High Segregation and Poverty	192 units (12% of lower-income units)	109 units (13% of moderate-income units)	5 units (<1% of above moderate-income units)	305 units (7% of total units)
Low-Resource	80 units (5% of lower-income units)	16 units (2% of moderate-income units)	23 units (1% of above moderate-income units)	119 units (3% of total units)
Moderate-Resource	94 units (6% of lower-income units)	44 units (5% of moderate-income units)	0 units (<1% of above moderate-income units)	138 units (3% of total units)
High-/Highest-Resource	1,267 units (78% of lower-income units)	639 units (79% of moderate-income units)	2,217 units (99% of above moderate-income units)	4,232 units (88% of total units)

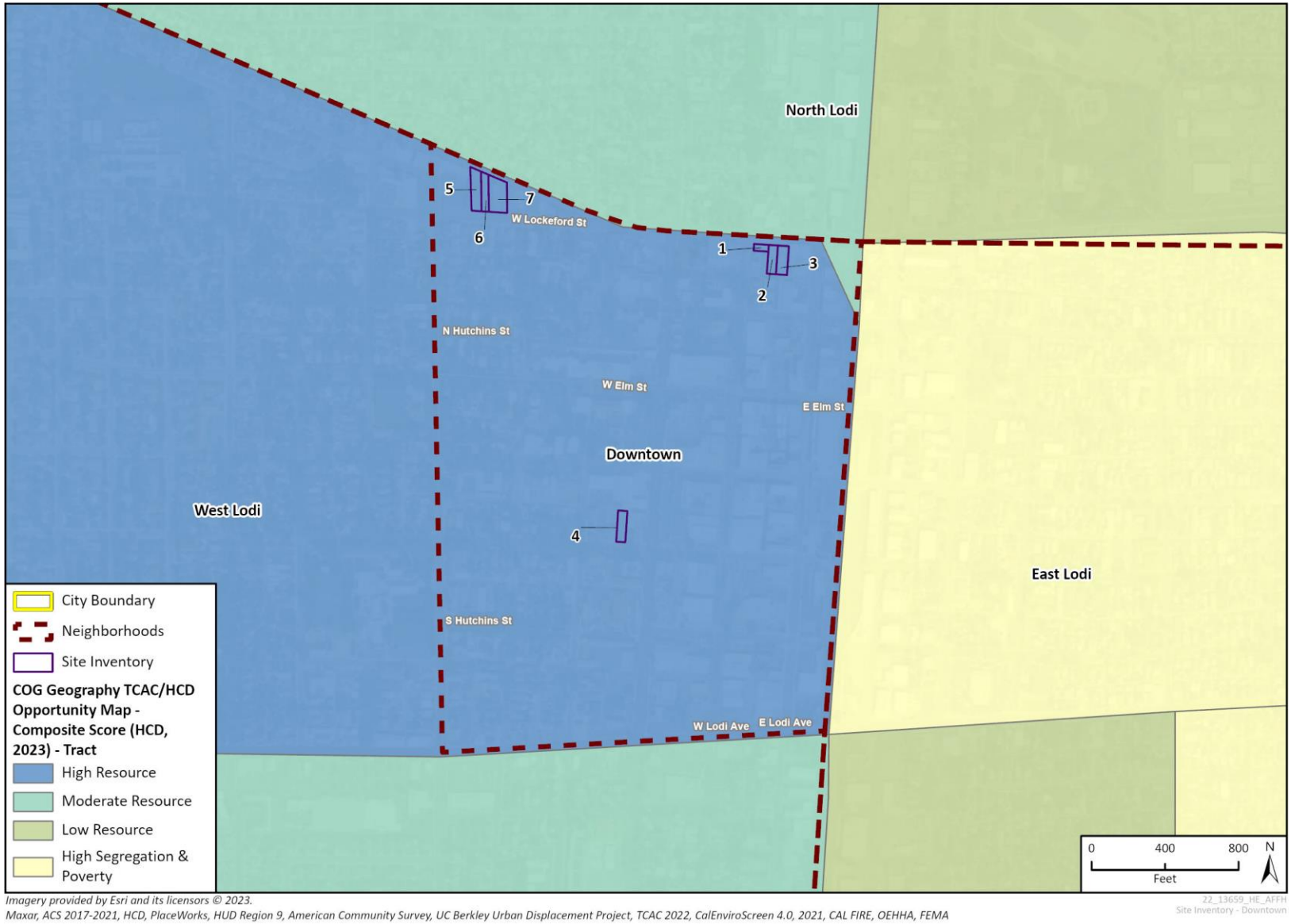
Housing opportunity sites will add a higher percentage of lower-income units in high and highest resource areas (78 percent) than areas with high segregation and poverty and low-resource or moderate-resource areas (12 percent, five percent, and six percent, respectively). Therefore, overall housing development during the planning period will not increase patterns of segregation and will increase integration by household income in terms of access to opportunity.

Figure 48 Housing Opportunity Sites by TCAC Resource Area (Downtown Lodi)



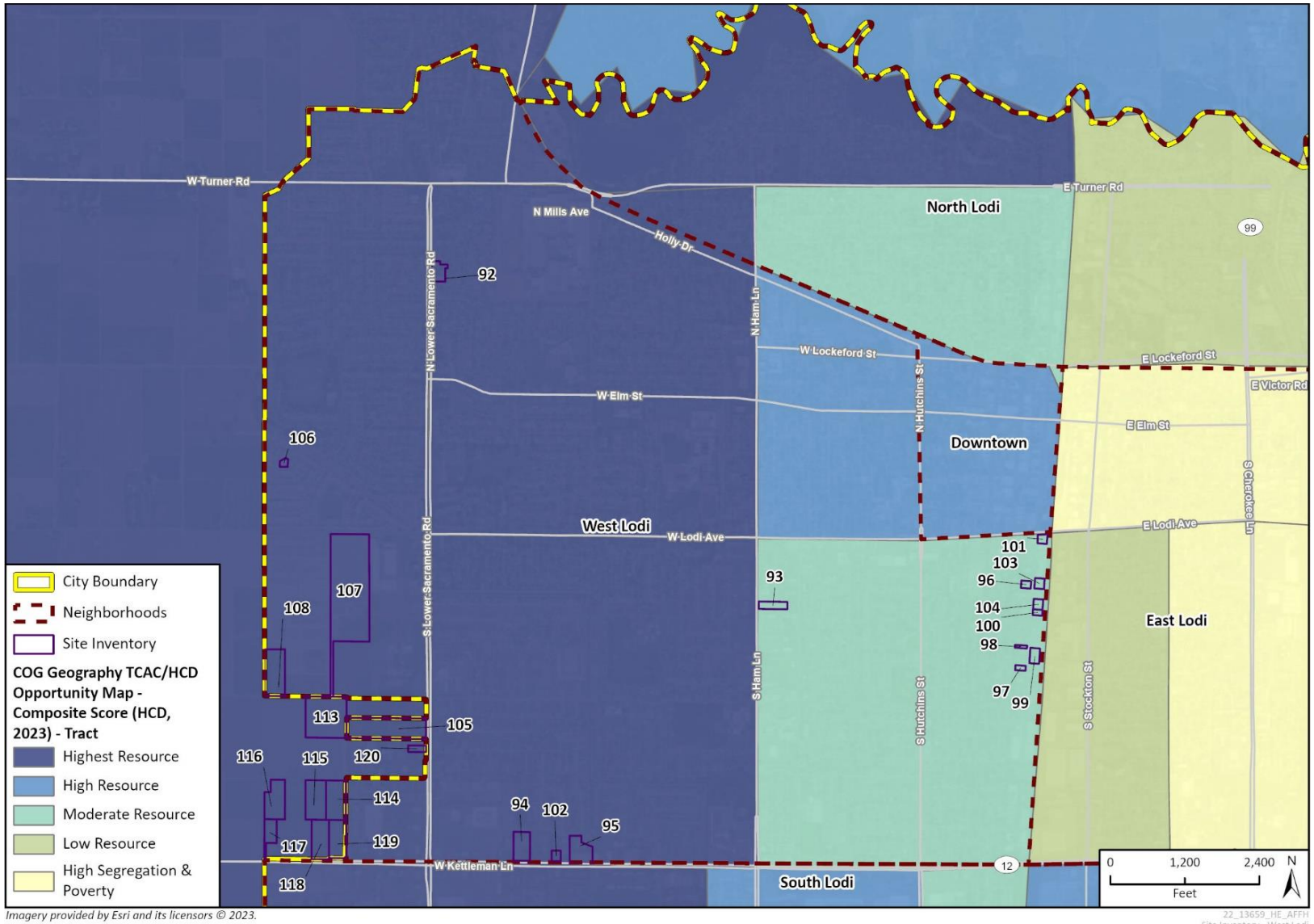
Source: AFFH Viewer 2023.

Figure 49 Housing Opportunity Sites by TCAC Resource Area (East Lodi)



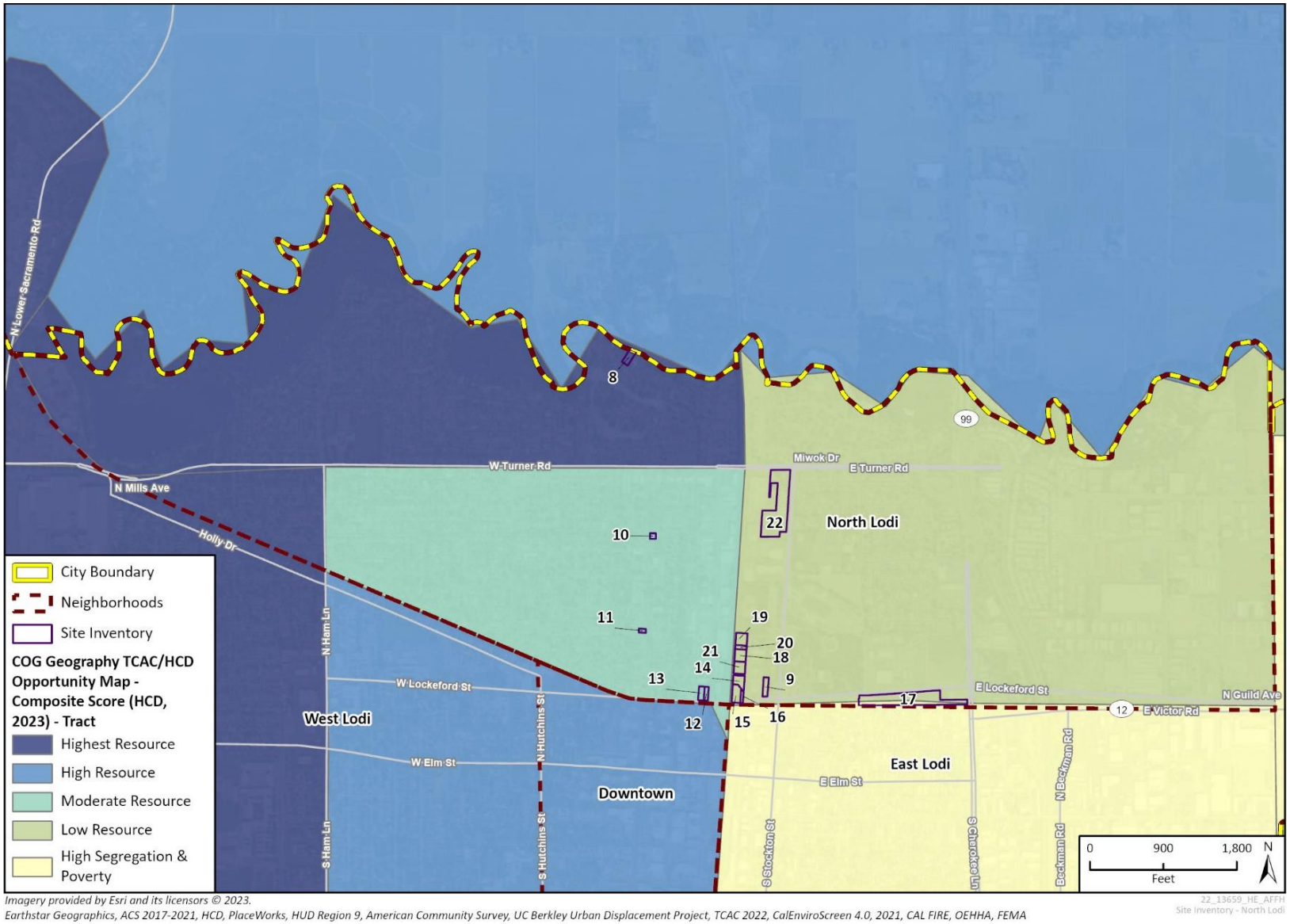
Source: AFFH Viewer 2023.

Figure 50 Housing Opportunity Sites by TCAC Resource Area (West Lodi)



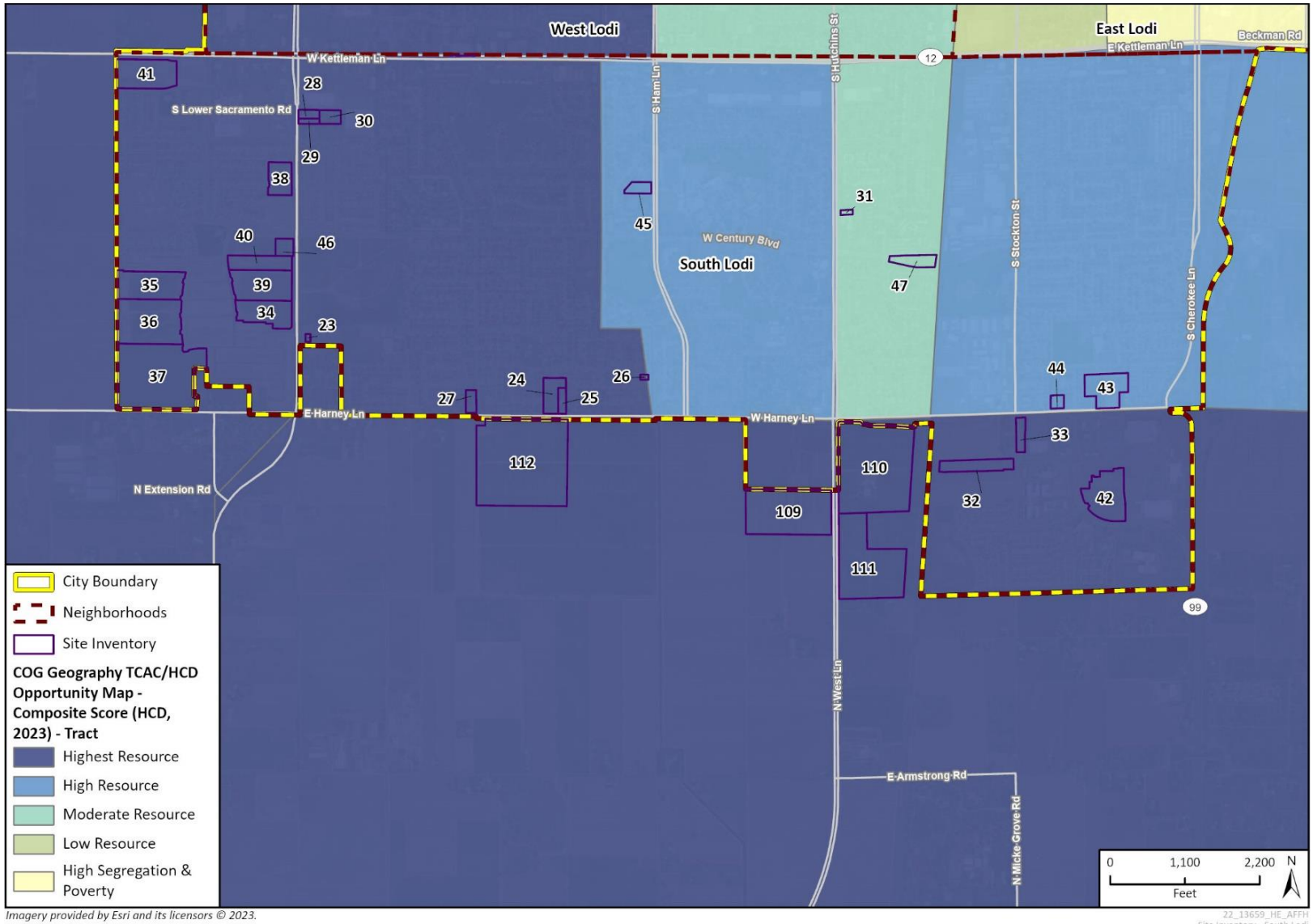
Source: AFFH Viewer 2023.

Figure 51 Housing Opportunity Sites by TCAC Resource Area (North Lodi)



Source: AFFH Viewer 2023.

Figure 52 Housing Opportunity Sites by TCAC Resource Area (South Lodi)



Source: AFFH Viewer 2023.

Sites by Income Population

Census tracts with more than 50 percent low- and moderate-income (LMI) households are located in East, West, and North Lodi. Figure 53 through Figure 57 show the housing opportunity sites by percentage of LMI populations. Approximately eight percent of the total housing units included in the opportunity sites are located in census tracts with more than 50 percent LMI households (14 percent of the low-income units, 18 percent of the moderate-income units, and less than one percent of the above moderate-income units). In contrast, census tracts with less than 25 percent LMI households are located in West, North, and South Lodi. These census tracts accommodate 25 percent of the total housing units included in the opportunity sites (24 percent of the low-income units, 19 percent of the moderate-income units, and 29 percent of the above moderate-income units). The Sites Inventory will improve the mixture of housing opportunities by income level in the city and will not exacerbate segregation by income between neighborhoods.

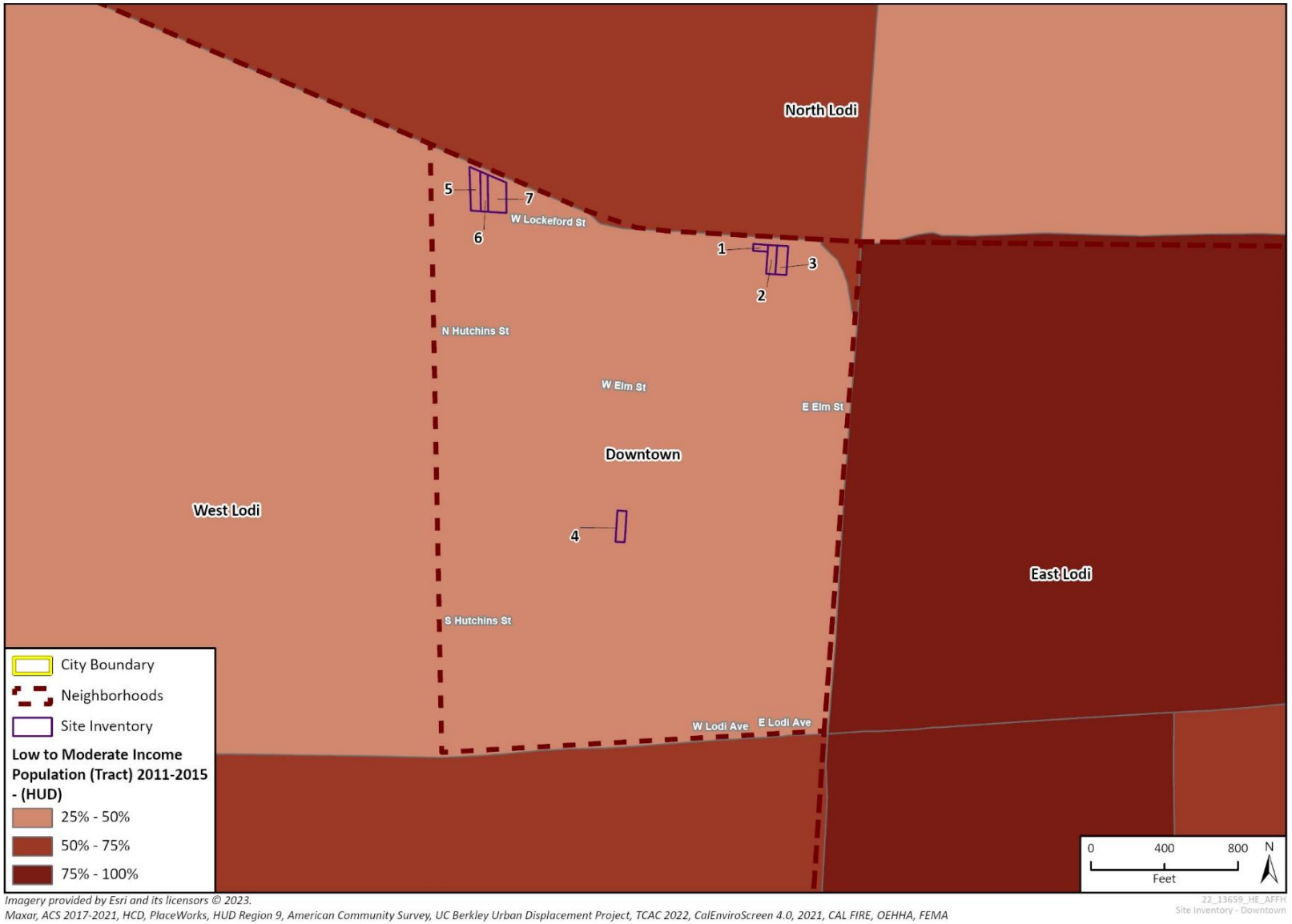
Sites by Overcrowded Households

Census tracts with high rates of overcrowded households are concentrated in East Lodi, where between 28 and 31 percent of households are overcrowded. These neighborhoods have a mixture of low-, medium-, and high-density residential development, alongside commercial and industrial land uses. The Sites Inventory assumes that sites in East Lodi could accommodate a total of 306 housing units, of which 192 would be lower-income, equal to approximately 12 percent of the total lower-income sites. The remaining lower-income housing units could be accommodated in Downtown, North, and South Lodi, which have lower levels of overcrowding. The Sites Inventory will not exacerbate overcrowding conditions but will add new housing opportunities in areas that need them.

Sites by Overpayment by Homeowners and Renters

The percentage of overpayment among homeowners and renters is high throughout Lodi. The highest rates of overpayment by homeowners are concentrated in East Lodi, where up to 61 percent of homeowners' experience overpayment. Figure 63 through Figure 67 show the housing opportunity sites by overpayment by homeowners. The housing opportunity sites will provide housing opportunities for a mix of income levels in East Lodi, including 192 lower-income units, 109 moderate-income units, and five above moderate-income units. The highest rates of overpayment by renters are in Downtown, East, and West Lodi, where up to 66 percent of renters' experience overpayment. Figure 68 through Figure 72 show the housing opportunity sites by overpayment by renters. The housing opportunity sites will provide housing opportunities for a mix of income levels in Downtown, East, and West Lodi, including 578 units appropriate for lower-income households, 316 units appropriate for moderate-income households, and 629 units appropriate for above-moderate-income households. Most of these housing units will likely be rental units, based on trends in planning entitlements and developer interest. According to the UDP, new market-rate construction in gentrifying areas neither worsens nor eases rates of people moving out of the area. It increases rates of people moving to an area across all socio-economic groups, particularly high-socio-economic residents. The UDP recommends subsidized housing construction and housing preservation to help existing residents stay in their neighborhood. The mix of lower, moderate, and above moderate-income housing units in Downtown, East, and West Lodi will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move into the area. The Sites Inventory will not exacerbate overpayment by homeowners or renters but will add new housing opportunities in areas that need them.

Figure 53 Housing Opportunity Sites by Low- and Moderate-Income Population Area (Downtown Lodi)

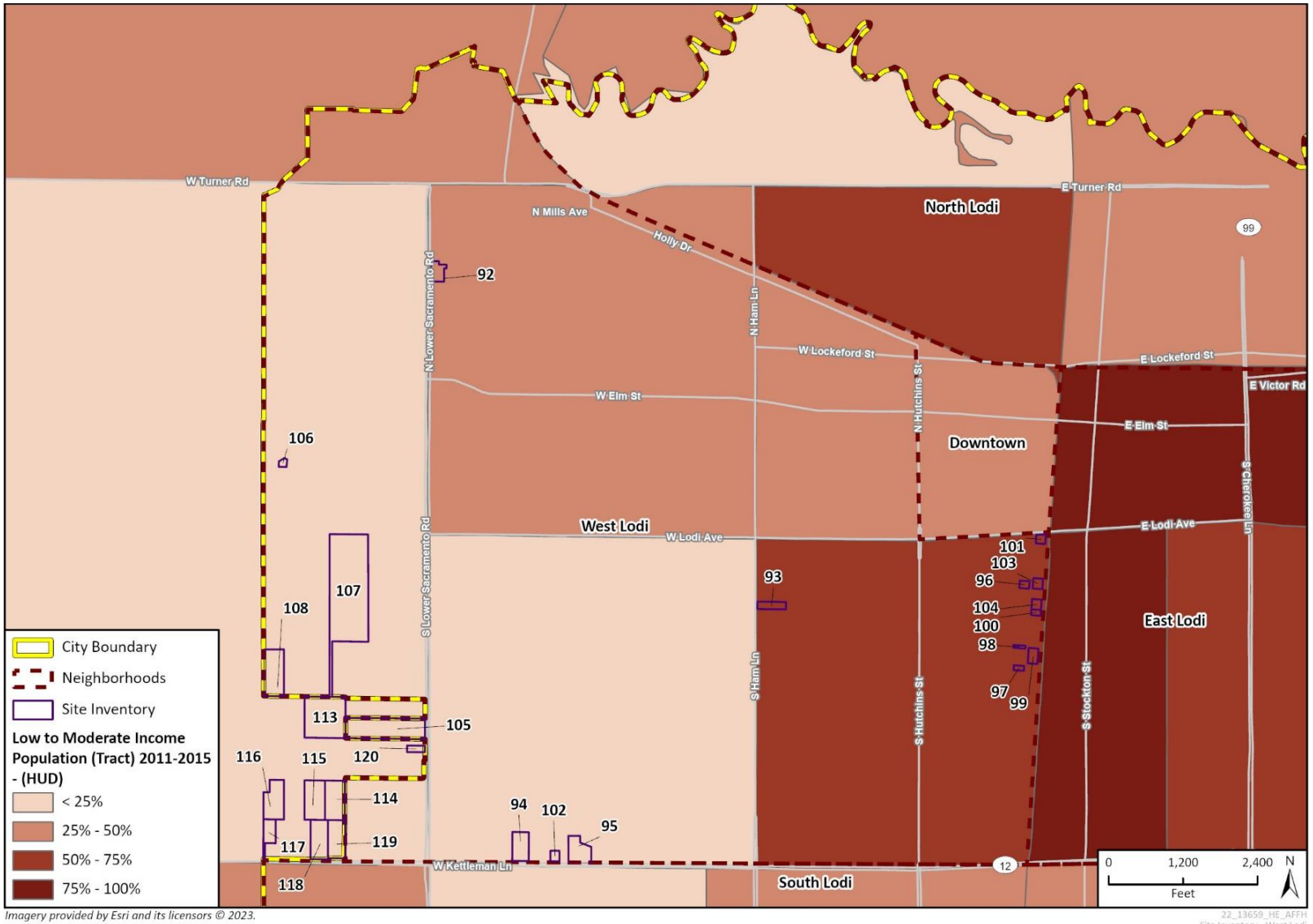


Source: AFFH Viewer 2023.

Figure 54 Housing Opportunity Sites by Low- and Moderate-Income Population Area (East Lodi)

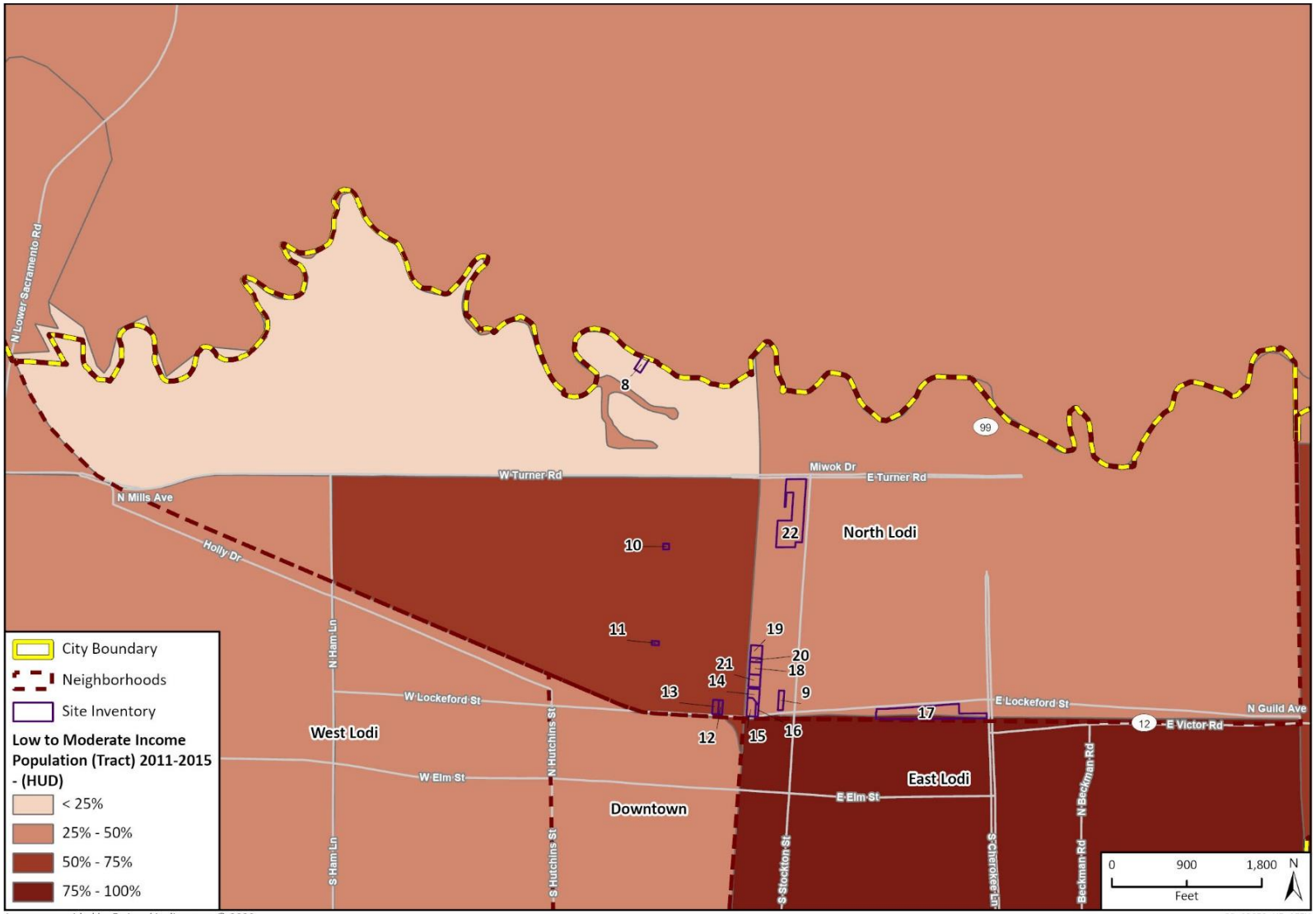
Source: AFFH Viewer 2023.

