



APPENDIX 1N: CITY OF SANGER

Fresno Multi-Jurisdictional 2023-2031 Housing Element HCD Second Submittal Draft

April 2024



A Regional Plan for Addressing Housing Needs

Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma



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Prepared By: PlaceWorks

101 Parkshore Drive, Suite 200
Folsom, California 95630
t 916.245.7500

APPENDIX 1N: CITY OF SANGER

TABLE OF CONTENTS

Summary of Needs and Conditions	1N-1
Housing Needs and Resources Assessment	1N-1
Housing Constraints	1N-7
Housing Resources	1N-8
Section 1N-1: Action Plan	1N-9
Regional Collaboration	1N-9
Adequate Sites	1N-11
Affordable Housing Development and Preservation	1N-13
Removal of Governmental Constraints	1N-21
Housing Quality	1N-28
Housing Assistance	1N-31
Place-Based Revitalization	1N-36
Quantified Objectives	1N-39
Section 1N-2: Sites Inventory	1N-41
Rezoning During Fifth Cycle	1N-41
Regional Housing Needs Allocation	1N-41
Availability of Land	1N-44
Hazards and Other Potential Site Constraints	1N-44
Accessory Dwelling Unit Potential	1N-59
Adequacy of Public Facilities	1N-66
Section 1N-3: Local Assessment of Fair Housing	1N-67
Introduction	1N-67
Outreach	1N-68
Fair Housing Issues	1N-71
Sites and Fair Housing Analysis	1N-137
Contributing Factors	1N-161
Section 1N-4: Constraints	1N-165
Land Use Controls	1N-165
Residential Development Standards	1N-169
Local Ordinances	1N-176
Density Bonus	1N-176
Zoning for a Variety of Housing Types	1N-177
On- and Off-Site Improvement Standards	1N-184

Fees and Exactions	1N-185
Processing and Permit Procedures	1N-189
Minor Deviation.....	1N-196
Building Codes	1N-197
Constraints on Housing for Persons with Disabilities	1N-197
Water and Sewer	1N-199
At-Risk Housing Units Analysis	1N-200
Section 1N-5: Review of Past Accomplishments.....	1N-205
Analysis of Previous Housing Element	1N-205
Section 1N-6: Public Outreach and Engagement	1N-223
Planning Commission and City Council Meetings	1N-223
Community Workshop	1N-224
Stakeholder Interviews	1N-225
Public Comments.....	1N-231
Noticing of Planning Commission and City Council Meetings and Community Workshops.....	1N-231
Noticing of the Draft Housing Element.....	1N-231
Comment Letter	1N-231
Summary of Public Input Incorporated into the Housing Element	1N-232

TABLES

Table 1N-1 Quantified Objective Summary	1N-40
Table 1N-2 Regional Housing Needs Allocation, 2023-2031	1N-42
Table 1N-3 Planned or Approved Projects	1N-43
Table 1N-4 Residential Project Examples	1N-48
Table 1N-5 Mixed-Use Project Examples	1N-49
Table 1N-6 Vacant Sites	1N-51
Table 1N-7 Underutilized Sites	1N-57
Table 1N-8 RHNA Summary.....	1N-60
Table 1N-9 Fresno County Jurisdictions AllTransit Performance Scores	1N-96
Table 1N-10 School Performance Scores in Sanger, 2019	1N-104
Table 1N-11 Cost Burden in Sanger, 2010-2018.....	1N-109
Table 1N-12 Demographic Characteristics of the Homeless Population, 2022	1N-115
Table 1N-13 Services to Address Homelessness.....	1N-116
Table 1N-14 Farmworker Housing Resources in Sanger	1N-120
Table 1N-15 RHNA Capacity by Census Tract in Sanger	1N-139
Table 1N-16 Factors Contributing to Fair Housing Issues	1N-162
Table 1N-17 General Plan Residential Designations.....	1N-165
Table 1N-18 Zoning Districts Residential Uses	1N-167
Table 1N-19 Residential Development Standards, Sanger	1N-170
Table 1N-20 Residential Parking Requirements.....	1N-171
Table 1N-21 Cumulative Impacts Analysis, by Zone	1N-174
Table 1N-22 Residential Uses Permitted by Zone.....	1N-177
Table 1N-23 Vacant Potential Emergency Shelter Sites	1N-180
Table 1N-24 Planning Fees	1N-186
Table 1N-25 Development Fees for Single-Family and Multifamily Units, Sanger	1N-186
Table 1N-26 Example Construction and Fee Costs.....	1N-188
Table 1N-27 Local Processing Times, Sanger	1N-189
Table 1N-28 Assisted Housing Developments, Sanger.....	1N-200
Table 1N-29 Review of Past Accomplishments	1N-209

FIGURES

Figure 1N-1 Sanger Sites Inventory.....	1N-61
Figure 1N-2 Sanger Sites Inventory (Detail 1 of 4)	1N-62
Figure 1N-3 Sanger Sites Inventory (Detail 2 of 4)	1N-63
Figure 1N-4 Sanger Sites Inventory (Detail 3 of 4)	1N-64
Figure 1N-5 Sanger Sites Inventory (Detail 4 of 4)	1N-65
Figure 1N-6 Local TCAC/HCD Opportunity Areas, 2021	1N-75
Figure 1N-7 Local Median income	1N-76
Figure 1N-8 Local TCAC/HCD Economic Domain Score	1N-77
Figure 1N-9 Local TCAC/HCD Educational Domain Score	1N-78
Figure 1N-10 Local Poverty Rate.....	1N-82
Figure 1N-11 Local Racial Demographics	1N-83
Figure 1N-12 Areas of High Segregation and Poverty, 2023.....	1N-84
Figure 1N-13 Percentage of Children in Single-Parent Female-Headed Households in Sanger.....	1N-87
Figure 1N-14 Percentage of the Population with a Disability in Sanger	1N-90
Figure 1N-15 Transit Mobility.....	1N-95
Figure 1N-16 Sanger AllTransit Performance Score	1N-97
Figure 1N-17 Jobs Proximity Index.....	1N-101
Figure 1N-18 Zoning in Sanger.....	1N-102
Figure 1N-19 CalEnviroScreen Scores.....	1N-106
Figure 1N-20 Overcrowding in Sanger	1N-108
Figure 1N-21 Percentage of Renters Overpaying.....	1N-110
Figure 1N-22 Percentage of Homeowners Overpaying	1N-111
Figure 1N-23 Elevated Displacement Risk	1N-125
Figure 1N-24 Vulnerable Community Designation.....	1N-126
Figure 1N-25 Census Tracts in Sanger	1N-141
Figure 1N-26 Percentage of Unit Capacity by TCAC Resource Category.....	1N-145
Figure 1N-27 Percentage of Unit Capacity by Median Income.....	1N-148
Figure 1N-28 Percentage of Unit Capacity by Poverty Rate.....	1N-149
Figure 1N-29 Percentage of Unit Capacity by Percentage Non-White Population	1N-150
Figure 1N-30 Percentage of Unit Capacity by Disability Rate	1N-151
Figure 1N-31 Percentage of Unit Capacity by Percentage of Children in Female- Headed Households	1N-153
Figure 1N-32 Percentage of Unit Capacity by Jobs Proximity Index Scores	1N-154
Figure 1N-33 Percentage of Unit Capacity by CalEnviroScreen Percentiles.....	1N-156
Figure 1N-34 Percentage Unit Capacity by Rate of Overcrowding.....	1N-157
Figure 1N-35 Percentage Unit Capacity by Rate of Renter Overpayment	1N-158

Figure 1N-36 Percentage Unit Capacity by Rate of homeowner Overpayment 1N-159

Figure 1N-37 Percentage Unit Capacity by flood hazard..... 1N-161

APPENDIX 1N: CITY OF SANGER

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APPENDIX 1N: CITY OF SANGER

SUMMARY OF NEEDS AND CONDITIONS

Housing Needs and Resources Assessment

As part of the Housing Element, the City prepared a detailed Needs Assessment (Section 2) analyzing Sanger's demographics. The Needs Assessment identified a number of trends that informed the goals and policies of the updated Housing Element, including:

- Sanger's population has seen an increase of 7,373 people from 2000 to 2022. The City's population increased by 1.8 percent on average between 2000 and 2022, which was higher than the countywide average annual growth rate of 1.2 percent. Similarly, the number of households in Sanger increased by 1.1 percent between 2010 and 2020, compared to 0.7 percent countywide.
- From 2010 to 2020, the vacancy rate in Sanger decreased by 3.1 percent, which indicates a shortage of housing and high competition for available housing. During this same period, the vacancy rates for the most communities in the county also decreased.
- Between 2021 and 2022, the average sale price of a home in Sanger decreased by 7.3 percent. Average sale prices rose 15.4 percent in the county as a whole during the same period. This decrease may be indicative of the need to rehabilitate existing housing stock.
 - To address this, the City will implement the **Programs 22, 23 and 24** which will facilitate home rehabilitation, with a particular focus in in areas of concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, and among owners of older housing units, which are in the city's original downtown core square mile area and scattered throughout the city
- The average number of persons per household in Sanger was higher than the County as whole; this trend was similar in 2010. Sanger also has a higher representation of very low-income households than countywide.
- The median income in Sanger was \$40,761 in 2010 and \$52,329 in 2022 with an average increase of \$964 per year. This is slightly lower than the countywide median income of \$57,109. Overcrowding among owner and renter households decreased from 16.7 percent in 2010 to 9.0 percent in 2022. This is consistent with a decrease in vacancy rate which can generally lead to higher housing prices. To improve development opportunities for affordable housing the City had included **Program 7**.

- Sanger residents are primarily employed in educational services, health care and social assistance (25.1 percent of jobs), retail trade (12.1 percent of jobs), and agriculture (10.6 percent of jobs), which has changed from 2011 where agriculture represented 16.9 percent of jobs. This shows a shift within the agricultural employment industry over ten years. Unemployment in Sanger as a whole decreased from 12.8 percent in 2014 to 6.8 percent in 2022.
- Sanger had an over-representation of very low-income families in 2018, with 17.3 percent of Sanger's families having incomes in that category compared to 12.8 percent of families across Fresno County.
- The unit composition of Sanger's housing stock has remained relatively consistent since 2010, with the predominant housing types being single-family detached units (77.9 percent) in 2010 and 77.9 percent in 2020. However, 20.8 percent of housing units were multi-family units. A large number of multi-family units are family apartment complexes managed by the Fresno Housing Authority.
- Over half of all housing units in Sanger (53.0 percent) were built more than 30 years ago, and 29.3 percent were built more than 50 years ago. This is lower than the rate of older housing stock countywide.
- As stated previously, owner-occupied households account for 58.7 percent of households in Sanger, compared to a countywide rate of 53.7 percent, and renter-occupied households account for 41.3 percent. This is representative of the current housing stock profile.
- As discussed in the Fair Housing section, it is estimated that 45 owner-occupied and 45 renter-occupied units in Sanger lack a complete kitchen or plumbing. In 2011, it was estimated that no households lacked complete plumbing facilities. The increase in complete plumbing facilities is a measure of substandard housing conditions.
 - In response to this increase, the City has included **Program 22** to connect at least 20 lower-income households with rehabilitation resources. Additional resources to assist with home rehabilitation are listed in the Regional Multijurisdictional Housing Element in Table 4-2 Financial Resources.
- Looking closer at special needs groups in Sanger, the proportion of seniors remained approximately the same within the overall population at 9.6 percent in 2010 and 9.5 percent in 2020. In 2020 large households were 25.6 percent of the total households (15 percent owner-occupied and 10.7 percent renter-occupied). Between 2010 and 2020, persons with disabilities, and female headed households all decreased by one percent or less. While the need may not be as high as it was in previous years, the need is still there.
 - Resources including the Fresno/Madera Area Agency on Aging (FMAAA) provide seniors with connections to programs, services, and resources that defray the cost of living, which can be a lifeline for seniors with lower incomes. In addition, the Central California Food Bank includes senior hunger programs to assist those seniors with their nutritional needs.

- To address the needs of special needs groups in Sanger, the City has included **Program 7: Affordable Housing Incentives**, **Program 10: Extremely Low-Income Households**, **Program 14: Housing for a Variety of Needs**, **Program 16: Zoning Code Amendments**.
- In 2020, 10.6 percent of the population was employed in agriculture, which is slightly higher than the countywide rate (8.8 percent). This has decreased since 2010 by 6.3 percent. Looking at the U.S. Department of Agriculture Census of Farmworkers, the number of permanent farm workers in Fresno County has decreased slightly from 2002 to 2017, decreasing from 18,751 farmworkers to 16,876 farmworkers. However, there was a slight increase from 2007 to 2012, showing an increase from 14,873 farmworkers to 17,751 farmworkers.
 - Given the significant size of the farmworker population in Sanger, the housing needs for this group are significant. Therefore, to prioritize housing for farmworkers the City has included **Program 8** to provide assistance in the form of letters of recommendation for grant applications and **Program 9** to require the developer to give qualified farmworker households a preference for 15 percent of the new units.
 - Additional resources to assist farmworkers are listed in the Regional Multijurisdictional Housing Element in Table 2-45 Resources for Farmworkers.
- In 2011, 10.4 percent of households were extremely low-income in Sanger, compared to 11.9 percent of households countywide. In 2018, the percent of extremely low-income households in Sanger rose to 12.8, compared to 13.3 percent countywide. Of these, 10.5 percent were renter-occupied households and 2.3 percent were owner-occupied households (2018). This indicates a greater need for rental housing to support extremely low-income households. Furthermore, 10.4 percent of all extremely low-income households are overpaying for housing, a higher rate than very low-income households (14.0 percent) and low-income households (7.5 percent) (2018). Overall, 38.6 percent of households in Sanger are overpaying for housing (2018).
 - In response to this local and regional need, the City has included **Program 7** to work with housing developers to expand affordable housing, **Program 25** to increase the availability of information and access to Section 8 rental assistance and units, and **Program 10** to incentivize and encourage construction of units specifically targeting extremely low-income households to reduce displacement.
 - Key resources such as Section 8 rental assistance, the Central California Food Bank, Emergency Shelter Grant Program, Rural Development Loans and Grants, and Rental Rehabilitation Program can assist extremely low-income households with providing essential social services, prevent homelessness, and connect individuals with affordable housing.
 - Additional resources to fund affordable housing activities are described in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development, in the subsection called Financial and Administrative Resources.

- Sanger had a slightly higher rate of households overpaying for housing than the county did as a whole in 2018, with 38.6 percent of all households in the city overpaying for housing compared to 37.8 percent across the county. The number of lower-income households overpaying for housing was same in Sanger and the county (70.6 percent). Given the significantly higher rates of overpayment among extremely low-, very low-, and low-income households, there is a great need for financial support and affordable units to meet the needs of these populations.
 - In response to these needs, the City has included **Program 7** to work with housing developers to expand affordable housing, **Program 27** to increase the availability of information and access to Section 8 rental assistance and units, and Program 10 to incentivize and encourage construction of units specifically targeting extremely low-income households to reduce displacement.
 - In addition, sites for new units have been identified across a range of overpayment rates for both owners and renters with the intent of increasing the supply of affordable housing for all income categories, thus reducing risk of displacement due to overpayment for all Sanger residents. These efforts are addressed in **Program 16** to remove governmental constraints with regard to development standards and barriers to special-needs housing opportunities.
 - Federal and state resources such as Section 8 rental assistance, HOME Investment Partnership Act Funds, CalHOME, the California Housing Finance Agency, as well as local resources such as the First Time Homebuyer Assistance Program and Habitat for Humanity are available to provide financial assistance to renters and homeowners.
 - Additional resources to fund affordable housing activities are described in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development in the subsection called Financial and Administrative Resources.
- In 2020, the city had a higher rate of household overcrowding compared to the countywide rate (8.7 percent of households in the city compared to 6.1 percent of households in the county). There was a lower rate of severe overcrowding in Sanger (2.6 percent of households) than in the county as a whole (3.6 percent).
- As stated above overcrowding rates are relatively high in Sanger, with about 12.0 percent of renter-occupied households experiencing overcrowding and 6.4 percent of owner-occupied households experiencing overcrowding. However, overpayment rates among renters and owners have decreased since 2010. Approximately 53.1 percent of renters are overpaying, compared to 27.0 percent of owners. When considering overpayment rates, overcrowding, and recent development trends, both owners and renters appear to have a housing need for adequately sized and priced housing opportunities in Sanger. When comparing 2018 overpayment rates to 2011 rates from the 5th cycle Housing Element, overpayment for both owners and renters has decreased. Overpayment for owner occupied households decreased from 46.6 percent to 27.0 percent overpaying, while renter occupied households decreased from 60.3 percent to 53.1 percent. Although overpayment

has decreased, more than half of renters are overpaying for housing and about one third of owners are overpaying.