Figure 55 Housing Opportunity Sites by Low- and Moderate-Income Population Area (West Lodi)



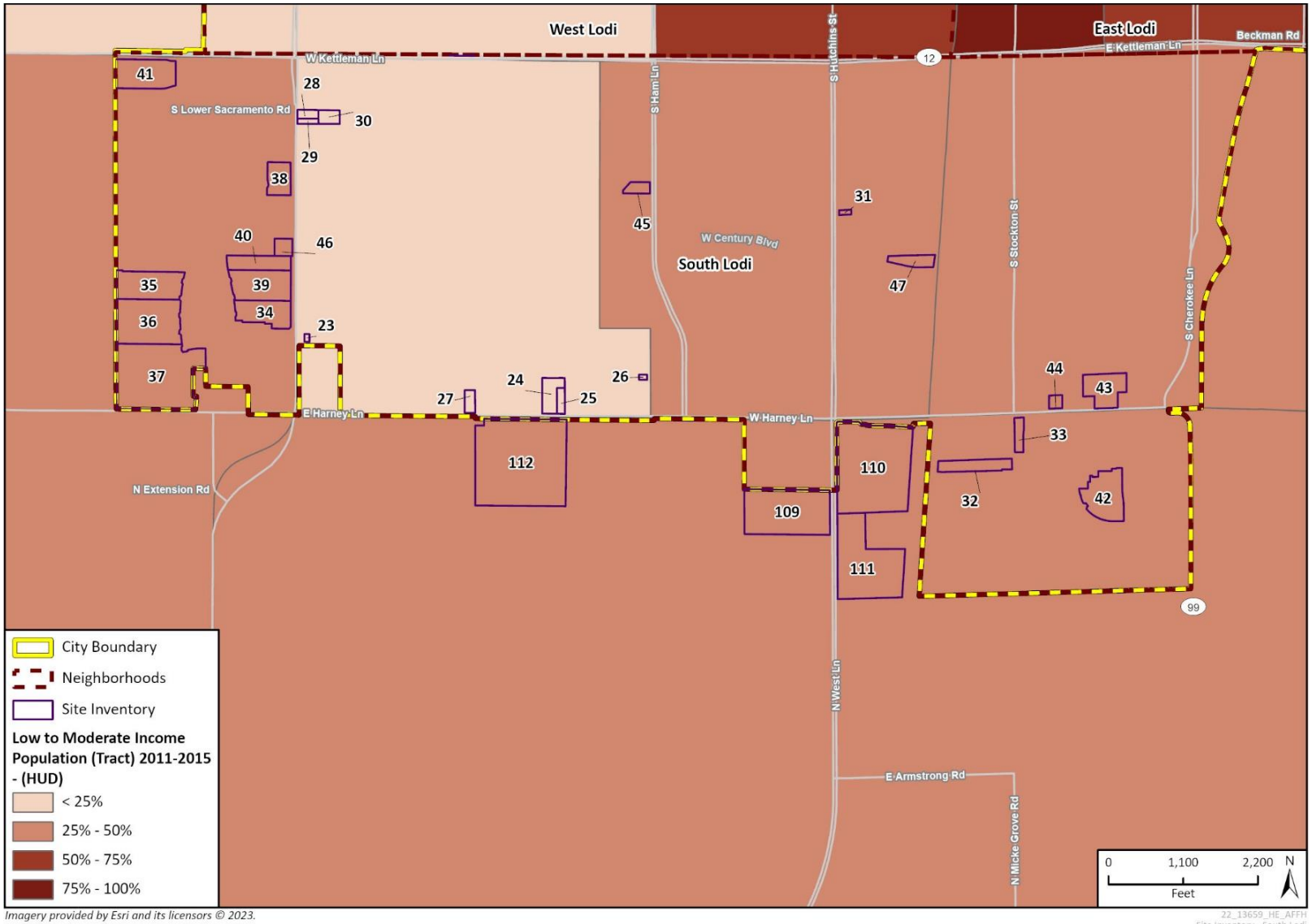
Source: AFFH Viewer 2023.

Figure 56 Housing Opportunity Sites by Low- and Moderate-Income Population Area (North Lodi)



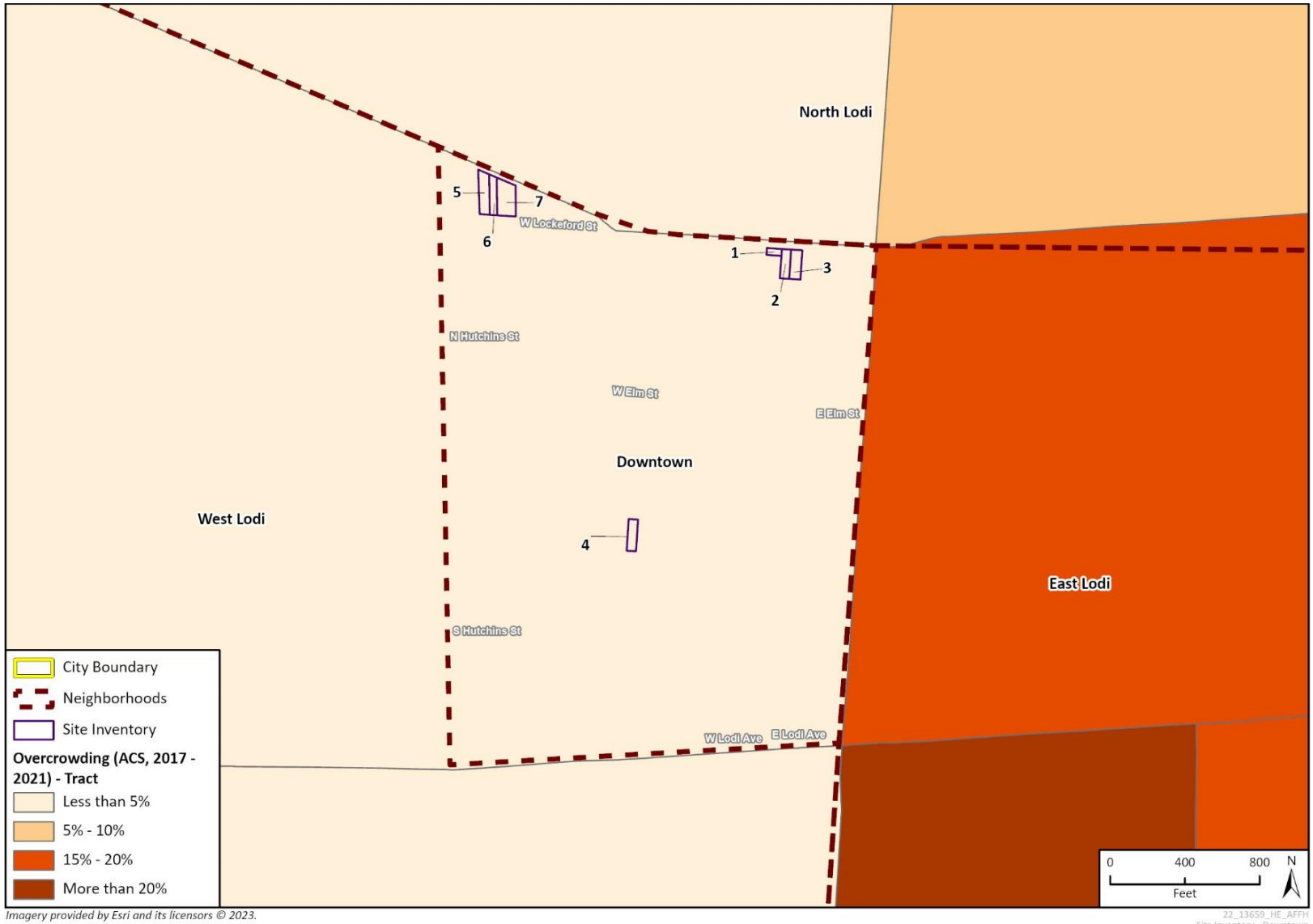
Source: AFFH Viewer 2023.

Figure 57 Housing Opportunity Sites by Low- and Moderate-Income Population Area (South Lodi)



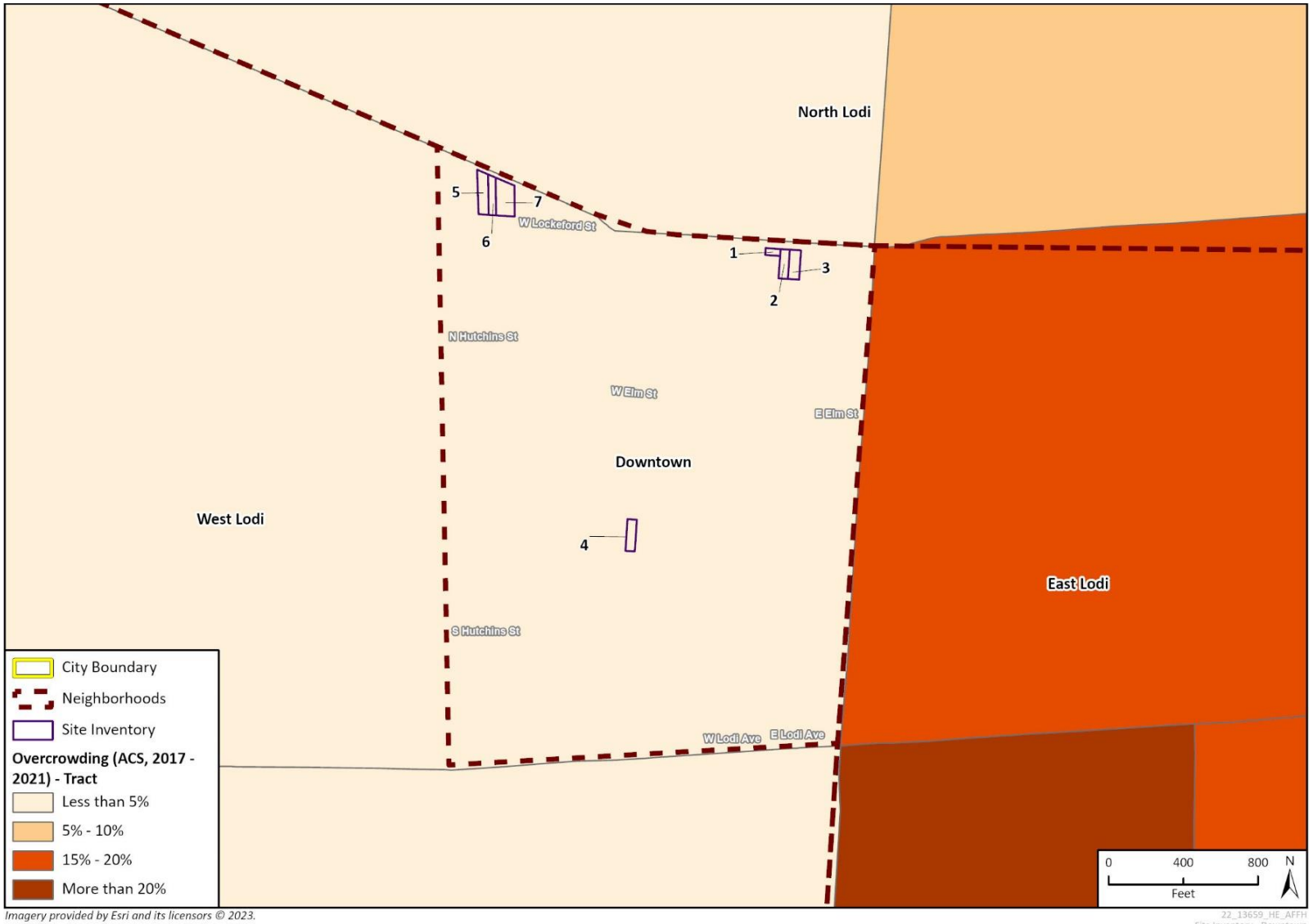
Source: AFFH Viewer 2023.

Figure 58 Housing Opportunity Sites by Overcrowding (Downtown Lodi)



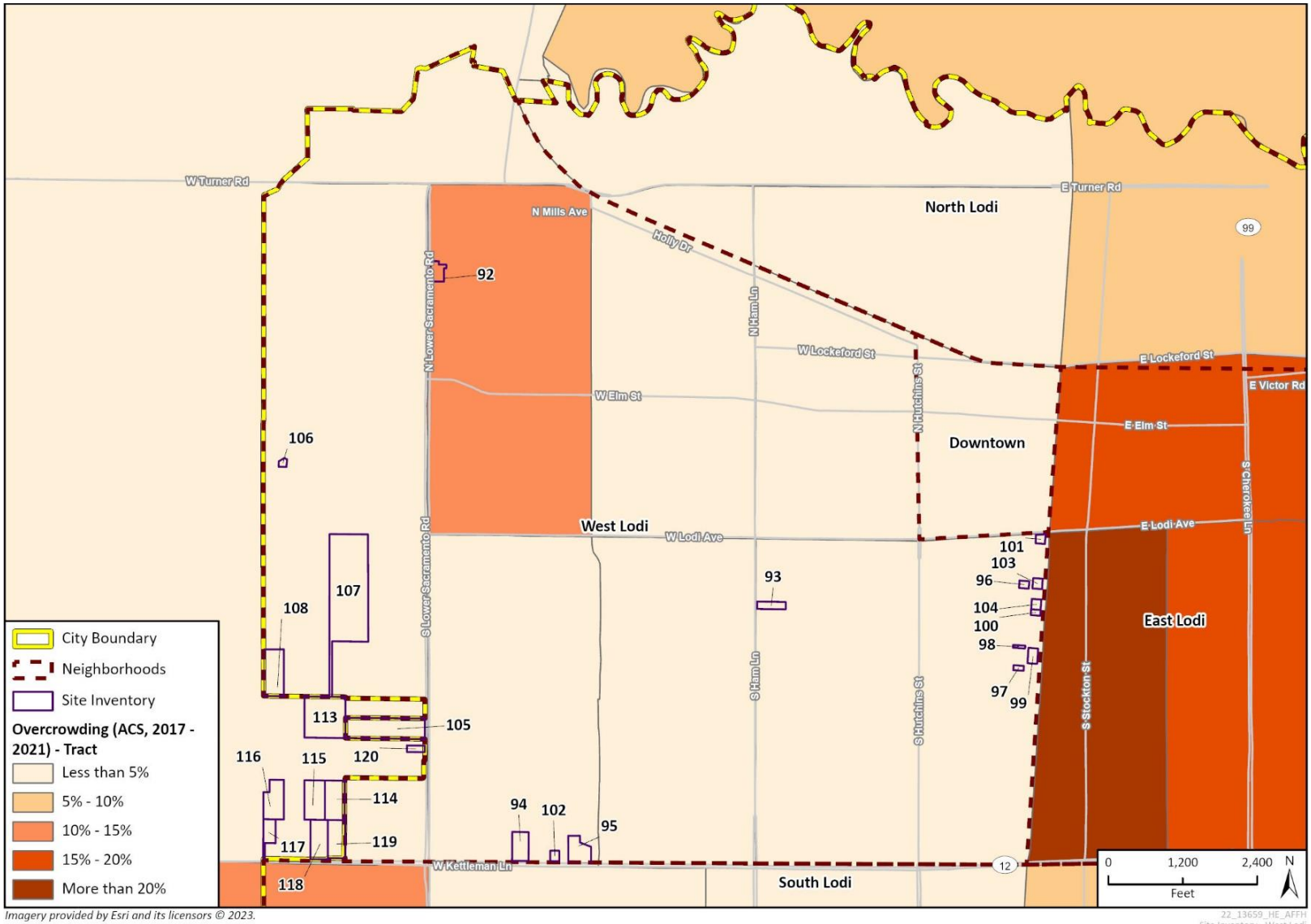
Source: AFFH Viewer 2023.

Figure 59 Housing Opportunity Sites by Overcrowding (East Lodi)



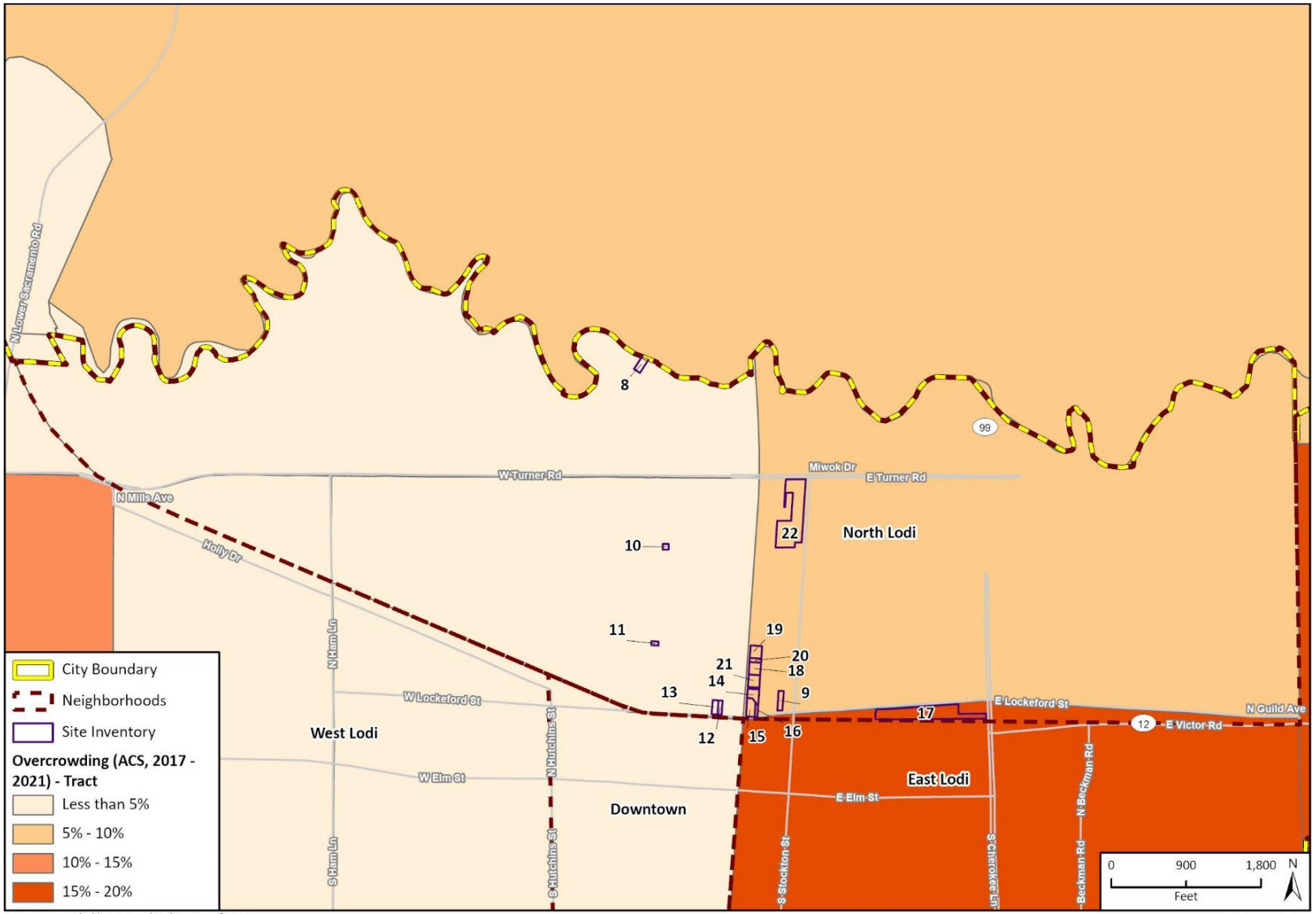
Source: AFFH Viewer 2023.

Figure 60 Housing Opportunity Sites by Overcrowding (West Lodi)



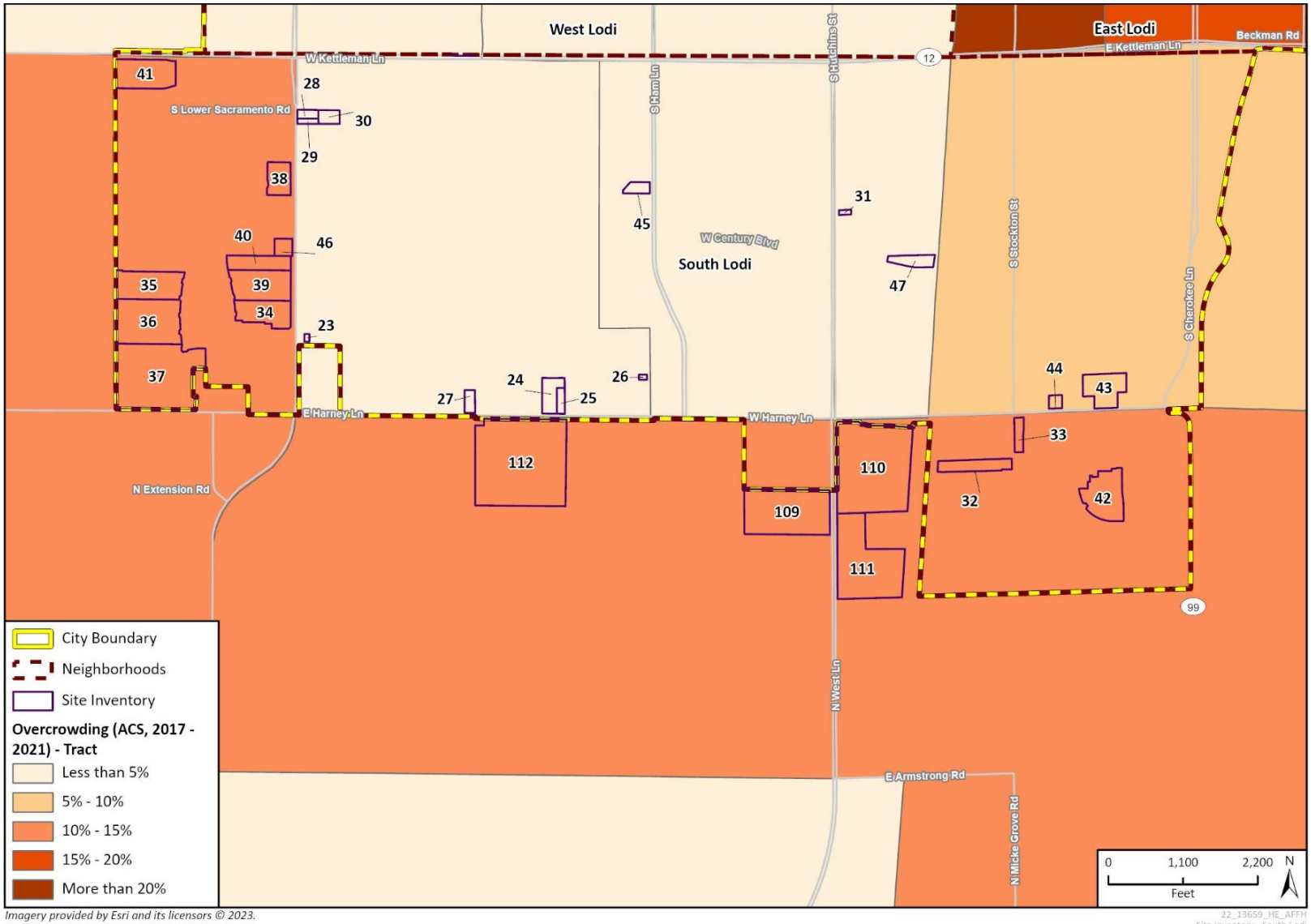
Source: AFFH Viewer 2023.

Figure 61 Housing Opportunity Sites by Overcrowding (North Lodi)



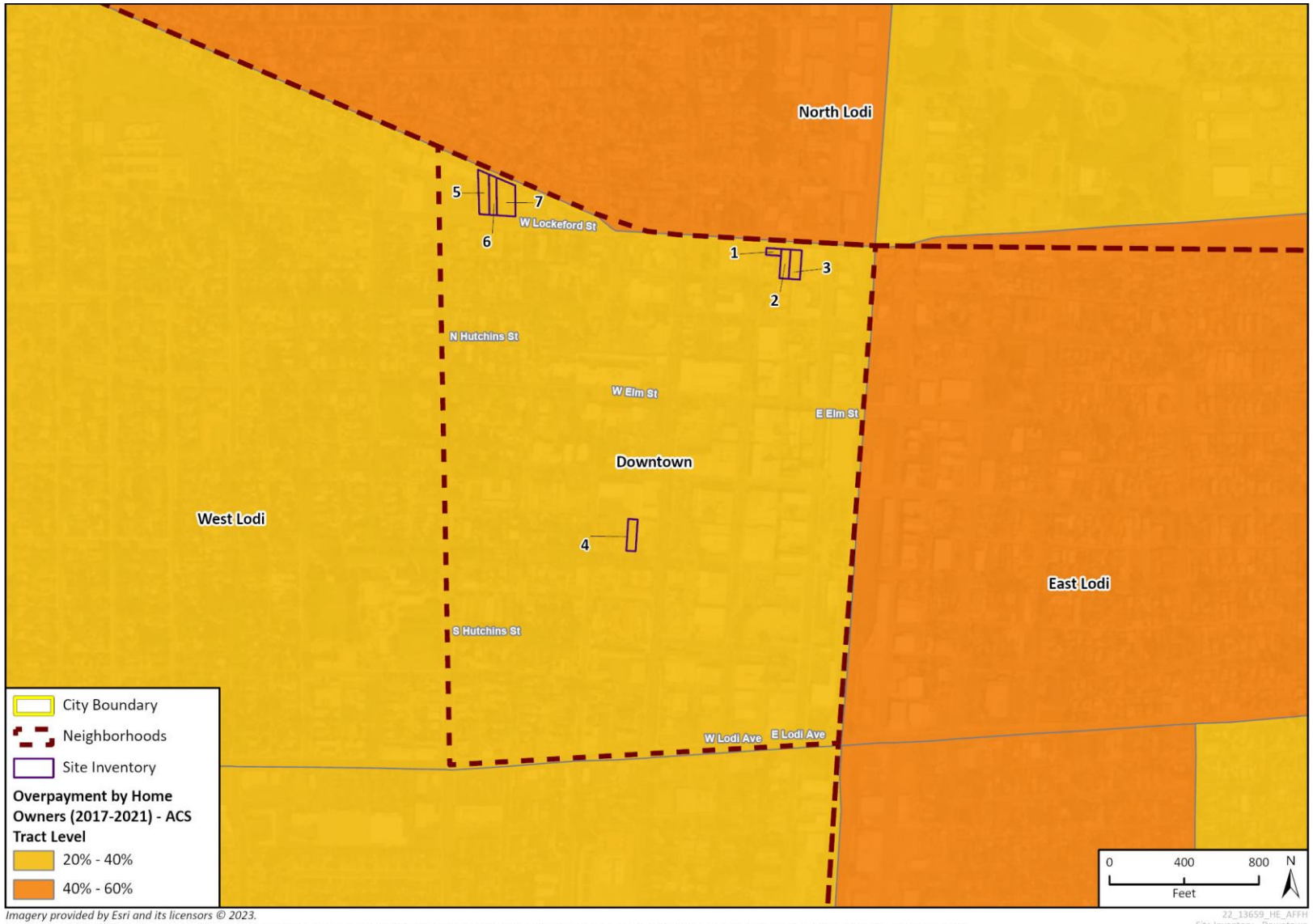
Source: AFFH Viewer 2023.

Figure 62 Housing Opportunity Sites by Overcrowding (South Lodi)



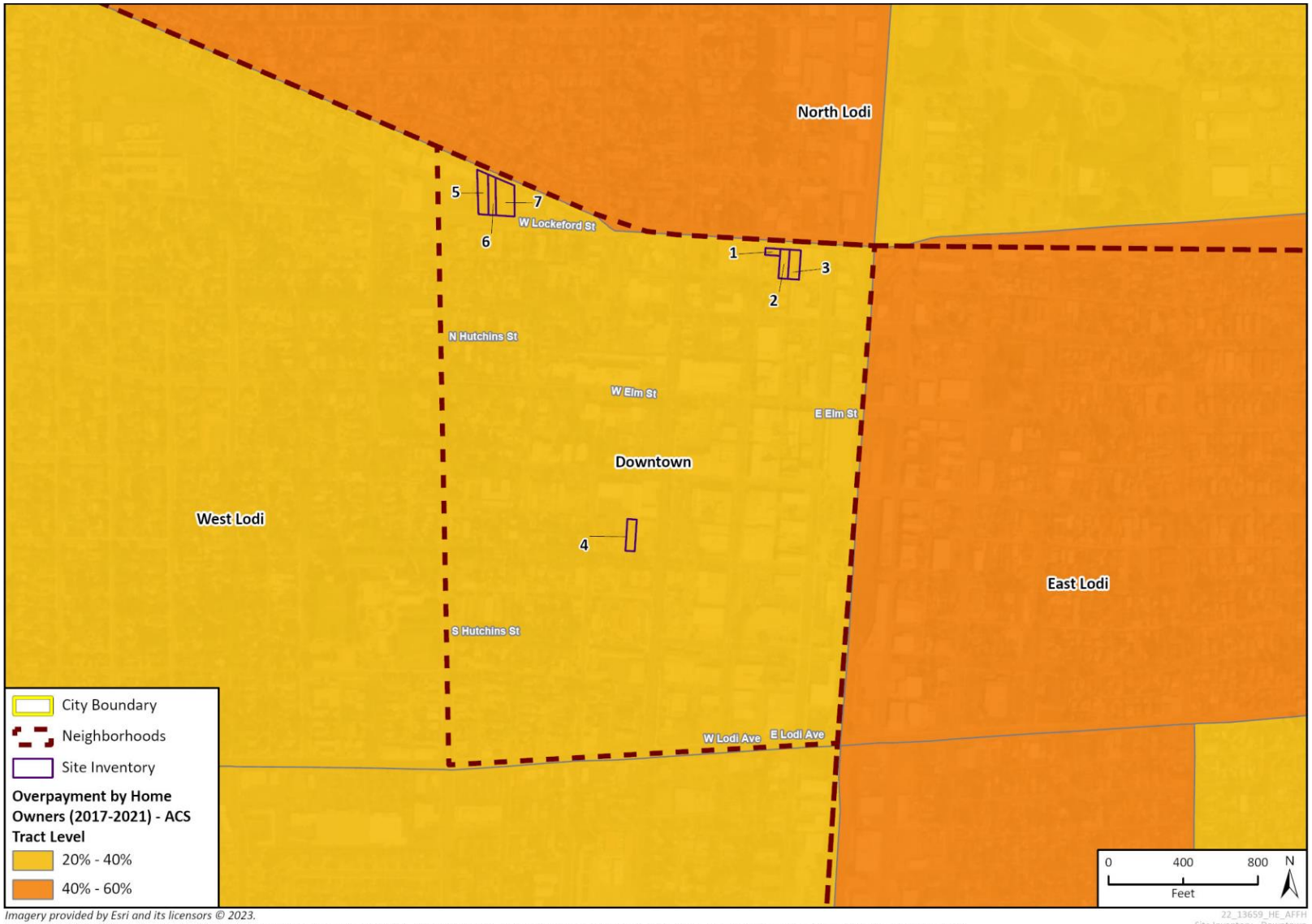
Source: AFFH Viewer 2023.

Figure 63 Housing Opportunity Sites by Overpayment by Homeowners (Downtown Lodi)



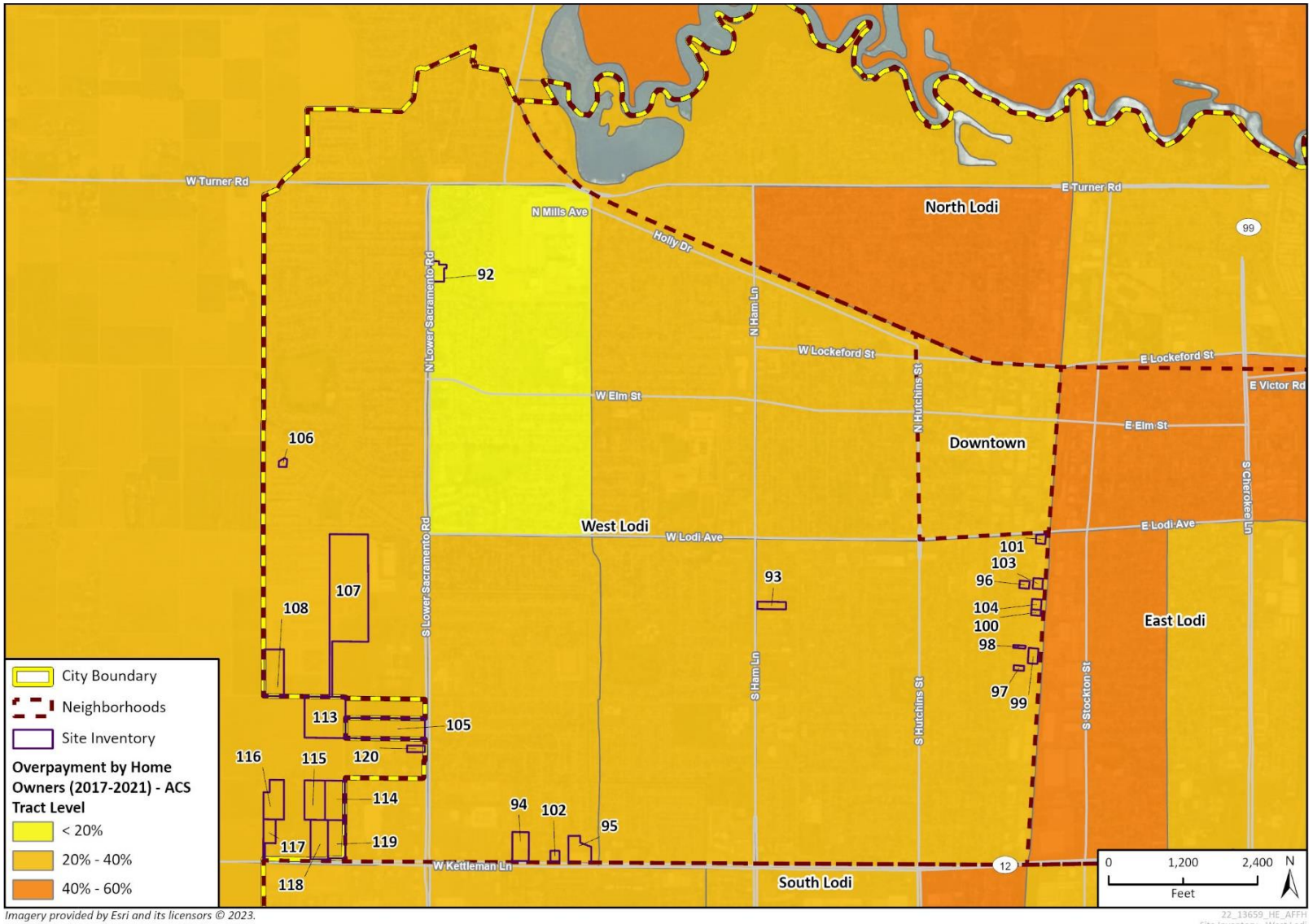
Source: AFFH Viewer 2023.