- This shows a need for affordable housing and homeowner assistance programs. For example, a down payment assistance loan program can help a renter household achieve homeownership that might not otherwise be able to, with a loan that enables them to afford monthly mortgage payments and other housing related costs.
- In response to this need the City has included the following programs to increase housing mobility for lower income households: **Program 25** to promote the availability of Fresno County's Homebuyer Assistance Program to connect 20 prospective homebuyers with the County program, **Program 7** to help facilitate the development of multifamily housing, **Program 12** to encourage construction of ADUs as a potential future affordable housing opportunity, **Program 14** to support affordable development in a range of sizes, and **Program 27** to improve access to Section 8 housing opportunities for renters.
- Key resources such as Section 8 rental assistance, the Central California Food Bank, Emergency Shelter Grant Program, Rural Development Loans and Grants, and Rental Rehabilitation Program can assist extremely low-income households with providing essential social services, prevent homelessness, and connect individuals with affordable housing.
- Additional resources to fund affordable housing activities are described in the Regional Multijurisdictional Housing Element in Section 4, Opportunities for Residential Development in the subsection called Financial and Administrative Resources.
- Sanger had a higher rate of large households, those with five or more members, compared to the county as a whole (25.6 percent of households in Sanger compared to 18.1 percent countywide).
 - To address the needs of special needs groups in Sanger, including large households, the City has included **Program 7: Affordable Housing Incentives**, **Program 14: Housing for a Variety of Needs**, and **Program 16: Zoning Code Amendments**.
- Approximately equal shares of residents in Sanger by age were school-age children (5 to 17 years, 31.7 percent of residents) and young adults (25 to 44 years, 29.5 percent of residents). The City also had a similar median age (31.6 years) compared to the county's median age (32.4 years).
- In 2020, the percentage of Sanger's population that was aged 65 or older was lower than the percentage of seniors in the county as a whole (9.5 percent in Sanger compared to 12.0 percent of the county). The majority (74.7 percent) of Sanger's senior households were homeowner households. Of all of the city's senior residents, 43.8 percent had a disability, compared to the countywide average of 41.6 percent.

- Key resources such as Section 8 rental assistance, the Central California Food Bank, Emergency Shelter Grant Program, Rural Development Loans and Grants, and Rental Rehabilitation Program can assist extremely low-income households with providing essential social services, prevent homelessness, and connect individuals with affordable housing.
- Sanger had a lower rate of residents with disabilities than the county as a whole (9.2 percent compared to 12.9 percent across the county). Ambulatory and cognitive difficulties were the most commonly reported disabilities.
 - Through **Program 17**, the City will encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing mobility opportunities for seniors and persons with disabilities. Additionally, the City will amend its reasonable accommodations regulations to remove potential barriers for persons with disabilities.
 - Key resources for persons with disabilities include the Fair Housing Council of Central California and Resources for Independence Central Valley. Other resources such as Rural Mobile Health allows for medical services and screenings at no-cost.
- The percentage of Sanger households with single female heads of household was higher than the countywide rate (9.6 percent in the city compared to 7.3 percent in the county). Additionally, 35.9 percent of single female-headed households in Sanger were living under the poverty level. The City has included **Program 7** to provide affordable housing, with an emphasis on housing opportunities special-needs populations, such as female-headed households.
 - Key resources for this special-needs population include Centro La Familia, who provides support services to families and victims of domestic violence and sexual assault, California Rural Legal Assistance, who provides legal and housing counseling, Green Raiteros who provides transportation, workforce development and small business advancement and Rural Mobile Health who provides no-cost medical services. These services can be crucial for female-headed, single-parent households.
- Estimates from the 2022 Point-in-Time count suggest that 10 persons in Sanger may have been experiencing homelessness at that time. However, the Sanger Police Department estimates that there are 36 unsheltered individuals (April 2023). In 2023, the Point-in-Time count was based on zip code. 39 homeless individuals were counted in the zip code where Sanger is, however it's estimated that 9 were counted in the unincorporated portion of the zip code, indicating that 30 homeless individuals were counted in the City of Sanger.
 - The City has included **Program 3** to address homelessness and the needs of the unhoused population. The City will cooperate with neighboring cities, the County, and other agencies in the development of programs aimed at providing homeless shelters and related services.

- Several services are available to homeless residents locally and in the region, including those provided by Catholic Social Services, Emergency Housing Center (Plaza Terrace), Evangel Home, Inc., United Way, Fresno Rescue Mission, and Marjaree Mason Center. A comprehensive list and description of resources is included in the Regional Multijurisdictional Housing Element in Section 2, Regional Housing Needs Assessment in the subsection called Homeless. The City has included Program 3 to cooperate with neighboring cities, the County, and other agencies in the development of programs aimed at providing homeless shelters and related services.

Housing Constraints

While the City has made extensive efforts to encourage development of affordable and market-rate housing, there are many governmental and nongovernmental constraints that can make housing development more difficult. Governmental constraints are typically rules that apply to all development and are intended to meet other community interests.

- The City will create and revise residential zones to prioritize middle-density development as well as allowing second-floor units by right.
- The City's Zoning Code provides for a range of housing options. Updates to the code that will be required to bring it into line with State law include changes to the zones that permit ADUs, low-barrier navigation centers, residential care facilities, employee housing, single-room occupancy units, and supportive housing.
- The City's Affordable Housing Density Bonus will need to be updated to be consistent with State law.
- Fees charged by the City as part of the development process, along with fees charged by regional agencies, are not considered a constraint to development but will be monitored by the City.
- Current standards for on-site and off-site improvements are not considered a barrier to housing production.
- The City will establish formal procedures for permit processing consistent with the requirements of SB 330 and will establish an application process related to SB 35.
- The City will amend the reasonable accommodations procedure to review findings for approval, additional conditions for approval, and the fee requirement for appeals.
- The City will amend its Zoning Ordinance to update the definition of "family."

Nongovernmental constraints include challenges such as water access, the desire to preserve land for agricultural use, availability of financing, and the high cost of land in the city and across the region. A number of the goals and policies in the Housing Element are aimed at eliminating or lessening constraints to development of housing.

Housing Resources

A major component of the Housing Element is an analysis of sites that are available for the development of housing to meet the City's RHNA. The Housing Element identifies sites in Sanger where zoning is in place to allow for housing development, including higher-density housing sites (20+ units per acre) that are suitable for affordable housing development.

- The City has identified sufficient housing sites to meet its lower-, moderate- and above-moderate housing allocation.
- The City partners with Fresno County to provide several programs designed to help residents find affordable housing. These programs include the Fresno County Housing Assistance Rehabilitation Program (HARP), the Fresno County Rental Rehabilitation Program (RRP), and the Fresno County Homebuyer Assistance Program (HAP).
- The City will encourage the development of ADUs by educating the public about this housing type and providing informational materials to all discretionary land use applicants.

SECTION 1N-1: ACTION PLAN

Regional Collaboration

Program 1: Regional Collaboration on Housing Opportunities

The Multijurisdictional Housing Element provides an opportunity for countywide housing issues and needs to be more effectively addressed at the regional level rather than just at the local level, and the 15 participating jurisdictions are committed to continuing the regional collaboration in the implementation of the Housing Element. By working together, the jurisdictions can share best practices, explore opportunities for further collaboration, and make the best use of limited resources. The following efforts will be made to further regional collaboration:

- The City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- The countywide Housing Element Technical Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs.
- The County of Fresno Public Works and Planning Department, with assistance from the Fresno Council of Governments (FCOG), will take the lead in coordinating biannual committee meetings.
- The Housing Element Technical Committee will meet annually with the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementation of programs and seek technical assistance from HCD and other State agencies in the implementation of housing programs and the pursuit of grant funding.
- The Housing Element Technical Committee will advocate on behalf of the Fresno region for more grant funding for affordable housing and infrastructure improvements.
- The City will continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.
- The City will develop a directory of services and resources for lower-income households available in the region, and review and update it annually. The directory will be available on City/County websites and at City/County offices.

Financing:	General Fund
Time Frame:	Continue to meet with the Housing Element Technical Committee twice per year; meet with HCD annually. Develop a directory of services and resources by December 2025, update annually as needed.

Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.3, Policy 1.4, Policy 2.1, Policy 4.2

Program 2: Review Annexation Standards in Memorandum of Understanding

All jurisdictions in Fresno County are subject to the City/County Memorandum of Understanding (MOU), which establishes procedures for annexation of land to cities. The City/County MOU encourages urban development to take place within cities and unincorporated communities where urban services and facilities are available or planned to be made available to preserve agricultural land. The MOU standards for annexation require that a minimum of 25 percent of annexation areas have an approved tentative subdivision map or site plan. While cities can take certain steps to “prezone” land in advance of annexation, the annexation of the land into city limits depends on private developers requesting an annexation. In cities that are mostly built out within their current city limits, the MOU may limit the cities’ ability to accommodate future housing needs. One currently approved project with 490 units of above-moderate housing counted toward RHNA (Somerset) has had annexation and planning entitlements approved but is awaiting the completion of the MOU to begin annexation proceedings.

The County of Fresno and cities within the county shall work together at least once during the planning period to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the City/County MOU.

Financing:	General Fund
Time Frame:	Meet with the County by December 2026 to review the MOU standards, and update within a year if changes are needed.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4
Quantified Objective:	Facilitate the development of 490 units of above-moderate housing.

Program 3: Homeless/Unhoused Needs

The City will cooperate with neighboring cities, the County, and other agencies in completing the Point-in-Time count every other year and the development of programs aimed at providing homeless shelters and related services. During this coordination, the City will distribute information about local service providers, agencies, and other community organizations that provide services for unhoused individuals and families. The City will also monitor the demographic composition of the unhoused population to identify needs for targeted resources and determine what efforts to take, such as providing education on financial assistance and programs available.

Financing:	General Fund
Time Frame:	Distribute information on City website and reach out to potential partner organizations by July 2024 and hold strategy meetings 6 months prior to scheduled Point-in-Time counts.
Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 4.6
Quantified Objective:	Conduct a biannual Point-in-Time count and assist with program development and funding identification that will assist at least five homeless persons.

Adequate Sites

Program 4: Provision of Adequate Sites

The City of Sanger will provide for a variety of housing types and ensure that adequate sites are available to meet its Regional Housing Needs Allocation (RHNA) of 1,494 units. As part of this Housing Element update, the City has developed a parcel-specific inventory of sites suitable for future residential development. The suitability of these sites has been determined based on the development standards in place and their ability to facilitate the development of housing to meet the needs of the City's current and future residents, pursuant to State laws. The City will:

- Maintain and annually update the inventory of residential land resources for internal purposes.
- Monitor the availability of sites appropriate for lower-income housing in keeping with state “no net loss” provisions (Government Code Section 65863). If development projects are approved at densities lower than anticipated in the sites inventory the City will make written findings that the remaining sites identified are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the sites inventory list failing to accommodate the remaining RHNA by income level, the City will identify and make available (including rezoning, if needed) additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced-density project. The City will ensure that there is sufficient higher-density residential land available in areas throughout the city to deconcentrate poverty.
- Monitor and report residential development through the HCD annual report process.
- Actively participate in the development of the next RHNA Plan to ensure that the allocations are reflective of the regional and local land use goals and policies.

Financing:	General Fund
Time Frame:	Annually monitor as projects are processed.

Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.3, Policy 1.4, Policy 1.5, Policy 1.6, Policy 1.7, Policy 1.8, Policy 1.9

Program 5: Water and Wastewater Service

The development viability of the vacant sites in the inventory is directly linked to the availability and capacity of public facilities and services. As the water and wastewater provider in the city, the City will continue to monitor water and wastewater capacity and apply for funding and make improvements, as appropriate and feasible, to better serve existing development and strive to accommodate the RHNA. The City will also continue to ensure that hook-ups are prioritized for developments that include housing units affordable to lower-income households consistent with the provisions of California Government Code Section 65589.7. The City will complete rehabilitation of existing water wells 7A and 25 and development of new water wells 22 and 19.

Financing:	General Fund, Community Development Block Grant (CDBG)
Time Frame:	Complete improvements to new well sites and/or existing sites by summer 2024. Prioritize water and sewer hook-ups, ongoing.
Implementation Responsibility:	Community Development Department and Public Works Department
Relevant Policies:	Policy 1.7

Program 6: Use of Sites in Previous Cycles

Pursuant to Government Code Section 65583.2(c), any nonvacant sites identified in the prior 5th Housing Element Cycle or vacant sites identified in two or more consecutive planning periods, shall be provided by-right development when at least 20 percent of the units in the proposed development are affordable to lower-income households.

Financing:	General Fund
Time Frame:	Within six months of adoption of the Housing Element.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 1.1, Policy 1.2

Affordable Housing Development and Preservation

Program 7: Affordable Housing Incentives

The City continues to have needs for affordable housing for lower-income households, especially for seniors, persons with disabilities (including persons with developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. The City will continue to work with housing developers to expand affordable housing opportunities by doing the following:

- Continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. Identify development opportunities for affordable housing on an annual basis. Meet more frequently if development rates increase.
- Work with public or private sponsors to identify candidate sites for new construction of housing for special needs and take all actions necessary to expedite processing of such projects.
- Pursue partnerships with the Central Valley Regional Center to identify funding opportunities and promote housing and home rehabilitation programs for persons with disabilities.
- Continue to offer fee reductions and deferral of development impact fee payments to facilitate affordable housing development and special-needs projects, particularly those on infill sites.
- Continue to promote the State density bonus and provide streamlined processing to facilitate affordable housing development and provide for additional flexibility for affordable housing and special-needs housing through the minor deviation process. The City will promote this program by publicizing the incentives on the City's website and by conducting pre-application consultation with developers regarding available incentives. Examples of flexible development standards include reduced parking requirements; reduced requirements for curb, gutter, and sidewalk construction; common trenching for utilities; and reduced water and wastewater connection fees.
- Provide incentives to builders to provide housing with multiple bedrooms affordable to lower- and moderate-income households, aiming for construction of at least 20 units that meet these sizes, to meet the needs of female-headed, single-parent, and large-family households of all income levels (possible incentives will include reduced setbacks, reduced parking requirements, and technical assistance with applications for funding).
- Continue to streamline the environmental review process for housing developments to the extent possible, using available State categorical exemptions and federal categorical exclusions, when applicable.

- Monitor HCD’s website annually for Notices of Funding Ability (NOFA) and, where appropriate, prepare or support applications for funding for affordable housing for lower-income households (including extremely low-income households), such as seniors, disabled (including persons with developmental disabilities), the homeless, and those at risk of homelessness.
- Facilitate the approval process for land divisions, lot line adjustments, and/or specific plans or master plans resulting in parcel sizes that enable affordable housing development and process fee deferrals related to the subdivision for projects affordable to lower-income households.
- Work with developers of multifamily and affordable housing projects to identify site opportunities on an annual basis in higher-resource areas and areas with higher median incomes to develop mixed-income housing in high-resource areas (i.e., Washington Middle neighborhood and Faller Park neighborhood) to reduce concentrations of poverty and improve access to resources.
- To promote housing mobility, the City will require affordable projects sited in higher-opportunity areas (including Cherry Crossings) to do expanded marketing in areas of concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on **Figure 3-1, Regional TCAC/HCD Opportunity Areas**.

Financing:	HOME, CDBG, Low-Income Housing Tax Credit (LIHTC), Multifamily Housing Revenue Bond, and other funding sources, as available.
Time Frame:	Ongoing, as projects are processed by the City. Annually apply for funding and engage with Central Valley Regional Center at least every two years. Identify development opportunities for affordable housing on an annual basis. Require expanded marketing at initial lease up for all new affordable projects in higher-opportunity areas.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Expand the City’s affordable housing inventory by 605 units over the next eight years, 206 extremely low-income, 206 very low-income, and 193 low-income units, at least 50 of which include accessibility modifications to facilitate housing mobility for lower-income households and special-needs groups. Focus on site opportunities in higher-resource areas and areas with higher median incomes (i.e., Washington Middle neighborhood and Faller Park neighborhood) to reduce concentrations of poverty (in the John F. Kennedy Park and Lincoln Park neighborhoods) and improve access to resources.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.3, Policy 2.4, Policy 2.5, Policy 2.7, Policy 4.3, Policy 4.4, Policy 5.2

Program 8: Support Funding for Farmworker Housing

The farming industry is the foundation of the County’s economy base. According to the United States Department of Agriculture (USDA) 2017 Census of Agriculture, about 37,819 workers were employed in farm labor throughout the county, indicating a significant need to provide housing for farmworkers and their families, particularly during peak harvest seasons.