Figure 64 Housing Opportunity Sites by Overpayment by Homeowners (East Lodi)



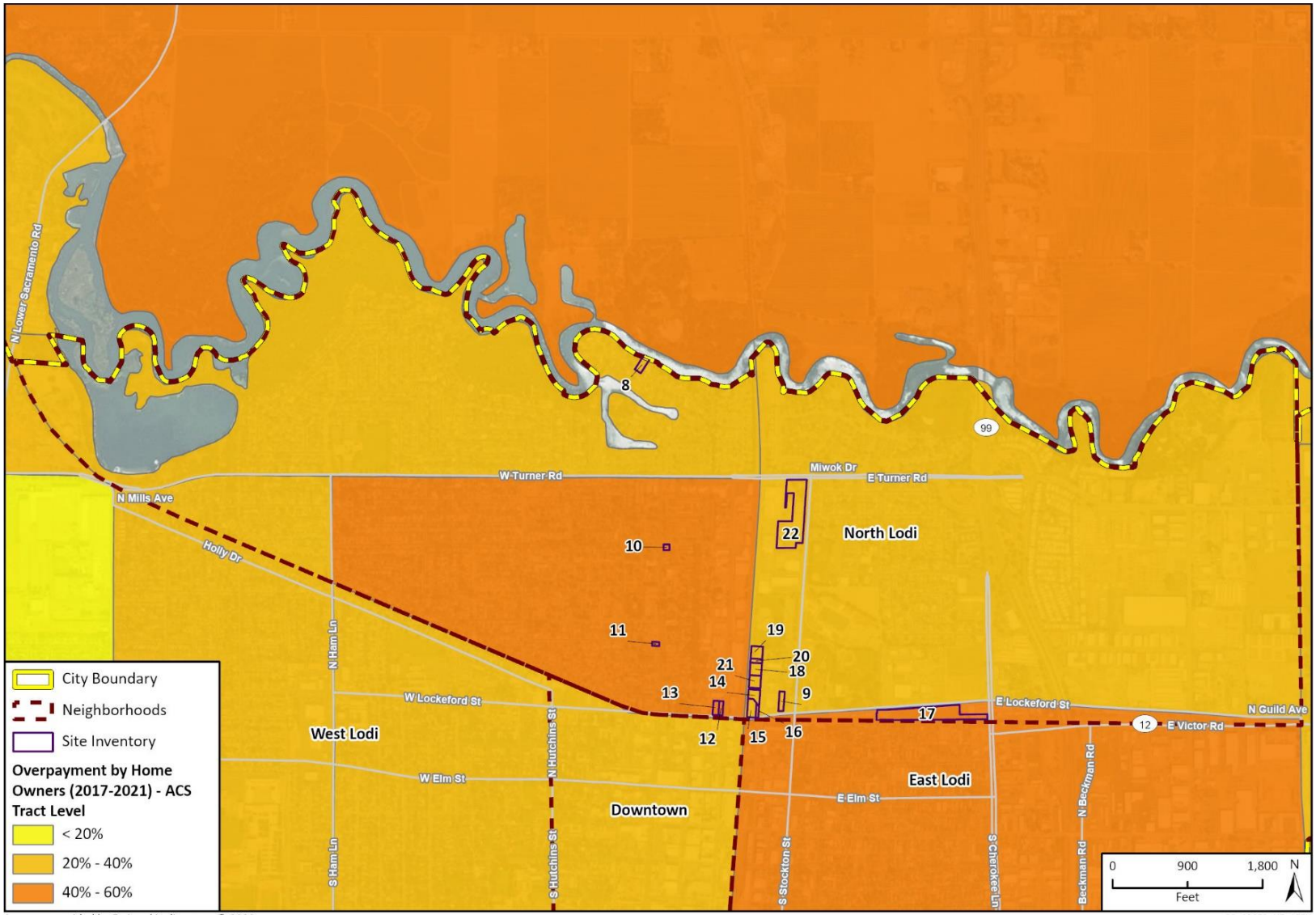
Source: AFFH Viewer 2023.

Figure 65 Housing Opportunity Sites by Overpayment by Homeowners (West Lodi)



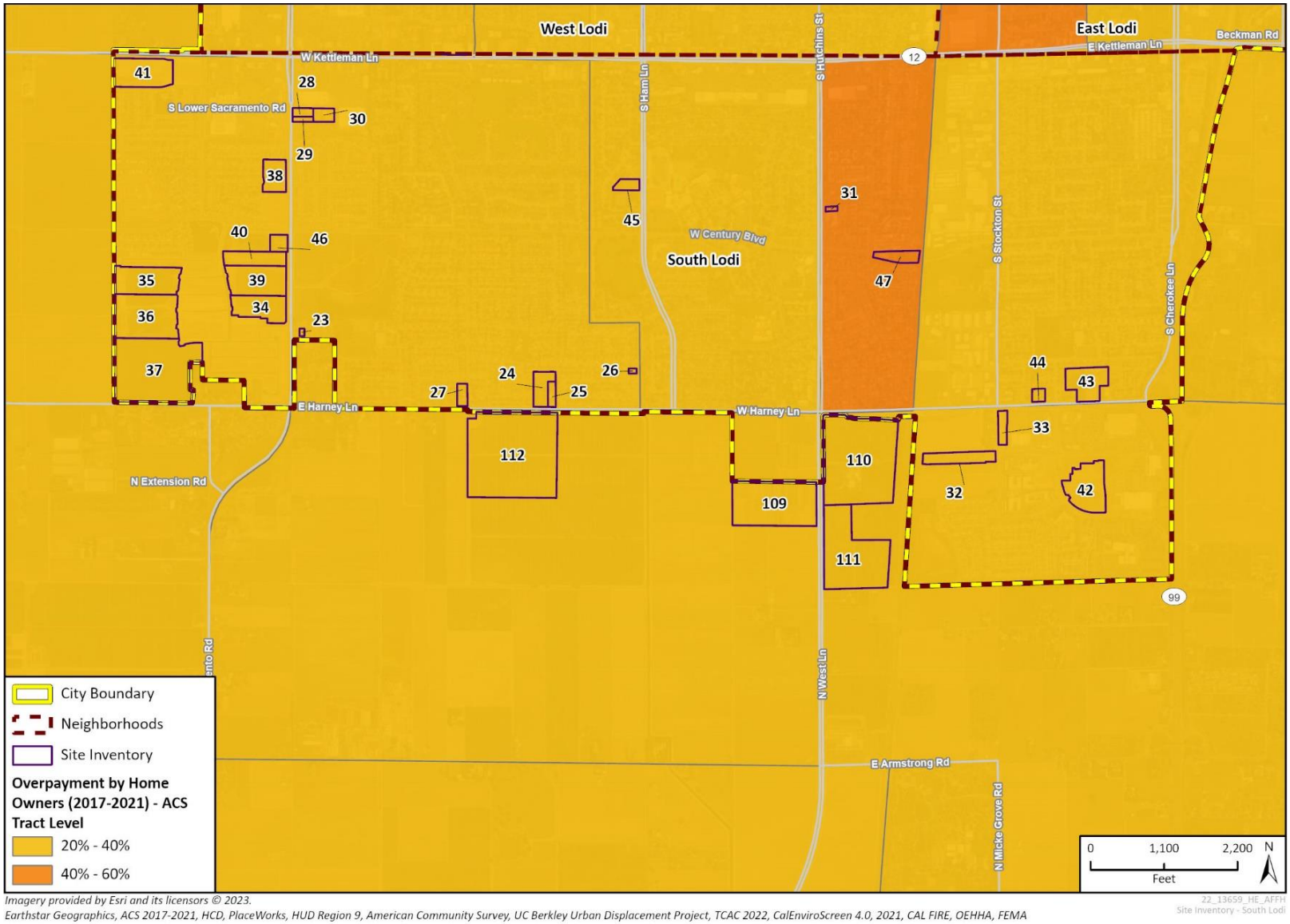
Source: AFFH Viewer 2023.

Figure 66 Housing Opportunity Sites by Overpayment by Homeowners (North Lodi)



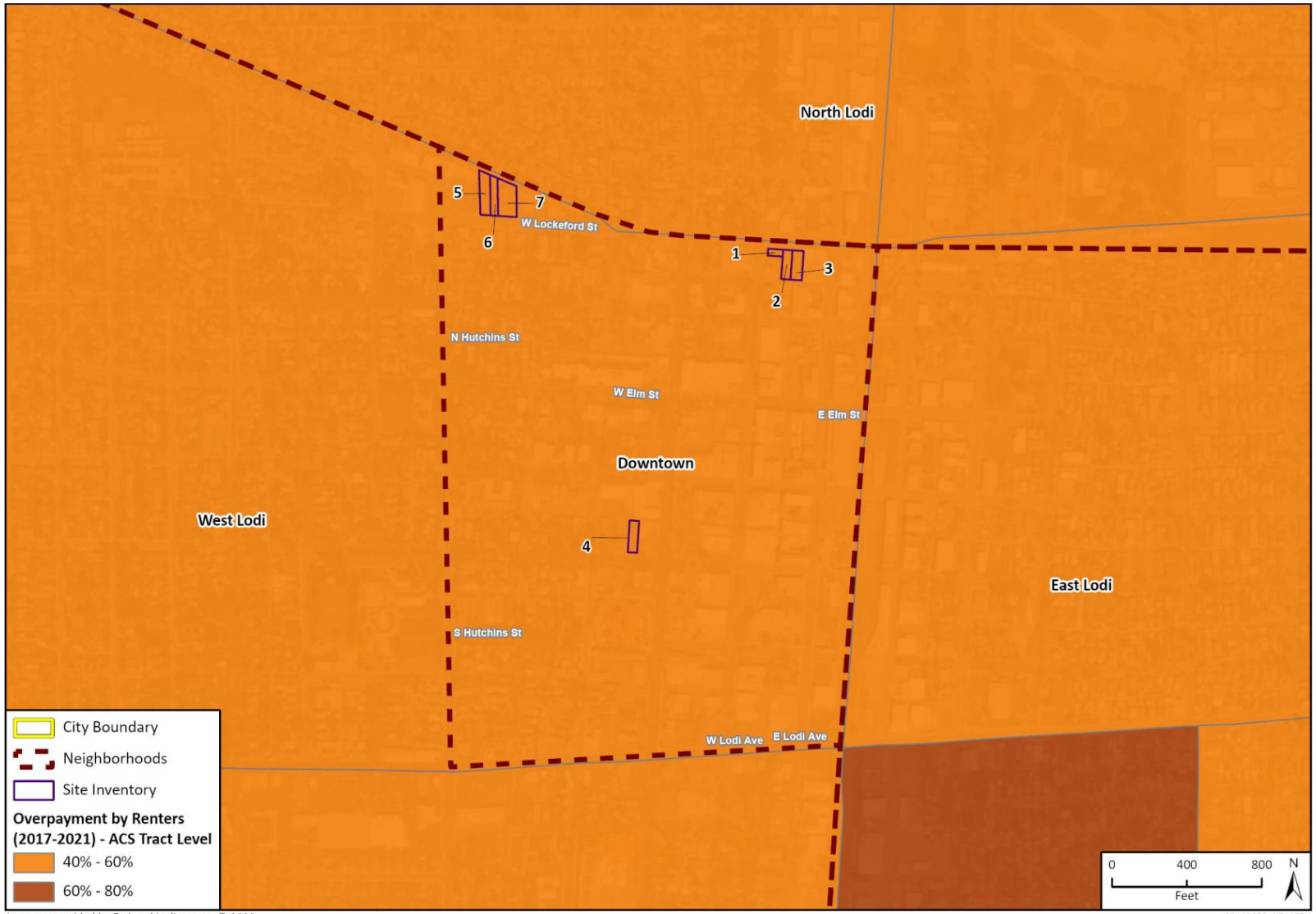
Source: AFFH Viewer 2023.

Figure 67 Housing Opportunity Sites by Overpayment by Homeowners (South Lodi)



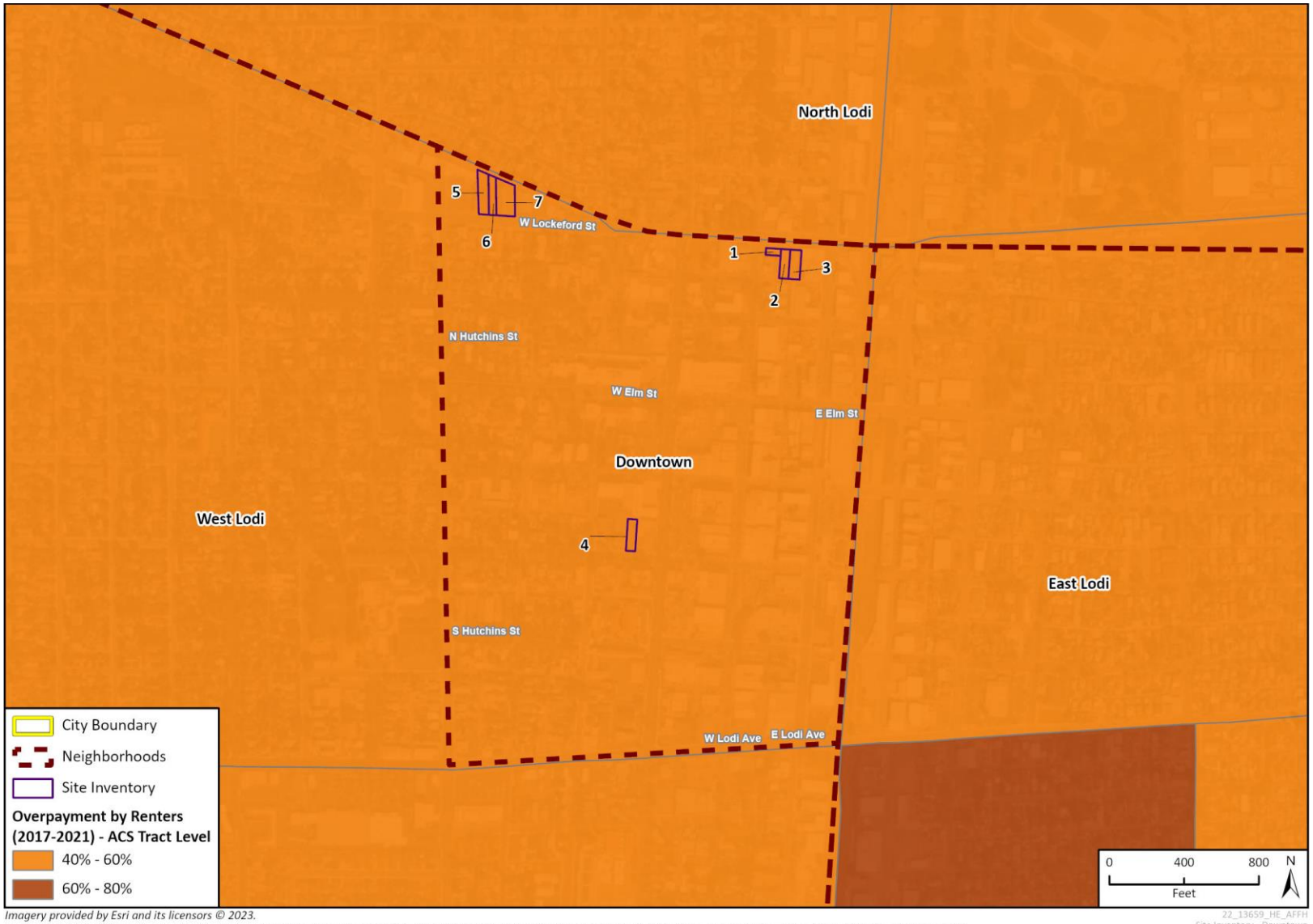
Source: AFFH Viewer 2023.

Figure 68 Housing Opportunity Sites by Overpayment by Renters (Downtown Lodi)



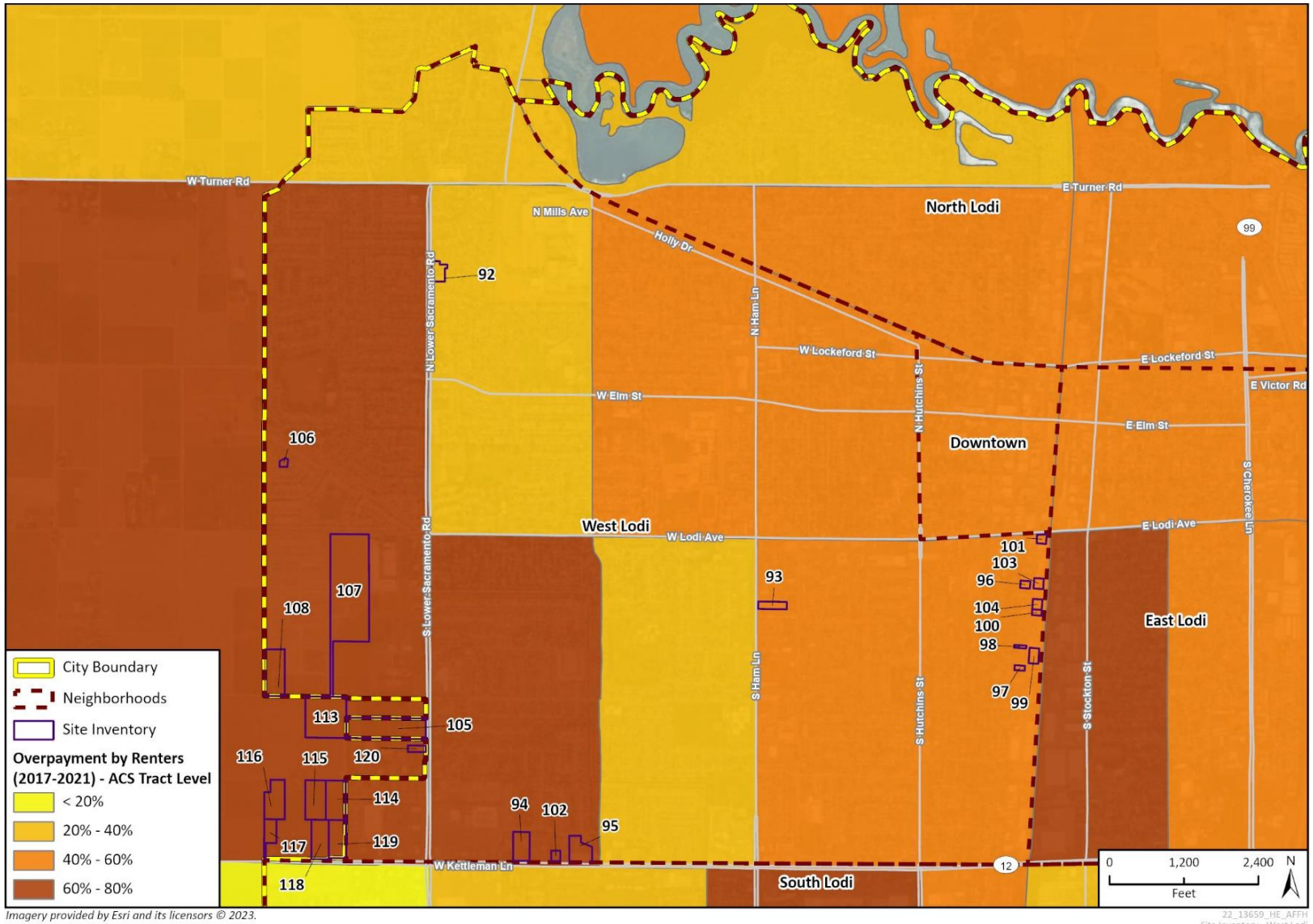
Source: AFFH Viewer 2023.

Figure 69 Housing Opportunity Sites by Overpayment by Renters (East Lodi)



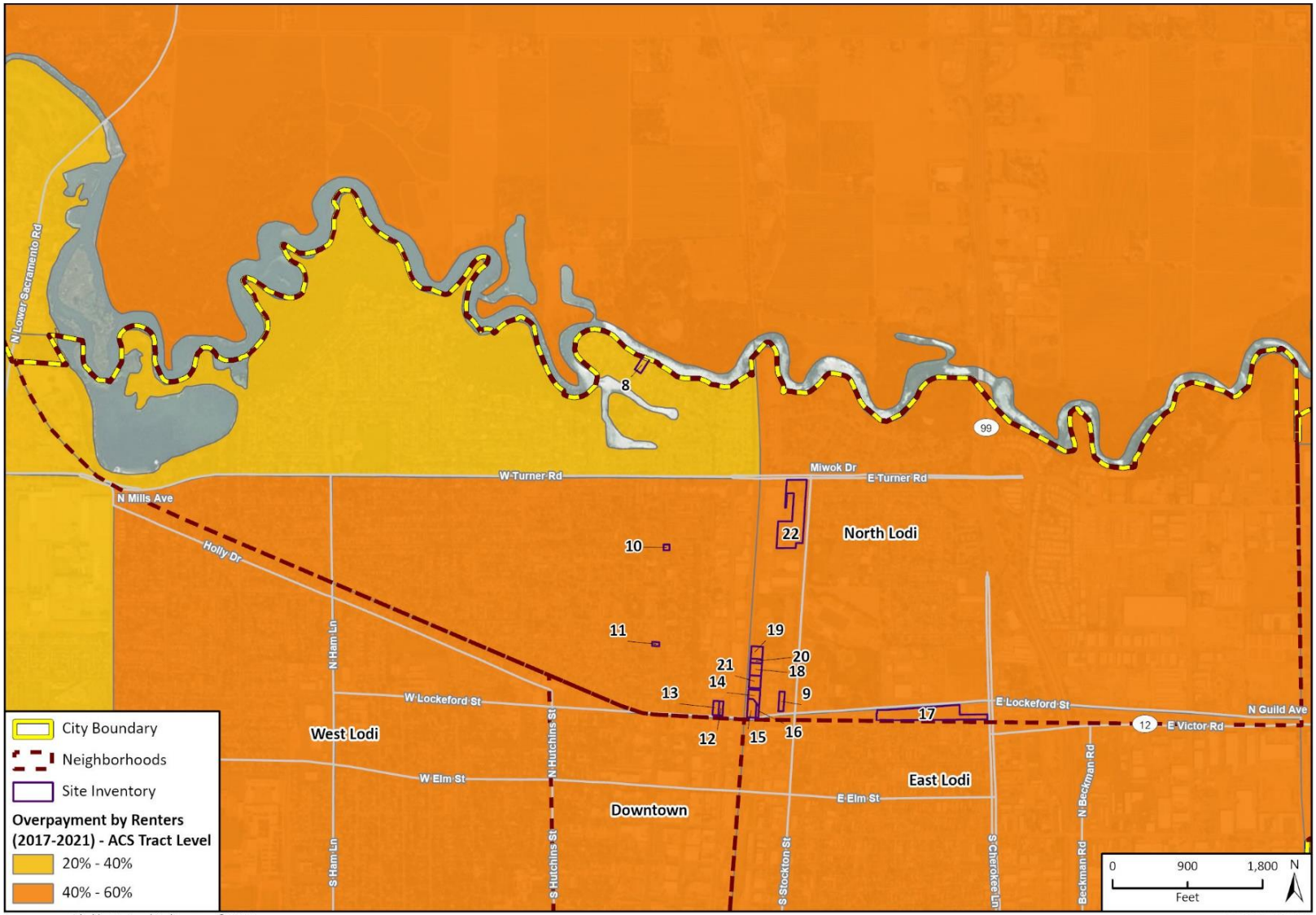
Source: AFFH Viewer 2023.

Figure 70 Housing Opportunity Sites by Overpayment by Renters (West Lodi)



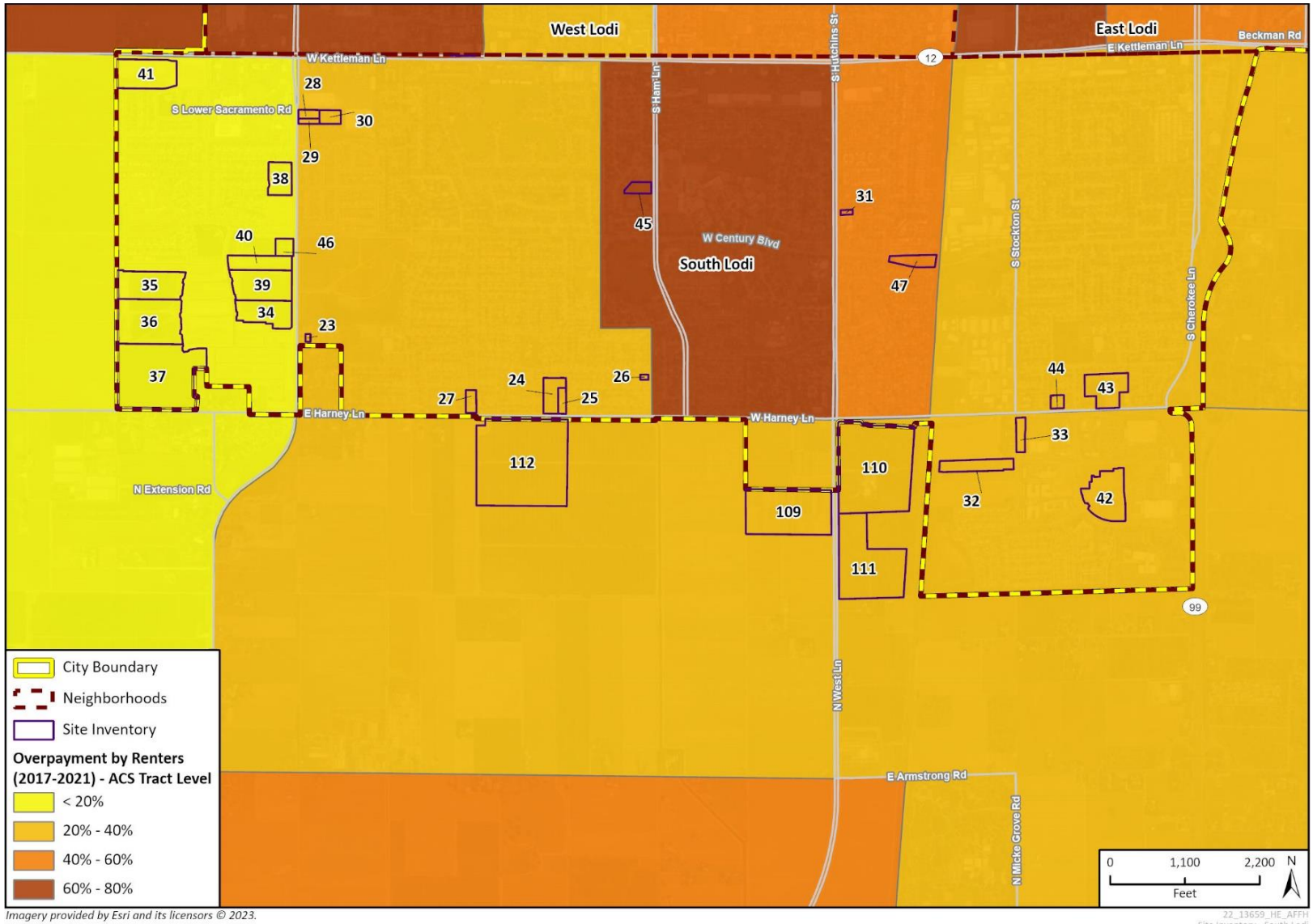
Source: AFFH Viewer 2023.

Figure 71 Housing Opportunity Sites by Overpayment by Renters (North Lodi)



Source: AFFH Viewer 2023.

Figure 72 Housing Opportunity Sites by Overpayment by Renters (South Lodi)



Source: AFFH Viewer 2023.

Sites by Areas of Integration and Segregation

There is one R/ECAP in Lodi, located north of Lodi Avenue in East Lodi. East Lodi is predominantly Hispanic/Latino and more than 81 percent of the population identifies as non-White. Housing opportunities sites in East Lodi accommodate a mix of income levels in areas that already have a diverse mix of ethnic and racial groups, including 192 low-income units, 109 moderate-income units, and five above moderate-income units. Figure 73 through Figure 77 show the housing opportunity sites by percent non-white residents. The Sites Inventory will not contribute to segregation based on race/ethnicity or income level.

As discussed in Appendix B, Housing Needs Assessment, approximately 12 percent of the population has one or more disabilities. For persons with disabilities who live independently or with other family members, independent living can be supported with special housing features, financial support, and in-home supportive services. The location of housing is also an important factor for persons with mobility restrictions who rely on public transportation for travel. Lodi does not have a concentrated of persons with disabilities. Housing opportunity sites distribute a mix of lower-, moderate-, and above moderate-income units throughout each neighborhood. In addition, most of the city is within one quarter mile of a transit stop. Therefore, the Sites Inventory will allow more residents to live near transit and create housing opportunities for residents who are unable to drive.

Sites Vulnerable to Displacement

According to the UDP, the entirety of East Lodi is considered to be vulnerable to displacement. Figure 78 through Figure 82 show the housing opportunity sites in relation to areas with residents that are at risk of displacement. Opportunity sites in East Lodi accommodate 192 lower-income units, 109 moderate-income units, and five above moderate-income units in areas considered to be vulnerable to displacement. These lower-income units will provide affordable housing options for existing very low and low-income residents that are at risk of displacement. In addition, no sites with existing residential uses were identified in the Sites Inventory.

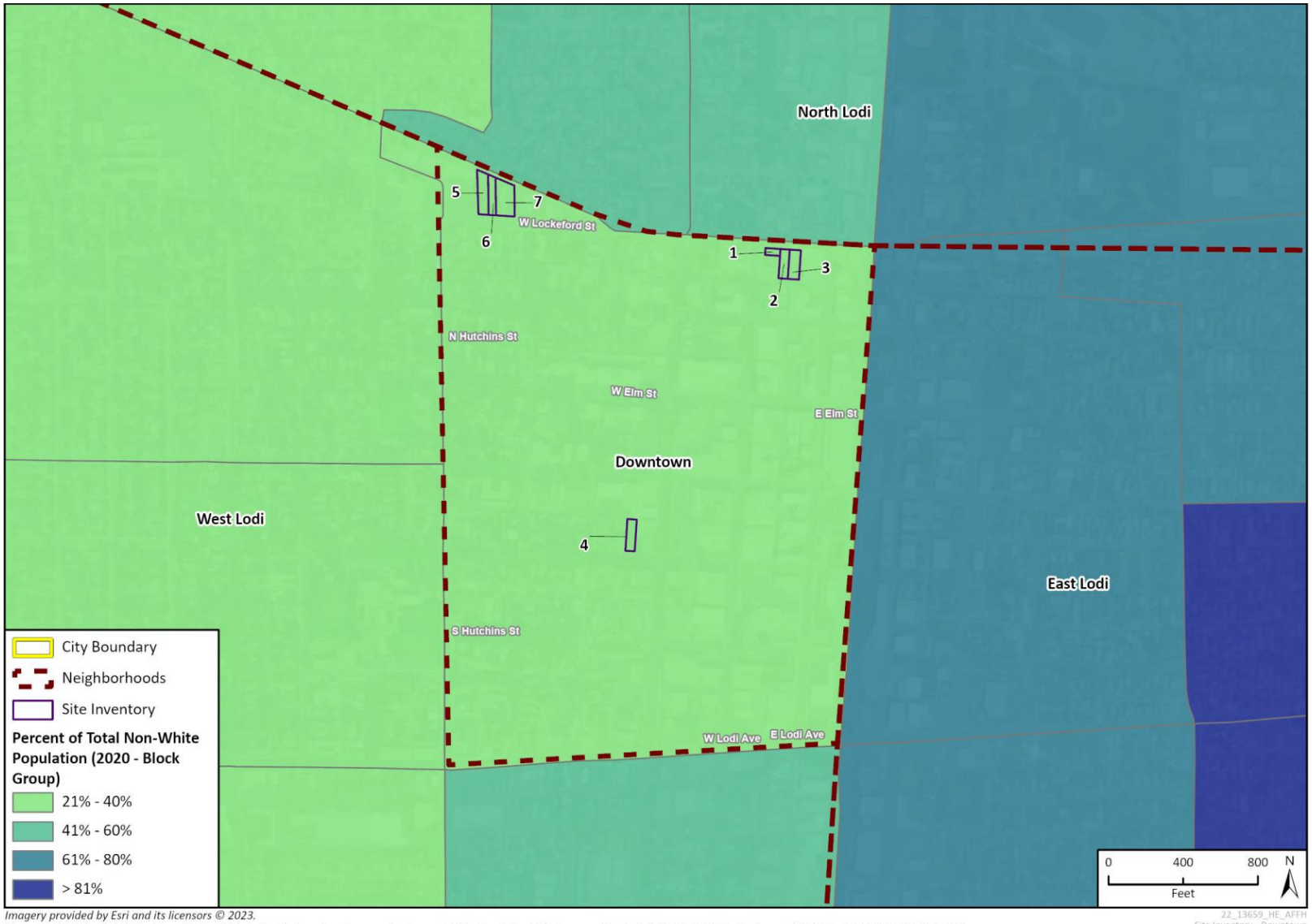
Sites by CalEnviroScreen Score

Lodi has a range of CalEnviroScreen scores, ranging from the 11th to 20th percentile (second decile, lower risk) to the 91st to 100th percentile (tenth decile, higher risk). The eastern half of city has higher CalEnviroScreen scores and the western half of the city has lower CalEnviroScreen scores. The lowest CalEnviroScreen scores are concentrated in West Lodi, while the highest CalEnviroScreen scores are located in East Lodi and the portion of North Lodi east of the Union Pacific Railroad. Approximately 73 percent of housing units proposed by the Sites Inventory are located in census tracts with a CalEnviroScreen score greater than 50. The remaining 27 percent of housing units are located in census tracts with a CalEnviroScreen score less than 50. Figure 83 through Figure 87 show the housing opportunity sites by CalEnviroScreen score. Housing opportunity sites in census tracts with a CalEnviroScreen score greater than 50 accommodate 1,167 lower-income units (71 percent of the total number of lower-income units), 649 moderate-income units (80 percent of the total number of moderate-income units), and 1,570 above moderate-income units (71 percent of the total number of above moderate-income units. Approximately 46 percent of all units in census tracts with a CalEnviroScreen score greater than 50 are appropriate for above moderate-income households. Therefore, the Sites Inventory would not concentrate lower-income units in areas of higher pollution burden.