The City will provide technical support and offer incentives to housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including HCD and USDA Rural Development loans and grants and other funding sources that may become available. The City will also reach out to local farm employers to identify housing needs and seek funding to support development and will also continue to offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing. The City will identify development opportunities for farmworker housing at least twice in the planning period.

The City will annually monitor the status of farmworker housing as part of their annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, the City will make necessary changes to enhance opportunities and incentives for farmworker housing development.

Financing:	General Fund
Time Frame:	Meet with farmworker housing developers and advocates on a biannual basis to discuss their needs and offer assistance in the form of letters of recommendation for grant applications, assistance with site identification and grant opportunities, and discuss incentives for constructing farmworker housing. Identify development opportunities for farmworker housing at least twice in the planning period.
Implementation Responsibility:	Community Development Department
Quantified Objective:	40 lower-income units set aside for farmworkers and their families to reduce displacement risk for this population.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 2.2, Policy 2.4, Policy 2.5, Policy 4.2, Policy 4.3

Program 9: Farmworker Preference in New Affordable Housing

For new affordable housing projects developed with City assistance, incentives, and/or subject to City requirements, the City will require that the developer give qualified farmworker households a preference for 15 percent of the new units. Should demand from farmworker households be insufficient to fill the set-aside units, then the units will be made available to other qualified households. The City will annually reach out to affordable housing developers to gather interest and input on how to best implement this program and will provide information on available funding. The City will monitor the effectiveness of the preference policy and if it is not found to be effective, will identify and implement other approaches to meeting the need for housing for farmworker households.

Financing:	General Fund, CDBG, HOME, USDA Rural Development
Time Frame:	Ongoing, as projects are processed through the Planning Division and Community Development Department; annually reach out to developers and determine next steps within six months. If the policy has not been effective, the City will identify and implement other methods for meeting the farmworker housing need and begin implementing them by the end of 2025.
Implementation Responsibility:	Community Development Department
Quantified Objective:	80 lower-income units set aside for farmworkers or other qualified households to reduce displacement risk. Focus on encouraging housing mobility by facilitating development of lower-income units in higher-resource areas and areas with higher median incomes (i.e., Washington Middle neighborhood and Faller Park neighborhood) to reduce concentrations of poverty and improve access to resources.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.2, Policy 4.3

Program 10: Extremely Low-Income Households

Assembly Bill (AB) 2634 requires the quantification and analysis of existing and projected housing needs of extremely low-income households. The City has included **Program 16** partly to either define “Apartment hotels” (currently permitted in the C-3 zone) as single-room occupancy (SRO) units or find a zone to permit SRO units. These units are often more affordable to those with extremely low incomes. To further support the development or rehabilitation of SRO units and/or other units affordable to extremely low-income households, such as supportive and multifamily units, the City will continue to seek and pursue state and federal funds to offer a variety of incentives or concessions, such as:

- Provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.
- Expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing.
- Encourage the provision of affordable housing for young adults, particularly former foster youth and young mothers, through planning consultations, streamlined permit processing, and funding assistance.
- Encourage the development of SRO facilities, transitional and supportive housing, and other special housing arrangements, including committing City funds to help affordable housing developers provide SRO facilities consistent with the SRO Ordinance.

Financing:	General Fund, CDBG, HOME
Time Frame:	Ongoing; as projects are processed by the Planning Division. By December 2024, conduct outreach to organizations that support extremely low-income residents to understand funding needs, and review and prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.
Implementation Responsibility:	Community Development Department
Quantified Objective:	605 lower-income units, including 206 units for extremely low-income households to prevent displacement and provide housing mobility opportunities. Focus on site opportunities in higher-resource areas and areas with higher median incomes to develop lower-income units in higher-opportunity areas (i.e., Washington Middle neighborhood and Faller Park neighborhood) to reduce concentrations of poverty and improve access to resources.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.2, Policy 4.6

Program 11: Preservation of At-Risk Housing Units

Preserving the existing affordable housing stock is a cost-effective approach to providing affordable housing in Sanger. The City must guard against the loss of housing units available to lower-income households. As of May 2023, there are no affordable units that are considered at risk of conversion to market rate in the next 10 years. The City will continue to monitor status of affordable housing projects. If projects become at risk of converting to market-rate housing, the City will contact nonprofit housing providers and the Fresno Housing Authority to pursue options to preserve the projects and the City shall:

- Contact property owners of units at risk of converting to market-rate housing within one year of affordability expiration to discuss the City’s desire to preserve complexes as affordable housing.
- Coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.

Financing:	General Fund, LIHTC, Multifamily Housing Revenue Bond, and other funding sources as available.
Time Frame:	Annually monitor units at risk of converting; coordinate noticing as required per California law.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Continue to monitor the 348 assisted affordable units in Sanger.
Relevant Policies:	Policy 3.6

Program 12: Encourage and Facilitate Accessory Units

An accessory dwelling unit (ADU), sometimes called a “granny flat,” 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. ADUs can be an important source of affordable housing given that they typically are smaller and have no associated land costs. The City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Washington Middle neighborhood and Faller Park neighborhood, to reduce concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods). The City will take the following actions, which are aimed at providing an increased supply of affordable units in the specified neighborhoods, as well as, throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households:

- Continue to implement the public education program advertising the opportunity for ADUs by updating informational handouts and brochures about ADUs that are available on the City’s website and at the public counter annually, or as needed to reflect changes in State law. Reach out directly with the informational materials to homeowners particularly in predominantly single-family neighborhoods with higher median incomes, such as the Washington Middle neighborhood and Faller Park neighborhood.
- Provide informational materials on ADU opportunities to all discretionary land use applicants.
- Publish informational materials at least annually pertaining to ADUs through a combination of media, including the City’s social media accounts and the bilingual Inside Sanger Newsletter.
- By December 2024, identify and implement incentives for construction of ADUs with new development, which may include differing collection times for impact fees for the square footage associated with the ADU.

Financing:	General Fund
Time Frame:	Update ADU materials annually, or as needed to reflect changes in State law, and identify and implement incentives for construction by December 2024.
Implementation Responsibility:	Community Development Department (Planning Division)
Quantified Objective:	13 ADUs for lower-income households, 6 for moderate-income households, and 6 for above moderate-income households to improve housing mobility opportunities and reduce displacement risk. Focus on site opportunities in higher-resource areas and areas with higher median incomes (i.e., Washington Middle neighborhood and Faller Park neighborhood) to reduce concentrations of poverty (in the John F. Kennedy Park and Lincoln Park neighborhoods) and improve access to resources.
Relevant Policies:	Policy 1.3, Policy 2.1, Policy 2.6

Program 13: Replacement Units

To reduce displacement risk and in accordance with California Government Code Section 65583.2(g), the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.

This requirement applies to:

- Nonvacant sites;
- Vacant sites with previous residential uses that have been vacated or demolished.

Financing:	General Fund
Time Frame:	Ongoing, the replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.
Implementation Responsibility:	Community Development Department (Planning Division)
Relevant Policies:	Policy 3.3, Policy 3.6

Program 14: Housing for a Variety of Needs

The City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes. This could include duplexes, townhomes, apartment buildings, and condominiums in neighborhoods and new subdivisions and will identify and implement innovative and alternative housing options that provide greater flexibility and affordability in the housing stock while promoting mixed-income development. This may include consideration for further reduction in regulatory barriers for community land trusts, tiny houses, microhomes, cottage homes, small lot subdivisions, and other alternative housing types, as well as exploration of a variety of densities and housing types in all zoning districts.

The City will use the findings of this program to target development of a variety of housing types in higher-opportunity areas (i.e., the Washington Middle neighborhood and Faller Park neighborhood) by identifying sites for higher-density development and mixed-income development to reduce displacement risk, promote inclusion, and support integration of housing types based on income.

Financing:	General Fund
Time Frame:	Identify and implement innovative and alternative housing options to help further housing production by December 2025; amend the Zoning Ordinance as needed.
Implementation Responsibility:	Community Development Department (Planning Division)
Quantified Objective:	30 lower-income units, 30 moderate-income units, and 10 above moderate-income units to reduce displacement risk for all residents and facilities in income-integrated neighborhoods in areas of predominantly single-family development and of concentrated overpayment.
Relevant Policies:	Policy 1.2, Policy 2.1, Policy 4.4

Program 15: Large Sites

The City will encourage and facilitate residential development on larger parcels over ten acres through actions such as subdividing sites to sizes smaller than ten acres or using other site planning methods to encourage the affordability and assumptions established in the sites inventory. The City will proactively conduct outreach efforts on an annual basis until large higher-density sites in the inventory have been developed in order to distribute information to potential developers and provide notice of incentives to further encourage development of larger parcels. Outreach efforts may include, but is not limited to, one-on-one meetings with developers and property owners, as well as maintaining and advertising an inventory of large sites appropriate for residential development and informational materials on available incentives. The City will formally approach the owner of Site 2 to divide the parcel along zoning lines and will continue to work with the owner of Site 3 on completing a lot line adjustment. The City is committed to applying priority project processing and deferral of development impact or permit fees for proposals on large sites that provide low-income, special needs, and/or farmworker housing on these sites. City staff will continue to work with affordable housing builders that have built projects within the City and keep them apprised of available properties for development. City staff will continue to be in direct communication with owners of available properties for development.

Financing:	General Fund
Time Frame:	Prepare informational materials, and notices of the incentives available on available large sites and distribute by December 2024. Other outreach activities annually while the available sites inventory contains higher-density sites larger than ten acres.
Implementation Responsibility:	Community Development Department (Planning Division)
Quantified Objective:	256 lower-income units, 126 moderate-income units, and 126 above moderate-income units.
Relevant Policies:	Policy 1.2, Policy 2.3

Removal of Governmental Constraints

Program 16: Zoning Code Amendments

The City will amend the Municipal Code and add City website links to the Zoning Ordinance portion of the Municipal Code for easy access by citizens and the development community. To address the following development standards and barriers to special-needs housing opportunities, the City will complete the following:

- **Density Bonus:** Amend the Density Bonus ordinance to allow up to a 50 percent increase in project density depending on the proportion of units that are dedicated as affordable, and up to 80 percent for projects that are completely affordable, in compliance with State law, and promote the use of density bonuses for lower-income units by providing information through a brochure in City buildings and on the City’s website.
- **Accessory Dwelling Units:** Amend the Zoning Code to be consistent with all State legislation related to ADUs, ensuring that ADUs are permitted in all zones that permit single-family or multifamily uses, and permit the construction of a junior accessory dwelling unit (JADU) on each lot in addition to an ADU, in accordance with California Government Code Section 65852.2.
- **Emergency Shelters:**
 - The City will comply with Government Code Section 65583(a)(4)(I), which requires that zoning designations identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit allow residential uses. To comply with State law, the City will amend the RM-2.5 zone to allow emergency shelters by-right, ensuring there is sufficient vacant land or redevelopment potential to accommodate shelter capacity to meet the homeless need. The City will update its definition of “emergency shelter” to clarify that emergency shelters may include other non-permanent housing interventions, such as a navigation center, bridge housing, and respite or recuperative care.
 - The City will remove the requirement that emergency shelters must be a certain distance from other emergency shelters.
 - The City will review parking requirements for emergency shelters to ensure that parking standards are sufficient to accommodate all staff, provided standards do not require more parking for emergency shelters than other residential or commercial uses in the same zone, in compliance with Government Code Section 65583(a)(4)(A)(ii).
- **Low-Barrier Navigation Centers:** Permit low-barrier navigation centers, defined as low-barrier, temporary service-enriched shelters to help homeless individuals and families to quickly obtain permanent housing by-right in zones where mixed uses are allowed or in nonresidential zones that permit multifamily housing (Government Code Section 65662; AB 101).
- **Definition of Family:** Adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law.
- **Residential Care Facilities:** Allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Sections 1267.8, 1566.3, and 1568.08, and allow residential care facilities, regardless of size, with an administrative approval process, in all zones that permit residential uses of the same type, in accordance with the City’s definition of family.

- **Employee Housing:** Treat employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Treat employee/farmworker housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with the California Employee Housing Act, and allow for a streamlined, ministerial approval process for projects on land designated as agricultural or land that allows agricultural uses (Health and Safety Code Sections 17021.5, 17021.6, and 17021.8).
- **Single-Room Occupancy Units:** The City will either define “Apartment hotels” (currently permitted in the C-3 zone) as SRO units or find a zone to permit them in compliance with Government Code Section 65583(c)(1).
- **Transitional and Supportive Housing:** Permit transitional housing and supportive housing as residential uses only subject to those restrictions that apply to other residential dwellings of the same type in the same zone (Government Code Section 65583(a)(5)). Additionally, allow supportive housing in multifamily and mixed-use zones, including nonresidential zones permitting multifamily uses (Government Code Section 65583(c)(3)).
- **Additional amendments to reduce barriers to residential development:**
 - Create an R-1-5 district allowing 5,000-square-foot residential lots and require architectural review to ensure a high standard of design for the proposed R-1-5 zone.
 - Revise RM zones to not allow single-family residential subdivisions, and instead prioritize middle-density development.
 - Amend the Neighborhood, Community, Central, and General Commercial districts, and the Administrative and Professional Office districts, to allow second-floor and above-residential units by-right.
 - Increase allowable heights in the RM districts to permit three-story structures by-right.
 - Revise parking standards for multifamily units to vary by unit type (i.e., parking demand for a studio unit differs from a three-bedroom unit).
 - Revise setbacks for residential garages, allowing habitable space closer to the street than the garage.
 - Revise the uses for zones into a Zoning Matrix format.
 - Revise and update standards pertaining to specific issues like fencing and landscaping.
 - Consider adding a Historic Preservation section to the Zoning Ordinance.
 - Update the Definitions section of the ordinance, including illustrations, where appropriate.
 - Eliminate un-used and unnecessary zone districts.
 - Eliminate unneeded and repetitious sections of the Zoning Ordinance.

- Make the Ordinance more user-friendly through the addition of tables and graphic illustrations of complex zoning standards.

Financing:	General Fund
Time Frame:	Complete remaining Zoning Ordinance amendments by December 2024. Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing.
Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 2.7, Policy 5.2

Program 17: Reasonable Accommodations and Universal Design

For requests for reasonable accommodations, the City will review findings of approval for objectivity, remove any subjective conditions for approval, and remove the fee requirement for appeals. The City will provide information to individuals with disabilities regarding reasonable accommodation policies, practices, and procedures based on the guidelines from HCD. This information will be available through postings and pamphlets at the public counter and on the City’s website.

The City will also amend its reasonable accommodations regulation in the Municipal Code to continue to permit applicants to appeal reasonable accommodations decisions, but to prohibit third parties from appealing decisions. Additionally, the City will amend its reasonable accommodations regulations to remove required findings related to the potential impact on the surrounding area, physical attributes of the property and structures, and other reasonable accommodations that may provide an equivalent level of benefit.

The City will also implement State requirements (Sections 4450 to 4460 of the California Government Code and Title 24 of the California Code of Regulations) to include accessibility in housing and public facilities for persons with disabilities:

- Encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing mobility opportunities for seniors and persons with disabilities.
- Review regulations and procedures for City-funded or operated housing programs to ensure that they do not exclude participation by persons with disabilities.
- Include accessibility considerations in the preparation of the City’s capital improvement plan and the allocation of funding for capital improvements in support of housing and residential neighborhoods for persons with physical or developmental disabilities.

Financing:	General Fund, SB 2 Grant Funding, LEAP Grant Funding
Time Frame:	Review findings for approval for objectivity, remove additional conditions for approval (including those specifically described in this program), prohibit third parties from appealing reasonable accommodations decisions and remove the fee requirement for appeals by December 2024; create brochures on universal design and the reasonable accommodations ordinance by December 2024 and update biannually, or as needed.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Assist five residents with reasonable accommodation requests to reduce displacement risk and encourage three accessible units to improve housing mobility.
Relevant Policies:	Policy 4.1, Policy 4.5

Program 18: Lot Consolidation and Lot Splits

To create additional opportunities for infill development and affordable housing, the City will revise maximum lot coverages in certain areas to allow more lot coverage for residential units. The City will also help to facilitate lot consolidations to combine small lots identified as part of a larger site in the Housing Element into larger developable lots for housing. The City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers. As developers and owners approach the City with interest in lot consolidation for the development of affordable housing, the City could defer certain fees, allow more height or additional stories, waive lot merger fees for certain small contiguous lots, and provide concurrent/fast tracking of project application reviews to developers who provide affordable housing. By 2026, the City will review the effectiveness of this program and revise as appropriate. The City will also evaluate grant funding for parcel assemblage land banking when it is available. Similarly, where lot splits are needed to facilitate housing development, the City will work with developers and owners to complete lot splits.