Sites Analysis Summary Data

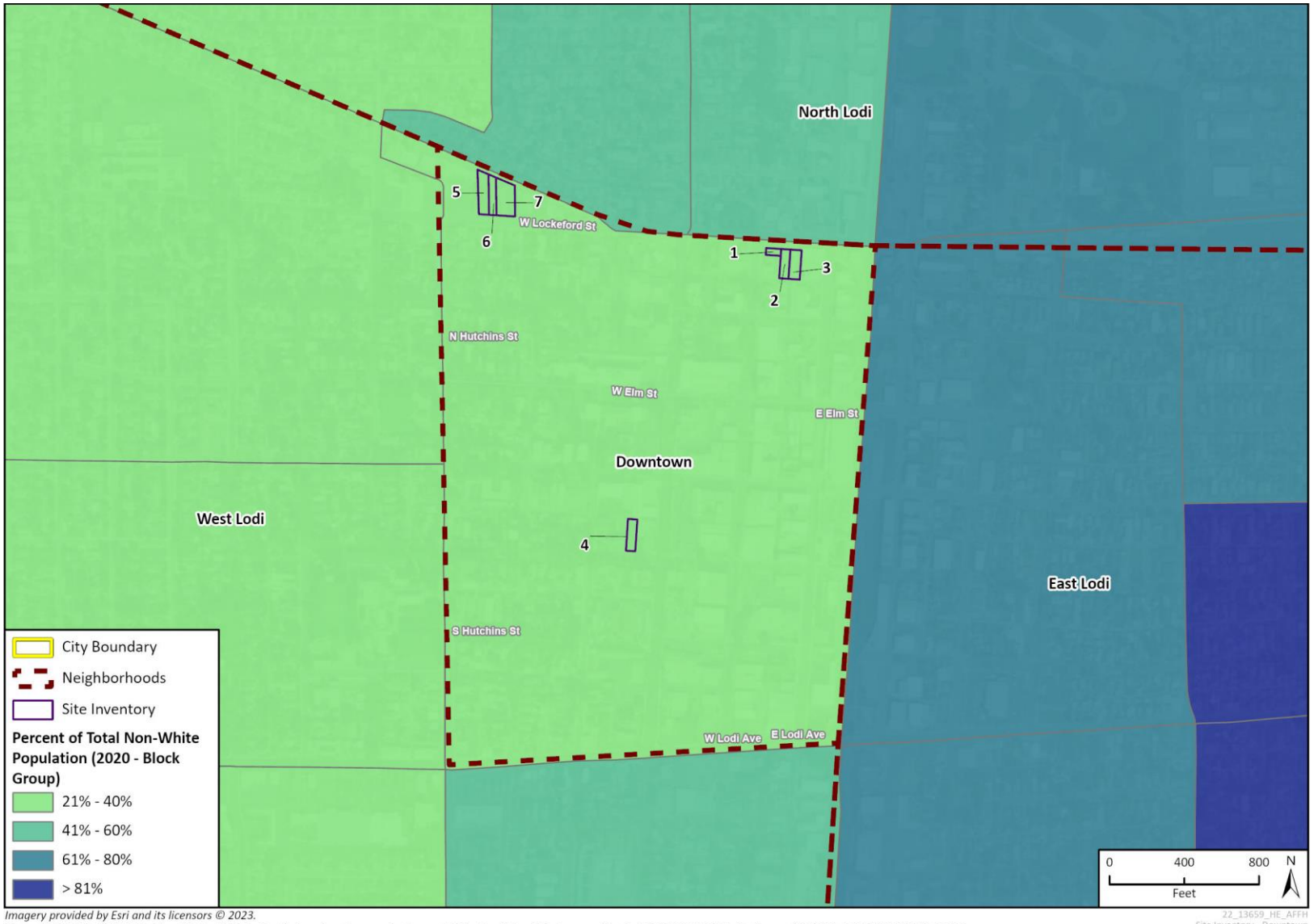
Table 89 summarizes the Sites Inventory by development priority area, sites, number of units by income level, and census tract characteristics.

Figure 73 Housing Opportunity Sites by Percent of Total Non-White Population (Downtown Lodi)



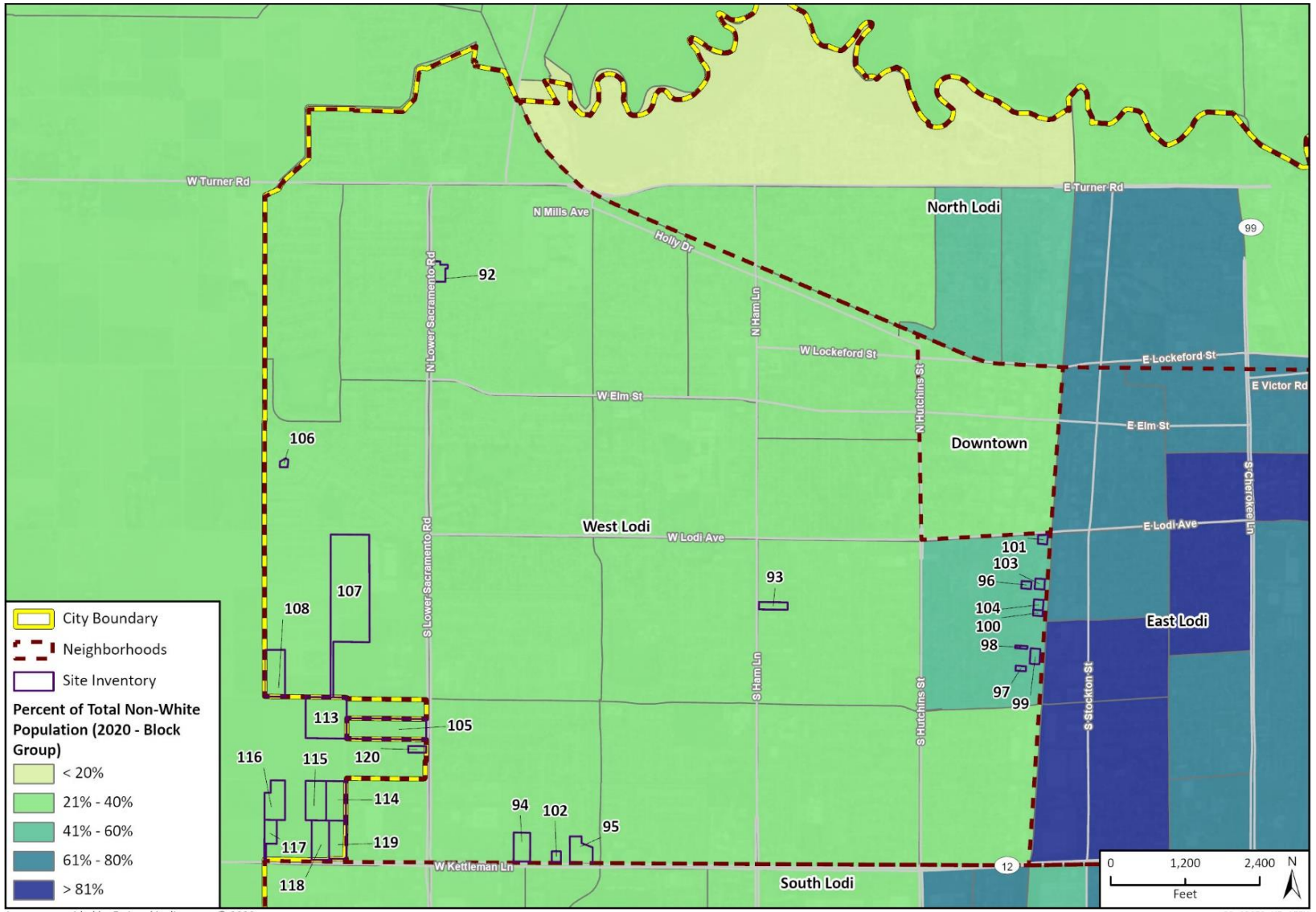
Source: AFFH Viewer 2023.

Figure 74 Housing Opportunity Sites by Percent of Total Non-White Population (East Lodi)



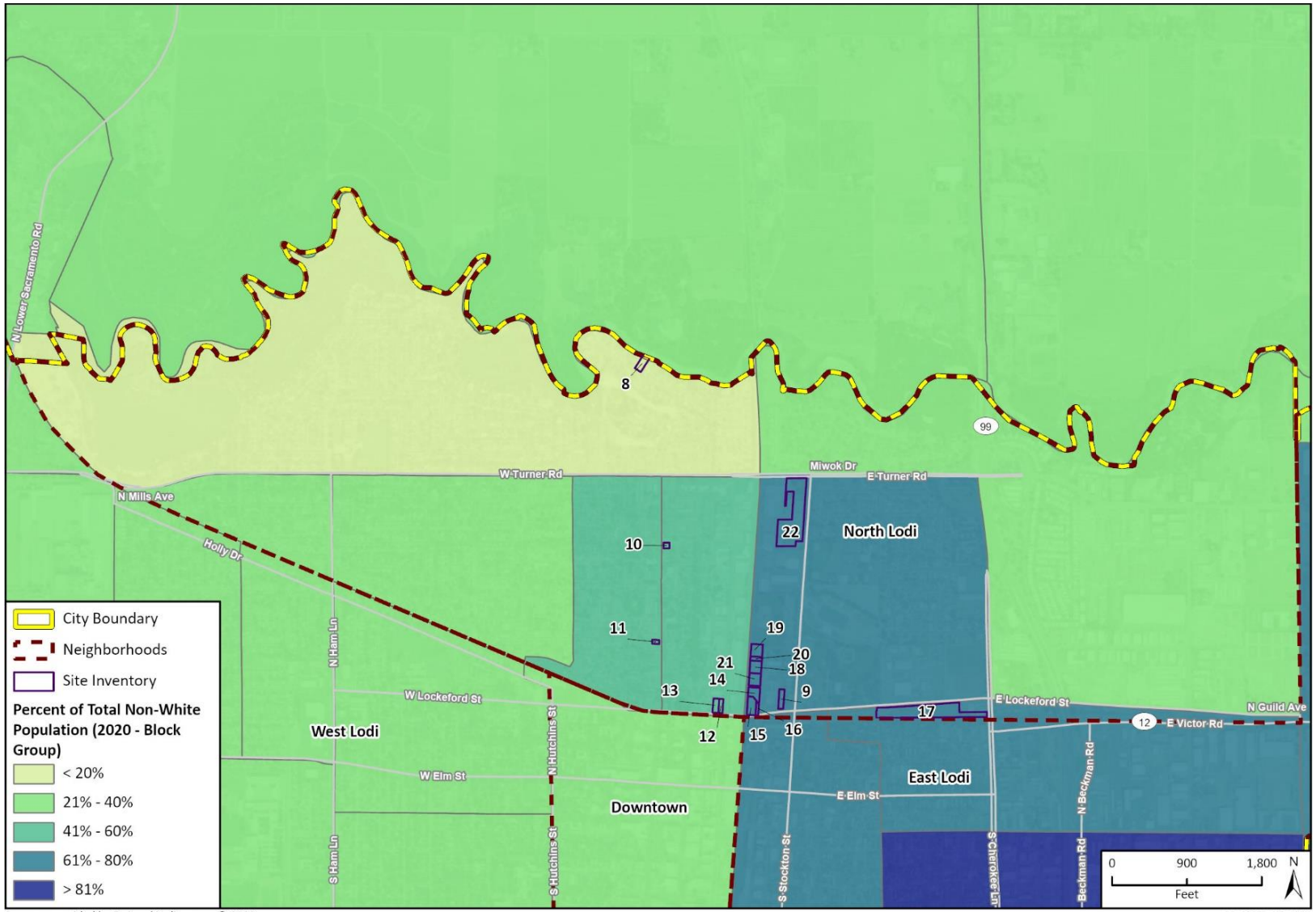
Source: AFFH Viewer 2023.

Figure 75 Housing Opportunity Sites by Percent of Total Non-White Population (West Lodi)



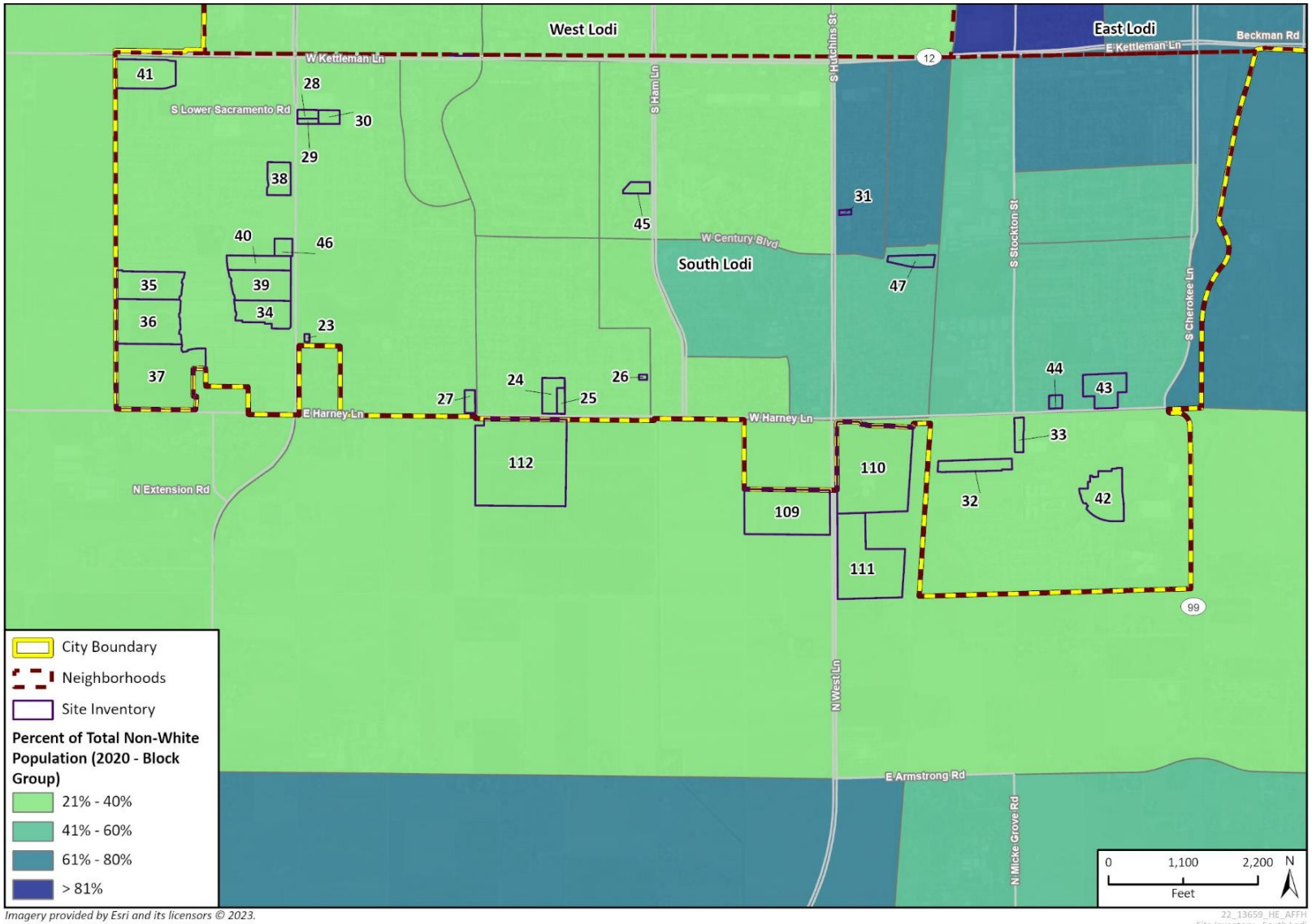
Source: AFFH Viewer 2023.

Figure 76 Housing Opportunity Sites by Percent of Total Non-White Population (North Lodi)



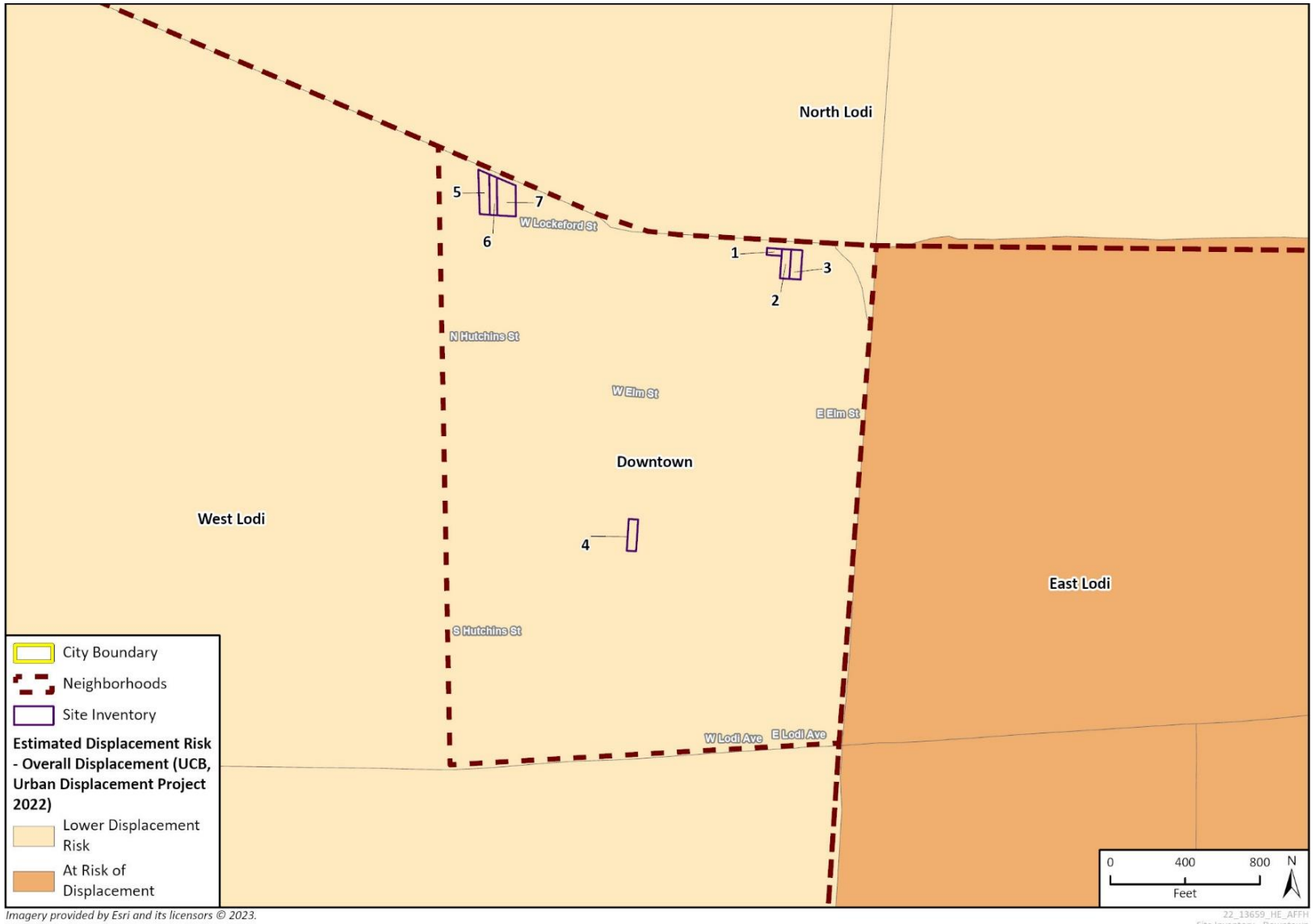
Source: AFFH Viewer 2023.

Figure 77 Housing Opportunity Sites by Percent of Total Non-White Population (South Lodi)



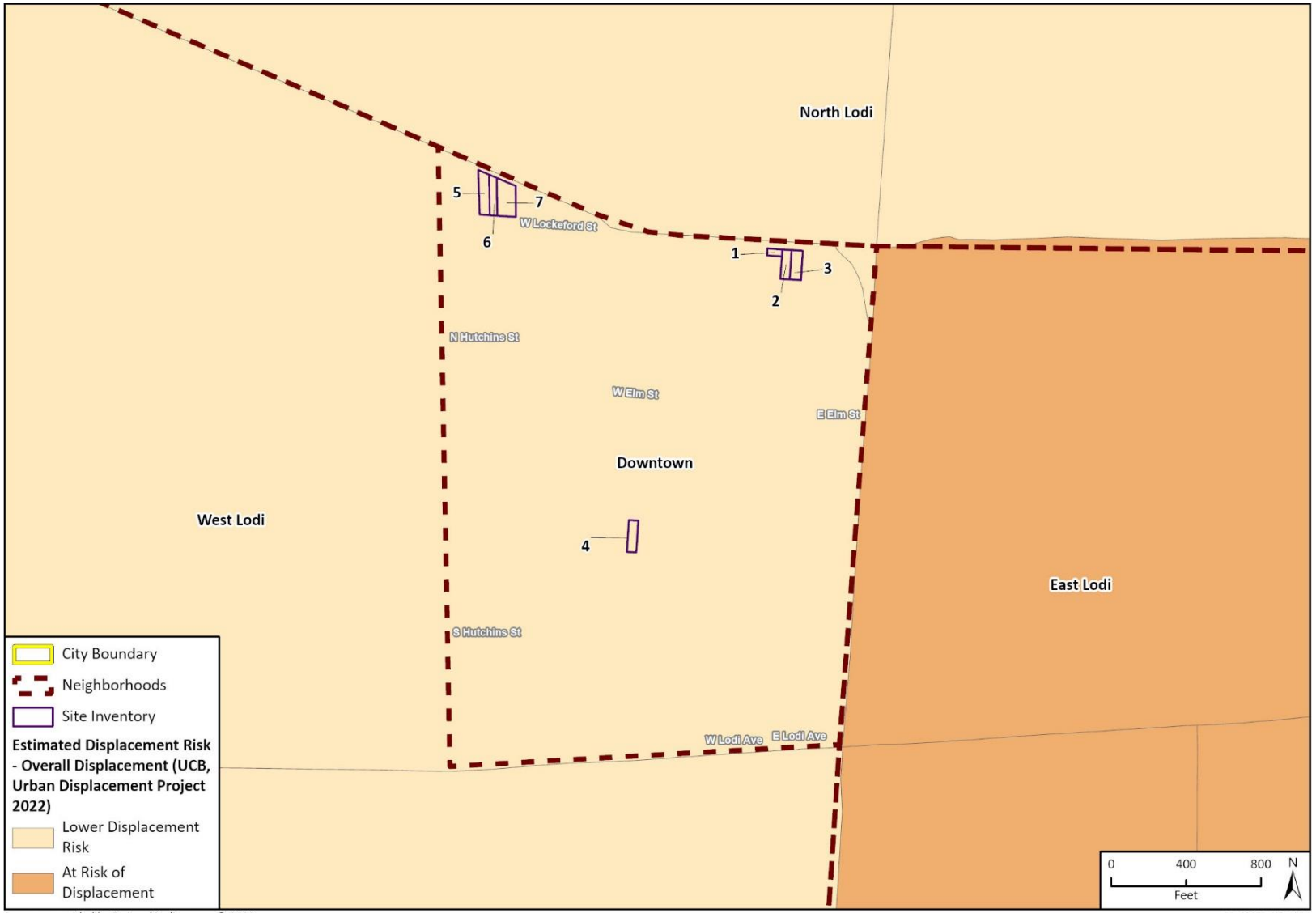
Source: AFFH Viewer 2023.

Figure 78 Housing Opportunity Sites by Displacement Risk (Downtown Lodi)



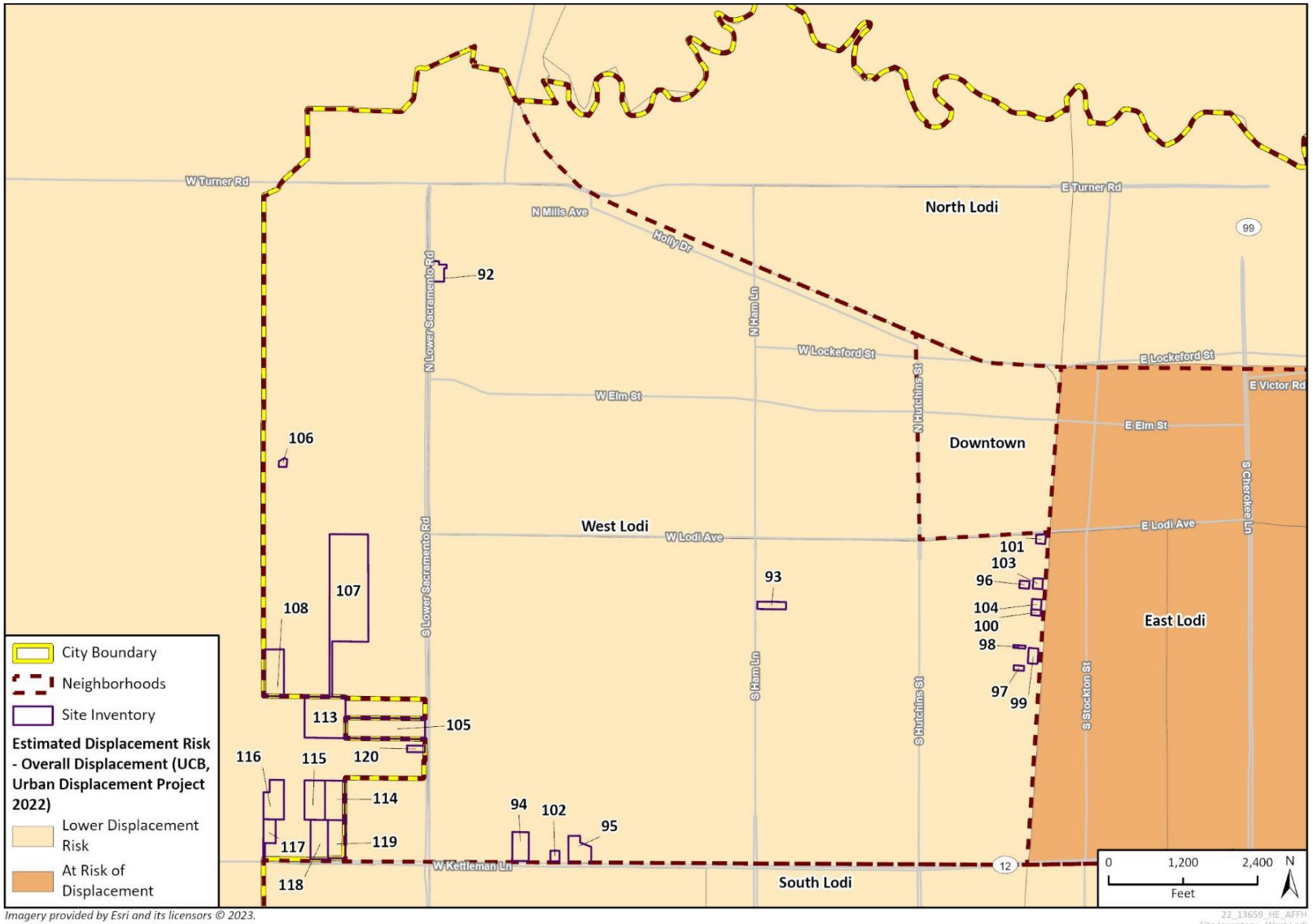
Source: AFFH Viewer 2023.

Figure 79 Housing Opportunity Sites by Displacement Risk (East Lodi)



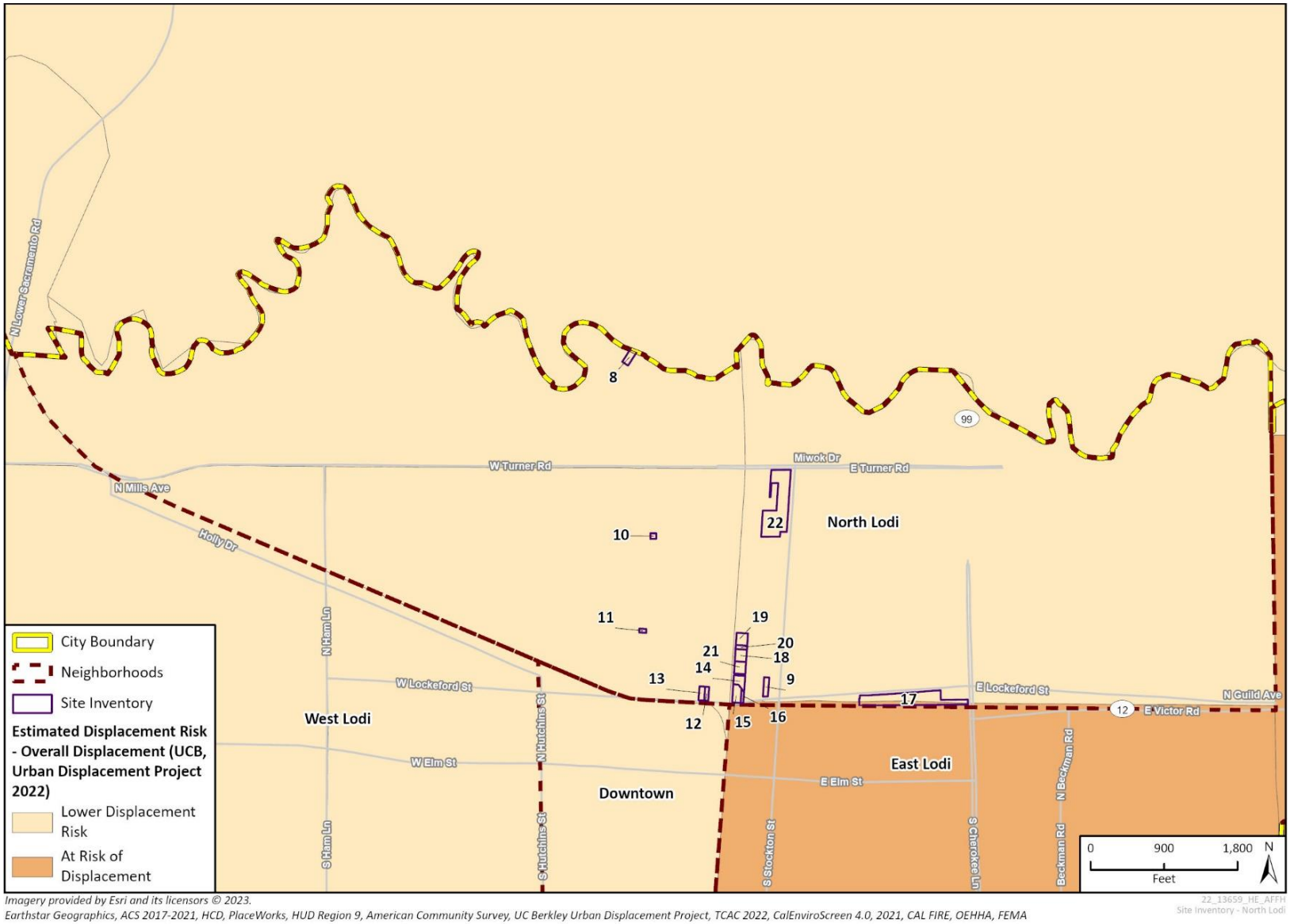
Source: AFFH Viewer 2023.