Financing:	General Fund (legislative efforts); grant funding (implementation)
Timeframe:	Meet with developers and property owners starting in 2024 and annually thereafter. Based on the meetings with developers and property owners, add incentives as appropriate within six months, and again each year after every annual meeting occurs. Ongoing: Support consolidation as applicable housing applications are received; pursue grant funding during planning period if California legislation and/or programs enable a tax-increment or similar program that leads to funding for site assembly.

Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 1.1, Policy 1.2, Policy 1.4, Policy 1.5, Policy 2.4
Quantified Objective:	Support two sets of lot consolidations (anticipating four units affordable to moderate-income households and four units affordable to above moderate-income households) during the planning period to improve housing mobility, reduce displacement risk, and increase the supply of affordable housing in higher-opportunity areas. Approve two applications to split parcels that result in feasible sites for housing during the planning period (anticipating 364 units affordable to lower-income households and 226 units affordable to moderate-income households).

Program 19: Monitoring of Planning and Development Fees

The City charges various fees to review and process development applications. Such fees may add to the cost of housing development. The City will analyze housing-related development fees, particularly for multifamily housing, on an annual basis to ensure they do not unduly constrain development. As part of the analysis process, meet with multifamily developers at least once by December 2024 to request input regarding constraints associated with fees. Based on feedback received, reduce fees if found to be a constraint. Further, the City will offer deferred or reduced fees to facilitate affordable housing development, as appropriate.

Financing:	General Fund
Time Frame:	Meet with multifamily developers by December 2024 and revise fees, if necessary, by December 2025. Review fees annually.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Facilitate construction of 605 units affordable to lower-income households during the planning period, targeting missing-middle development in higher-resource areas.
Relevant Policies:	Policy 1.2, Policy 1.4

Program 20: Preliminary Applications (SB 330) and Streamlined Approval (SB 35)

The City complies with SB 330, relying on regulations set forth in the law for processing preliminary application for housing development projects, conducting no more than five hearings for housing projects that comply with objective General Plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report (EIR) or 60 days after adoption of a mitigated negative declaration (MND) or an environmental report for an affordable housing project. The City will continue to review projects in compliance with SB 330 and use the SB 330 preliminary application form prepared by HCD.

The City will comply with SB 35 by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects per Government Code Section 65913.4. The applications will be available on the City’s website and at public counters.

Financing:	General Fund
Time Frame:	Continue to review projects in compliance with SB 330 and use the SB 330 preliminary application form prepared by HCD: ongoing. Develop an SB 35 streamlined approval process by June 2025 and implement as applications are received.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Facilitate construction of 10 very low-income units and 10 low-income units to increase housing mobility opportunities, prioritizing new opportunities in higher-resource areas.
Relevant Policies:	Policy 1.4, Policy 2.3, Policy 2.4

Program 21: Objective Design Standards

The City will adopt all portions of the Sanger Design Guidelines as part of the zoning ordinance and develop objective design guidelines and standards to provide clear and objective standards related to single-family, multifamily, and mixed-use residential developments. Additionally, the City will review its Conditional Use Permit (CUP) process and revise or remove any subjective findings requirements in order to ensure objectivity in the CUP process. This will include clarifying finding 1 to specify that determinations of adequacy of size and shape are based on the objective development standards described in the applicable chapters of the zoning code; clarifying finding 2 to reference the objective bases of street width and pavement adequacy in the Circulation Element; and clarifying finding 3 to specify that the finding will not preclude conditions for residential care facilities or necessary alterations for reasonable accommodations requests.

Financing:	General Fund
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Time Frame:	Adopt objective design standards and both review and revise CUP findings requirements by December 2025 and implement thereafter.
Implementation Responsibility:	Community Development Department
Quantified Objective:	50 units over the planning period; of these, 25 units in higher-opportunity areas to promote access to resources and mobility for target households.
Relevant Policies:	Policy 1.8, Policy 2.7

Housing Quality

Program 22: Fresno County Housing Assistance Rehabilitation Program (HARP)

This program provides loans to qualifying homeowners, including owners of mobile or manufactured homes, in the unincorporated county and participating cities for the improvement of their homes. The City of Sanger is a participating jurisdiction. Eligible improvements include energy-efficiency upgrades and installations, health and safety and hazard corrections, and accessibility modifications to reduce displacement risk and facilitate place-based revitalization. Loan terms under this program vary according to household income and the improvements and repairs that are needed. The City will:

- Promote available housing rehabilitation resources on the City’s website and at public counters.
- Seek funding for targeted assistance for property owners and landlords of rental properties throughout Sanger.
- Conduct targeted outreach to inform property owners of rehabilitation assistance in neighborhoods with concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as to owners of older housing units, which are scattered throughout the city. Conduct additional outreach in the southeast side of the city to ensure the program reaches households in areas of high segregation and poverty to promote place-based revitalization and to houses in the city’s original downtown core square mile area, where there may be increased need for home rehabilitation and replacement.
- Advertise HARP specifically to persons with disabilities who may need home accessibility modifications by partnering with the Central Valley Regional Center (*see also Program 7: Affordable Housing Incentives*).
- Refer interested households to the County HARP program.
- Target promotion through the City’s bilingual newsletter and areas of need to assist in reducing displacement risk for residents by improving living conditions and enabling them to stay in their home and community.

Financing:	CDBG and HOME funds
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Time Frame:	Update materials every other year, or as new information is provided by the County, and send out targeted promotion annually.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division, and City of Sanger
Quantified Objective:	Connect at least 20 lower-income households with rehabilitation resources during the planning period. Facilitate rehabilitation of five housing units, three of these in areas of concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, and among owners of older housing units, which are in the city's original downtown core square mile area and scattered throughout the city, to facilitate place-based revitalization.
Relevant Policies:	Policy 3.2, Policy 4.1

Program 23: Fresno County Rental Rehabilitation Program (RRP)

This program provides no-interest loans to qualifying property owners in the unincorporated county and participating cities for making improvements to their rental properties to reduce displacement risk for renters. The City of Sanger is a participating city in the RRP and provides information to property owners. Eligible improvements include repairing code deficiencies, completing deferred maintenance, lead-based paint and asbestos abatement, heating, ventilation, and air conditioning (HVAC) repairs, energy-efficiency upgrades, accessibility modifications, and kitchen and bathroom upgrades. The City will:

- Promote available housing rehabilitation resources on the City's website and at public counters.
- Refer interested property owners to the County RRP program.
- Advertise RRP specifically to persons with disabilities who may need home accessibility modifications by partnering with the Central Valley Regional Center (*see also Program 7: Affordable Housing Incentives*).
- Target promotion through the City's bilingual newsletter and in areas of concentrated renter households or older housing stock to assist in reducing displacement risk and promote place-based revitalization for residents by improving living conditions and enabling them to stay in their home and community. Conduct additional outreach in areas of concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods, and areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, including the southeast side of the city and the city's original downtown core square mile area, to ensure the program reaches households in areas of high segregation and poverty along with areas of greater need for rehabilitation and replacement to facilitate place-based revitalization.

Financing:	HOME funds
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Time Frame:	Update materials every other year, or as new information is provided by the County, and send out targeted promotions annually.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division, and City of Sanger
Quantified Objective:	Connect at least 20 lower-income households with rehabilitation resources during the planning period. Facilitate rehabilitation of five housing units, three of these in areas of concentration of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, and among owners of older housing units, which are in the city's original downtown core square mile area and scattered throughout the city, to facilitate place-based revitalization.
Relevant Policies:	Policy 3.2, Policy 4.1

Program 24: Code Enforcement

The City's Code Enforcement division will continue to use code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with City codes. The City's Code Enforcement will also refer income-eligible households to County housing rehabilitation programs and promote targeted assistance for property owners and landlords of rental properties for assistance in making the code corrections. Targeted efforts to improve housing conditions in areas of need, such as the southeast side of the city and in the city's original downtown core square mile area, will facilitate place-based revitalization and assist in reducing displacement risk for residents by improving living conditions and enabling them to remain in their home and community. As shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, these are areas of high segregation and poverty. The city's original downtown core has a higher need for rehabilitation and replacement. This program will also be targeted towards areas of concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods).

Financing:	General Fund
Time Frame:	Make informational materials on rehabilitation assistance programs available by January 2024, to be provided on an ongoing basis when violations are confirmed, conduct code enforcement as complaints are received.
Implementation Responsibility:	Code Enforcement and Community Development Department (Building Division)

Quantified Objective:	Reduce displacement risk and encourage place-based revitalization by facilitating rehabilitation of 10 units by providing informational materials to owners in violation of City codes on available assistance programs and annually promote available assistance programs in areas of concentrated lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as, areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas , and among owners of older housing units, which are in the city’s original downtown core square mile area and scattered throughout the city.
Relevant Policies:	Policy 3.1, Policy 3.3

Housing Assistance

Program 25: Fresno County Homebuyer Assistance Program

The City of Sanger participates in the County’s Homebuyer Assistance Program (HAP), which is administered through the Fresno County Housing Authority. To reduce displacement risk of homeowners being priced out of the community and to facilitate housing mobility opportunities, this program assists lower-income families with purchasing their first home by providing a zero-interest, deferred-payment loan that does not exceed 20 percent of the purchase price of the single-family residence (plus loan closing costs). Households earning up to 80 percent of the area median income (AMI) in unincorporated Fresno County and participating cities are eligible for this program. The City will:

- Promote available homebuyer resources on the City’s website and at public counters.
- Refer interested households to the County program with the goal of assisting four households.
- Promote the availability of this program, particularly in areas with concentrations of renters, particularly lower-income renters who may be overpaying, by providing multilingual informational materials at public buildings and community locations and will post the program on the City’s website.

Sanger residents also have access to a number of homebuyer assistance programs offered by the California Housing Finance Agency (CalHFA), through the Fresno County Public Works and Planning Department, Community Development Division.

- Mortgage Credit Certificate (MCC): The MCC Tax Credit is a federal credit that can reduce potential federal income tax liability, creating additional net spendable income that borrowers may use toward their monthly mortgage payment. This MCC Tax Credit program may enable first-time homebuyers to convert a portion of their annual mortgage interest into a direct dollar-for-dollar tax credit on their U.S. individual income tax returns.

- CalPLUS Conventional Program: This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalPLUS Conventional is fixed throughout the 30-year term. The CalPLUS Conventional is combined with a CalHFA Zero Interest Program (ZIP), which is a deferred-payment junior loan of 3 percent of the first mortgage loan amount, for down payment assistance.
- CalHFA Conventional Program: This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalHFA Conventional is fixed throughout the 30-year term.

The City will promote all available homebuyer resources on the City’s website and at public counters and will annually review funding resources available at the state and federal levels and pursue as appropriate to provide homebuyer assistance.

Financing:	General Fund, HOME funds
Time Frame:	Ensure informational materials on all homebuyer resources are on the City’s website and available at public counters by June 2024. Update materials annually, or as new information is provided by the County, and send out targeted promotions at least every other year.
Implementation Responsibility:	Fresno County Public Works and Planning Department, Community Development Division
Quantified Objective:	Connect 20 prospective low-income and/or moderate-income homebuyers with the County program to facilitate housing mobility opportunities in the city.
Relevant Policies:	Policy 2.1, Policy, 2.4, Policy 2.5, Policy 2.8

Program 26: Energy Conservation

The City will continue to promote energy conservation in housing development and rehabilitation:

- Promote California HERO and YGRENE programs by providing links on the City’s website and making brochures available at City counters.
- Continue to promote and support Pacific Gas and Electric Company programs that provide energy-efficiency rebates for qualifying energy-efficient upgrades by providing a link on the City’s website and making brochures available at City counters.
- Expedite review and approval of alternative energy devices (e.g., solar panels).
- Assist lower-income households with energy efficiency through the County’s Housing Assistance Rehabilitation Program. Target additional outreach for this program to houses in the city’s original downtown core square mile area.
- Encourage developers to be innovative in designing energy-efficient homes and improving the energy efficiency for new construction.

Financing:	General Fund
Time Frame:	Make information easily available on the City’s website and at public facilities by June 2025.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Assist five lower-income residents annually in need of assistance with energy-efficiency improvements to reduce displacement risk due to housing costs.
Relevant Policies:	Policy 6.1, Policy 6.2, Policy 6.3

Program 27: Housing Choice Vouchers

The Housing Choice Voucher (HCV) Program extends rental subsidies to extremely low- and very low-income households, including families, seniors, and the disabled. The program offers a voucher that pays the difference between the current fair market rent (FMR) as established by the United States Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e., 30 percent of household income). The Fresno Housing Authority administers the HCV program in Fresno County.

- Improve access to higher-opportunity areas for lower-income households by encouraging voucher acceptance in higher-resource neighborhoods (i.e., Washington Middle neighborhood and Faller Park neighborhood).
- Work with the Housing Authority to refer interested HCV households to the County program with the goal of maintaining the 142 active HCVs in Sanger.
- Meet with the Fresno Housing Authority by June 2024 to discuss the process of developing printed informational materials, with the goal of making materials available at public counters by June 2025.
- Work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the city to promote housing mobility opportunities for all residents.
- Refer interested households to the Fresno Housing Authority and encourage landlords in higher-resource neighborhoods to register their properties with the Housing Authority for accepting HCVs.

Financing:	HUD Section 8
Time Frame:	Provide information on the City’s website by February 2024. Meet with the Housing Authority by June 2024 and develop informational materials by June 2025. Target outreach to property owners and landlords at least annually.
Implementation Responsibility:	Fresno Housing Authority

Quantified Objective:	Conserve the 142 active HCVs in Sanger. Encourage voucher acceptance in higher-resource neighborhoods (i.e., Washington Middle neighborhood and Faller Park neighborhood).
Relevant Policies:	Policy 2.2

Program 28: Housing Discrimination Monitoring and Referral

The Fresno Housing Authority publicizes all information related to housing opportunities, programs, fair-housing information, and assistance in English, Spanish, Hmong, French, German, Chinese, Arabic, Dutch, Italian, Korean, Portuguese, and Russian. However, while all public notices and information on the Housing Authority website are translated to all of the previously mentioned languages, general circulation of information and secondary links, such as applications, are available only in English. In response to the feedback received, the City will improve fair housing outreach capacity and multilingual accessibility to all public resources, information, and meetings, including fair housing resources. The City will coordinate with the Housing Authority, Fresno Council of Governments (FCOG), and other Fresno County jurisdictions to develop Spanish-language printed materials to improve accessibility to fair housing resources for residents. If additional languages become more prevalent in the county, materials will be translated into those languages as needed.

The City will also:

- Establish a procedure to refer residents with fair housing questions or issues to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair housing organizations.
- Provide fair housing information on the City’s website and in printed materials available in public buildings in both English and Spanish.
- Coordinate with local fair housing service providers to conduct biannual trainings for landlords and tenants on fair housing laws, rights, and responsibilities and ongoing access to legal counseling.