Figure 80 Housing Opportunity Sites by Displacement Risk (West Lodi)



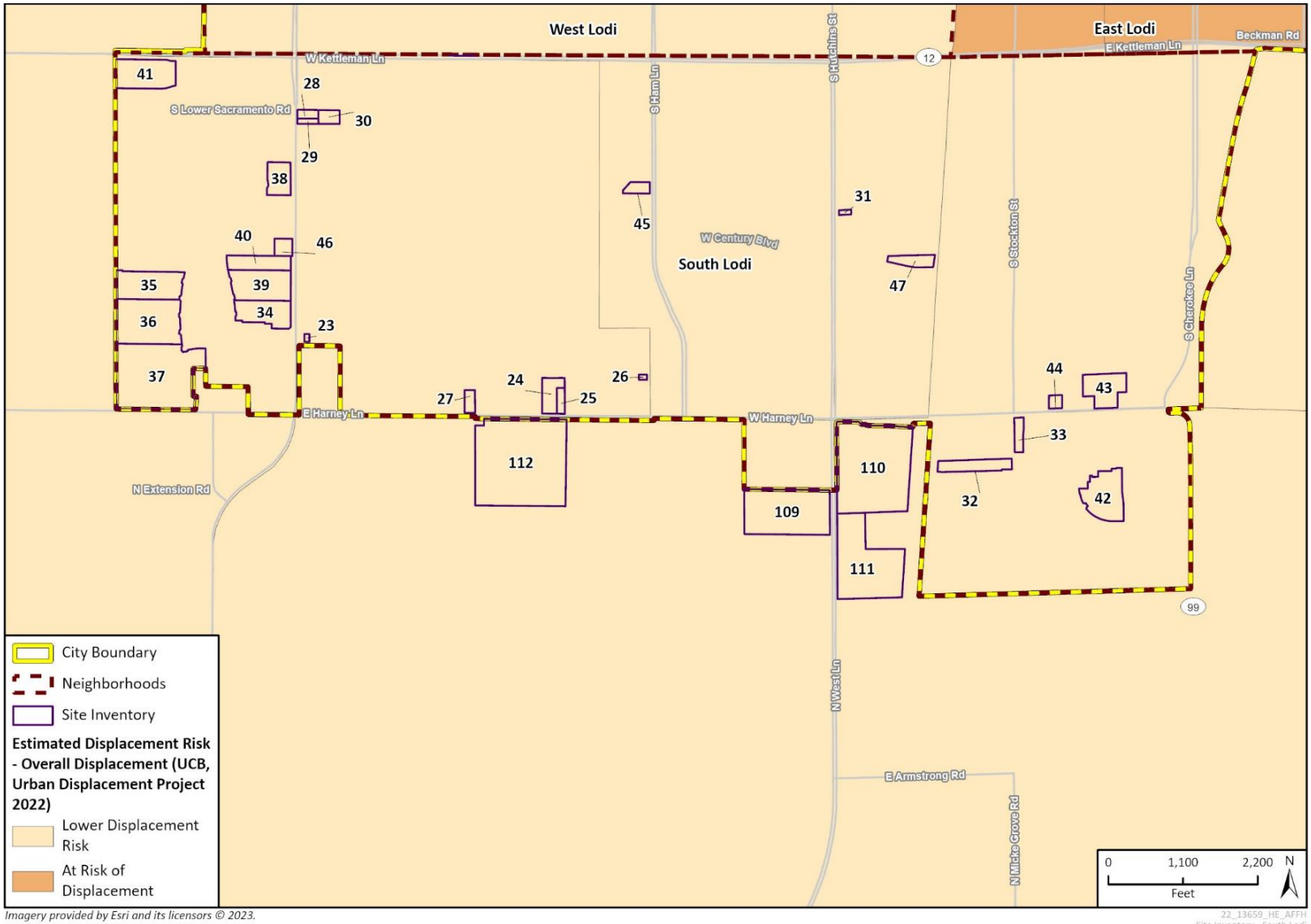
Source: AFFH Viewer 2023.

Figure 81 Housing Opportunity Sites by Displacement Risk (North Lodi)



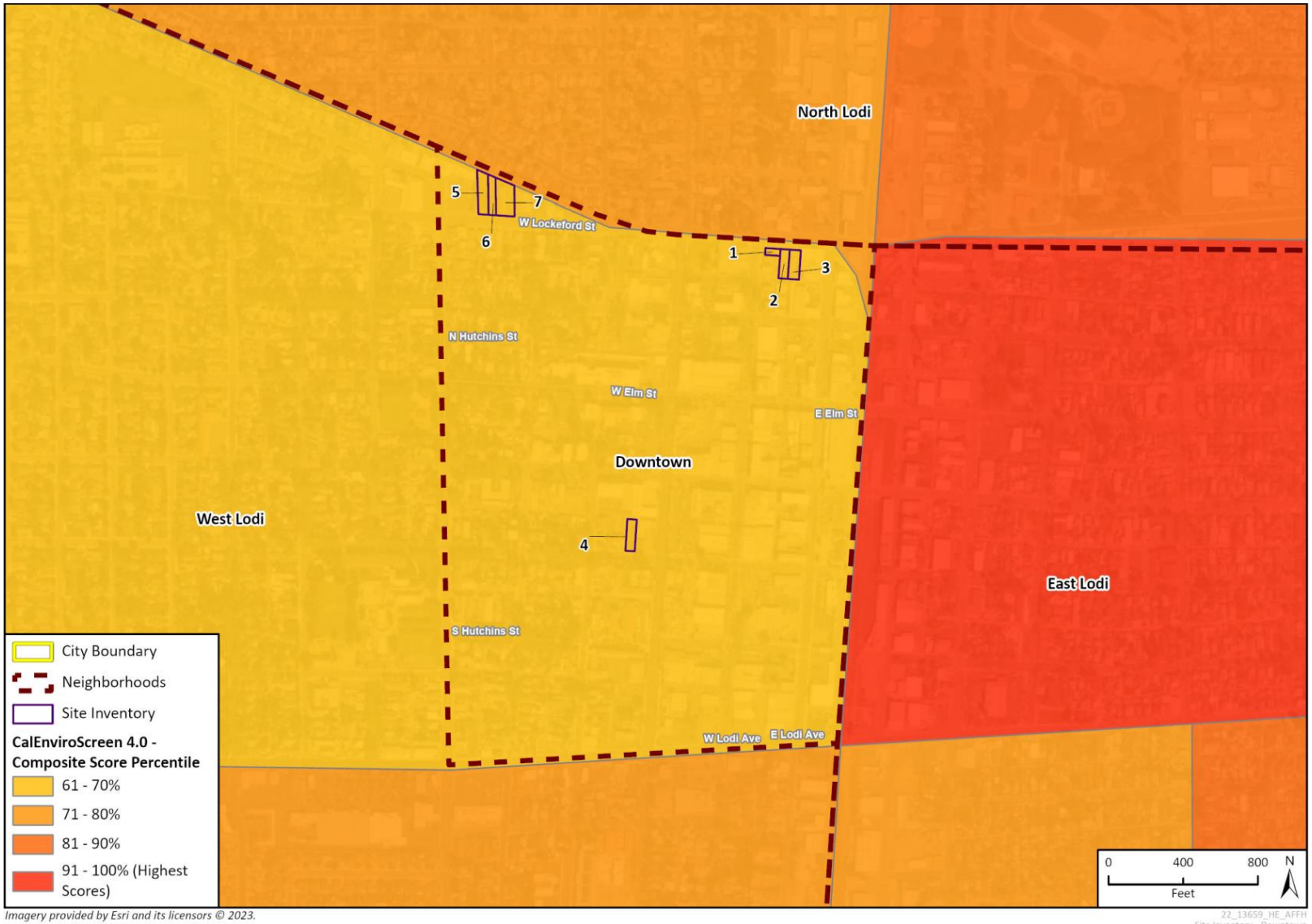
Source: AFFH Viewer 2023.

Figure 82 Housing Opportunity Sites by Displacement Risk (South Lodi)



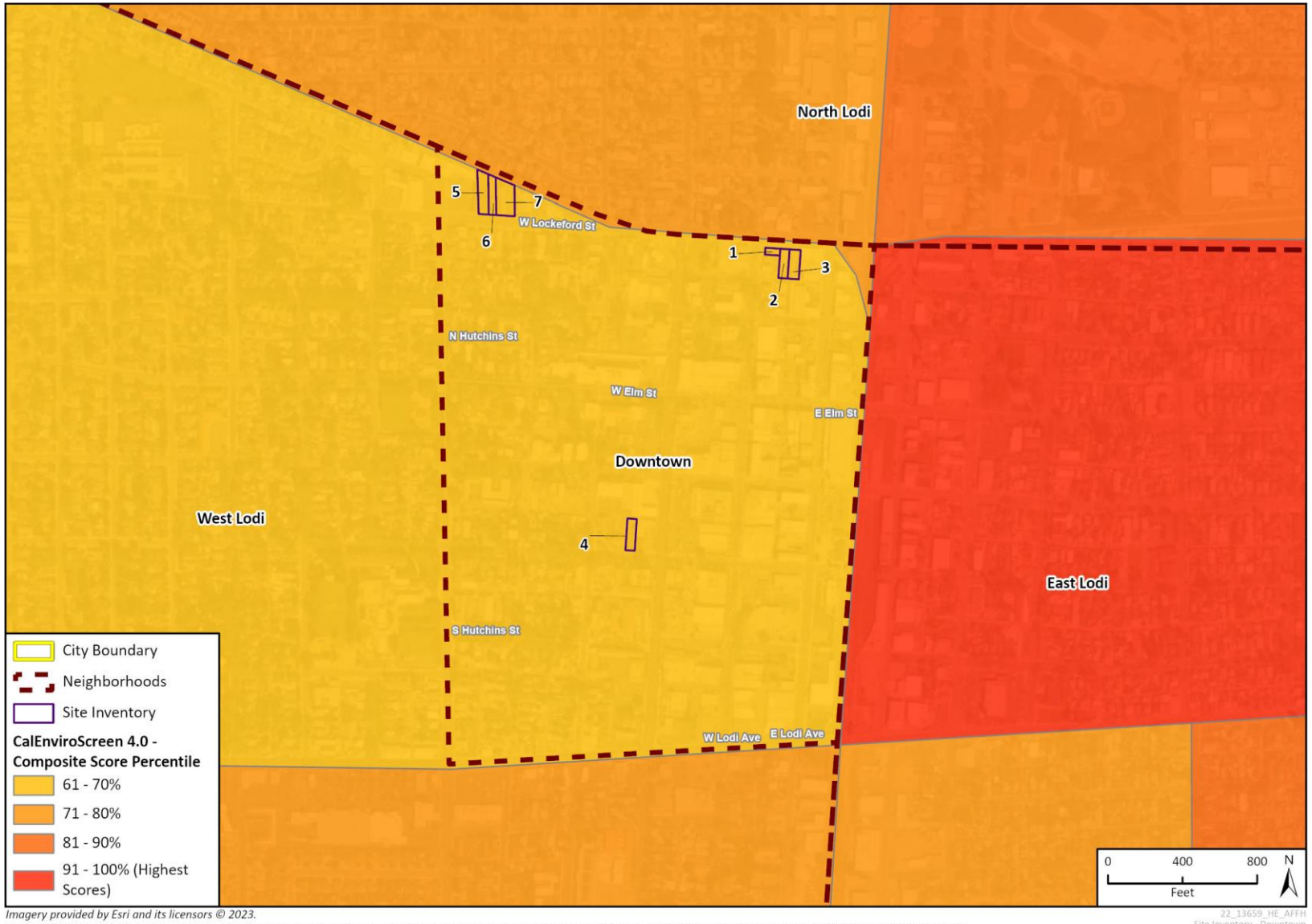
Source: AFFH Viewer 2023.

Figure 83 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (Downtown Lodi)



Source: AFFH Viewer 2023.

Figure 84 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (East Lodi)



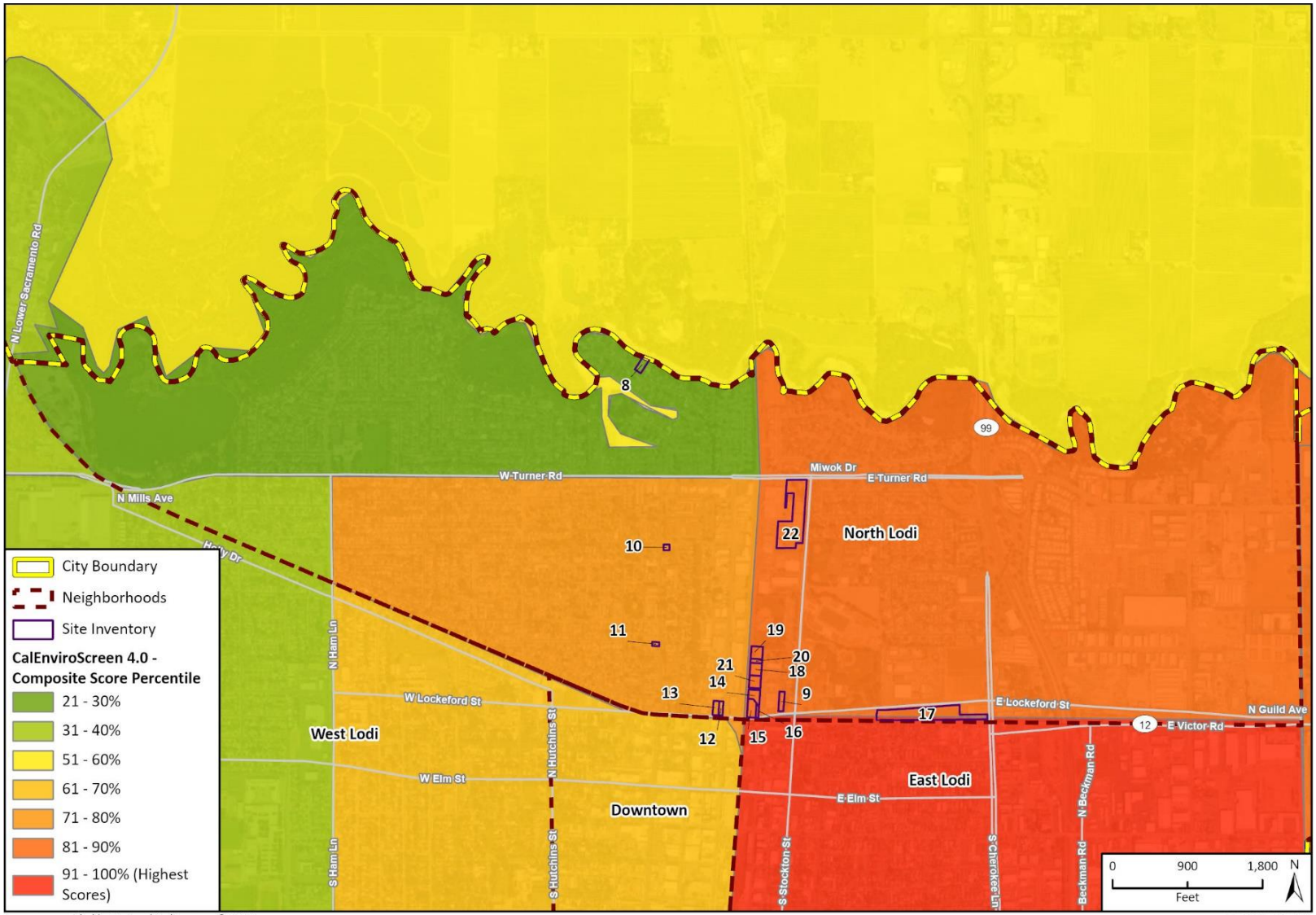
Source: AFFH Viewer 2023.

Figure 85 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (West Lodi)

Imagery provided by Esri and its licensors © 2023.
Earthstar Geographics, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, American Community Survey, UC Berkley Urban Displacement Project, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

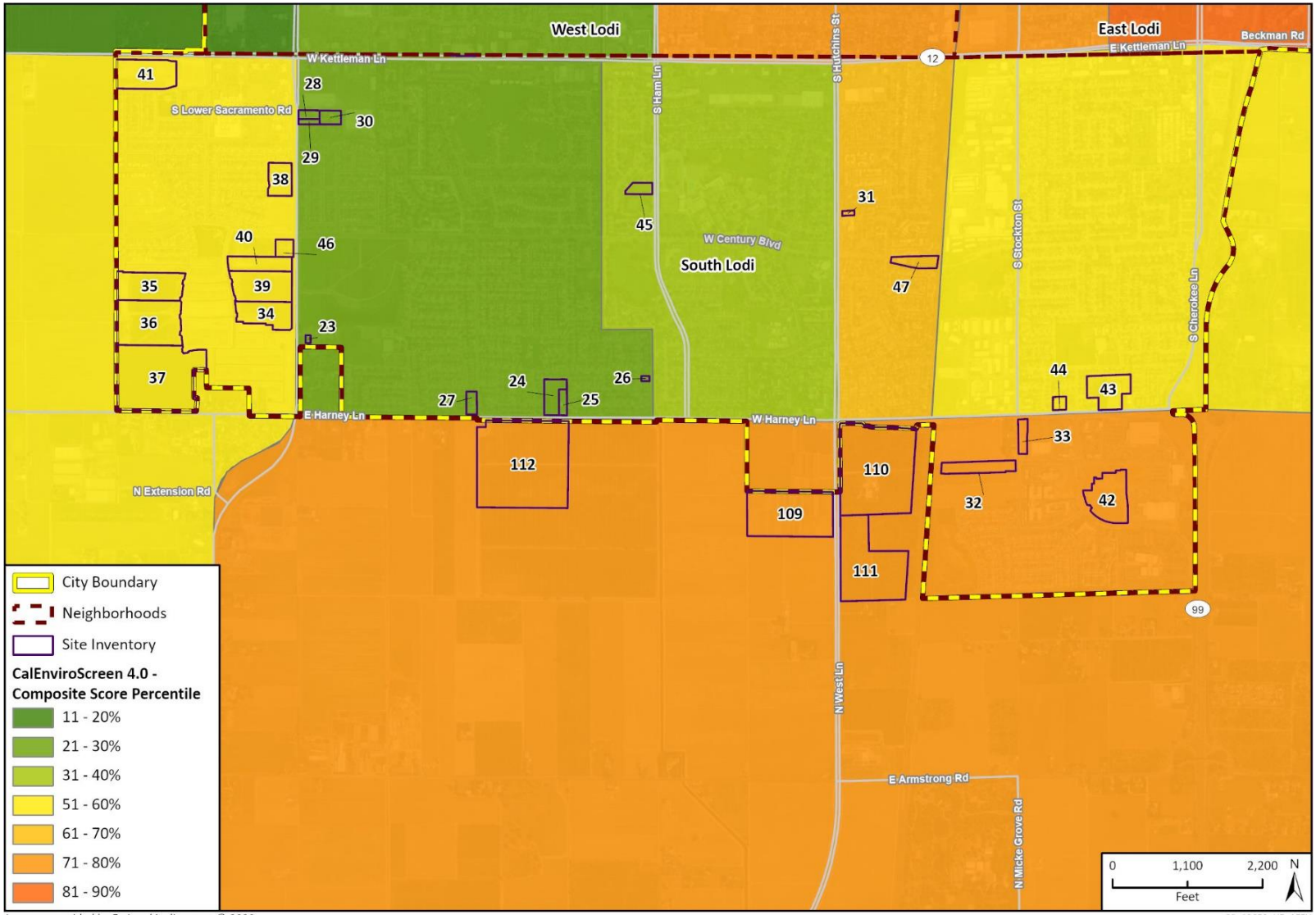
Source: AFFH Viewer 2023.

Figure 86 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (North Lodi)



Source: AFFH Viewer 2023.

Figure 87 Housing Opportunity Sites by CalEnviroScreen 4.0 Percentile Scores (South Lodi)



Source: AFFH Viewer 2023.

Table 88 Sites Inventory by Census Tract Characteristics

		Capacity						AFFH Indicators					
Census Tract	Number of Existing Households	Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	Household Median Income	TCAC Opportunity Area	Percent Low- to Moderate-Income Population	Percent Overpayment by Owners	Percent Overpayment by Renters	Percent Over-Crowded Households	Displacement Risk	CalEnviroScreen Pollution Burden Percentile
Downtown													
06077004204	1,269	0	30	0	30%	$64,349	High Resource	45%	22%	55%	5%	Lower Displacement Risk	61%
East													
06077004502	1,111	75	103	0	90%	$36,486	High Segregation & Poverty	75%	51%	53%	17%	At Risk of Displacement	85%
06077004404	1,153	117	6	5	82%	$39,188	High Segregation & Poverty	55%	38%	59%	19%	At Risk of Displacement	71%
West													
06077004104	1,480	252	152	622	22%	$110,324	Highest Resource	12%	38%	61%	0%	Lower Displacement Risk	17%
06077004303	1,023	93	0	0	28%	$93,068	Highest Resource	21%	34%	64%	2%	Lower Displacement Risk	23%
06077004201	1,249	0	0	2	33%	$77,791	Highest Resource	29%	18%	21%	10%	Lower Displacement Risk	31%
06077004302	2,280	41	25	0	46%	$57,109	Moderate Resource	53%	25%	52%	1%	Lower Displacement Risk	52%
North													
06077004501	901	80	16	23	49%	$60,846	Low Resource	42%	26%	41%	9%	Lower Displacement Risk	85%
06077004203	1,519	0	12	0	52%	$67,803	Moderate Resource	67%	40%	51%	2%	Lower Displacement Risk	61%
06077004202	705	0	0	2	25%	$130,250	Highest Resource	17%	23%	40%	0%	Lower Displacement Risk	35%
06077004502	1,111	75	0	0	90%	$36,486	High Segregation & Poverty	75%	51%	53%	17%	At Risk of Displacement	85%
South													
06077004305	2,035	39	0	21	54%	$112,230	Highest Resource	21%	25%	36%	1%	Lower Displacement Risk	17%
06077004106	611	314	41	426	29%	$106,696	Highest Resource	46%	31%	3%	12%	Lower Displacement Risk	74%
06077004307	1,404	29	0	0	41%	$63,684	High Resource	49%	21%	62%	4%	Lower Displacement Risk	23%
06077004402	1,663	116	13	20	61%	$82,849	High Resource	42%	38%	35%	6%	Lower Displacement Risk	56%
06077004308	1,264	53	7	0	74%	$61,875	Moderate Resource	45%	47%	44%	2%	Lower Displacement Risk	32%
06077004102	1,084	425	403	1,096	77%	$61,774	Highest Resource	26%	31%	31%	12%	Lower Displacement Risk	71%

This page is intentionally left blank.

State law (AB 686) requires identification and prioritization of contributing factors to fair housing issues based on all the previously required analysis. This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights. AB 686 also requires identification of metrics or quantified objectives and milestones for determining what fair housing results will be achieved.

This section lists contributing factors that create, perpetuate, or increase the severity of one or more fair housing issues that were identified in the 2022 SJV comprehensive housing report, community outreach, and the analysis in this document. Table 89 summarizes the identified fair housing issues, contributing factors to these issues, and meaningful actions The City will undertake to affirmatively further fair housing for special needs, racial/ethnic minority, and low-income residents.

Enforcement and Outreach

The AI identified a lack of information on the nature and basis of housing discrimination and lack of awareness of assistance resources available to residents. The AI also indicated that Lodi residents are reluctant to make and follow up on fair housing complaints, indicating more fair housing education and support is needed in the city.

Contributing factors to insufficient enforcement and outreach in Lodi, in order of priority, include:

1. Lack of sufficient distribution of fair housing information and lack of awareness of resources for fair housing assistance
2. Limited participation in fair housing outreach
3. Lack of sufficient fair housing enforcement
4. Lack of reporting of fair housing testing result

Segregation and Integration Patterns and Trends

East Lodi has the highest concentration of non-White residents, LMI residents, residents living below the poverty line, single-parent, and female-headed households. In particular, Hispanic/Latino residents are segregated from other racial and ethnic groups. Lodi has a concentration of higher-density residential land use designations in the eastern part of the city, including medium-density residential, high-density residential, and mixed-use land use designations.

Contributing factors to segregation and integration patterns and trends in Lodi, in order of priority, include:

1. Location of affordable housing
2. Discrimination towards renters using HCVs
3. Land use and zoning patterns
4. Rental discrimination based on race/ethnicity, nationality, and familial/marital status

Racially and Ethnically Concentrated Areas of Poverty

There is one R/ECAP located in the East Lodi neighborhood. Approximately 90 percent of residents in this area are non-White and 37 percent of residents in this area are living below the poverty line.

Contributing factors to racially and ethnically concentrated areas of poverty in Lodi, in order of priority, include:

1. Concentration of affordable housing in East Lodi
2. Land use and zoning patterns

Disproportionate Housing Needs

Housing problems are a widespread issue throughout the city. Approximately 43 percent of all households in Lodi are experiencing housing problems. Low-income residents are also at risk of displacement in part of East Lodi and part of North Lodi. According to the AI, many residents complain about poor housing conditions.

Contributing factors to disproportionate housing needs in Lodi, in order of priority, include:

1. Lack of affordable housing, especially for persons with disabilities and large households
2. Displacement of residents due to economic pressures
3. Housing units in need of repair
4. Older housing stock in East Lodi
5. Low production of new affordable housing units

Disparities in Access to Opportunities

East Lodi and the portion of North Lodi located east of State Route 99 are areas of high segregation and poverty and low resource. In contrast, Most of South Lodi, West Lodi, and the portion of North Lodi east of State Route 99 are high-resource areas. East Lodi and the portion of North Lodi located east of State Route 99 have the lowest TCAC education and economic opportunity scores and the highest pollution burden in the city.

Contributing factors to disparities in access to opportunities in Lodi, in order of priority, include:

1. High cost of housing
2. Lack of public investment in certain neighborhoods
3. Lack of variety in the types of affordable housing
4. Rental discrimination based on race/ethnicity, nationality, familial/marital status, and HCV use
5. Location of environmental health hazards
6. Lack of high performing schools

Prioritization of Contributing Factors

Based on the findings of this AFFH analysis and the City's outreach efforts, the highest priority contributing factors include the following:

- Lack of sufficient affordable housing to accommodate low-income households, households including a person with a disability, and large households
- Concentration of affordable housing and older housing units in East Lodi
- Displacement due to economic pressure

Meaningful Actions to Address Fair Housing Issues

Based on the analysis conducted in this AFFH document, Table 89 highlights the prominent fair housing issues and contributing factors that impede access to safe, affordable, and vibrant housing in Lodi. Furthermore, the findings of this analysis were used to develop meaningful actions, metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the city. The contributing factors were prioritized to better formulate policies and programs and carry out meaningful actions to further fair housing. Meaningful actions to address fair housing issues are included in the housing programs located in Chapter 2, Housing Plan.

Table 89 Fair Housing Issues, Contributing Factors, and Meaningful Actions

Program	Action	Timeline	Metric	Geographic Targeting
Enhancing fair housing outreach and housing mobility strategies (medium priority)				
4.1	Update the City's website to include fair housing rights and responsibilities for landlords and lenders. List upcoming housing classes, workshops, and events hosted by the City and partner organizations.	Quarterly	Update the City's website by January 2025.	Citywide
1.10	Partner with local organizations to distribute information on fair housing services and homebuyer education programs by distributing flyers, attending local events, social media campaigns, and educational workshops.	Annually	Coordinate with non-profit organizations, local community groups, and service organizations to increase awareness of and access to housing resources and fair housing assistance.	Citywide with an emphasis in neighborhoods with LMI households
4.7	To effectively address the requirements of Government Code Sections 8899.50 and 65583, coordinate with San Joaquin Fair Housing/other fair housing nonprofit organizations to provide fair housing and tenant/landlord services, including investigation of discrimination complaints, fair housing counseling and education, fair housing testing, and tenant/landlord counseling and mediation.	Annually	Assist at least 1,231 residents and landlords with fair housing services annually.	Citywide with an emphasis in neighborhoods with LMI households
4.7		Annually	Coordinate with SJFH to gather, analyze, and report data on fair housing complaints filed with FHCCC annually.	Citywide
4.1 &4.7	Fair Housing Services and Education: Provide informational seminars to area residential real estate agents and brokers on fair housing laws and regulations Work with tenants, tenant advocates to identify violations of fair housing federal and State fair housing laws and support prospective and existing tenants who are experiencing discrimination Provide trainings for property owners/managers on the requirements of federal and State fair housing laws to prevent discrimination.	Annually	Provide trainings on fair housing rights and services to at least 20 real estate agents and brokers annually. Engage and assist 50 renter households annually Provide trainings on fair housing rights and services to at least 20 property owners and managers annually.	Citywide with an emphasis on renters
4.1	Review the City's outreach methods annually, using feedback from resident surveys and focused discussions with community organizations to inform online, mail, and in-person outreach	Once every three years	Conduct at least one citywide resident survey every three years to obtain feedback about City outreach methods on fair housing issues,	Citywide with an emphasis on neighborhoods with non-white populations, LMI

Program	Action	Timeline	Metric	Geographic Targeting
	methods. Increase participation of historically underrepresented residents in all City housing programs and community planning activities. Collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process.		prioritizing feedback from underrepresented residents.	populations, and special needs populations (residents with disabilities, female-headed, single parent households, seniors, etc.).
4.7	Require reporting from consultants providing tenant services in Conciliation/Mediation and Legal Assistance to evaluate existing State and federal "just cause for eviction" (AB 1482, 2019-Chiu) provisions to determine if additional protections through a local ordinance is warranted.	Annually	Annually collect reporting by consultant(s) and review data.	Citywide
	Racial and socio-economic segregation concentrated in East Lodi and overall lack of affordable housing			
1.12	Diversify and expand the city's housing stock to accommodate the varied housing needs of different groups within areas of high opportunity, particularly in West Lodi, and western areas of North Lodi and South Lodi.	Annually	Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types and sizes in High and Moderate Resource areas identified by TCAC. Recommend amendments, as necessary, to accommodate added housing capacity in high opportunity areas. Review the zoning code to identify opportunities to increase and encourage a greater mix of dwelling types and sizes, specifically housing types that may accommodate moderate-income households (e.g., duplexes, triplexes, fourplexes, townhouses, courtyard buildings), in lower-density residential areas citywide, and amend the zoning code as needed.	Citywide with emphasis on West Lodi, and western areas of North Lodi and South Lodi
1.13	Promote the development of ADUs, prioritizing West Lodi, and western areas of North Lodi and South Lodi.	Four times in the planning period	Conduct four educational workshops, campaigns, or outreach events to inform and promote ADU development in the city to	Citywide with emphasis on West Lodi, and western

Program	Action	Timeline	Metric	Geographic Targeting
			residents, with at least three targeted to residents and developers in West Lodi, and western areas of North Lodi and South Lodi, by December 2030. Contact at least four community or neighborhood organizations to host workshops and/or disseminate information and hold at least two workshops about ADUs with housing developers and/or real estate professionals, by December 2030.	areas of North Lodi and South Lodi
1.13	Determine and implement strategy to promote ADUs for moderate and lower-income households.	2026, 2027	Prepare a report on potential strategies to encourage affordability of ADUs for moderate and lower-income households, including but not limited to, promoting the use of Section 8 vouchers or development of cost incentive programs or no-interest loan program for ADU developers in exchange for income restrictions. Prepare report by January 2026 and present to City Council for adoption of a pilot program by August 2026. If adopted, implement pilot program by January 2027.	Citywide
1.9	Encourage development affordable housing in West Lodi, and western areas of North Lodi and South Lodi by monitoring potential sites, actively promoting available and appropriate parcels to private and non-profit developers, and providing technical and financial assistance for affordable housing development.	2025, 2026	Identify potential sites in West Lodi, and western areas of North Lodi and South Lodi by January 2025 and promote sites to at least ten potential developers by January 2026.	West Lodi, and western areas of North Lodi and South Lodi
1.12	Identify potential sources of funding to support affordable housing development that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, low-income, and/or persons with disabilities.	Annually	Identify opportunities for grant programs for affordable housing development, such as the Community Development Block Grant (CDBG) program, HOME Investment Partnerships Program, and Low-Income Housing Tax Credits (LIHTC) by monitoring government websites and grant databases and utilizing regional resources (Housing Authority of the County of San Joaquin and non-profit	Citywide

Program	Action	Timeline	Metric	Geographic Targeting
			organizations). Prioritize and apply for grant opportunities that are most feasible to obtain and best fit the City's needs.	
1.12	Facilitate the development of housing for persons with disabilities (including developmental disabilities) through incentives for affordable housing development with services, resources, and assistance.	Annually	Support non-profit organizations and housing developers in creating 40 housing units for special needs households during the planning period or at least five units annually.	Citywide
	Improving place-based strategies to encourage community conservation and revitalization in East Lodi			
4.8	Prioritize public health, education, economic, and safety programs in lower-resource areas as defined by TCAC in coordination with area public health entities (e.g., Adventist Health Lodi Memorial), Lodi GrapeLine, Lodi Unified School District, workforce development groups, and the Lodi Police Department. Identify addresses and compile mailing list and email addresses to focus outreach to neighborhoods with higher concentrations of low-income and minority residents (East Lodi and eastern parts of North and South Lodi) to prioritize services in these areas.	2031	Develop a comprehensive, long-term community development strategy and/or program priority strategy for East Lodi and eastern parts of North and South Lodi by January 2031.	East Lodi and eastern parts of North and South Lodi
4.8	Prepare a study on transit needs for Lodi residents and identify actions to address those needs, focusing on the commuting needs of low-income residents. Work with Lodi GrapeLine to expand transit services that connect Lodi to other nearby cities, including Stockton, Sacramento, and the Bay Area.	2027, 2028	Prepare a transit needs study by 2027 and identify potential actions by 2028.	Citywide
4.8	Implement small-scale placemaking projects/events such as pedestrian improvements or parklets in East Lodi and eastern parts of North and South Lodi.	Four projects and eight events during the planning period	Implement four projects and eight events in East Lodi and eastern parts of North and South Lodi during the planning period.	East Lodi and eastern parts of North and South Lodi

Program	Action	Timeline	Metric	Geographic Targeting
4.6	Collaborate with non-profit organizations and housing developers to generate a list of small older multi-family rental properties for potential acquisition/rehabilitation and deed restriction. Work with non-profits and housing developers to obtain funding for acquisition and/or rehabilitation or acquire and rehabilitate two small rental properties.	2026, 2031	Collaborate with non-profit organizations and housing developers to generate a list of small older multi-family rental properties by 2026. Work with non-profits and housing developers to obtain funding for acquisition and/or rehabilitation by the end of the planning period.	Citywide
2.6	Prioritize capital improvement projects, including new parks and amenities, in low-resource areas (East Lodi and eastern parts of North and South Lodi). Budget for and implement plans and strategies for communities in East Lodi and eastern parts of North and South Lodi, prioritizing neighborhoods designated for low-income and mixed-income housing opportunities in the sites inventory.	Three times during the planning period	Hold at least three workshops during the planning period in East Lodi and eastern parts of North and South Lodi to develop infrastructure and programming plans that support mixed-income housing development by January 2031.	East Lodi and eastern parts of North and South Lodi

7. Goals, Policies, & Implementation Programs (Policy Document)

The provision of housing is a critical concern for cities throughout California. The housing element is a city's major statement of local housing strategy, providing an integrated set of goals, policies, and programs to improve the condition and availability of housing.