Financing:	General Fund, grant funding
Time Frame:	Either individually or as part of the Countywide Housing Element Technical Committee (Program 1), meet annually with FHC-CC to discuss fair housing issues and opportunities for education. Assist the Housing Authority to translate fair housing materials and resources into Spanish by December 2024. Make fair housing information available on the City’s website and in public buildings by June 2025. Coordinate with fair housing providers to conduct biannual trainings for landlords and property owners.
Implementation Responsibility:	Community Development Division, Fresno Housing Authority

Quantified Objective:	Reduce displacement risk for 20 individuals or families resulting from language barriers and 10 from discrimination by landlords or property owners.
Relevant Policies:	Policy 5.1

Program 29: Improve Access to Resources

The City shall take the following actions to encourage place-based revitalization improve access to resources and opportunities citywide, but with a particular emphasis on neighborhoods with a concentration of lower-income residents who often face additional barriers in accessing resources:

- Work with Fresno County Rural Transit Agency (FCRTA) and other jurisdictions in the county to develop a fact sheet, or similar informational materials, of FCRTA programs to be posted on the City’s website, social media, and in public buildings by January 2026, and advertised annually in the City’s newsletter to help connect seniors and other residents to services in the city and throughout the county. Once informational materials are available, conduct targeted outreach in areas with higher rates of seniors and persons with disabilities within six months, including on the north side of the city and to City of Sanger Community Center/Senior Center age-restricted senior housing complexes.
- Work with FCRTA to identify ways to increase transit access to areas of high segregation and poverty, such as identifying at least one additional stop within this area on both routes that include the city to promote place-based revitalization.
- Prioritize projects that facilitate place-based revitalization and stimulate access to economic opportunities through the City’s Capital Improvement Plan (CIP), such as projects that improve public infrastructure in deteriorating or underserved areas, such as the area of high segregation and poverty in the southeast quadrant of the city. See **Program 30**.
- Ensure program availability and funding announcements are made available in Spanish starting within six months of Housing Element adoption. Ensure that attendees at all public meetings are aware of the availability of translation services and provide translation services at all meetings where it is requested, during the planning period.
- Recruit residents from the area of high segregation and poverty on the southeast side of the city to serve on boards, committees, task forces and other local government decision-making bodies when vacancies are available, and conduct additional public input outreach in this area when generating the CIP.
- Facilitate place-based revitalization and improve access to healthy outdoor spaces and reduce exposure to pollutants for new housing by evaluating transitional buffers between residential and agricultural uses and highways and working with developers as projects are proposed to mitigate impacts associated with emissions from agricultural industries and traffic and facilitate access to healthy outdoor spaces. Identify environmental mitigation strategies on at least two projects during the planning period. See **Program 30**.

- Meet with school district representatives by June 2025 to analyze whether there are links between housing stability and school performance, with an emphasis on schools with a high proportion of socioeconomically disadvantaged students. Work with the school district to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide. If district representatives identify housing availability as a barrier to teacher retention, conduct a feasibility study to identify the funding that would be required to provide teacher housing or other housing incentives for teachers by June 2028.

Financing:	General Fund
Time Frame:	Refer to each bulleted action for specific timeframes.
Implementation Responsibility:	Community Development Department
Quantified Objective:	Improve access to resources and reduce displacement risk resulting from a variety of factors for at least 30 residents, particularly in areas with concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods)
Relevant Policies:	Policy 3.1, Policy 3.5, Policy 5.1, Policy 5.2

Place-Based Revitalization

Program 30: Neighborhood Improvements

- The City shall promote environmental justice and maintain and revitalize neighborhoods citywide, with a particular focus on areas of lower opportunity and concentrated poverty, including in the John F. Kennedy Park and Lincoln Park neighborhoods. Targeted investment in neighborhood revitalization will focus on improving infrastructure, schools, employment, parks, transportation and other community amenities.
- To address environmental disparities or negative environmental impacts, particularly related to air quality, the City will conduct citywide outreach to publicize available residential and commercial programs from non-City sources, such as the San Joaquin Valley Air Pollution Control District, on an annual basis. The City will also investigate the availability of additional funds and programs to mitigate air quality issues, particularly in buildings with low-income tenants and for low-income homeowners, as well as funding that can be used to incentivize air quality improvement strategies on projects with lower- or moderate-income units, such as the installation of green roofs. The City will seek this funding on an annual basis and apply as opportunities become available, then make funding available for the applicable strategy within six months of receipt. As is discussed in **Program 29**, the City will also study transitional buffer areas between residential uses and highways or agricultural uses to mitigate associated issues related to air quality and will identify

environmental mitigation strategies on at least two projects during the planning period related to air quality issues.

- The City will prepare a comprehensive update to the City’s 2006 - 2025 Parks and Recreation Master Plan. The City has drafted an RFP soliciting proposals to complete this Master Plan update and anticipates releasing the RFP in April 2024. As stated in the draft RFP, the Master Plan update should be completed within 8 months of acceptance of a proposal. The draft RFP specifies that the City is looking for a consultant with expertise in planning inclusive environments that welcome and accommodate people of all ages, abilities, and backgrounds. As described in the draft RFP, the updated Master Plan will facilitate the existing services provided by the Parks and Recreation department, including landscaping and facility maintenance, open space preservation, special events, and recreation programming for all ages. The updated Master Plan will include other key items such as creation of a Parks and Recreation Director position, creation of river corridor park space, location and development of a sports park, short and long-term deferred maintenance needs, support and facilitation of non-profit groups to benefit parks and recreation in and around Sanger, and coordination with existing and anticipated related plans and studies. The City will ensure that the updated Master Plan focuses on improvements in neighborhoods citywide, with a particular focus on areas of lower opportunity and concentrated poverty, including in the John F. Kennedy Park and Lincoln Park neighborhoods.
- In 2021, the City assisted the Newmark Village project with an application for an Affordable Housing and Sustainable Communities (AHSC) Grant. As a result, the project was awarded \$10,660,240. A portion of these funds will assist with the development of phase 2 of Newmark Village, which is in the southeast part of the city, in an area of lower opportunity and concentrated poverty (see **Table 1N-3 Planned or Approved Projects**). Approximately \$7,000,000 of the grant funds will be used for the development of 72 lower-income units, while the remaining \$3,694,500 will be used for improvements that will enhance and promote transit accessibility within this neighborhood by providing a variety of supporting infrastructure improvements focused on connecting residents and key neighborhood destinations. Such improvements include active transportation improvements that will encourage walking and biking, safe and accessible street improvements, enhancing the visibility of neighborhood pathways, and improving transit station and express bus stop areas. A portion of these funds will be used for a Workforce Development Program and to provide Transit Bus Passes for residents at the new housing development.
- The City will continue to implement the 2016 Sanger Accessibility Master Plan, which was developed to be compliant with the Americans with Disabilities Act (ADA) of 1990, Title II requirements for accessibility to City programs, services and activities in the public right of way.
- The City will continue to regularly update its Active Transportation Plan (ATP) in coordination with Fresno Council of Governments (FCOG). FCOG publishes member jurisdictions’ ATPs in dedicated sections within the Fresno County Regional Active Transportation Plan. The latest update was released February 8, 2024. If FCOG discontinues regular updates of the regional ATP, the City will adopt regular updates of its ATP as a stand-alone plan. Sanger’s ATP (within the regional document) includes the following:

- An analysis of indicators of disadvantaged communities.
- Tables and maps of projects that will benefit disadvantaged communities, including bicycle parking facilities at parks, and near retail areas and other destinations; railroad crossings; and planned walking and biking networks, including shared-use paths, bike lanes and routes, sidewalks, and crosswalk improvements that will facilitate connectivity.
- Appendix D of the ATP includes a list of these improvements including locations and extents, lengths, high-level estimated costs, and priorities. Several of these projects are itemized in the City’s FY24-28 CIP and have dedicated funding from Congestion Mitigation and Air Quality (CMAQ, Active Transportation Program (ATP)) and Highway Safety Improvement Program (HSIP). A sample of these includes:
 - Fowler Switch Canal Bicycle/Pedestrian Trail Improvements – Bethel to Jensen
 - Jensen Avenue Pedestrian Improvements – Canal to Bethel
 - Jensen Avenue Pedestrian Crossing of Fowler Switch Canal Crossing
 - Fowler Switch Canal Bicycle/Pedestrian Trail Improvements – Bethel to Greenwood
- Between 2019 and 2023, the City spent \$3.25 million on bicycle and pedestrian improvements. The City will continue to apply for funding for and invest in these types of improvements, as described in its ATP (see Appendices E and F). The City will apply for funding from a minimum of five sources including but not limited to:
 - Fresno County Transportation Authority Measure C
 - San Joaquin Valley Air Pollution Control District Bikeways Incentive Program
 - State Grants including State Grants Active Transportation Program, Local Streets and Roads Program, Local Partnership Program, Local Transportation Fund, Clean Mobility Options Program, Road Maintenance and Rehabilitation Account & Highway Users Tax Account, Transformative Climate Communities
 - Federal grants including Rebuilding American Infrastructure with Sustainability and Equity (RAISE) Grant
 - The City will implement bicycle and pedestrian awareness campaigns using grant funding that has been provided by the Office of Traffic Safety. The City has targeted specific problem locations for each effort, several of which will benefit disadvantaged communities.
 - The City will review funding opportunities for projects currently listed as unfunded in the CIP to invest in community amenities such as water and sewer infrastructure, parks and recreation facilities or active transportation facilities on an annual basis and apply as they become available. Apply for funding for at least two community amenities projects during the planning period.

- The City shall implement strategies from its General Plan 2025, which was adopted November 6, 2003, including: Circulation and Transportation Policies 2.1 through 2.5 address air quality and noise levels resulting from vehicle transportation and encourage innovative mitigation measures.
- Circulation and Transportation Policies 5.1 through 6.1 work to support low-income residents, students, the elderly, and physically disabled by developing a safe and efficient Citywide public transportation system. Support the development of bicycle and pedestrian paths to create a safe and convenient alternative to vehicular transportation.
- Open Space, Recreation, and Public Facilities Element Policies 1.1 through 3.2 work to better address the needs of the local community by increasing opportunities for physical activity by encouraging the development of parks and open space and pedestrian and bicycle paths.

Financing:	General Fund
Time Frame:	Conduct citywide outreach to publicize available residential and commercial programs that address air quality annually. Seek funding and apply for it to mitigate air quality issues on an annual basis and apply as opportunities become available, then make funding available for the applicable strategy within six months of receipt. Ongoing, per General Plan implementation. A list of specific projects that implement the above policies is updated annually during fiscal year budget and Capital Improvement Plan process. Implement the funded bicycle and pedestrian improvements in this program by July 2028. Apply for at least two grants for active transportation projects annually. Apply to a minimum of five different types of funding programs for active transportation projects by July 2028. Complete a comprehensive update to the City's 2006 - 2025 Parks and Recreation Master Plan by May 2025.
Implementation Responsibility:	Community Development Department
Relevant Policies:	Policy 3.1, Policy 3.5

Quantified Objectives

Quantified objectives estimate the number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the planning period based on optimal implementation of each program. The quantified objectives do not set a ceiling on development; rather, they set a target goal for the jurisdiction to achieve based on needs, resources, and constraints. Each quantified objective is detailed by income level, as shown in **Table 1N-1**.

Table 1N-1 Quantified Objective Summary

Program	Extremely Low Income	Very Low Income	Low Income	Moderate Income	Above Moderate Income
RHNA	206	206	193	245	644
New Construction					
Program 2 - Review Annexation Standards in Memorandum of Understanding					490
Program 7 – Affordable Housing Incentives	206	206	193		
Program 8 – Support Funding for Farmworker Housing			40		
Program 9 – Farmworker Preference in New Affordable Housing			80		
Program 10 – Extremely Low-Income Households	206	206	193		
Program 12 – Encourage and Facilitate Accessory Units	13			6	6
Program 14 – Housing for a Variety of Needs	30			30	10
Program 15 – Large Sites	256			126	126
Program 18 – Lot Consolidation and Lot Splits	364			230	4
Program 19 – Monitoring of Planning and Development Fees	605				
Program 20 – Preliminary Applications (SB 330) and Streamlined Approval (SB 35)		10	10		
Program 21 – Objective Design Standards	50				
Rehabilitation					
Program 22 – Fresno County Housing Assistance Rehabilitation Program	20				
Program 23 – Fresno County Rental Rehabilitation Program	20				
Program 24 – Code Enforcement	10				
Conservation					
Program 3 – Homeless/Unhoused Needs	5				
Program 10- Extremely Low-Income Households	206	206	193		
Program 11 – Preservation of At-Risk Housing Units	348				
Program 17 – Reasonable Accommodations and Universal Design	5				
Program 25 – Fresno County Homebuyer Assistance Program			20		
Program 26 – Energy Conservation	5				
Program 27 – Housing Choice Vouchers	142				
Program 28 – Housing Discrimination Monitoring and Referral	30				
Program 29 – Improve Access to Resources	30				

Source: City of Sanger, May 2023

1. In some cases, quantified objectives overlap and therefore identify multiple strategies to achieve the RHNA.
2. Moderate- and above moderate-income unit capacity is anticipated to be met by market development trends.

SECTION 1N-2: SITES INVENTORY

Rezoning During Fifth Cycle

Assembly Bill (AB) 1233 was signed into law on October 5, 2005, and applies to housing elements due on or after January 1, 2006. Specifically, the law states that if a jurisdiction fails to provide adequate sites in the prior planning period, within one year of the new cycle, the jurisdiction must rezone/upzone adequate sites to accommodate the shortfall. This requirement is in addition to rezoning/upzoning that may be needed to address the Regional Housing Needs Allocation (RHNA) for the new cycle. As part of its 5th cycle 2015-2023 Housing Element, the City was required to rezone land to provide capacity to accommodate a total of 284 units of lower-income housing and 169 units of moderate-income housing to meet this requirement. A total of 54.09 acres were rezoned for high-density residential development (RM-1), as discussed in Section 5, Review of Previous Housing Element, which can accommodate 1,188 lower-income or moderate-income units. As a result, no carryover of units from the 5th cycle housing element period is required during the 6th cycle.

California law (Government Code Section 65583 (a)(3)) requires that the housing element contain an inventory of land suitable for residential development, including vacant sites that can be developed within the planning period and nonvacant (i.e., underutilized) sites having potential for redevelopment. State law also requires an analysis of the relationship of zoning and public facilities and services to these sites.

Regional Housing Needs Allocation

The RHNA is the State of California–required process that seeks to ensure cities and counties are planning for enough housing to accommodate all economic segments of the community. The process is split into the following three steps.

1. **Regional Determination:** The California Department of Housing and Community Development (HCD) provides each region with a Regional Determination of housing need, which includes a total number of units split into four income categories. The City of Sanger is in the region covered by the Fresno Council of Governments (FCOG). HCD allocated FCOG a Regional Determination of 58,298 units for the 6th cycle RHNA (2023-2031). This is the total number of units that the cities and counties in the FCOG region must collectively plan to accommodate.
2. **RHNA Methodology:** Councils of Governments (COG), including FCOG, are responsible for developing an RHNA methodology for allocating the Regional Determination to each city and county. This methodology must further State objectives, including, but not limited to, promoting infill, equity, and environmental protection; ensuring jobs-housing balance; and affirmatively furthering fair housing.

3. **Housing Element Updates:** Each city and county must then adopt a housing element that demonstrates how the jurisdiction can accommodate its assigned RHNA through its zoning. HCD reviews each jurisdiction's housing element for compliance with State law.

The City of Sanger's share of the regional housing need was determined using a methodology prepared by FCOG as part of the Regional Housing Needs Plan, adopted in October 2022. In accordance with FCOG's Regional Housing Needs Plan, the City must plan to accommodate a total of 1,494 housing units between July 30, 2023, and December 31, 2031. **Table 1N-2, Regional Housing Needs Allocation, 2023-2031**, shows the City's RHNA by income category. Of the 1,494 total units, the City must plan to accommodate 412 units for very low-income households, 193 units for low-income households, 245 units for moderate-income households, and 644 units for above moderate-income households.

Table 1N-2 Regional Housing Needs Allocation, 2023-2031

Income Category	Allocation	Percentage
Very Low*	412	27.6%
Low	193	12.9%
Moderate	245	16.4%
Above Moderate	644	43.1%
Total	1,494	100.0%

**It is assumed that 50 percent of the very low-income units are allocated to address extremely low-income need.*

Source: FCOG, 2022.

Planned or Approved Projects

Sanger's (RHNA can be reduced by the number of new units in projects that are planned or approved, but not yet built. **Table 1N-3** and **Figures 1N-1** through **1N-5** show an inventory of all residential projects that are approved, as of June 2023, or in the planning process and scheduled to be built by the end of the current Housing Element planning period (December 31, 2031). For each project, the table shows the name of the development, assessor's parcel number (APN), number of units by income category, General Plan land use and zoning designations, and the current status of the project. Planned and approved projects in Sanger are anticipated to result in 817 units, including 178 lower-income units and 639 above moderate-income units. The 178 lower-income units include Cherry Crossings, which received funding from several sources, including the State's Multifamily Housing finance program and the State's HOME Investment Partnerships Program (HOME), and Newmark Villages, which received funding from the State's Affordable Housing and Sustainable Communities program.

Table 1N-3 Planned or Approved Projects

Project Name	Assessor's Parcel Number	Affordability	General Plan Land Use Designation	Zoning	Total Project Units	Project Status
Cherry Crossings	32212334	Lower	Residential High	RM-1	64	Senate Bill 35 streamlined approval complete, anticipating building permit applications in 2024.
	32212317	Lower	Residential High	RM-1		
	32212327	Lower	Residential High	RM-1		
Star Multi-Family	31512109	Above Moderate	Residential Medium	RM-2.5	14	Approved entitlement, awaiting building permit application submission
Serenade	33209021	Above Moderate	Residential Low	R-1-10	135	Under construction.
Somerset	33209026	Above Moderate	Residential Medium	R-1-6	490	Annexation and planning entitlements approved December 2023..
	33209027	Above Moderate	Residential Medium	R-1-6		
	33209017 (Portion)	Above Moderate	Residential Medium	R-1-6		
Newmark Villages	32503024S	Lower	Residential High	RM-1	114	First phase is under construction. Second phase in site plan review. Received AHSC funding.
	32503076	Lower	Residential High	RM-1		
Total Lower-Income Units					178	
Total Above Moderate Income Units					639	
Total Units					817	

Source: City of Sanger, 2023.

Availability of Land

State Housing Element law emphasizes the importance of adequate land for housing and requires that each Housing Element “...identify adequate sites ... to facilitate and encourage the development of a variety of housing types for all income levels...” (California Government Code Section 65583(c)(1)). To allow for an adequate supply of new housing, land must be zoned at a variety of densities to ensure that development is feasible for a wide range of income levels. The identified land must also have access to appropriate services and infrastructure, such as water, wastewater, and roads.

To demonstrate the City’s capacity to potentially meet its RHNA, an adequate-sites inventory was conducted. The inventory must identify adequate sites that will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of housing types for households of all income levels. **Tables 1N-6** and **1N-7** list vacant and underutilized sites, respectively, and **Figures 1N-1** through **1N-5** identify the locations of these sites along with pending projects identified in **Table 1N-3**.

The analysis of the relationship of suitable sites to zoning provides a means for determining the realistic number of dwelling units that could actually be constructed on those sites in the current planning period.

Hazards and Other Potential Site Constraints

The Safety Element addresses the topic of public health and safety following State requirements in Section 65302(g) of the California Government Code. State law requires that the Safety Element contain background information and goals and policies to address multiple natural hazards, analyze the vulnerabilities from climate change and contain policies to improve climate change resilience, and assess residential areas with evacuation constraints. The City’s Safety Element is contained in the 2035 Sanger General Plan, which was updated in February 2020.

The Housing Element sites inventory was screened for the presence of the following hazard zones:

1. Federal Emergency Management Agency (FEMA), 100-year flood zone
2. Department of Water Resources (DWR), Dam Inundation Zone
3. California Geological Survey, California Department of Conservation, landslide susceptibility
4. California Geological Survey, California Department of Conservation, liquefaction susceptibility
5. California Department of Forestry and Fire Protection (CAL FIRE), Fire Hazard Severity Zones (FHSZ)
 - a. State Responsibility Areas (SRA)
 - b. Local Responsibility Areas (LRA)

Several of the inventory sites intersect with a 100-Year Flood Zone and/or a Dam Inundation Zone, as indicated in the environmental constraints column of **Tables 1N-6** and **1N-7**. However, these conditions do not preclude development. Presence of the 100-year flood zone is not an impediment to construction because a minimal amount of fill can be added to the site to mitigate the potential flood risk.

There are no other known environmental constraints or conditions within the city that could preclude development on identified sites within the planning period, including hazards, airport compatibility, and related land use controls, shape, contamination, easements, or overlays.

Sites Identified in Previous Housing Element

Pursuant to California Government Code Section 65583.2(c), a nonvacant site identified in the previous planning period and a vacant site identified in two or more previous consecutive planning periods cannot be used to accommodate the lower-income RHNA unless the site is subject to an action in the Housing Element that requires rezoning within three years of the beginning of the planning period that will allow residential use by right for housing developments with at least 20 percent units affordable to lower-income households.

Of the sites in the inventory that are identified to meet the lower-income RHNA:

- One nonvacant site (site 52) was identified in the previous planning period.
- Three vacant sites (sites 2, 3, 17) were identified in two or more previous consecutive planning periods.

Therefore, the City has included **Program 6**, which commits the City to allowing residential use by right on sites consistent with Government Code Section 65583.2(c) for housing developments in which at least 20 percent of the units are affordable to lower-income households.

Sites Appropriate for Lower-Income Housing

Housing Element law requires jurisdictions to provide an analysis showing that zones identified for lower-income households are sufficient to encourage such development. The law provides two options for preparing the analysis: (1) describe market demand and trends, financial feasibility, and recent development experience; or (2) use default density standards deemed adequate to meet the appropriate zoning test. According to State law (California Government Code Section 65583.2(c)(3)(B)), the default density standard for Sanger is 20 dwelling units per acre. The City has included several sites, listed in **Table 1N-6** and **Table 1N-7**, that allow for densities up to 29 or 32.7 units per acre and are assumed to accommodate the City's lower-income RHNA.

The following assumptions were used to determine the income categories according to the allowed densities for each site:

- **Lower-Income Sites.** Sites at least 0.5 acres in size that allow at least 20 units per acre were inventoried as feasible for lower-income (low- and very low-income) residential development. This includes sites with Residential High or Residential Medium High land use designations that are either zoned RM-1, which allows for up to 32.7 units per acre, and RM-1.5, which allows for 29 units per acre. One site greater than 10 acres was also included within the lower-income sites category, discussed further below.
- **Moderate-Income Sites.** Sites that have Residential Medium or Residential Medium High paired with the medium-density RM-2.5 zone were inventoried as feasible for moderate-income residential development. Typical dwelling units include small- and medium-sized apartments and other attached units. Sites with a land use and zone designation of Retail Mixed-Use/RMU were also inventoried as moderate-income sites, as this zone allows for up to 29 units per acre but only on a portion of the site.
- **Above Moderate-Income Sites.** Sites within zones that allow only single-family homes at lower densities were inventoried as above moderate-income units, as were small sites with higher zoning density that might be candidates for lot consolidation with lower-density parcels. This includes sites with Residential Medium and Residential Medium Low land use designations combined with R-1-6, R-1-7.5, or RM-2.5 zoning.

Large Sites

Assembly Bill (AB) 1397 requires additional justification to include parcels larger than 10 acres in the sites inventory for lower-income housing. Site 2 is two parcels of 12.9 and 15.1 acres, respectively that were included in the inventory with a combined estimated realistic capacity of 212 units of housing affordable to lower, moderate, and above moderate-income households. Each parcel has Residential High zoning on a five-acre portion, so inventory estimates are based on this parcel size. The City of Sanger Community Development Director spoke to the owner of Site 2 in Autumn 2023 regarding residential development on the site, and the City will formally approach the owner to divide the parcel along zoning lines. Site 3 includes a 13.91-acre parcel that was included in the inventory with an estimated realistic capacity of 296 units of housing affordable to lower, moderate, and above moderate-income households. The City is currently working with the property's owner to prepare a lot-line adjustment application to divide the site into a ten-acre parcel and an additional 3.91 acre parcel in order to facilitate development. The owner of this property has received active interest from developers in redeveloping the site. Recent affordable projects completed by the interested developer have ranged in size from 4.96 to 6.17 acres, so based on this trend, the City is assuming that 5 of the 10 acres will develop with housing affordable to lower-income households while the remainder will be developed with moderate and above moderate-rate units. The affordable housing developer that is interested in developing Site 3 was also recently awarded a 1 million dollar loan to complete another affordable housing project, which highlights the interested developer's ability to successfully develop affordable projects in the area. The City has included sites of this size in this area because two of the City's current pending projects are developing on significantly larger sites. Somerset is developing on a site of more than 90 acres (3 parcels), and the

Serenade project is developing on an approximately 29-acre parcel. Additionally, Site 3 is adjacent to two other parcels that have been included in the above moderate-income portion of the inventory, and so may be well-suited for inclusion in a larger, mixed-income development if a developer has an interest in developing all three sites together. Through **Program 15** the City will facilitate the development of higher-density, affordable housing on large sites by subdividing sites into parcels smaller than ten acres, conducting proactive outreach to developers and property owners to market sites, and offering development incentives for affordable or special-needs housing on large sites. As part of **Program 7**, the City can seek partnerships with affordable housing developers and identify incentives for developing affordable housing on this site, or potentially split the lot as part of **Program 18**, if needed to develop the lot at this income level.

Realistic Capacity

Residential Zones

In determining the realistic capacity for the City's inventory of sites, the City considered land use controls and site improvements and assumed an initial 80 percent adjustment to reflect developable acreage due to on-site improvements, including sidewalks, utility easements, and infrastructure improvements (roadway access, water, sewer, and stormwater). All sites are served by or planned to be served by infrastructure, with no constraints identified that would reduce capacity beyond the 80 percent adjustment, including the City's current multifamily development standards (e.g., setbacks, building height, parking, density requirements, land use controls, water and wastewater access, and open space requirements). To further determine an appropriate realistic capacity assumption, the City considered and evaluated the project examples to determine approximate density and unit capacity so as to not over-project unit potential. After considering the 80 percent adjustment factor, and an average 66 percent buildout of recent project examples (see **Table 1N-4**), the City decided to assume a conservative 65 percent capacity on all residentially zoned sites in **Table 1N-6, Vacant Sites**. Though the Cherry Crossings site has a lower realistic capacity percentage than the other projects listed in **Table 1N-4**, this project indicates that projects that develop lower than the State's default density for affordability can also be developed with affordable units.

Site 2 in **Table 1N-6** contains two five-acre portions of larger parcels which are estimated will each develop with approximately two to three acres of housing affordable to lower-income households and approximately two to three acres of housing affordable to moderate-income and above moderate-income households. These areas of each of the two adjacent parcels were rezoned to RM-1 with an amended General Plan land use designation of Residential – High Density. Though the parcels would not need to develop simultaneously, the RM-1 areas are adjacent and so could present an opportunity for concentrated high-density development. For purposes of calculating the realistic capacity, only the portions of these parcels with high-density zoning and land use designation were used.

Site 52, an underutilized site, is an 8.8-acre parcel, of which, only 5.38 acres are considered developable due to the presence of a house on one corner of the lot. Similarly, for purposes of calculating the realistic capacity of the site, only 5.38 acres of the site were used in the calculation.

Table 1N-4 Residential Project Examples

Project Name	Afford-ability	Acres	Project Status	General Plan/ Zoning	Max. Density du/ac	Max. Allowable Units	Total Project Units	Developed Density du/ac	Realistic Capacity
Cherry Crossings	Lower	5.54	Approved, pending building permit applications	Residential High/RM-1	32.7	181	64	12	35%
Sanger Crossing 1 and 2	Lower	4.96	Constructed 2021	Residential Medium Density/ RM-2.5	17.4	86	81	16	94%
Blossom Trail Commons/ Fresno Housing Authority	Lower	4.3	Constructed 2017	Residential Medium-High Density/ RM-2.5	17.4	75	55	13	74%
Newmark Villages, Phase 1	Lower	3.59	Entitled 2021	Residential High Density/ RM-1	32.7	117	72	20	61%
									Average 66%

du/ac = dwelling unit per acre. Source: City of Sanger, 2023

Mixed-Use Zones

In Sanger, the Retail Mixed Use (RMU) zoning district allows mixed-use development of up to 29 dwelling units per acre. Multifamily uses are permitted by right. One parcel of underutilized land in this zone is included in the sites inventory as Site 54. Per the City’s Municipal Code, “the residential component of any mixed-use development shall be limited to no more than 45 percent of the site.” However, as this parcel is just one fraction of the RMU area in the larger North Academy Corridor Master Plan area, it is anticipated that some residential uses will develop in the Plan area. The parcel that is included in the inventory is the closest of the RMU parcels in the master plan to existing residential areas, making it most likely to develop with residential uses.

The RMU zone was recently established, so a development track record in this zone has not yet been established. However, as shown in **Table 1N-5**, recent mixed-use projects in the region have typically been approved and built out at an average of 127 percent of the allowable units. Reedley I is a primarily residential building and includes only 2,500 square feet of nonresidential space, 1,500 square feet of which are proposed to be a community room. The Stone Plaza project in Kingsburg is designed with retail spaces on the bottom floor and residential above. The City elected to take a conservative approach to estimating build-out of sites in this zone and estimated that 55 percent of the maximum residential density on 45 percent of the parcel would develop (25 percent of total density across the whole parcel acreage).

Table 1N-5 Mixed-Use Project Examples

Project Name	Affordability	Acres	Project Status	General Plan/Zoning	Total Project Units	Max. Allowable Units*	Realistic Capacity
City of Reedley							
Reedley I Mixed-Use	Lower Income	4.25	Approved 2022	LI/ML	80	63	127%
City of Kingsburg							
Stone Plaza Mixed Use Project	Market Rate	0.28	Under Construction 2023	CC/CC	10	6	145%
Average							127%

Source: Cities of Reedley and Kingsburg, 2023.

*Maximum allowable units based on general plan and zoning maximum density multiplied by total site acreage.

APPENDIX 1N: CITY OF SANGER

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Table 1N-6 Vacant Sites

Site Number	Potential Lot Consolidation	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density	Maximum Capacity	Capacity Modifier	Realistic Capacity	Realistic Capacity, Lower-Income Units	Realistic Capacity, Moderate-Income Units	Realistic Capacity, Above Moderate-Income Units	Environmental Constraints
1		31502129	4.48	Residential Medium High	RM-2.5	17.4	78	0.65	51			51	Dam Inundation Zone
2		31503067 (Portion)	Total Parcel Acreage: 12.9 Acres Realistic Capacity Calculated Based on 5.00 Acres Zoned RM-1 (Split Zone)	Residential High	RM-1	32.7	164	0.65	106	54	26	26	
		31503068 (Portion)	Total Parcel Acreage: 15.1 Acres Realistic Capacity Calculated Based on 5.00 Acres Zoned RM-1 (Split Zone)	Residential High	RM-1	32.7	164	0.65	106	54	26	26	
3		31506007	13.91	Residential High	RM-1	32.7	455	0.65	296	148	74	74	Dam Inundation Zone
		31506024	2.34	Residential Medium	R-1-6	7.2	17	0.65	11			11	Dam Inundation Zone
4		31506042	3.79	Commercial General/ Residential Medium (Split)	R-1-6	7.2	27	0.65	18			18	Dam Inundation Zone
5		31516043	0.31	Residential Medium High	RM-2.5	17.4	5	0.65	4		4		Dam Inundation Zone
		31516044	0.49	Residential Medium High	RM-2.5	17.4	9	0.65	6		6		Dam Inundation Zone
		31516045	0.24	Residential Medium High	RM-2.5	17.4	4	0.65	3		3		Dam Inundation Zone
		31516046	0.25	Residential Medium High	RM-2.5	17.4	4	0.65	3		3		Dam Inundation Zone
6		31520402	0.21	Residential Medium	R-1-6	7.2	2	0.65	1			1	Dam Inundation Zone
7		31531204	0.18	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
8		31538048	0.15	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31538049	0.15	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31538050	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
9		31544058	0.23	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31544059	0.32	Residential Medium Low	R-1-7.5	5.8	2	0.65	1			1	Dam Inundation Zone
10		31545204	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
11		31545207	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
12		31546001	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546002	0.28	Residential Medium Low	R-1-7.5	5.8	2	0.65	1			1	Dam Inundation Zone
		31546003	0.25	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546004	0.23	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546005	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone

Site Number	Potential Lot Consolidation	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density	Maximum Capacity	Capacity Modifier	Realistic Capacity	Realistic Capacity, Lower-Income Units	Realistic Capacity, Moderate-Income Units	Realistic Capacity, Above Moderate-Income Units	Environmental Constraints
		31546006	0.20	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546007	0.20	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546008	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546009	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546010	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546011	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546012	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546013	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546014	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546015	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546016	0.25	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546017	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546018	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546019	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546020	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546021	0.19	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546022	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546023	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546024	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546025	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546026	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546034	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546035	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546036	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546037	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546038	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546039	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546040	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31546049	5.56	Residential Medium Low	R-1-7.5	5.8	32	0.65	21			21	Dam Inundation Zone
13		31548061	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31548062	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31548063	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
14		31551036	0.34	Residential Medium	R-1-6	7.2	2	0.65	2			2	Dam Inundation Zone