Goals and Policies

H-G1 ***Provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.***

H-P1.1 Promote the development of a broad mix of housing types through the following mix of residential densities as described in Policy GM-P4 of the Growth Management and Infrastructure Element.

H-P1.2 Regulate the number of housing units approved each year to maintain a population-based annual residential growth rate of two percent, consistent with the recommendations of the Mayor's Task Force and the Growth Management Allocation Ordinance.

H-P1.3 Facilitate and encourage the development of senior and other special needs housing near, and/or with convenient public transportation access to, neighborhood centers, governmental services, and commercial service centers.

H-P1.4 Maintain and regularly update the City's land use database to monitor vacant residential land supply.

H-P1.5 Pursue available and appropriate state and federal funding programs and collaborate with nonprofit organizations to develop affordable housing.

H-P1.6 Promote the expeditious processing and approval of residential projects that conform to General Plan policies and City regulatory requirements.

H-P1.7 Reduce the cost impact of City policies, regulations, and permit procedures on the production of housing, while assuring the attainment of other City objectives.

H-P1.8 Intersperse extremely low-, very low-, and low-income housing units within new residential developments and ensure that such housing is visually indistinguishable from market-rate units.

H-G2 ***Encourage the maintenance, improvement, and rehabilitation of existing housing stock and residential neighborhoods, particularly in the Eastside area.***

H-P2.1 Encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.

H-P2.2 Use available and appropriate state and federal funding programs and collaborate with nonprofit organizations to rehabilitate housing and improve older neighborhoods.

H-P2.3 Give housing rehabilitation efforts high priority in the use of available grant funds, especially in the Eastside area.

H-P2.4 Support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.

H-P2.5 Allow reconstruction of existing housing in the Eastside area and in commercially or industrially designated areas in the event such housing is destroyed or damaged.

H-P2.7 Enforce residential property maintenance standards.

H-G3 Ensure the provision of adequate public facilities and services to support existing and future residential development.

H-P3.1 Support the use of grant funds for the upgrading of streets, sidewalks, and other public improvements.

H-P3.2 Ensure that new residential development pays its fair share in financing public facilities and services and pursues financial assistance techniques to reduce the cost impact on the production of affordable housing.

H-P3.3 Ensure that all necessary public facilities and services are available prior to occupancy of residential units.

H-P3.4 Require that park and recreational acquisitions and improvements keep pace with residential development.

H-G4 Proactively promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other discriminatory factors.

H-P4.1 Seek to address the special housing needs of persons with disabilities, with lower incomes, large families, seniors, single-parent households, farmworkers, and persons in need of temporary shelter.

H-P4.2 Make available to the public information on nonprofit, county, state, and federal agencies that provide education, mediation, and enforcement services related to equal housing opportunity.

H-P4.3 Work with surrounding jurisdictions to address the needs of the homeless on a regional basis.

H-P4.4 Cooperate with community-based organizations that provide services or information regarding the availability of assistance to the homeless.

H-P4.5 Promote fair housing programs and services to residents and property owners in Lodi.

H-P4.6 In coordination with San Joaquin Fair Housing (SJFH), provide of fair housing education and enforcement efforts to work to protect and expand housing opportunities for all, regardless of race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, genetic information or other protected characteristic.

H-G5 Encourage residential energy efficiency and reduce residential energy use.

H-P5.1 Require the use of energy conservation features in the design and construction of all new residential structures and promote the use of energy conservation and weatherization features in existing homes.

H-P5.2 Pursue residential land use and site planning policies and promote planning and design techniques that encourage reductions in residential energy consumption.

Implementation Programs

The following programs describe actions that the City intends to implement during the time frame of this Housing Element (2023 through 2031). For some of these programs, the description includes a target (quantified objective) for the number of units to be produced or households to be assisted during the Housing Element time frame.

Program 1.1: Revise Development Code

The City will revise Title 17 of the Lodi Municipal Code (Development Code) to reduce barriers to, and provide incentives for, the construction and conservation of a variety of housing types. The City shall amend the Development Code to:

- Allow mobile home parks in all residential zones in compliance with Government Code Section 65852.7;
- Permit residential care facilities serving seven or more residents with objectivity and certainty in all residential zones, subject only to the same requirements of residential uses of similar form in the same zone to remove constraints to this housing type;
- Comply with the requirements for low barrier navigation centers in Government Code Section 65660 et seq.
- Allow supportive housing types in compliance with Government Code Section 65651, including allowing supportive housing by right in all multifamily and mixed-use zones, ensuring applications are processed within statutory deadlines, and excluding supportive housing units from minimum parking requirements;
- Update Chapter 17.36.050 (Residential Density Bonus) to reflect new maximum density bonus tier framework in compliance with California Government Code Sections 65915 through 65918.
- Allow agricultural employee housing up to 36 beds or 12 single family units in all zones allowing agricultural uses or the production of crops, in compliance with California Health and Safety Code Section 17021.6.
- Provide streamlined ministerial review for eligible agricultural employee housing development, pursuant to California Health and Safety Code Section 17021.8.
- Revise SPARC approval findings including 17.40.020(E)(1)(b), (c) and (d) to remove subjective criteria and provide approval certainty.
- Remove subjective criteria for approving reasonable accommodation requests that constrain approval certainty, including findings 17.67.050(A)(5) and (6).
- Revise the definition for “farmworker housing” within section 17.78.020 of the Development code to remove the year-round residency requirement related to permanent employee housing for farmworkers.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Complete Development Code amendments within one year of adoption of this Element.

Funding: General Fund

Objective: Reduce regulatory barriers to the provision of housing. *[Source: Existing Program 1.1, revised]*

Program 1.2: Revise Growth Management Allocation Ordinance

Although jurisdictions in San Joaquin County are exempt from the restriction on growth management policies based on its status as a predominantly agricultural county, the City will adopt amendments to the Growth Management Allocation Ordinance (GMAO) to remove constraints to housing development. To remove constraints, the City will amend the GMAO to:

- Exempt housing units affordable to extremely low-, very low-, or low-income households with long-term affordability restrictions.
- Exempt housing units affordable to moderate income households with long-term affordability restrictions in RCAAs and high resource areas.
- Provide a staff-level ministerial approval process for approving extensions to existing allocations.
- Provide allocations equivalent to one-half unit for SRO and studio units.

Responsibility: Community Development Department

Time Frame: Adopt amendments to the Growth Management Allocation Ordinance within a year of adoption of this Housing Element and evaluate implementation by the end of the planning period.

Funding: Application fees

Objective: Remove constraints to housing production *[Source: Existing Program 1.2, revised]*

Program 1.3: Personal Security Standards

The City will continue to implement design standards applicable to all new residential projects with the objective of improving the personal security of residents and discouraging criminal activity. Design standards will address issues such as the placement of landscaping, accessory buildings, and accessory structures in a manner that does not impede the City's ability to conduct neighborhood police patrols and observe potential criminal activity, lighting and other security measures for residents, and the use of materials that facilitate the removal of graffiti and/or increase resistance to vandalism.

Responsibility: Community Development Department

Time Frame: As projects are submitted to the Planning Division.

Funding: Development fees

Objective: Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety.
[Source: Existing Program 1.3]

Program 1.4: Land Inventory

The City will maintain a current inventory of vacant, residentially zoned parcels and a list of approved residential projects, and will make this information available to the public and developers, including information on underutilized sites within the downtown area with residential or mixed-use development potential. The City will update the inventory and list annually, at minimum.

To provide residential capacity to meet the RHNA shortfall, the City will rezone parcels as identified within the sites inventory analysis in Chapter 5: *Sites Inventory and Analysis* including 14.35 acres to MCO (8-35 du/ac) and 16.04 acres to RHD (15-35 du/ac), as identified in Table 72.

The City will maintain an inventory of parcels meeting the requirements of Government Code Section 65583.2(c); that is, vacant sites identified in two or more consecutive housing elements or nonvacant sites identified in a prior housing element, that are identified to accommodate housing for lower income households. This inventory shall be made available online.

Lower-income sites included in the sites inventory with a proposed zoning change, as well as vacant sites identified in two previous housing elements and non-vacant sites identified in the previous housing element, will be rezoned, incompliance with Government Code Section 65583.2(h) and (i), to:

- Permit owner-occupied and rental multifamily uses by-right (without discretionary approval) for developments in which 20 percent or more of the units are affordable to lower income households;
- Accommodate a minimum of 16 units per site;
- Require a minimum density of 20 units per acre; and
- Allow up to 100 percent residential floor area and require that residential uses occupy at least 50 percent of the total floor area of a mixed use project.

To maintain adequate sites throughout the planning period to accommodate the City's RHNA, pursuant to Government Code Section 65863, the City will monitor available residential capacity and evaluate development applications, particularly in nonresidential and/or mixed-use zones. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower-income households, the City will identify and zone sufficient sites to accommodate the shortfall to ensure that the "no net loss" provision is upheld (i.e., if any units that had been designated for subsidized housing are developed as market rate, then an equal number of units must be designated in their stead).

The inventory update of infill sites should focus on opportunity sites along Mixed Use Corridors, in the Downtown Mixed Use designation, and in residential areas downtown, as identified in the Land Use Element. The City promotes the land inventory and the availability of each update through the City's website, a notice at the Community Development Permit Counter, and a press release subsequent to each update.

Responsibility: Community Development Department

Time Frame: Maintain a current list of vacant residentially zoned parcels, as projects are approved. Rezone parcels to meet the RHNA shortfall by December 15, 2026.

Funding: General Fund; contributions from property owners

Objective: Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use.
[Source: Existing Program 1.4, revised]

Program 1.5: Pursue State and Federal Funds in Support of Housing Construction

The City will continue to pursue available and appropriate State and Federal funding sources to support efforts to construct housing meeting the needs of extremely low-, low-, and moderate-income households, permanent and migrant farmworker housing, to assist persons with rent payments required for existing housing units, to provide supportive services, and to provide on- and off-site improvements and public facilities, in support of affordable housing projects. The City takes the following actions in pursuit of State and Federal funding:

a. Meet annually with private nonprofit and for-profit affordable housing providers and public agencies that are interested in constructing affordable housing, and permanent and migrant farmworker housing (and keep in contact with them throughout the year), providing special needs housing or shelter, and/or providing supportive services for low-income and special needs residents. The purpose of the annual meetings will be to discuss priorities for lending City support for funding requests for affordable housing projects and programs during the subsequent 12 to 24 months. The City will promote these annual meetings through direct notices to private and public entities that have provided housing or supportive services in Lodi or that expressed an interest in doing so in the past.
b. Provide support to other entities (nonprofit organizations, for-profit affordable housing providers, and public agencies) that apply directly for state or federal funds. Examples of support to be provided by the City include: (1) expedited processing of planning permits that are needed before an applicant can submit a state or federal funding request or receive funds; (2) providing information to complete a funding request (such as demographic, housing, or economic statistics in support of an application); and (3) letters of support for projects or programs that the City has approved (including preliminary or conceptual approval). This can help support organizations such as the Central Valley Low Income Housing Corporation and the LOEL Foundation which provide services to extremely low-income households.
c. Apply directly for State and Federal funding under programs in which the City must be the applicant, with a goal of securing $1 million by 2028 and $2 million by 2031.

In pursuing State and Federal funding, and working with other private and public entities to provide affordable housing, the City seeks to increase the availability of housing and supportive services to the most vulnerable population groups and those with the greatest unmet needs, such as very low-income and frail seniors, persons with disabilities who cannot live independently, persons with developmental disabilities, farmworkers and their families, low-income large families, and single-parent households, particularly those with small children.

Responsibility: Community Development Department

Time Frame: For Action a., annual meetings, 2023-2031; for Action b., quarterly each year, depending on funding deadlines for specific state and federal programs, 2023-2031; for Action c. semi-annual review and assessment of funding opportunities based on (1) funding cycles and eligible activities for various state and federal programs, (2) projects and programs proposed to the City for state or federal funding, and (3) City staff capacity to prepare funding requests.

Funding: California Multi-family Housing Program, California Housing Finance Agency Affordable Housing Partnership Program, Low-Income Housing Tax Credits (State and federal), CalHome Program, Federal Home Loan Bank-Affordable Housing Program, Enterprise Community Partners, Federal Department of Housing and Urban Development Programs-Section 221(d) (low-income), Section 202 (elderly), Section 811 (persons with disabilities), National Stabilization Program, and Joe Serna Jr. Farmworker Housing Fund

Objective: 40 extremely low-, 100 very low-, and 100 low-income housing units, with a target of 50 percent in RCAAs and higher resource areas.
[Source: Existing Program 1.5, revised]

Program 1.6: Encourage Efficient Use of Land for Residential Development

The City encourages the efficient use of land for residential development while reducing the premature conversion of agricultural land to urban use. The City uses the following approaches:

- The General Plan Growth Management and Infrastructure Element guides contiguous development through the identification of three expansion phases. The third phase includes Urban Reserve designations that define future growth areas if initial phases are built out. (See the Growth Management and Infrastructure Element for details.)
- In response to the City's dual goals of preserving agricultural land/open space and supporting employment in the agriculture industry, the City will continue to implement an agricultural conservation program that requires a mitigation fee to protect and conserve agricultural lands. The fee is assessed for acreage converted from agricultural to urban use, and used for conservation easements, fee title acquisition, research, education, and capital improvement projects that benefit agriculture. (Program details and priority areas are described in the Conservation Element, Policy C-P7.) Notably, all conservation areas are outside the City's current Sphere of Influence and future growth areas as delineated in the current Land Use Element and therefore would not affect any housing sites listed in the inventory herein.
- The City will maintain a citywide inventory of potential residential infill sites. The sites will consist of vacant and underutilized lots that allow residential or mixed uses. To ensure that developers are aware of all potential multifamily residential sites, the inventory will identify nonresidential land use designations that allow multifamily residential uses. The City shall make this information available to the public by posting the inventory on the City's website and providing the inventory at the Community Development Department counter.
- The City will provide one or more incentives for high density (20 units/acre or greater) housing on infill sites such as: credits for required parking stalls; fee waivers, reductions and/or deferrals (when financially feasible); provision of priority reviews and processing; and/or abbreviated or modified processing (where permissible by law). These incentives will be in addition to those incentives available through the State density bonus laws. The City will engage regional multifamily developers and non-profit affordable housing providers annually to provide information on available incentives.

The City has adopted the San Joaquin County Multi-Species Conservation and Open-Space Plan (SJMSCP), a habitat conservation plan that seeks to protect agriculture, open space, habitat, and wildlife, in order to address the impacts of urban development and conservation of open space land. This allows project applicants to mitigate open space conversions and satisfy CEQA requirements by paying an in-lieu fee, dedicating land, purchasing credits from a mitigation bank, or proposing an alternative plan consistent with SJMSCP goals.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Require fee payment as mitigation, ongoing (2023–2031); enforce Urban Reserve designation and contiguity requirements when this Housing Element is adopted; citywide inventory of potential residential infill sites: posted in 2024 and updated as applications are processed; establish incentives to encourage residential infill development by 2025; engage developers and non-profits homebuilders annually.

Funding: General Fund

Objective: Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs. Encourage and incentivize the infill development. Incentivize the development of 100 extremely low-, 200 very low-, and 200 low-income housing units on infill parcels within developed areas of the city.
[Source: Existing Program 1.6, revised]

Program 1.7: Provide Rental Assistance

The City will continue to support the San Joaquin County Housing Authority in its administration of the Housing Choice Voucher rental assistance program (formerly called the Housing Choice Voucher Program). The City's support will include distribution of program information at the Community Development public counter and on the City website, distribution of program information to rental property owners as part of the City's code enforcement activities, annual meetings with representatives of the Housing Authority to discuss actions the City can take to encourage greater participation in the Voucher Program by rental property owners, particularly targeting properties in moderate and high resource areas. Additionally, the City will work with the Housing Authority in pursuit of additional funding to expand the number of vouchers available in the county with a goal of increasing the number of vouchers by 10 percent.

Responsibility: Community Development Department

Time Frame: Distribution of Housing Choice Voucher Program information, current and ongoing, 2023-2031; maintain information on the City website, continuously 2023-2031; engage local property owners annually, 2023-2031; meet with the Housing Authority to explore available funding opportunities twice annually.

Funding: General Fund

Objective: Increase rental property owner awareness of, and participation in, rental assistance programs. Expand the number of Housing Choice Vouchers available by 10 percent, with a target of 50 percent in moderate and high resource areas.
[Source: Existing Program 1.7, revised]

Program 1.8: Focus on Neighborhood Improvement Initiatives

The City will continue to designate a staff position, Neighborhood Services Manager (NSM), in the Community Development Department to focus on the implementation of housing and neighborhood improvement programs. Among the duties of the NSM are to:

- Develop programs and plans to support and incentivize housing, especially affordable housing, by means of new construction, rehabilitation, or acquisition;
- Implement neighborhood improvement programs on a citywide basis and develop neighborhood improvement strategies for the Eastside area;
- Ensure compliance with federal and State laws and regulations and consistency with local objectives and community requirements;
- Prepare a variety of reports on housing preservation and development, neighborhood improvement and code enforcement, and other related City activities; and
- Manage programs for housing rehabilitation, first-time homebuyer, and code enforcement.

The Community Improvement Division (formerly Code Enforcement) is responsible for enforcing City codes and ordinances pertaining to neighborhood maintenance; the NSM is tasked with coordinating activities with the Community Improvement team and the Planning Division.

Responsibility: Community Development Department

Time Frame: Maintain NSM position continuously throughout the planning period, 2023-2031; develop geographically targeted neighborhood improvement strategies for the Eastside area by 2025; coordinate with Community Improvement staff regularly.

Funding: CDBG, CalHOME Program

Objective: Improve the City's ability to focus on the implementation of housing and neighborhood improvement programs.
[Source: Existing Program 1.8, revised]

Program 1.9: Annex Land to Accommodate Future Housing Needs as Necessary

In 2022, the City approved an update to the Municipal Services Review (MSR) and Sphere of Influence (SOI). The boundaries of the 10-year horizon were expanded to include the Phase I areas in the south-east quadrant which is generally bound by East Kettleman Lane to the north, East Hogan Lane to the south, Central California Traction Company Railroad (CCTRR) to the east, and Golden State (Hwy 99) to the west. The boundaries of the 30-year horizon were expanded to include the Phase II areas in the south-east quadrant. The City has begun pursuing annexation of land within the expanded 10-year SOI area to serve the future needs of residents and conform with the 6th Cycle Regional Housing Needs Allocation (RHNA).

The annexations shall be completed within the planning period and shall include the following remaining milestones:

- Board of Supervisors approval of the Annexation and Tax Sharing Agreement(s), estimated in 2024.
- City Council approval of the Annexation and Tax Sharing Agreement(s), estimated in 2024.

- LAFCO annexation approval, estimated by 2026.
- If LAFCO does not approve the annexations, the City shall continue to pursue approval through additional LAFCO hearings throughout the planning period.
- In 2027, complete a mid-cycle review of progress toward annexations and revise RHNA calculations, potentially including rezoning additional sites (by 2028) if the annexations sites are found to be infeasible for development in the planning period.
- Provide zoning in compliance with Government Code section 65583.2, subdivisions (h) and (i) on appropriate acreage within annexation sites included as lower income RHNA capacity, including a combined total of at least 16 acres within sites 109-112. Zoning will permit owner-occupied and rental multifamily uses by-right (without discretionary approval) for developments in which 20 percent or more of the units are affordable to lower income households, allow for at least 20 dwelling units per acre, at least 16 dwelling units per site, require a minimum density of 20 units per acre and up to 100 percent residential floor area in mixed use zones and require that residential uses occupy at least 50 percent of the total floor area of a mixed use project.

To encourage development in the Phase I area, the City will continue working with developers on a strategy to identify available parcels and annexation opportunities.

The City will work to identify infrastructure needs within the City's Sphere of Influence and will work with local developers and non-profit affordable housing providers to identify and pursue funding opportunities to support needed expansion of electric, water, and sewer infrastructure services in areas most appropriate for residential development with a goal of securing $8-10 million in the planning period.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Pursue discussions with property owners about annexation, as appropriate according to housing needs, but, at minimum, by 2025 and again by 2036; engage at least 10 potential developers by 2026; identify infrastructure needs in the SOI by January 2025; engage local developers to discuss infrastructure funding opportunities annually; apply for funding to expand infrastructure as opportunities are identified; complete annexations by 2028.

Funding: Annexation and permit fees; State and Federal infrastructure grants; Potential Mello-Roos Community Facilities District (CFD) fee.

Objective: Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs; encourage the development of 320 lower- 372 moderate-, and 1,383 above moderate-units on annexation sites in the planning period.
[Source: Existing Program 1.9, revised]

Program 1.10: Provide Homebuyer Assistance

The City will pursue funding to restart the first-time homebuyer down payment assistance program. The City will continue to participate with the Housing Authority in a countywide consortium for the issuance of mortgage revenue bonds or mortgage credit certificates to assist first-time homebuyers and shall work with the Housing Authority to ensure that programs target neighborhoods in need of community investment and revitalization, such as East Lodi. The City will promote the program by providing information at the Community Development

Department's public counter and by providing a link to the program on the City's website. The City's Neighborhood Services Manager will annually contact real estate agents and mortgage lenders active in Lodi to identify opportunities for program participation.

The City will partner with local organizations to distribute information on fair housing services and homebuyer education programs by distributing flyers, attending local events, completing social media campaigns, and educational workshops. In coordination with San Joaquin Fair Housing, the City also will hold annual engagement events or advertising campaigns targeting the Eastside area.

Responsibility: Community Development Department

Time Frame: Current and ongoing, 2023-2031; continue to provide information on the City website and at the public counter; Neighborhood Services Manager to meet with local realtors and mortgage lenders annually; hold engagement events/advertising campaigns targeting lower resourced areas annually.

Funding: CDBG, HOME, CalHOME, CalHFA's California Homebuyer's Down Payment Assistance Program, Mortgage Credit Certificate or Mortgage Revenue Bonds (through San Joaquin County or a local government consortium)

Objective: 48 homebuyers: 8 very low-, 20 low-, and 20 moderate-income housing units.
[Source: Existing Program 1.10, revised]

Program 1.11: Multifamily Housing Development Standards and Design Requirements

The City will distribute information related to multifamily development standards and design guidelines through the Community Development Department's link on the City's website, informational brochures available at the Community Development Department, pre-application meetings, and a notice to the local homebuilders, realtors, and contractors associations. The City shall adopt objective design standards for affordable multifamily developments that ensure approval certainty. Finally, the City will increase height limits in the RMD zone to three stories to remove constraints to achieving maximum density in the zone.

Responsibility: Community Development Department

Time Frame: Current and ongoing (2023-2031); information is currently available on the City's website and at the public permit counter. The City also encourages pre-application meetings. These practices will continue indefinitely. A notice of the City's multifamily development standards will be distributed to industry organizations within six months of the adoption of this Housing Element and every year thereafter; adopt objective design standards for affordable multifamily developments by January 2025; amend the Development Code to allow three story residential development in the RMD zone by January 2025.

Funding: Permit Fees

Objective: Increase awareness of the City's multifamily development standards and design guidelines; establish design standards for affordable multifamily developments that provide objectivity and approval certainty.
[Source: Existing Program 1.11, revised]

Program 1.12: Diversify and Expand the Housing Stock

The City will work to diversify and expand the city's housing stock to accommodate the varied housing needs of different groups within areas of high opportunity, particularly in West Lodi, and western areas of North Lodi and South Lodi (higher resource areas). Under this Program, the City will:

a. Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types, such as "Missing Middle" housing, and sizes in higher resource areas, and recommend amendments, as necessary, to accommodate added housing capacity in high opportunity areas;
b. Identify opportunities to increase and encourage a greater mix of dwelling types and sizes, specifically housing types that may accommodate moderate-income households (e.g., duplexes, triplexes, fourplexes, townhouses, courtyard buildings), in lower-density higher resource residential areas, and amend the zoning code as needed to provide sufficient densities (10 to 20 units per acre) for these housing types and development standards appropriate to facilitate maximum densities in these areas;
c. Identify potential sources of funding to support affordable housing developments that serve the needs of special needs populations, including seniors, homeless, female-headed households, large families, low-income, and/or persons with disabilities by monitoring government websites and grant databases and utilizing regional resources, such as the Housing Authority of San Joaquin County; and
d. Facilitate the development of housing for persons with disabilities (including developmental disabilities) through incentives, such as reduced development standards, fee waivers, or financial assistance for affordable housing development with services, resources, and assistance.

Responsibility: Community Development Department

Time Frame: for action a: review by 2025, adopt amendments by 2026; for action b: identify by 2026, adopt amendments in 2026; for action c.: annually; for action d: adopt incentives by 2026.

Funding: General Fund; Community Development Block Grant (CDBG) program, HOME Investment Partnerships Program, and Low-Income Housing Tax Credits (LIHTC)

Objective: Diversify and expand the city's housing stock in higher resource areas with a goal of encouraging the development of 150 missing middle/multifamily units in higher resource areas in the planning period (action b); prioritize and apply for grant opportunities that are most feasible to obtain and best fit the City's needs, with a goal of obtaining $2 million in grant funding to support affordable housing development for special needs households in the planning period; support non-profit organizations and housing developers in creating 40 housing units for special needs households during the planning period or at least five units annually.
[Source: New Program]

Program 1.13: Accessory Dwelling Unit (ADU) Strategy

The City will establish a strategy to encourage, promote, and incentivize ADU development, particularly in low-density higher resource areas. The strategy will include, but is not limited to, the following actions:

a. Conduct four educational workshops, campaigns, or outreach events to inform and promote ADU development in the city to residents, with at least three targeted to residents and developers in higher resource areas, by December 2030;
b. Contact at least four community or neighborhood organizations to host workshops and/or disseminate information and hold at least two workshops about ADUs with housing developers and/or real estate professionals, by December 2024;
c. Prepare a report on potential strategies to encourage affordability of ADUs for moderate and lower-income households, including but not limited to, promoting the use of Housing Choice Vouchers or development of cost incentive programs or no-interest loan program for ADU developers in exchange for income restrictions; and
d. Develop pre-approved ADU plans and a guidebook to help educate residents and streamline the ADU process.
e. Submit the current ADU ordinance to HCD for review (2024) and update the Development Code within six months of findings of non-compliance with State law.

Responsibility: Community Development Department

Time Frame: for action a: every two years (4 total); for action b: every four years (2 total); for action c: Prepare report by January 2026 and present to City Council for adoption of a pilot program by August 2026; if adopted, implement pilot program by January 2027; for action d: by 2026; for action e: submit ordinance with Adopted Housing Element.

Funding: Permit Fees

Objective: Promote the development of ADUs, particularly in higher resource areas; determine and implement strategy to promote ADUs for moderate and lower-income households, with a goal of encouraging the development of 30 ADUs by 2027 and 70 by 2032.
[Source: New Program]

Program 1.14: Single Room Occupancy Housing Types

The City will allow and encourage the development of single-room occupancy (SRO) developments, in compliance with State law. Under this Program, the City will:

a. Engage the local development community to identify zones appropriate for SRO development;
b. Complete an evaluation of the Development Code to identify constraints to the development of SROs and potential incentives to encourage development;
c. Adopt amendments to the Development Code to allow SROs as an allowed use without a conditional use or other discretionary permit, in zones identified under action a; and
d. Amend zoning regulations to include appropriate development standards that encourage and incentivize SRO development based on the conclusions of the evaluation under action b.

Responsibility: Community Development Department

Time Frame: for actions a and b: 2024, for actions c and d: 2025.

Funding: General Fund

Objective: Remove constraints to SRO housing types with a goal of developing 40 extremely low-and very low-income SRO units in the planning period.
[Source: New Program]

Program 1.15: Zoning for Emergency Shelters

To ensure compliance with Government Code section 65583(a)(4), as amended by AB 2339, the City shall:

a. In 2024, amend the Development Code to expand the definition of emergency shelter to include interim interventions, including, but not limited to navigation centers, bridge housing, and respite or recuperative care.
b. In 2024, adopt parking standards for emergency shelters that require no more than is sufficient to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking than other residential or commercial uses within the same zone.
c. In 2024, identify and evaluate candidate zones appropriate for emergency shelters in compliance with State law; complete a capacity analysis for each zone to ensure sufficient capacity to meet the housing need identified in the most recent point in time count.
d. By 2026, amend the Development Code to allow emergency shelters by right (without conditional or other discretionary permit) with appropriate development standards in a zone that allows residential uses, is in proximity to transportation and services, and contains sufficient capacity to meet the need identified in the annual PIT count.

Responsibility: Community Development Department

Time Frame: for actions a, b, and c: 2024, for actions d: by 2026.

Funding: General Fund

Objective: Remove constraints to the development of emergency shelters with a goal of encouraging capacity to meet the annual point in time count survey.
[Source: New Program]

Program 1.16: City-owned Sites/Surplus Land Act

The City maintain compliance with all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as "surplus properties" under California Law throughout the planning period.

The sites inventory identifies city-owned sites as capacity to meet the RHNA. These sites are summarized in Table 68. The City intends to make these four properties available through the Surplus Land Act process over the next two years. The City shall conduct studies of each site to determine the most efficient use for housing, including engagement with local affordable housing developers to determine site constraints and potential policies to meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by 2026. The City anticipates two- years to enter into an Exclusive Negotiation Agreement

(2026), and one-and-a-half additional years for land use entitlements and development agreements (2027-2028). In implementing this program, the City shall:

- Engage local affordable housing developers immediately to identify opportunities and potential incentives.
- Assess City-owned sites to determine the most efficient use for affordable housing development within the first year following adoption.
- By 2026, implement an action plan to sell, or release an RFP to develop, City-owned land for affordable housing development based on the findings of the sites assessments and engagement with developers.
- By 2026, adopt incentives for affordable housing on City-owned sites based on engagement with the development community.
- Target Exclusive Negotiating Agreement in 2026
- Target land use entitlements issuance in 2027 or 2028 and building permits in 2029
- Through this program, encourage the development of 101 lower income units on City-owned sites in the planning period.

In 2027 the city will evaluate progress toward completion in the planning period, and in the event that any of these City-owned sites are found to be infeasible for development in the planning period, the City will identify and rezone alternative sites to accommodate the RHNA by 2029.

Responsibility: Community Development Department

Time Frame: Various, see program details.

Funding: General Fund

Objective: 101 lower income units on City-owned sites in the planning period.

[Source: New Program]

Program 1.17: Large Sites

To facilitate the development affordable housing on existing large sites (10+ acres) identified in the sites inventory as lower-income capacity, including sites 107 to 112, the City shall:

- By 2025, adopt incentives to encourage the development of large RHNA sites (over 10 acres) on parcels of appropriate sizes (one to 10 acres) potentially including, but not limited to, expedited approval of lot splits or creation of new parcels to facilitate parceling at appropriate sites (one to ten acres), and fee waivers, reductions, or deferral;
- Continue to require land dedications for affordable housing development as a condition of approval for residential subdivisions;
- Engage local affordable housing builders immediately upon receiving land dedications; with a goal of competing land transfers in support of affordable housing development within six months of dedication; and

- In 2027, complete a mid-cycle review of development activity related to large RHNA sites and revise RHNA calculations, potentially including rezoning additional sites (by 2029), if the sites are found to be infeasible for development in the planning period.

Responsibility: Community Development Department

Time Frame: Adopt incentives by 2025; complete mid-cycle evaluation in 2027.

Funding: General Fund

Objective: Facilitate the development of 460 lower income units on RHNA listed large sites.
[Source: New Program]

Program 1.18: Ensure Consistency with General Plan

The City will annually evaluate the Housing Element, General Plan, and Development Code to identify and correct inconsistencies between the documents.

Responsibility: Community Development Department

Time Frame: Evaluation: annually by April 1, adopt changes: within 6 months of identification of inconsistencies.

Funding: General Fund

Objective: Maintain consistency throughout the planning period.

Program 1.19: Non-Vacant Sites

The City shall complete a mid-term evaluation of development activity on non-vacant sites identified as capacity to meet the RHNA. If permitting trends are not meeting the objectives of this program, the City shall adopt additional incentives to encourage development on these sites or revise RHNA calculations, potentially including rezoning additional sites.

Responsibility: Community Development Department

Time Frame: Complete mid-cycle evaluation in 2027; adopt incentives or revise RHNA calculations in 2028.

Funding: General Fund

Objective: Facilitate the development of 213 units (161 lower, 47 moderate, and 5 above-moderate) on non-vacant sites in the planning period, including 75 units by 2028.
[Source: New Program]

Program 2.1: Assist the Eastside Area with Housing Rehabilitation and Code Enforcement

The City will continue to combine community improvement (formerly code enforcement) and housing rehabilitation assistance, targeted to the Eastside area. Community Improvement falls under the purview of the Community Development Department, while the Neighborhood Services Manager (NSM) is responsible for coordinating rehabilitation efforts. The NSM will promote its program through the Lodi Improvement Committee and Fairy Yard Mothers of Lodi, as well as by providing information at the Community Development Department's public counter

and through a link to the program on the City's website. The NSM will work with the Improvement Committee and Fairy Yard Mothers to continue marketing the program to residents and property owners in the target areas.

Responsibility: Community Development Department

Time Frame: Current and ongoing, 2023-2031; Promote/market program annually, at minimum.

Funding: CDBG, HOME, CalHOME funding

Objective: Improvement of 150 units (including private investment to correct code violations) over the planning period of this Housing Element: 50 extremely low/very low-, 50 low-, and 50 moderate-income.
[Source: Existing Program 2.2, revised]

Program 2.2: Implement Property Maintenance and Management Standards

The City will continue to implement standards for private property maintenance (Chapter 15.30 of the Municipal Code) to (1) control or eliminate conditions that are detrimental to health, safety, and welfare; (2) preserve the quality of life and alleviate certain socioeconomic problems created by physical deterioration of property; and (3) protect property values and further certain aesthetic considerations for the general welfare of all residents of the City of Lodi.

Responsibility: Community Development Department, Neighborhood Services Division (implementation)

Time Frame: Code enforcement on both complaint and proactive basis; current and ongoing, 2023-2031.

Funding: Inspection fees, code violation penalties, CDBG funds (for dwelling units occupied by low-income households)

Objective: Eliminate substandard building and property conditions.
[Source: Existing Program 2.3]

Program 2.3: Conduct a Housing Condition Survey

The City will conduct a housing survey to document its efforts at improving housing conditions and to identify future areas and housing types for targeting its code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts. This program will be carried out in coordination with the updated Analysis of Impediments to Fair Housing Choice and 5-year Consolidated Plan.

Responsibility: Community Development Department

Time Frame: Complete survey and report to City Council by January 2025.

Funding: CDBG, General Fund

Objective: Document housing conditions and establish priorities for future code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts.
[Source: Existing Program 2.4]

Program 2.4: Preserve Affordable Rental Housing

There are currently no affordable units at risk of converting to market rate in Lodi. However, if in the future units become at risk, the City would coordinate a meeting or series of meetings between the Housing Authority, local nonprofits, and the owner (or owner's representative) to discuss the owner's intentions to remain or opt out of the federal Housing Choice Voucher (Section 8) Program and future plans for the property. If the owner intends to convert the apartments to market-rate housing or sell the property, the City will seek to facilitate the acquisition of the property by a nonprofit or other entity to preserve the rental units as affordable housing. The City would not take part directly in negotiations regarding the property, but would apply for State or Federal funding on behalf of an interested nonprofit entity, if necessary, to protect the affordability of the rental units. The City would request that the property owner provide evidence that it has complied with State and Federal regulations regarding notice to tenants and other procedural matters related to conversion and contact HUD, if necessary, to verify compliance with notice requirements.

Responsibility: Community Development Department

Time Frame: Implement this program as necessary.

Funding: Minimal administrative cost to coordinate meetings; CDBG, HOME, CalHFA, Multi-family Housing Program, and Section 207 Mortgage Insurance for Purchase/Refinance (HUD) as potential funding sources for preservation

Objective: To preserve affordable rental housing units.
[Source: Existing Program 2.5]

Program 2.5: Target the Eastside Area for Use of Funds for Public Improvements

The City will continue to target a portion of its annual CDBG allocation for public improvements in the Eastside area in support of its housing rehabilitation and neighborhood improvement activities. The General Plan Land Use Diagram identifies the Eastside area for medium and high-density residential, acknowledging opportunities for redevelopment and reinvestment through density increases. Public investment is intended to stimulate private investment in order to preserve the character of the neighborhood and introduce new housing, while also improving streetscapes and connections to downtown. In addition, the City will continue the practice of including conditions in developer agreements of major projects to pay for rehabilitation of housing units. Funds can be specifically directed toward units for extremely low- and very low-income households and supportive housing providers, and will be negotiated on a case-by-case basis.

Additionally, under this Program the City will:

a. Provide $55,000 in 2024 to support the construction of the Boys and Girls Club's Sunshade Project, with a goal of impacting 414 youths annually.
b. Provide $32,773 by 2025 to complete graffiti abatement programs to promote safer neighborhoods and increase resident pride. The programs will remove graffiti from public/private, residential, nonresidential, public facilities and improvements surfaces in the Eastside area with the goal of impacting 20,000 individuals.

c. Provide $225,000 in 2023 to complete improvements to park access at Hale Park. The project will include removing and replacing existing deteriorating chain link fencing and resurfacing existing sport courts, with a goal of benefitting 19,000 residents annually.
d. Prioritize capital improvement projects, including new parks and amenities, in the Eastside area by budgeting for and implementing plans and strategies for the Eastern Area, prioritizing neighborhoods designated for low-income and mixed-income housing opportunities in the sites inventory; hold at least three workshops during the planning period in the Eastside area to develop infrastructure and programming plans that support mixed-income housing development by January 2031.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Apply for funding bi-annually, at minimum; annual CDBG allocation, maintain zoning, 2023-2031; action a.: 2024; action b. 2025; action c.: throughout the planning period; action d: three workshops during the planning period and complete strategy by 2031.

Funding: CDBG, permit fees, impact fees

Objective: Preserve and improve the Eastside area, with a goal of assisting in the rehabilitation of five extremely low- and five very low-income units; complete one improvement project each year; for detailed objectives: see descriptions of actions a-d.
[Source: Existing Program 2.6, revised]

Program 2.6: Replacement Unit Program

The City will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, or
- subject to any other form of rent or price control through a public entity's valid exercise of its police power, or
- occupied by low or very low-income households.

Responsibility: Community Development Department

Time Frame: Adopt policy in 2024.

Funding: General Fund

Objective: Mitigate the loss of affordable housing units by requiring new housing developments to replace all affordable housing units lost due to new development.
[Source: New Program]

Program 3.1: Collect Development Impact Fees and Enforce Improvement Requirements

The City will continue to collect a unified development impact fee to pay for off-site public facilities and services needed for residential development and require that residential developers continue to provide on-site infrastructure to serve their projects. The City will continue to charge fees that reflect the actual cost of service provided to housing units anticipated by this Element. Prior to the issuance of building permits, the City will require evidence that the developer has paid the required school impact fees.

The City will annually review fees to ensure they do not pose a constraint to development.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Annually review fees

Funding: General Fund

Objective: Reduce impact fees for multifamily projects based on actual project densities. Complete four off-site public facilities and/or service improvement projects in the Eastside area.
[Source: Existing Program 3.1]

Program 3.2: Ensure Adequate Public Services for Residential Development

The City will continue to use its Growth Management Allocation Ordinance to ensure that the pace of development is consistent with the City's and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community. The City will contact other public facility and service providers annually during the housing unit allocation process to ensure that these agencies can serve the increased number of housing units to be allocated.

The City will establish specific procedures providing priority access to water and sewer infrastructure to developments with units affordable to lower income households, as required by State law.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Annually during housing allocation process, 2023-2031; priority access to water and sewer: implement immediately; establish procedure in 2024.

Funding: Application fees, development impact fees

Objective: Provide public facilities and services meeting minimum City standards.
[Source: Existing Program 3.2]

Program 3.3: Use of CDBG Funds

The City will continue to use CDBG funds to upgrade public facilities and services in older neighborhoods. (See Program 2.6 for implementation.) *[Source Existing Program 3.3]*

Program 3.4: Support Transit Facilities and Transit-Oriented Development

To coordinate the availability of public transit as Lodi develops and to support transit-oriented development (TOD) on infill sites and properties with reuse potential, the City will:

a. Ensure the continued construction of transit facilities, facilitate adequate transit service, and lower the cost of living within the community, with funding to be paid from traffic impact fees, state and federal funding sources, and "Measure K" sales tax funds;
b. Promote development opportunities in mixed use zones through a link on the City's website, an information bulletin to be distributed to property owners within these zones, and with developers and business organizations in Lodi, and one or more meetings with business and community organizations to explain the benefits and implications of mixed use zoning designations for development opportunities;
c. Adopt a Downtown Specific Plan that sites mixed use and high-density multifamily uses near transit facilities, and promotes transit-oriented development in Downtown Lodi; and
d. Within the Downtown Specific Plan effort, update and modernize the 12-year-old Transit-Oriented Development Design Guidelines for the Downtown to include an examination of highest and best uses, through a balance of commercial and residential infill sites, to further encourage a vibrant walkable downtown with access to transit facilities.

Through the Downtown Specific Plan and updated Transit Oriented Development Design Guidelines, develop TOD in Lodi's downtown, establishing a framework for infill development and public improvements, such as streets and open spaces.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: For Action a., annually, prior to the adoption of a City budget, 2023-2031; for Action b., within one year of adoption of this Housing Element; for Actions c. and d., within two years of adoption of this Housing Element.

Funding: General Fund

Objective: Increase housing opportunities near transit facilities and encourage forms of travel other than private vehicles. All income groups will be targeted for TOD housing. However, extremely low-and very low-income households that may rely on transit as their primary transportation mode should be prioritized.
[Source: Existing Program 3.5, revised]

Program 4.1: Promote Fair Housing Services

The City will promote equal housing opportunity for all persons in compliance with state and federal laws by continuing to provide funding for the operation of the City's Affirmatively Furthering Fair Housing Program. Under the program, the City provides information to the public on state and federal fair laws, provides referrals to County, State, and Federal agencies for investigation of fair housing complaints, and provides financial support to San Joaquin Fair Housing, which provides landlord-tenant mediation services.

The City currently collaborates with San Joaquin Fair Housing (SJFH) to promote fair housing information and resources at an annual community event and promotes fair housing activities and resources by providing links through its website to nonprofit, County, State, and Federal agencies; providing fair housing information at the Community Development Department public counter; designating a point of contact in the department to handle fair housing inquiries; and distributing fair housing information at public locations in the city (such as the Lodi Public Library and the LOEL Senior Center).

Under this Program the City will also:

a. Update the City's website bi-annually to include fair housing rights and responsibilities for landlords and lenders and to list upcoming housing classes, workshops, and events hosted by the City and partner organizations;
b. Distribute fair housing information through social media and public outreach campaigns, as well to the Access Center, LOEL Senior Center, and other local organizations annually and as events are scheduled;
c. Provide annual informational seminars to area residential real estate agents, mortgage lenders, and property owners on fair housing laws and regulations, with a goal of providing trainings to at least 20 real estate agents and lenders and 20 property owners annually; and
d. Review the City's outreach methods annually, using feedback from resident surveys and focused discussions with community organizations to inform online, mail, and in-person outreach methods, with a goal of conducting at least one citywide resident survey every three years to obtain feedback about City outreach methods on fair housing issues, prioritizing feedback from underrepresented residents.

Responsibility: Community Development Department

Time Frame: Current and ongoing, 2023–2031; annual community events for display of fair housing information targeting the Eastside area; publish fair housing links on the City's website; for action a.: every two years beginning in 2025; for action b: annually; for action c: annually; for action d: in 2024, 2027, and 2030.

Funding: CDBG

Objective: Provide information on fair housing law to the public and support landlord-tenant mediation services; increase participation of historically underrepresented residents in all City housing programs and community planning activities; collaborate with existing and new community stakeholders from all sectors and geographic areas to engage in the public participation process. *[Source: Existing Program 4.1, revised]*

Program 4.2: Regulate Condominium Conversion

The City will continue to regulate the conversion of rental housing to condominium or stock cooperative ownership to reduce the displacement of extremely low-, very low-, low-, and moderate-income households (see Title 15 of the Lodi Municipal Code). The regulations ensure that:

- Residential condominium conversion projects are consistent with the Housing Element of the General Plan and State law;
- Converted dwellings meet safety, quality, and appearance standards;
- Purchasers of converted dwelling units are fully informed as to the physical condition of the structure and facilities;
- Tenants are provided with notice of the conversion, relocation benefits, first right of refusal; and
- The City maintains a supply of affordable housing.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Ongoing, 2023-2031 and as conversions come forward.

Funding: Application fees

Objective: Minimize the impact of displacement of very low-, low-, and moderate-income households and assure safety of converted units.
[Source: Existing Program 4.2, revised to provide "first right of refusal"]

Program 4.3: Pursue Regional Solutions to Homeless Needs

The City will continue to support regional solutions to homelessness through its collaboration with the Salvation Army and funding and expansion of the Access Center, which provides extensive wraparound services in addition to overnight shelter, meals, and hygiene facilities. The City will participate in and support the Committee on Homelessness and will continue to fund a homeless liaison staff position. The City will also support San Joaquin County in implementing San Joaquin County Homelessness Strategic Plan and continue to have a City representative serve on the Board of the San Joaquin Continuum of Care (SJCoC) Shelter Committee and Strategic Planning Committee. The City will acquire and rehabilitate a former SRO on Main Street for purposes of transitional and supportive housing. It will consist of 40 units and provide continued case management to ensure residents path forward to self-sufficiency and permanent housing.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Current and ongoing, 2023-2031; review applications by nonprofit organizations for use of City's share of CDBG funds annually, participate in Committee on Homelessness meetings monthly; secure funding to support expansion of the Access Center in 2023 with a goal of completing expansion in 2024.

Funding: CDBG; General Fund; Federal and State Grants

Objective: Provide regional solutions to homelessness through assistance to nonprofit organizations and the County who work on solutions to end homelessness in the region; expand the shelter capacity within the Access Center by 200 beds.
[Source: Existing Program 4.3, revised]

Program 4.4: Educate the Public About Affordable Housing

Affordable housing is seen negatively by many in the community; the perception is that affordable housing drives down property values, increases the demand for services, and facilitates criminal activity. The reality is that affordable housing helps police officers, firefighters, teachers, and other low- and moderate-wage workers live in Lodi. The City will:

- Provide information on the City's website regarding housing in Lodi that discusses typical wages for various jobs that are held in the city and the housing costs that each earner can afford; and
- In conjunction with the rollout of the Annual Action Plan, conduct an annual workshop on the issue of affordable housing, publicizing the events to neighborhood groups, homeowner's associations, community organizations, religious institutions, and others. Discuss affordable housing myths and the value that affordable housing can bring to a community, as well as important issues to consider.

Responsibility: Community Development Department

Time Frame: Continue to provide a newsletter and conduct at least eight workshops during the Housing Element planning period.

Funding: General Fund

Objective: Provide information to the community about the benefits of affordable housing.
[Source: Existing Program 4.4, revised simply to add "homeowners' associations" in second bullet]

Program 4.5: Incentivize Affordable Housing Development

To incentivize the development of affordable housing opportunities, the City will implement an Affordable Housing Incentives Program to encourage private housing developers and non-profit affordable housing providers to provide affordable housing. The program will incorporate streamlined review, regulatory incentives, revised fees (as possible), priority processing, and community engagement, including the following:

- To the extent required for compliance with State law, adopt and apply streamlined permit processing for affordable housing developments in compliance with provisions under SB 35 and SB 330;
- Provide regulatory incentives in support of affordable housing, potentially including additional density or FAR allowances; waived, reduced, or deferred fees; or additional concessions to development standards beyond those provided by State density bonus law;
- To the extent possible, provide priority processing to developments that incorporate affordable units (minimum 20 percent); and
- Make information regarding incentives and funding opportunities available at the Community Development Department's public counter and on the City website; provide information on incentives to developers and affordable housing providers annually.

Additionally, Program 1.2 calls for the exemption of affordable units from the growth management allocation process, which would eliminate the time and expense of the process.

Further, as described in Program 1.5, the City will meet annually with private nonprofit and for-profit affordable housing providers and public agencies that are interested in constructing affordable housing (and keep in contact with them throughout the year), providing special needs housing or shelter, and/or providing supportive services for low-income and special needs residents. The purpose of the annual meetings will be to discuss priorities for lending City support for funding requests for affordable housing projects and programs during the subsequent 12 to 24 months.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Within one year of adoption of the Housing Element

Funding: General Fund, State and Federal funding and grant opportunities

Objective: Facilitate the development of affordable housing opportunities in the city; incentivize the development of 200 very low- and 200 low-income housing units in the planning period.
[Source: Existing Program 4.5, revised]

Program 4.6: Facilitate the Development of Project-Based Housing Choice Voucher (formerly Section 8) Units

The City will work with nonprofit developers to try to secure project-based Housing Choice Voucher funding in order to develop and expand the availability units affordable to lower-income families, seniors and residents with a disability in the city.

Additionally, the City will collaborate with non-profit organizations and housing developers to generate a list of small older multifamily rental properties for potential acquisition/rehabilitation and deed restriction and pursue funding to support acquisition and/or rehabilitation.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: Hold a meeting and work with local nonprofits to secure project-based Housing Choice Voucher funding within a year and a half of adoption of this Housing Element and again by 2028; create inventory of small older multifamily rental properties by 2026; obtain funding to assist in the acquisition of two properties by the end of the planning period.

Funding: General Fund, CDGB, HCD, and other State and Federal grants

Objective: Increase the total of affordable and senior housing units in the city through new funding sources and coordination with local property owners; 20 senior units, 20 units for residents with a disability, and 40 lower-income units; inventory small older multifamily rental properties; work with local agencies to obtain funding to assist in the acquisition of two small rental properties. *[Source: Existing Program 4.6, revised]*

Program 4.7: Affirmatively Furthering Fair Housing

The City shall address disparities in housing needs and access to opportunity for all persons regardless race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, genetic information and other protected characteristics identified by the California Fair Employment and Housing Act (Government Code Section 12900 et seq.), Government Code Section 65008, and any other State and Federal fair housing and planning law. The City shall continue to fund fair housing services which promote equal housing opportunity within the community.

To effectively address the requirements of Government Code Sections 8899.50 and 65583, the City will coordinate with San Joaquin Fair Housing/other fair housing nonprofit organizations to provide fair housing and tenant/landlord services, including investigation of discrimination complaints, fair housing counseling and education, fair housing testing, and tenant/landlord counseling and mediation.

Under this Program, the City shall:

a. Provide funding for San Joaquin Fair Housing (SJFH) to conduct fair housing testing, maintain the housing discrimination and tenant/landlord law hotline, investigate complaints, and complete outreach and education through public forums, with goals of providing $100,000 during the planning period (including $18,000 in 2023-2024) and assisting 1,000 households annually;

b. Coordinate with SJFH to gather, analyze, and report data on fair housing complaints filed with the Fair Housing Council of Central California annually;
c. Contract with SJFH to work with tenants and tenant advocates to identify violations of fair housing federal and State fair housing laws and support prospective and existing tenants who are experiencing discrimination, with a goal of assisting 50 households annually;
d. Annually review prior year performance regarding affirmatively furthering fair housing in the annual planning for the use of CDBG funds and identify funding support that addresses the removal of impediments or advancing specific fair housing goals;
e. Provide $25,000 in 2023-2024 to the Community Partnership for Families of San Joaquin (CPFSJ) to provide gang prevention and wraparound services for Lodi's at-risk youth and their families. This will include assessments, case management, group counseling, and a curriculum program with a goal of serving 600 low-income individuals and 30 youth from low-income neighborhoods;
f. Provide $125,000 in funding in 2024 to fund the rehabilitation of Creekside South Apartments, with a goal of improving housing conditions for 40 senior households;
g. Provide funding to support the Second Harvest Food Bank's food assistance program that provides food to local community partners that distribute it to low-income persons and persons experiencing homelessness, with goals of providing $50,000 in the planning period, including $10,000 in 2024, and serving serve 3,500 lower-income residents;
h. Provide funding to support The Salvation Army's Hope Harbor Shelter Operations that provide overnight shelter and a meal to residents experiencing homelessness, with goals of providing $50,000 during the planning period, including $20,000 in 2024, and serving 465 residents;
i. Provide funding to support the LOEL Senior Center's Meals on Wheels Program, with goals of providing $40,000 in the planning period, including $10,000 in 2024, and providing hot meals to up to 96 homebound seniors Monday through Friday each year;
j. Provide funding to support PREVAIL's PROPEL Program to expand outreach resources to assist at-risk youths, with goals of providing $40,000 in the planning period, including $10,000 in 2024 and serving 50 homeless/at-risk youths annually; and
k. Require reporting from consultants providing tenant services in Conciliation/Mediation and Legal Assistance to evaluate existing State and Federal "just cause for eviction" (AB 1482, 2019-Chiu) provisions to determine if additional protections through a local ordinance is warranted, with a goal of collecting, reviewing, and reporting data annually.

Responsibility: Community Development Department, Planning Commission, City Council

Time Frame: See individual actions.

Funding: General Fund, CDBG

Objective: See individual actions.
[Source: New Program]

Program 4.8: Place-based Strategies

The City will work to improve place-based strategies to encourage community conservation and revitalization in the Eastside area. Under this Program, the City will:

a. Prioritize public health, education, economic, and safety programs in the Eastside area in coordination with area public health entities (e.g., Adventist Health Lodi Memorial), Lodi GrapeLine, Lodi Unified School District, workforce development groups, and the Lodi Police Department. In coordination with these agencies, the City will develop a comprehensive, long-term community development strategy and/or program priority strategy for the Eastside area by January 2031;
b. Identify addresses and compile mailing list and email addresses to focus outreach to neighborhoods with higher concentrations of low-income and minority residents to prioritize services in these areas by 2027;
c. Prepare a study on transit needs for Lodi residents and identify actions to address those needs, focusing on the commuting needs of low-income residents. Work with Lodi GrapeLine to expand transit services that connect Lodi to other nearby cities, including Stockton, Sacramento, and the Bay Area; and
d. Implement small-scale placemaking projects/events such as pedestrian improvements or parklets in the Eastside area as part of the Lodi Asset Based Community Development Group (ABCD) activities.

Responsibility: Community Development Department, ABCD

Time Frame: For action a: by 2031; for action b: by 2027; for action c: prepare transit needs study in 2024 and identify potential actions by 2025; for action d: complete projects every two years and hold events annually.

Funding: General Fund

Objectives: For action a: develop a comprehensive, long-term community development strategy and/or program priority strategy for the Eastside area; for action b: prioritize services in neighborhoods with higher concentrations of low-income and minority residents; for action c: prepare a transit needs study and identify potential actions to increase access too transit linking Lodi to regional job centers; for action d: implement four projects and eight events in East Lodi and eastern parts of North and South Lodi during the planning period.
[Source: New Program]

Program 4.9: Encourage Development of Farmworker Housing

In conjunction with Program 1.5, the City will take measures to encourage and facilitate the production of housing for permanent and migrant farmworkers, such as funding development, developer identification, maintaining an inventory of suitable sites, site development, etc. and ensure zoning and development standards facilitate a variety of housing types for farmworker housing needs. The City will make a specific and at least annual effort to assist in the development of housing for farmworkers and conserve and improve the existing housing stock for farmworkers, including but not limited to:

- Contacting nonprofit developers at least every other year to identify opportunities for the development or improvement of housing for farmworkers.

- Coordinating and participating with regional organizations, including non-profit, academic and employers, to raise awareness, share and employ strategies, and identify or target new resources.
- Coordinating annually with organizations that represent or serve farm workers.
- Providing incentives and other strategies beyond state density bonus law to encourage housing for farmworkers, including setting aside housing for farmworkers within developments, supporting funding applications, prioritizing entitlements and establishing appropriate zoning and development standards.
- Targeting code enforcement and other resources to the existing housing stock with the most need for rehabilitation and sanitary conditions that could be more likely to house farmworkers and work with regional or other organizations to improve living conditions for farmworkers.

Responsibility: Community Development Department

Time Frame: Annually; adopt incentives by 2026.

Funding: General Fund

Objective: Encourage the development of 50 affordable units for farmworkers.
[Source: New Program]

Program 4.10: Anti-Displacement Strategy

In combination with programs included in this Housing Element, the City shall adopt a multi-pronged anti-displacement strategy to work to relieve displacement pressures caused by the increasing income gap and increasing housing costs in the City. The strategy shall include measures that encourage affordable housing production, work to preserve existing affordable housing, and protect current residents from displacement in rapidly changing portions of the city, particularly in the Eastside Area where lower income households exist in higher concentrations.

The anti-displacement strategy may include, but is not limited to, the following potential efforts:

Production: increase multifamily residential and mixed-use opportunities in throughout the city beyond capacity to meet the RHNA; allow duplexes, triplexes, and multiple JADUs in lower density high resource areas; adopt an inclusionary housing ordinance.

Preservation: create partnerships with the Housing Authority to support acquisition of affordable units at-risk of conversion to market rate; identify a code enforcement specialist on staff that can provide technical assistance and information to property owners of lower income units to address code enforcement issues; seek funding to support rehabilitation of substandard multifamily units; establish a rent control ordinance; restrict conversion of existing units occupied by lower-income households to short term rentals; require replacement of all lower income units lost due to redevelopment.

Protect Current Residents: ensure first right of return to existing residents; establish a just cause eviction policy; develop an engagement strategy to disseminate information on tenant protections and available resources.

In developing the Strategy, the City shall discuss issues, opportunities, and potential anti-displacement measures with the public through a minimum of three events targeting the Eastside Area, seniors, farmworkers, and residents with a disability.

Responsibility: Community Development Department

Time Frame: Annually; adopt incentives by 2026.

Funding: General Fund

Objective: Complete targeted engagement in 2024-2025; adopt Anti-Displacement Strategy in 2026; encourage the development of 100 lower income units (beyond the RHNA), with a target of 75 percent for seniors, residents with a disability, and farmworkers.
[Source: New Program]

Program 5.1: Promote Energy Efficiency and Weatherization Improvements for Older Homes

The City will continue to promote energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program, which began in 2020. The City will post and distribute information on currently available weatherization and energy conservation programs operated by the City, nonprofit organizations, and utility companies through the City's website and through social media outlets, the Community Development Department public counter, the Lodi Public Library, the LOEL Senior Center, and other public locations. The Conservation Element also promotes energy conservation and weatherization improvements to existing structures and public buildings.

Responsibility: Community Development Department

Time Frame: Current and ongoing, 2023-2031; advertising campaigns twice annually.

Funding: CDBG, HOME, public and private utilities, nonprofit organizations (such as the San Joaquin County Department of Aging, Lodi Electric Utility Department, and Pacific Gas and Electric)

Objective: Increase energy efficiency in older homes, with a goal of providing rebates to qualified households for energy conservation/weatherization improvements.
[Source: Existing Program 5.1, revised]

Program 5.2: Energy Conservation for New Homes

The City will enforce State requirements for energy conservation, including Title 24 of the California Code of Regulations (state building code standards), in new residential projects and encourage residential developers to employ additional energy conservation measures in the design of new residential developments. In addition, the Community Design and Livability Element addresses green building and construction techniques.

Responsibility: Community Development Department

Time Frame: Current and ongoing, 2023-2031, as part of review of planning and building permit applications.

Funding: Permit fees

Objective: Increase energy efficiency in the design and construction of new homes.
[Source: Existing Program 5.2]

Quantified Objectives

The City of Lodi has established quantified objectives for several program categories to provide measurable standards for monitoring and evaluating program achievements. Quantified objectives have been established for accommodating the City's share of San Joaquin County's regional housing needs, new housing construction, housing rehabilitation, and the preservation of existing affordable housing. The quantified objectives represent the target goal based on the needs, resources (including, land and financing), constraints, policies, and programs identified in this element. The quantified objectives for the City's share of regional housing needs and housing construction differ because the housing construction objective is based on the City's estimate of the number homes that can actually be constructed and at each household income level.

Table 90 Quantified Objectives

Objective Type	Housing Units, by Income					
	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Accommodate Regional Share[1]	471	470	591	706	1,671	3,909
New Construction[2]	150	680	680	392	1,383	3,285
Homebuyer Assistance	0	8	20	20	0	48
Housing Rehabilitation[3]	75	245	320	300	0	940
Conservation of Rental Housing[4]	50	200	250	50	0	550
Senior and Other Special Housing Needs[5]	100	121	45	0	0	266

1. *Quantified objectives are for City's fair share of the 2023-2031 San Joaquin County Regional Housing Needs Allocation*
2. *Quantified objectives are based on anticipated market rate housing production (for moderate- and above moderate-income) and availability of financial resources to assist in the construction of very low- and low-income housing, including quantified objectives included in Programs 1.5, 1.6, 1.9, 1.13, and 4.5.*
3. *Quantified objectives are based on historic rate of code enforcement and housing rehabilitation and anticipated availability of State and Federal funding, as well as on funding potential from CDBG, HOME, and CalHOME and quantified objectives included in Programs 2.1 and 4.7.*
4. *Quantified objectives are based on Program 1.7 (150 units) and 2.1 (400 units).*
5. *Quantified objectives are based on Programs 1.12, 4.6,4.7, and 4.9.*

Appendix A: Evaluation of the Previous Housing Element

Overview

The success of the updated Housing Element is dependent to a great extent on a useful examination of the policies and implementation programs included in the previously adopted Housing Element. The evaluation identifies programs that have been successful in achieving housing objectives and addressing local needs, as well as programs that require modifications to address objectives in the updated Housing Element. State law (California Government Code Section 65588 (a)) requires each jurisdiction review its housing element as frequently as appropriate to evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal;
- The effectiveness of the housing element in attainment of the community's housing goals and objectives; and
- The progress of the jurisdiction in implementing the housing element.

According to the California Department of Housing and Community Development (HCD), "Housing Element Questions and Answers: a Guide to the Preparation of Housing Elements," the review is a three-step process:

- Review the results of the previous element's goals, objectives, policies, and programs. The results should be quantified where possible (e.g., the number of units rehabilitated), but may be qualitative where necessary (e.g., mitigation of governmental constraints).
- Compare what was projected or planned in the previous element to what was actually achieved. Analyze the significant differences between them. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.

Based on the above analysis, describe how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from the results of the previous element.

Construction Achievements

The City's RHNA for the 2015-2023 planning period was for 497 units affordable to very low-income households (of which 249 were for extremely low-income units), 331 units affordable to low-income households, 333 units affordable to moderate income households, and 770 units affordable to above moderate-income households, for a total of 1,931 housing units. Table 91 compares the constructed deed restricted and non-deed restricted units to the RHNA allocation for each income category during the 2015–2023 period. The City has permitted a total of 1,637 units, of which 52 are constructed for the very low-income category, 27 are constructed for the low income

category, 60 are constructed for the moderate income category and 1,498 for the above moderate income category.