Site Number	Potential Lot Consolidation	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density	Maximum Capacity	Capacity Modifier	Realistic Capacity	Realistic Capacity, Lower-Income Units	Realistic Capacity, Moderate-Income Units	Realistic Capacity, Above Moderate-Income Units	Environmental Constraints
15		31704023	0.12	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
16		31704028	0.44	Residential High	R-1-6	7.2	3	0.65	2			2	Dam Inundation Zone
17		31706138	0.89	Residential High	RM-1.5	29	26	0.65	17	17			Dam Inundation Zone
18		31711425	0.13	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
19		32008216	0.25	Residential Medium	R-1-6	7.2	2	0.65	1			1	Dam Inundation Zone
20		32011323	0.50	Residential Medium High	RM-2.5	17.4	9	0.65	6		6		100-Year Flood Zone, Dam Inundation Zone
21		32016310	0.45	Residential Medium High	RM-2.5	17.4	8	0.65	5		5		Dam Inundation Zone
22		32017307	0.17	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		100-Year Flood Zone, Dam Inundation Zone
23		32018105	0.17	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone
24		32035001	0.14	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
		32035002	0.17	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
		32035003	0.21	Residential Medium	R-1-6	7.2	2	0.65	1			1	Dam Inundation Zone
		32035004	0.22	Residential Medium	R-1-6	7.2	2	0.65	1			1	Dam Inundation Zone
25		32203051	4.67	Residential Medium	R-1-10	4.3	20	0.65	13			13	Dam Inundation Zone
26		32208136	0.69	Residential Medium	R-1-6	7.2	5	0.65	3			3	Dam Inundation Zone
27		32221201	0.18	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
		32221202	0.15	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
28		32221501	0.15	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
		32221502	0.16	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
29		32222501	0.33	Residential Medium	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
		32222502	0.34	Residential Medium	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
		32223001	0.29	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223002	0.31	Residential Medium	RM-2.5	17.4	5	0.65	4		4		Dam Inundation Zone
		32223003	0.31	Residential Medium	RM-2.5	17.4	5	0.65	4		4		Dam Inundation Zone
		32223004	0.32	Residential Medium	RM-2.5	17.4	5	0.65	4		4		Dam Inundation Zone
		32223005	0.32	Residential Medium	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
		32223006	0.32	Residential Medium	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
		32223007	0.32	Residential Medium	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
		32223008	0.31	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223009	0.30	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223010	0.30	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223011	0.30	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone

Site Number	Potential Lot Consolidation	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density	Maximum Capacity	Capacity Modifier	Realistic Capacity	Realistic Capacity, Lower-Income Units	Realistic Capacity, Moderate-Income Units	Realistic Capacity, Above Moderate-Income Units	Environmental Constraints
		32223012	0.30	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223013	0.30	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
		32223014	0.28	Residential Medium	RM-2.5	17.4	5	0.65	3		3		Dam Inundation Zone
30		32505223	0.36	Residential Medium High	RM-2.5	17.4	6	0.65	4		4		Dam Inundation Zone
31	Group A	32505205	0.10	Residential Medium High	RM-2.5	17.4	2	0.65	1		1		Dam Inundation Zone
	Group A	32505206	0.23	Residential Medium High	RM-2.5	17.4	4	0.65	3		3		Dam Inundation Zone
32		32505305	0.18	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone
33	Group B	32503049	0.07	Residential Medium	RM-2.5	17.4	1	0.65	1			1	Dam Inundation Zone
	Group B	32509058	0.52	Residential Medium	R-1-6	7.2	4	0.65	2			2	Dam Inundation Zone
34		31549001S	0.18	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31549002S	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31549003S	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31549004S	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
		31549005S	0.17	Residential Medium Low	R-1-7.5	5.8	1	0.65	1			1	Dam Inundation Zone
35		31715707T	0.11	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
36		31718616T	0.76	Residential Medium	R-1-6	7.2	5	0.65	4			4	Dam Inundation Zone
37		32008210	0.16	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
38		32509061T	0.50	Residential Medium	R-1-6	7.2	4	0.65	2			2	Dam Inundation Zone
39		32510121S	0.16	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
40		31720407	0.17	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone
41		32208137	2.38	Residential Medium	R-1-6	7.2	17	0.65	11			11	100-Year Flood Zone, Dam Inundation Zone
42		31718310	0.18	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone
Total									830	273	225	332	

Source: City of Sanger, 2023 and Department of Water Resources (DWR), 2023

Underutilized Sites

The Sanger Housing Element sites inventory includes 14 underutilized parcels that are expected to develop with residential uses within the next eight years. Four parcels in three sites have been counted toward RHNA. The remainder have been included in the inventory and in the fair housing analysis, as they may be future development sites, but were not counted toward RHNA. Brief descriptions of the current use on each underutilized site are indicated in **Table 1N-7** and below.

Underutilized Sites Counted Toward RHNA:

- Sites 47, 52, and 54: These parcels have active agricultural uses. However, active agricultural use on a property has not been a barrier to residential development in the recent past. The Serenade development, a 135-unit above-moderate housing project that was entitled in 2021 and is partially under construction, is a recent example of land that was converted from active agricultural use to housing. Sites 47 and 54 only have agricultural uses and contain no structures. The parcel containing site 52 has one home on the corner of Greenwood Ave. and North Ave. The total acreage of the parcel is 8.8 acres, however, units are only calculated for 5.38 acres because it is likely that the home site would be retained when the rest of the property is sold for residential development because that is a very typical development pattern throughout the region. This parcel is surrounded on all sides by residential developments.

Underutilized Sites Not Counted Toward RHNA:

- Sites 43 through 46, and 48 through 50: These parcels have minimal existing items that would need to be removed prior to development, such as storage containers, fencing, concrete slab, or dilapidated shed.
- Site 51: This parcel is currently a parking lot that is near a school, but not contiguous with the school campus. The City may be able to seek out funding for an alternative parking area, or to seek out funding for other travel-demand management strategies that would reduce the amount of parking required by those working in or visiting the school.
- Site 53: This site consists of two parcels that have cleared land on much of the parcel, but one existing structure on one parcel and a drainage pond on the other. Part of each parcel is considered to be developable. On parcel number 322-161-20, a pool currently sits on approximately half of the site. On parcel 322-161-21, a house is currently on the front 20-25 percent of the parcel, and the remainder is cleared land. The house appears to be older, and the owner may have an interest in selling the house for redevelopment. These parcels are also adjacent to other vacant sites in the inventory, and development on the adjacent sites may encourage development on Site 53.

APPENDIX 1N: CITY OF SANGER

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Table 1N-7 Underutilized Sites

Site Number	Potential Lot Consolidation	Assessor's Parcel Number	Acres	General Plan Designation	Zoning	Maximum Density	Maximum Capacity	Capacity Modifier	Realistic Capacity	Realistic Capacity, Lower-Income Units	Realistic Capacity, Moderate-Income Units	Realistic Capacity, Above Moderate-Income Units	Environmental Constraints	Current Use
43*		31720111	0.17	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone	Fenced lot with a shed
44*		31511421	0.15	Commercial Office	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone	Paved/landscaped lot
45*		32006213	0.17	Residential Medium	R-1-6	7.2	1	0.65	1			1	100-Year Flood Zone, Dam Inundation Zone	Fenced lot with play structure, landscape structure, and/or laundry line
46*		32007318	0.15	Residential Medium	R-1-6	7.2	1	0.65	1			1	Dam Inundation Zone	Fenced with dilapidated shed
47		32007349	8.97	Residential Medium	R-1-6	7.2	65	0.65	42			42	Dam Inundation Zone	Agricultural Use
48*		32011208	0.12	Commercial General	RM-2.5	17.4	2	0.65	1		1		100-Year Flood Zone, Dam Inundation Zone	Fenced, paved area
49*		32015220	0.20	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone	Fenced with concrete pad
50*		32509036	0.17	Residential Medium High	RM-2.5	17.4	3	0.65	2		2		Dam Inundation Zone	Fenced, open storage area
51*		31715709T	0.62	Residential Medium	R-1-6	7.2	4	0.65	3			3	100-Year Flood Zone, Dam Inundation Zone	Parking lot
52		32213205	4.65	Residential High	RM-1.5	29	135	0.65	88	88			Dam Inundation Zone	Agricultural Use
		32213203 (Portion)	Total Acreage: 8.8 Acres Realistic Capacity Calculated Based on Estimated 5.35 Developable Acres	Residential High	RM-1.5	29	155	0.65	101	101				House on Corner of Lot (Not Counted in Developable Acreage) Current Agricultural Use
53*		32216120	1.21	Residential Medium	R-1-7.5	5.8	7	0.65	5			5	100-Year Flood Zone, Dam Inundation Zone	Drainage infrastructure on part of lot, remainder buildable
		32216121	2.28	Residential Medium	R-1-6	7.2	16	0.65	11			11	Dam Inundation Zone	Back portion of lot buildable. Depending on owner interest, may be able to redevelop the whole site. If not, approximately 75 percent of the site may be developable.
54		31406340S	31.16	Residential Mixed Use	RMU	29	904	0.25	226		226			Agricultural Use
Total									486	189	233	64		

Note: Sites with an asterisk were not counted toward RHNA but were included in the inventory as surplus capacity. Source: City of Sanger, 2023

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Accessory Dwelling Unit Potential

California Government Code Section 65583.1(a) states that a town, city, or county may identify sites for accessory dwelling units (ADUs) based on the number of ADUs developed in the prior housing element planning period, whether the units are permitted by right, the need for ADUs in the community, the resources or incentives available for their development, and any other relevant factors. Based on recent changes in State law reducing the time to review and approve ADU applications, requiring ADUs that meet requirements to be allowed by right, eliminating discretionary review for most ADUs, and removing other restrictions on ADUs, it is anticipated that the production of ADUs will increase in the 6th cycle Housing Element planning period.

In 2021, the City issued one building permit for an ADU in the previous planning period. Based on these trends, the City anticipates that four ADUs will be built by December 2031. To promote ADUs, the City has included **Program 12** to comply with State law and make construction of ADUs feasible for more property owners.

ADUs are seen as an appropriate housing type for a primary residence for low-income households. Because regional affordability analysis of ADUs was not available for Fresno County, the City relied on rental rates for one- and two-bedroom units as a proxy for ADU rental rates. According to 2016-2020 American Community Survey (ACS) five-year estimates, the median gross rent for one-bedroom units in Sanger is \$590 per month, and \$919 per month for two-bedroom units. As shown in Table 2-24, Fresno County Ability to Pay (2022), in Chapter 2, Regional Housing Needs Assessment, low-income households can afford between \$1,091 (one-person households) and \$1,558 (four-person households) in monthly housing costs without being cost burdened. Comparing rental rates with the affordability of low-income households demonstrates that ADUs are appropriate to credit toward the City's lower-income RHNA, based on the median price of one- and two-bedroom units in Sanger. However, the City has decided to take a conservative approach and assume that 50 percent of ADUs will be affordable to lower-income households, 25 percent affordable to moderate-income households, and 25 percent affordable to above moderate-income households.

RHNA Summary

Table 1N-8 provides a summary of Sanger's ability to meet the 2023-2031 RHNA. After accounting for planned and approved projects capacity on vacant/underutilized sites and potential ADUs, Sanger has a surplus capacity that can accommodate an estimated 614 units, including 37 lower-income units, 207 moderate-income units, and 370 above moderate-income units, beyond meeting the City's RHNA. An additional 29 units (7 moderate and 22 above-moderate) were identified in the inventory as additional capacity but not counted toward RHNA.

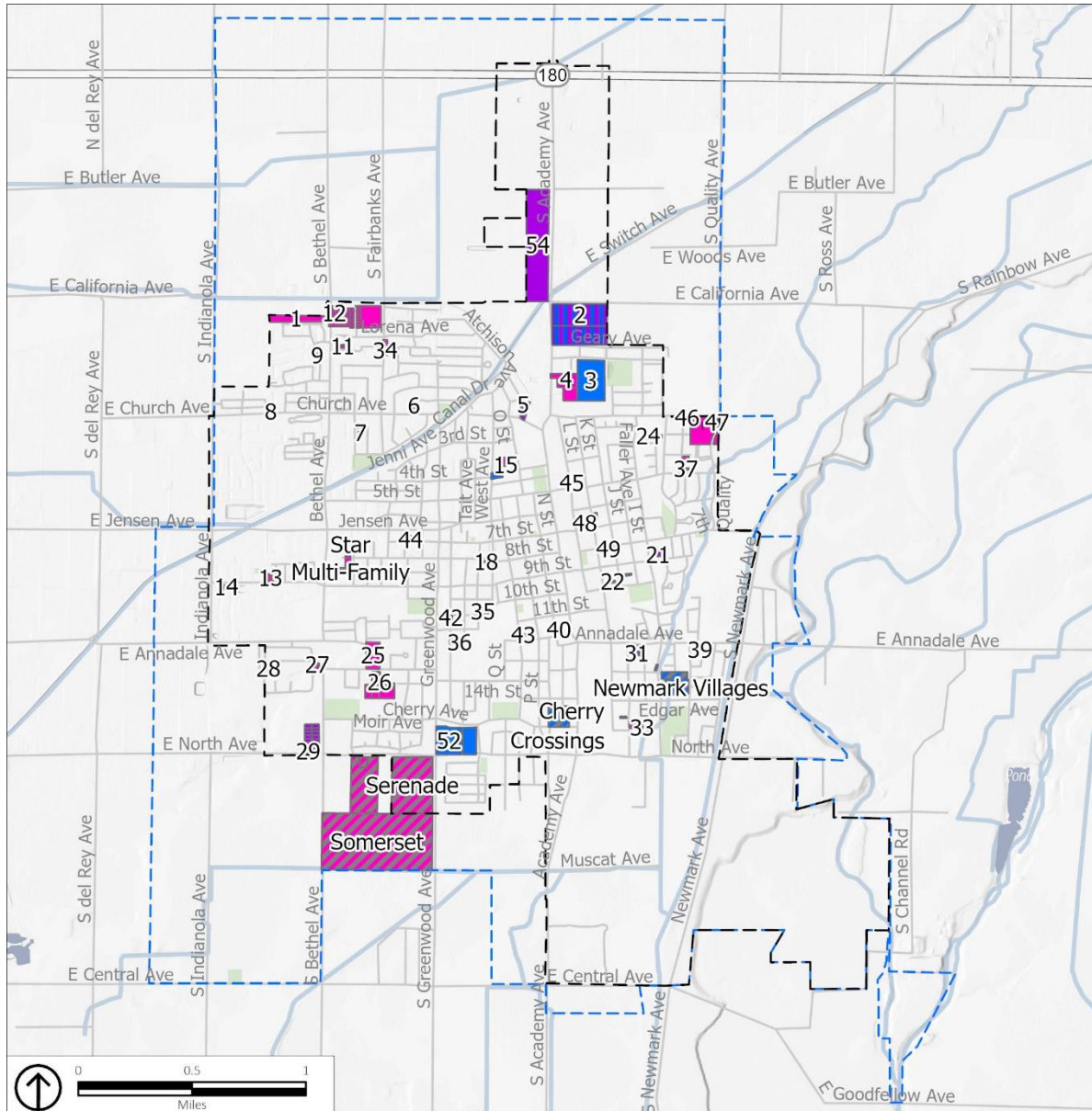
Table 1N-8 RHNA Summary

	RHNA	Pending Projects	Vacant Sites Capacity	Underutilized Sites Capacity	ADUs	Total Capacity Counted Toward RHNA	Surplus*	Underutilized Sites Not Counted Toward RHNA
Very Low	412	178	273	189	2	642	37	0
Low	193							
Moderate	245	-	225	226	1	452	207	7
Above Moderate	644	639	332	42	1	1,014	370	22
Total	1,494	817	830	457	4	2,108	614	29

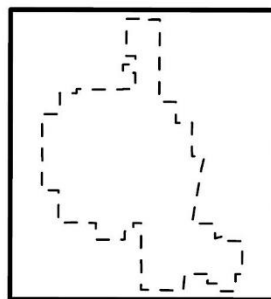
*Surplus is calculated by subtracting the total RHNA from the combined capacity of planned/pending projects, ADUs, and capacity on vacant and underutilized sites counted toward RHNA.

Source: City of Sanger, 2023.