Table 91 Progress Toward the RHNA, 2015-2023

Income Level		RHNA Allocation by Income Level	2015	2016	2017	2018	2019	2020	2021	2022	2023	Total Units to Date (all years)	Total Remaining RHNA by Income Level
Extremely Low-Income Units		249	-	-	-	-	-	-	-	-	-	-	249
Very Low	Deed Restricted	497	-	-	52	-	-	-	-	-	-	52	445
	Non-Deed Restricted		-	-	-	-	-	-	-	-	-		
Low	Deed Restricted	331	-	-	27	-	-	-	-	-	-	27	304
	Non-Deed Restricted		-	-	-	-	-	-	-	-	-		
Moderate	Deed Restricted	333	-	-	-	-	-	-	-	-	-	60	273
	Non-Deed Restricted		-	-	-	48	-	2	-	10	-		
Above Moderate		770	-	-	211	170	490	265	196	166	-	1,498	-
Total RHNA		1,931											
Total Units					290	218	490	267	196	176	-	1,637	1,022

Source: City of Lodi, Housing Element Annual Housing Element Progress Report, 2015 through 2023.

Program Evaluation

This section summarizes the achievements and effectiveness for each program in the 5th cycle 2015 Housing Element, which planned to meet housing needs from 2015-2023. Programs are organized within relevant Housing Element goals.

The 2015 Housing Element established five goals with coordinated policies and implementing programs. Table B-2 provides a detailed evaluation of the implementing programs that support each of these goals.

Goal H-G1

Provide a range of housing types and densities for all economic segments of the community while emphasizing high quality development, homeownership opportunities, and the efficient use of land.

To ensure that the City could supply a range of housing types for local residents, Lodi's 2015 Housing Element developed policies H-P1.1 through H-P1.9. These policies promoted a mix of housing types, facilitated and encouraged the development of affordable and senior housing units within new residential developments and adjacent to public transportation, maintained and updated the City's land use database on vacant residential land supply, pursued funding to develop affordable housing, and expedited permit processing and approval for residential projects. In line with these policies, the City proceeded with successfully implementing Programs 1.1 through 1.8, as well as 1.11 and 1.12, which range from efforts such as amending the development code to reduce barriers to different types of housing developments and providing permanent housing to homeless persons and families, to providing financial assistance to renters during the COVID-19 pandemic. The City encountered some barriers in implementing programs 1.9, 1.10, and 1.12. For Programs 1.9 and 1.12, it was found that several million dollars of funding would be needed to expand utility services if the City were to annex land to accommodate additional residential development. The City's first-time homebuyer program, associated with program 1.10, was discontinued due to unfavorable market conditions, however other successful programs have been implemented in its place. Program 1.12 is ongoing as the City continues to seek opportunities for affordable housing.

Goal H-G2

Encourage the maintenance, improvement, and rehabilitation of existing housing stock and residential neighborhoods, particularly in the Eastside area.

Policies H-P2.1 through H-P2.7 encouraged private reinvestment into older residential neighborhoods and the use of various funding sources to rehabilitate housing, supported keeping older neighborhood streets and system in good repair, allowed the reconstruction of homes when damaged, implemented historic preservation guidelines, and enforced residential property maintenance standards. These policies were effectively supported by implementing programs 2.1 through 2.6, which modified permit standards, focused on graffiti abatement and housing rehabilitation, implemented private property maintenance standards, collected information on housing conditions, and conducted public improvement projects.

Goal H-G3

Ensure the provision of adequate public facilities and services to support existing and future residential development.

Policies H-P3.1 through H-P3.4 supported the use of funding to upgrade streets and sidewalks, ensured that new residential developments helped to finance and assist the production of affordable housing, make certain that necessary public facilities and services are available prior to the occupancy of residential units, and required that park and recreational acquisitions keep pace with residential development. Programs 3.1 through 3.5 were generally successful, with efforts including the collection of development impact fees which are reviewed annually, the use of a Growth Management Allocation Ordinance to keep the pace of development consistent with public facility and service provider's abilities, upgrading park facilities and services in older neighborhoods, addressing new park and recreational facilities in the Zoning Ordinance and Subdivision Regulations update, and instating mixed use zone districts and transit-oriented developments.

Goal H-G4

Promote equal opportunity to secure safe, sanitary, and affordable housing for all members of the community regardless of race, sex, or other discriminatory factors.

In order to promote equal opportunities in affordable housing, policies H-P4.1 through H-P4.6 were developed. These policies sought to address special housing needs, including for those with disabilities, lower incomes, seniors, and more, as well as making information on affordable housing readily available to different agencies, modify regulations on apartments and mobile home parks to protect investments while minimizing the impact on rental tenants, work on addressing the needs of homeless persons, cooperate with community-based organizations that provide services on the availability of assistance to the homeless, and promote fair housing programs and services to Lodi residents. Programs 4.1 through 4.6 were successful in implementing these policies, although Program 4.2 is still in progress. The remaining programs succeeded in providing fair housing assistance, supporting regional solutions to homelessness, incorporating affordable housing into the City's Annual Action Plan and 5-year Consolidated Plan in addition to the City's Housing Element, reducing the fee schedule for high-density housing, and working with nonprofit developers to secure project-based or tenant-based Housing Choice Vouchers (formerly Section 8).

Goal H-G5

Encourage residential energy efficiency and reduce residential energy use.

Policies H-P5.1 and H-P5.2 required the use of energy conservation measures in new residential structures and pursued land use and planning policies that would encourage reductions in residential energy consumption. Programs associated with these policies (5.1 through 5.3) were successful overall, including energy conservation programs through the City's electric utility company, enforcing state requirements for energy conservation, and encouraging the use of passive and active solar devices in the design of local buildings.

Effectiveness of the 2015 Housing Element

As discussed in the preceding section and in Table B-2, the City implemented many policies and programs to facilitate housing production, improvement, and rehabilitation. Most notably, the City has made great strides in modifying its development and land use zoning codes to facilitate the construction of a variety of housing types, encouraging transit-oriented developments, and securing funding for a variety of large projects, including funding for persons experiencing homelessness and rental assistance to local residents. The City recognized the severity of the housing crisis through its efforts on preserving and rehabilitating existing housing and services, expanded opportunities for multifamily housing developments through modified regulations, and worked in adding housing to meet its RHNA goals. However, in some cases, the City did not have the necessary staff resources or funding to implement certain programs. These programs include Programs 1.9 and 1.12, which both faced difficulties in being implemented as the City has limited available vacant land for residential developments as well as funding limitations for potential expansion of electric and water/sewer services. The first-time homebuyer program associated with Program 1.10 was discontinued due to unfavorable market conditions, although additional programs that replaced this Program's objective were implemented, such as a housing rehab program and a graffiti abatement program. This can be observed on a number of program status reports provided in Table A-2.

Effectiveness of Programs in Meeting Special Housing Needs

Several of the 2016 Housing Element programs successfully assisted residents with special housing needs. Recent successes include:

- Through Program 1.1, the City amended its Zoning Code to allow residential care facilities in the Office zoning district to expand opportunities for special needs housing.
- In 2022, through Program 1.7, the City worked with the SJ Housing Authority to secure additional Housing Choice Vouchers, as well as four tenant-based vouchers that were used to assist the Harmony Homes project.
- Through Program 1.8, the City allocated CDBG and City dollars to fund the Asset-Based Community Development (ABCD): Love Your Block program which supports capacity building and resident leadership in low-income neighborhoods.
- Through Program 3.5, the City's new Harmony Homes permanent supportive housing project was placed directly adjacent to a primary transit stop in order to increase housing opportunities near transit facilities. The City helped these efforts through coordinating an appropriate infill development site for the project.
- Through Program 4.3, the City collaborated with the Salvation Army to address local and regional homelessness issues, adopted the San Joaquin County Homelessness Strategic Plan in 2020, and purchased a site for the development of an Access Center and Emergency Shelter.

Table 92 Housing Programs Progress Report

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
Program 1.1: Revise Development Code	The City will revise Title 17 of the Lodi Municipal Code to reduce barriers and provide incentives for the construction of a variety of housing types: • Amend the Development Code to comply with the state Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6) to treat employee housing for farmworkers or other employees that serves six or fewer persons as a single-family structure and permitted in the same manner as other single-family structures of the same type in the same zone (Section 17021.5). • Work with the San Joaquin County Housing Authority in developing procedures and guidelines for establishing income eligibility for the "reserved" units and for maintaining the “reserved” units as affordable units for at least 30 years. • Amend the Development Code to allow single-room occupancy units in the Medium Density Residential and High Density Residential zoning districts.	Develop procedures and guidelines for establishing income eligibility for “reserved” units within two years from adoption of Housing Element. Complete Development Code amendments within one year of adoption of this element.	The City does not have any agricultural land within city limits. Employee housing is not precluded but also is not specifically called out in the Development Code. The City anticipated Development Code reviews to address Health and Safety Code Sections 17021.5 and 17021.6; however, due to staff turnover this program has yet to be addressed. The City has not yet developed procedures and guidelines for establishing income eligibility for the "reserved" units. The City amended the Development Code in 2013 to allow for “group residential,” which includes single-room occupancy units in the Medium Density Residential and High Density Residential zoning districts. The City amended its Zoning Code to allow residential care facilities in the Office zoning district to expand opportunities for special needs housing. ADU and JADU Ordinance adopted by City Council on November 17, 2021 by Ordinance No. 1987. In November 2022, the City amended regulations in its Subdivision and Zoning codes to facilitate division of residential parcels and construction of two homes on a single lot consistent with Senate Bill 9. The City continued incremental code amendments in 2023.	Keep: update objectives based on Constraints analysis and evaluation of zoning for a variety of housing types.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
1.2 Revise Growth Management Allocation Ordinance	Expedite the residential development approval process for affordable housing.	1 year, Revise Growth Management Allocation Ordinance within a year of adoption of this Housing Element and evaluate implementation by the end of the planning period.	In 2020 the City undertook a comprehensive review of its Growth Management Program that addressed potential barriers to housing production. Key features that were addressed included eliminating a restriction on when during the year a growth allocation request could be submitted, streamlining the Growth Allocation review process to allow the Planning Commission to consider tentative maps and growth allocations concurrently, simplifying application requirements for Growth Allocations. These amendments were presented to and approved by the City Council in January 2021. The City understands and acknowledges that State law would preclude affordable housing from being restricted by the Growth Management Allocation Ordinance. To date, no housing applications have come near exceeding the Growth Allocation, which rolls forward and increases annually.	Complete, remove.
1.3 Personal Security Standards	Reduce the susceptibility of residential properties and neighborhoods to criminal activity and increase residents' perception of personal safety.	As projects are submitted	The City continues to implement project design as part of the development process.	Keep.
1.4 Land Inventory	Increase the potential for infill development, thereby reducing the need to prematurely annex land and convert agricultural land to urban use.	Maintain vacant, residentially zoned land for projects as they are approved	The City will continue to keep the most recent Housing Element with the related housing land inventory map online so that the public and developers can access this inventory from the City's website. https://www.lodi.gov/DocumentCenter/View/40/2015-to-2023-Housing-Element-PDF	Keep; expand with rezone requirements, if necessary.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
1.5 Pursue State and Federal Funds in Support of Housing Construction	The City will continue to pursue available and appropriate state and federal funding sources to support efforts to construct housing meeting the needs of extremely low-, low-, and moderate-income households, permanent and migrant farmworker housing, to assist persons with rent payments required for existing housing units, to provide supportive services, and to provide on- and off-site improvements and public facilities, in support of affordable housing projects. The City's objective for this Program is the development of 20 extremely low-, 50 very low-, and 50 low-income housing units.	For Action a., annual meetings; for Action b., quarterly each year, depending on funding deadlines; for Action c. semi-annual review and assessment of funding opportunities based on (1) funding cycles and eligible activities for various state and federal programs, (2) projects and programs proposed to the City for state or federal funding, and (3) City staff capacity to prepare funding requests.	The City received CDBG funding which can be used to assist with housing construction. As part of the annual funding cycle, the City reached out to various organizations and agencies to solicit applications for affordable housing development projects or related housing support services. The City also conducted consultations with these groups as part of its annual community needs assessment and Annual Action Plan. City staff attended monthly Lodi Committee on Homelessness (LCOH) meetings to stay engaged and supportive of local and regional efforts to house and serve homeless and low-income households. Members of the committee include homeless service/housing providers. This committee continually looked for funding and opportunities to partner with agencies. As a result of such efforts, the City applied and receive	Keep: expand with specific metrics and milestones.
1.6 Encourage Efficient Use of Land for Residential Development	Preserve agricultural land and reduce the amount of land needed to meet future urban growth needs.	Require fee payment as mitigation, ongoing (2015–2023); enforce Urban Reserve designation and contiguity requirements when this Housing Element is adopted.	Lodi General Plan Policy C-P7 requires mitigation fees to protect and conserve agricultural lands. Lodi General Plan Policy C-P4 encourages San Joaquin County to conserve agricultural soils, preserve agricultural land surrounding the City and promote the continuation of existing agricultural operations, by supporting the county's economic programs. The impacts resulting from conversion of agricultural land conversion to urban uses are mitigated through the City's participation in the San Joaquin County Multi Species Conservation Plan.	Keep; revise to encourage and incentivize infill development.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
1.7 Provide Rental Assistance	Increase rental property owner awareness of, and participation in, rental assistance programs.	Distribution of Housing Choice Voucher Program information, current and ongoing, 2015–2023; create website link to Housing Authority website within two years of adoption of this Housing Element, maintain link thereafter, 2015–2023.	Due to the COVID-19 pandemic, the City was awarded almost $800,000 in CDBG-CV Coronavirus aid in 2020. Out of these funds $293,000 was allocated to two public service providers to provide emergency rental assistance to individuals and families impacted by COVID-19 throughout calendar year 2021 and moving into 2022. After the subrecipients either exhausted these funds or agreement term ended, another organization stepped forward to request support for rental and utility assistance and remaining CDBG-CV funds was awarded for 2022-2023 program year(s). The City continues to work with the SJ Housing Authority to secure Housing Choice Vouchers. In 2022, 4 tenant-based vouchers were used to assist the Harmony Homes project.	Keep: add action related to engagement with Housing Authority to discuss opportunities and coordinate on funding pursuits.
1.8 Focus on Neighborhood Improvement Initiatives	Improve the City's ability to focus on the implementation of housing and neighborhood improvement programs.	Current and ongoing, 2015–2023	• The City allocated CDBG and City dollars to fund the Asset-Based Community Development (ABCD): Love Your Block program which supports capacity building and resident leadership in low-income neighborhoods, as well, a mini-grant program for resident driven community improvement projects. • The City's Lodi Improvement Committee forms annual goals and works towards those ends including: community safety programs, property improvement program, and more. • In collaboration with the City, City Council approved the Lodi Access Center Emergency Shelter which will be a low-barrier shelter that will have the capacity to house our 2022 point in time count numbers. As of August 2022 a temporary emergency shelter was opened that has the capacity to house up to 49 individuals overnight and often sees approximately 80-100 individuals for day services. This temporary emergency shelter will remain open until the permanent center can be constructed. • Consultant and Neighborhood Services Manager is ensuring federal laws and all applicable laws are being complied with. • City has completed a Housing Element and Consolidated Plans effective through 2023 and is currently working on the updates to both documents for future years. • The first-time homebuyer program was cancelled due to unfavorable market conditions; City has implemented housing rehab program; City continues to support graffiti abatement through CDBG funds. • The City is working with SJV REAP consultants on free pre-approved ADU plans, a Guidebook for the public, and application checklist.	Keep.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
1.9 Annex Land to Accommodate Future Housing Needs as Necessary	Increase the City's residential development capacity to accommodate its share of the region's future housing construction needs.	Pursue discussions with property owners about annexation, as appropriate according to housing needs, but no later than the end of the planning period in 2023.	The City of Lodi has limited vacant land available for residential development within the City limits. In 2022, the City completed the Sphere of Influence (SOI) and Municipal Services Review (MSR) update to enable annexation of several hundred acres of property along the south-eastern portion of the City's limits. The City has been in discussions with property owners and developers of these expanded SOI/MSR areas concerning potential annexation for housing purposes, however, several million dollars in funding is needed for expansion of electric and water/sewer services.	Revise to add actions related to funding pursuits for infrastructure to support housing development in annexation areas.
1.10: Provide Homebuyer Assistance	The City will continue to implement a first-time homebuyer down payment assistance program. The City will continue to participate with the Housing Authority in a countywide consortium for the issuance of mortgage revenue bonds or mortgage credit certificates to assist first-time homebuyers. The City's objective for this Program is to aid 24 homebuyers for down-payment assistance for 4 very low-, 10 low-, and 10 moderate-income housing units.	Current and ongoing; provide website link within one year of adoption of this Housing Element and continue to provide information at the public counter; Neighborhood Services Manager to meet with local realtors within one year of adoption of this Housing Element.	The first-time homebuyer program was discontinued due to unfavorable market conditions. The City implemented a housing rehab program from 2020-2022 and continues to support graffiti abatement through CDBG funds. The City actively pursues other affordable housing development opportunities with local social service providers and agencies. Additionally, the City actively looks to partner with the Housing Authority and other local affordable housing developers in locating suitable development sites, and will continue applying for affordable housing grants as they become available.	Revise to provide focus on pursuing funding to restart program.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
1.11 Promote the City's Multifamily Housing Development Standards	Increase awareness of the City's multifamily development standards.	Current and ongoing (2015–2023); information is currently available on the City's website and at the public permit counter. The City also encourages preapplication meetings. These practices will continue indefinitely. A notice of the City's multifamily development standards will be distributed to industry organizations within six months of the adoption of this Housing Element.	The City continues to provide information regarding the multifamily development standards, both on the City's website and at the public permit counter. In 2019, the City worked with Eden Housing on the development of an 80-unit, affordable senior housing project as well as on Rubicon at Reynolds Ranch, a 156-unit apartment project, Revel at Reynolds Ranch, a 142-unit market-rate senior project, and a few other medium-density projects. The City is very active in developing housing other than conventional single-family homes. The City's multifamily development standards were distributed to the Building Industry Association. All multifamily developments are required to be reviewed by the Site Plan and Architectural Review Committee (SPARC) as a condition of approval prior to construction. The City actively meets with multifamily housing developers concerning proactive planning, including location of suitable sites and predevelopment activities.	Keep; expand with new actions and objectives.
1.12 Subdividing Large Sites for Lower-Income Households	Facilitate parcel sizes that that are developable for multifamily affordable housing and consistent with recommendations/requirements of state, federal, and local financing programs.	Determine appropriate incentives within one year of adoption. Provide incentive throughout planning period, as projects are submitted to the Planning Division.	The City continues to seek opportunities for affordable housing, and feasibility of a Linkage Fee Ordinance. The City of Lodi has limited vacant land available for residential development within the City limits. In 2022, the City completed the Sphere of Influence (SOI) and Municipal Services Review (MSR) update to enable annexation of several hundred acres of property along the south-eastern portion of the City's limits. The City has been in discussions with property owners and developers of these expanded SOI/MSR areas concerning potential annexation for housing purposes, however, several million dollars in funding is needed for expansion of electric and water/sewer services.	Keep; the revised sites inventory includes several large sites.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
2.1 Evaluate Applications for the Demolition of Residential Structures	Maintain or replace existing affordable housing.	Complete review within six months of adoption of this Housing Element; implement new review procedures within one year of adoption of this Housing Element; ongoing thereafter, based on proposals.	As required by City policies and procedures, the proponent must apply for a permit, which is subject to review by the Planning Division.	Remove.
2.2 Assist the Eastside Area with Housing Rehabilitation and Code Enforcement	Improvement of 750 units (including private investment to correct code violations) over the planning period of this Housing Element: 250 extremely low/very low, 250 low, and 250 moderate income.	Current and ongoing, 2015–2023.	The City combined the proactive efforts of code enforcement (now Community Improvement) and housing rehabilitation assistance to focus on the CDBG target area, which includes the eastside neighborhoods. The City has one full-time staff person working on graffiti abatement. The City's 2020-2021 housing rehabilitation program provided small grants of $10,000 for minor housing rehabilitation. While this program was promoted in the CDBG target area, the eastside neighborhoods are included in this CDBG target area. Most projects have been completed, with 2 pending completion.	Keep; add specific actions, metrics, and milestones.
2.3 Implement Property Maintenance and Management Standards	Eliminate substandard building and property conditions.	Code enforcement on both complaint and proactive basis; current and ongoing, 2015–2023.	The City implemented standards for private property maintenance. Moreover, the City's Graffiti Abatement Program continues to reduce blight by cleaning up tagged properties, with a focus on higher need areas. The year-round Program typically cleans up these sites within 24-48 hours, which decreases blight and discourages secondary tagging. The Program aids in preserving property values and maintenance of housing stock. During program year 2021-2022, the Program removed over 1,500 instances of graffiti in the CDBG target area (low/mod census tract). In 2022, Community Improvement (Code Enforcement) implemented a proactive, as well as complaint driven approach, to further ensure compliance with applicable codes. Three Community Improvement Officers cover nine areas of the city, with officers rotating areas on a regular basis, enabling a fresh set of eyes and relationship-building with citizens city-wide. The proactive approach has been very successful, with a voluntary compliance rate of 98% before citations are issued.	Keep.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
2.4 Conduct a Housing Condition Survey	Document housing conditions and establish priorities for future code enforcement, housing rehabilitation assistance, and neighborhood improvement efforts.	Complete survey and report to City Council before the start of the next planning period.	The City has not conducted a stand-alone housing conditions survey, but instead monitors and tracks housing conditions through the proactive engagement of the Community Improvement team, a division of the Community Development Department. In addition, housing conditions are documented in the City's 2015 Analysis of Impediments to Fair Housing Choice. The City is currently working on an update to the Analysis of Impediments to Fair Housing Choice to coincide with the updates to the 5-year Consolidated Plan. The City has had difficulty with this program due to COVID-19 and pending legislation updates. A new Analysis of Impediments to Fair Housing Choice, will coincide with 2023 Housing Element and 5-year Consolidated Plan updates.	Keep; revise to including new actions.
2.5 Preserve Affordable Rental Housing	To preserve affordable rental housing units.	Implement this program as necessary.	The City does not currently have any affordable units at risk of converting to market rate.	Revise based on analysis of units at-risk of conversion in updated Element.
2.6 Target the Eastside Area for Use of Funds for Public Improvements	Preserve and improve the Eastside area.	Annual CDBG allocation, maintain zoning, 2015–2023.	The City continues to use its annual CDBG allocation for several public improvement projects: Alley Improvement Project – This project improves alleyways that suffer from damaged pavement and poor drainage by removing existing pavement, installing proper drainage systems, and repaving each alleyway. The 2021-22 alleyway project is nearing completion and the 2022-23 Hale Park upgrade to the parking lot project is underway. Applications are now being accepted for City Departments for the 2023-2024 program year. In 2022, the City funded the Harmony Homes supportive housing project, creating four new affordable housing units on a vacant parcel.	Keep; revise to include new actions, metric, and milestones.
3.1 Collect Development Impact Fees and Enforce Improvement Requirements	Reduce impact fees for multi-family projects based on actual project densities.	Annually review fees.	The City continues to collect a unified development impact fee to pay for off-site public facilities and services needed for residential development, and requires that residential developers continue to provide on-site infrastructure to serve their projects. The City reviews its fee structure annually.	Continue.
3.2 Ensure Adequate Public Services for Residential Development	Provide public facilities and services meeting minimum City standards.	Annually during housing allocation process, 2015–2023.	The City continued to use its Growth Management Allocation Ordinance to ensure that the pace of development is consistent with the City's and other public facility and service providers' abilities to provide public facilities and services and maintain minimum facility and service standards for the entire community.	Keep.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
3.3 Use of CDBG Funds	The City will continue to use CDBG funds to upgrade public facilities and services in older neighborhoods.	(See Program 1.8 for implementation.)	The City continued to use CDBG funds to upgrade public facilities and services in older neighborhoods. Refer to Program 2.6.	Keep; establish new objectives.
3.4 Provide Park and Recreation Facilities	see General Plan Policy P-P20	see General Plan Policy P-P20	General Plan Policy P-P20 requires the City to address park dedication and new development impact fees as part of the Zoning Ordinance and Subdivision Regulations Update, to ensure compliance with the General Plan park and open space standard of 8 park acres per 1,000 residents. The City Council adopted the Lodi Impact Mitigation Fee Program dated on August2012. The Program requires developers to pay a fee per unit based on density that would be used for the development of park facilities to meet the General Plan standard.	Remove.
3.5 Support Transit Facilities and Transit-Oriented Development	Increase housing opportunities near transit facilities and encourage forms of travel other than private vehicles. All income groups will be targeted for TOD housing. However, extremely low-and very low-income households that may rely on transit as their primary transportation mode should be prioritized.	For Action a., annually, prior to the adoption of a City budget; for Action b., within one year of adoption of this Housing Element, designate infill opportunities and identify and adopt zoning amendments that are needed and appropriate to develop in infill opportunity zones within two years of adoption of this Housing Element; for Action c., within two years of adoption of this Housing Element, conduct one or more community meetings; for Action d., ongoing.	a. In 2021, a transit-oriented development was completed as part of the Reynold's Ranch planned development, including Lavida, 150 Units, and Oakmont, 88 Units. b. The City's zoning code includes three mixed-use zoning districts, with flexible development standards for each zone, including the Downtown Mixed Use District. c. In 2023-24, the City is looking to update and modernize the 12-year old Transit-Oriented Development Design Guidelines for the Downtown to include an examination of highest and best uses, through a balance of commercial and residential infill sites, to further encourage a vibrant walkable downtown with access to transit facilities. d. The City's new Harmony Homes permanent supportive housing project is directly adjacent to a primary transit stop.	Keep; revise to speak to mixed use zoning, a Downtown Specific Plan, and update to the city's TOD Design Guidelines.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
4.1 Promote Fair Housing Services	Provide information on fair housing law to the public and support landlord tenant mediation services.	Current and ongoing, 2015–2023; annual community event for display of fair housing information within one year of adoption of this Housing Element; fair housing links will be provided on the City's website within two years of adoption of this Housing Element.	The City completed its Analysis of Impediments to Fair Housing Choice in 2015, which was accepted by US Department of Housing's Office of Fair Housing and Equal Opportunity. The City is currently working on an update to the Analysis of Impediments to Fair Housing Choice to coincide with the 5-year consolidated Plan update. San Joaquin Fair Housing (SJFH) provided fair housing assistance, including education, counseling, and mediation services to the residents of San Joaquin County. SJFH assisted 1,217 Lodi households in the 2021-2022 program year. The program goals are to ensure fair housing, and to teach and advocate tenant and landlord rights and responsibilities regarding providing and maintaining adequate and safe housing. SJFH helped mediate conflicts between tenants and landlords and provided educational opportunities. By educating both tenants and landlords, the program works to assist in the process of mitigating housing discrimination in Lodi and promoting fair housing opportunities regardless of a person's disability, religion, race/ethnicity, color, country of origin or ancestry, age, sex, gender identification/expression, familial status, source of income, marital status, or sexual orientation. These services have become increasingly important as the eviction moratoriums expired during the COVID-19 pandemic.	Keep; expand with new AFFH actions and objectives based on fair housing analysis.
4.2 Regulate Condominium Conversion	Minimize the impact of displacement of very low-, low-, and moderate income households and assure safety of converted units.	Ongoing, 2015 – 2013 and as conversions come forward.	The City continues to regulate the conversion of rental housing to condominiums, although no conversions have occurred.	Keep.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
4.3 Pursue Regional Solutions to Homeless Needs	Provide regional solutions to homelessness through assistance to nonprofit organizations and the County who work on solutions to end homelessness in the region.	Current and ongoing, 2015–2023; annual review of applications by nonprofit organizations for use of City's share of CDBG funds.	In an effort to continue to support regional solutions to homelessness through its collaboration with The Salvation Army, in 2015 the City formed a committee on homelessness, which is citywide and regional. This committee meets on a monthly basis to address both local and regional homeless issues. The City and committee helped form a new homeless liaison position. The new homeless liaison began in 2018. For more details of the LCOH efforts, see the webpage: http://www.lodi.gov/940/Homelessness. The City of Lodi adopted the San Joaquin County Homelessness Strategic Plan in November 2020, which provides a blueprint for how the City and County should address housing the unsheltered population. The City of Lodi received approval from City Council in October 2021 to purchase a site for development the Access Center and Emergency Shelter. On August 22, 2022, the City opened a temporary emergency shelter that has the capacity to house up to 49 unsheltered and provide services including, housing navigation, income advocacy, mental health and substance use treatment, job readiness training, etc. These services are similar to what will be provided at the permanent Access Center, once complete. The permanent Access Center is planned for development over the next approximately 18 months and will meet the needs of the 2022 Point in Time Count (208).	Keep: add milestones for engagement with service providers and regional agencies.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
4.4 Educate the Public About Affordable Housing	Provide information to the community about the benefits of affordable housing.	Continue to provide a newsletter and conduct at least two workshops during the Housing Element planning period.	The City's Annual Action Plan, 5-year Consolidated Plan, and the City's Housing Element provide information concerning the City's efforts to promote affordable housing. These documents are available on the City's website. Annual Action Plan https://www.lodi.gov/DocumentCenter/View/154/Annual-Action-Plan-PDF?bidId= Housing Element https://www.lodi.gov/DocumentCenter/View/40/2015-to-2023-Housing-Element-PDF Additionally, the Lodi Improvement Committee holds workshops with residents annually for the development of the City's Annual Action Plan. Currently the city is working on community engagement processes for the update to the 5-Year Consolidated Plan, Analysis of Impediments to Fair Housing, Affirmatively Furthering Fair Housing (AFFH), and the 6th cycle update to the City Housing Element. As the City looks to bring additional affordable housing opportunities to Lodi, City staff will continue to engage with the public on the benefits of affordable housing.	Keep; revised to expand engagement efforts.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
4.5 Incentivize Affordable Housing Development	Facilitate the development of affordable housing opportunities in the city.	Investigate possible incentives for facilitating the development of affordable housing and present findings to the City Council within one year of the adoption of this Housing Element. The Development Code and Growth Management Allocation Ordinance update will be completed within one year of the adoption of this Housing Element.	The City has a reduced fee schedule for high-density housing, and impact fees could be reduced further for projects affordable to lower-income households. In addition, City staff promotes infill higher-density projects which by-design have a greater affordability. The City has awarded variances to a 12-unit affordable housing project that was approved in 2021 and planned for development by summer of 2023. The City completed an update of the Growth Management procedures in 2021 to streamline and facilitate the review and approval of growth allocations. Furthermore, the City is undergoing their 6th cycle Housing Element update which will provide updates to this topic. The City encourages use of State Density Bonus law to creatively enable development of affordable housing projects. The City has requested technical assistance from the SJV REAP team in creating free pre-approved ADU plans, along with a Guidebook and checklist.	Keep; revise to add specific incentives, as well as engagement with local agencies and affordable housing developers.
4.6 Facilitate the Development of Project-Based Section 8 Units	Facilitate the development of affordable and senior housing opportunities in the city.	Hold a meeting and work with local nonprofits to secure project-based Section 8 funding within a year and a half of adoption of this Housing Element.	The City works with nonprofit developers to secure project-based or tenant based Housing Choice Vouchers (formerly Section 8). For the City's new Harmony Homes Project, 4 tenant-based vouchers were provided in collaboration with the SJ Housing Authority, and a local social service provider, who will manage the property. Throughout the latter part of 2022 the City worked in conjunction with the SJ Housing Authority on a potential affordable housing project and the first part of 2023 saw Housing Authority submit a grant application for the Homeless Housing Assistance and Prevention (HHAP) grant funds available through San Joaquin County. The City is looking at further opportunities to collaborate in 2023 on grant applications for affordable housing.	Keep; revise to establish metrics within objectives.
5.1 Promote Energy Efficiency and Weatherization Improvements for Older Homes	Increase energy efficiency in older homes.	Current and ongoing, 2015–2023.	The City's electric utility, Lodi Electric Utility Department, offers energy conservation programs. A direct link to Lodi Electric's webpage is provided on the City's website. https://www.lodi.gov/818/Attention-Discounts-Incentives-and-Rebat The City plans to promote energy conservation and weatherization improvements as eligible activities under the Lodi Housing Rehabilitation Program. The program administration began in 2020 and is now in process.	Keep; revise to establish metrics within objectives.

Name of Program	Objective	Timeframe in H.E.	Status of Program Implementation	Recommendation
5.2 Energy Conservation for New Homes	Increase energy efficiency in the design and construction of new homes.	Current and ongoing, 2015–2023, as part of review of planning and building permit applications.	The City continues to enforce state requirements for energy conservation. A 235 Single-Family development, Vineyard Terrace, were all built with Solar to expand their energy efficiency.	Keep.
5.3: Encourage Use of Solar Devices Through Voluntary Incentives Program (see Program C P41 in the Conservation Element)	See Program C P41 in the Conservation Element.	Current and ongoing, 2015-2023	Conservation Element Program C-P41 calls for the City to encourage the use of passive and active solar devices such as solar collectors, solar cells, and solar heating systems into the design of local buildings. Promote voluntary participation in incentive programs to increase the use of solar photovoltaic systems in new and existing residential, commercial, institutional, and public buildings. In 2022, the City issued 60 permits for residential rooftop solar systems.	Remove.