FIGURE 1N-1 SANGER SITES INVENTORY

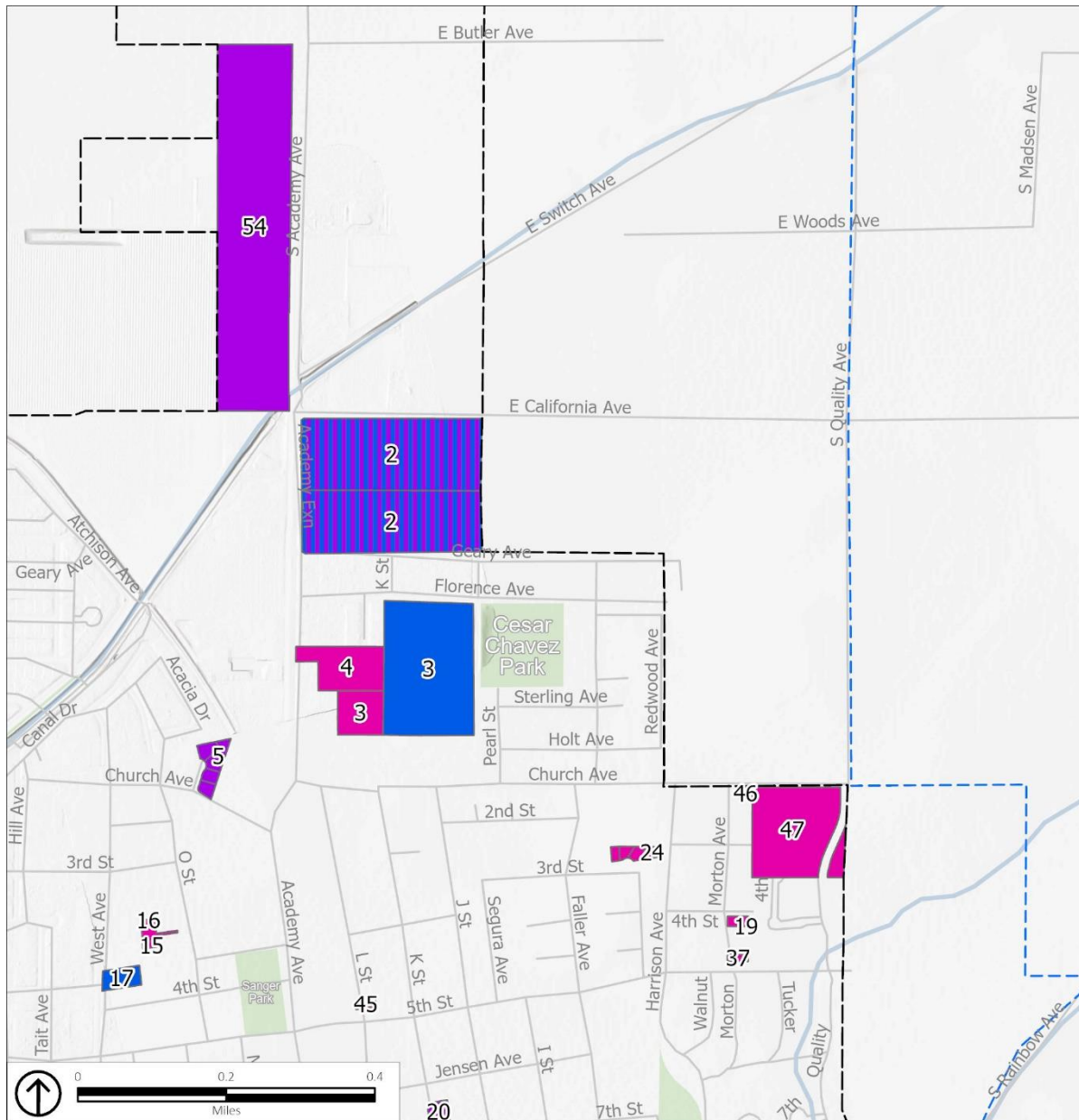


Source: City of Sanger, CA, 2023. ESRI, 2023. PlaceWorks, 2023



- City Limits
- Sphere of Influence
- Vacant and Underutilized Sites
- Affordability
 - Lower
 - Lower and Moderate
 - Moderate
 - Above- Moderate
- Pending Projects
 - Affordability
 - Lower
 - Above-Moderate

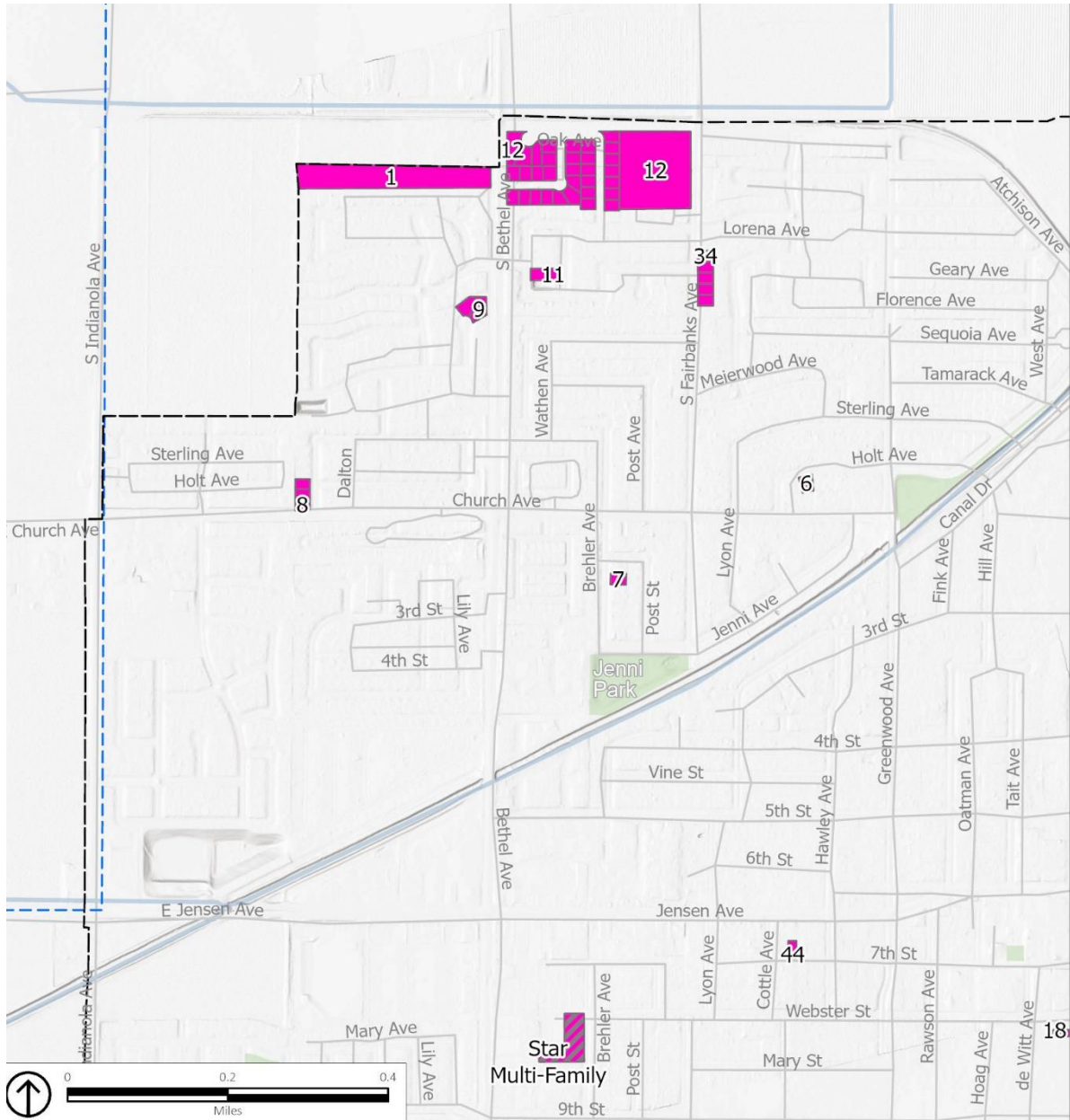
FIGURE 1N-2 SANGER SITES INVENTORY (DETAIL 1 OF 4)



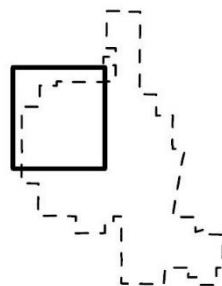
Source: City of Sanger, CA, 2023. ESRI, 2023 PlaceWorks, 2023



FIGURE 1N-3 SANGER SITES INVENTORY (DETAIL 2 OF 4)

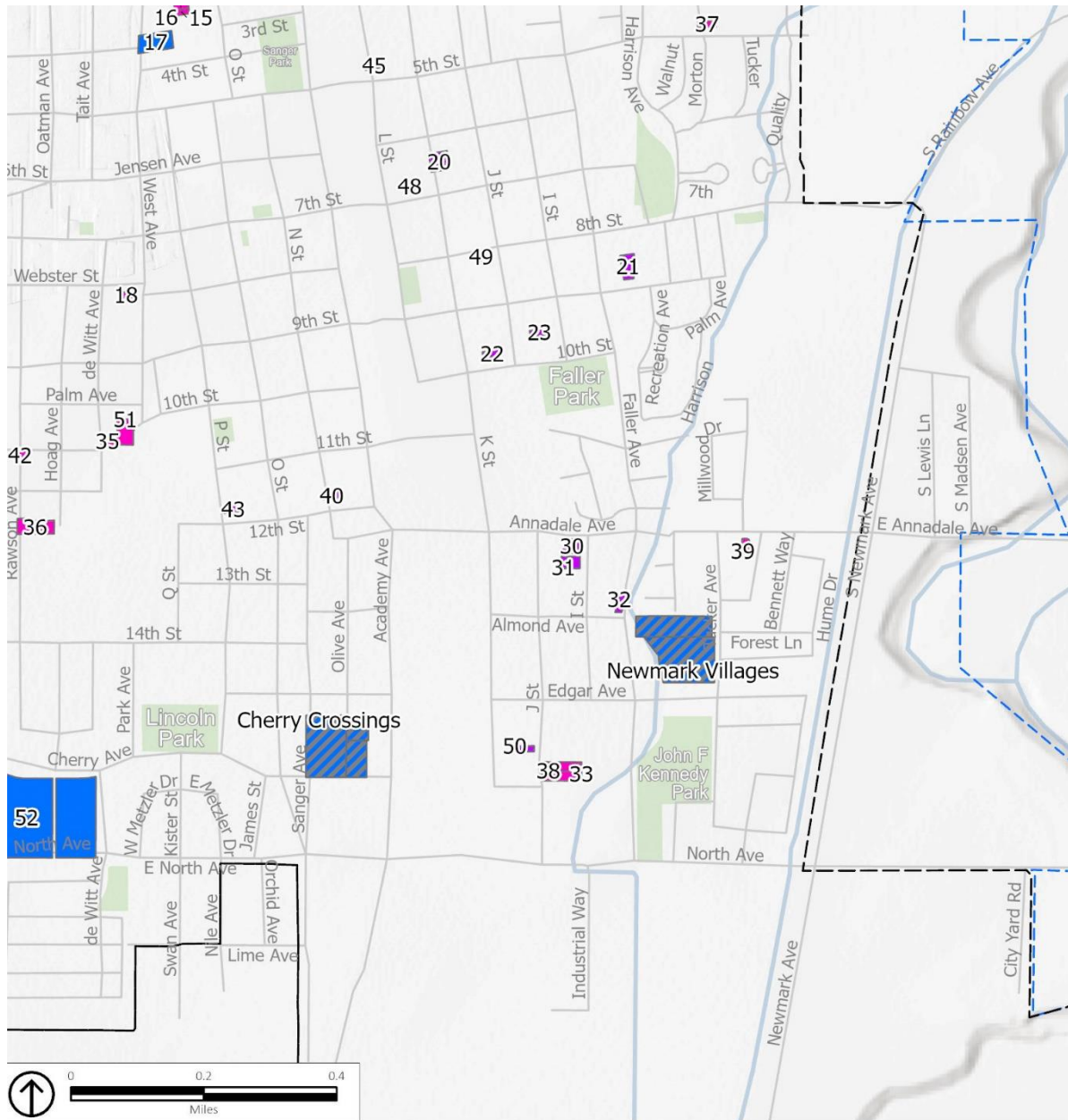


Source: City of Sanger, CA, 2023. ESRI, 2023. PlaceWorks, 2023

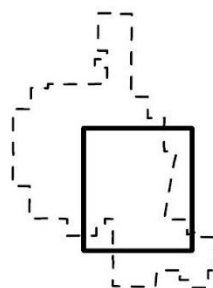


- City Limits
- Sphere of Influence
- Vacant and Underutilized Sites
- Affordability
 - Lower
 - Moderate
 - Above- Moderate
- Pending Projects
- Affordability
 - Lower
 - Above-Moderate

FIGURE 1N-4 SANGER SITES INVENTORY (DETAIL 3 OF 4)

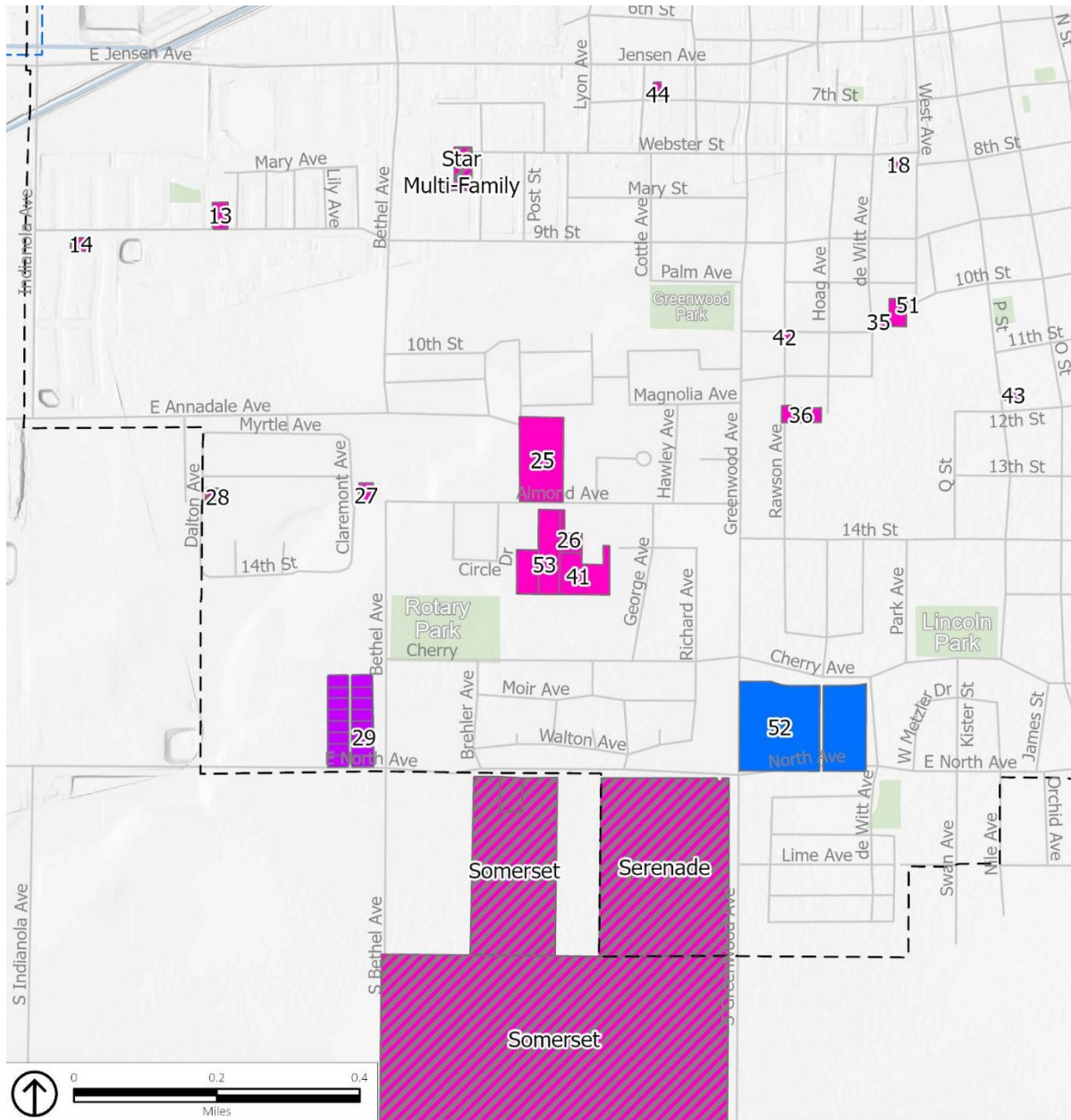


Source: City of Sanger, CA, 2023. ESRI, 2023. PlaceWorks, 2023

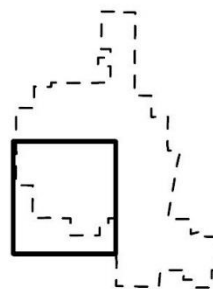


- City Limits
- Sphere of Influence
- Vacant and Underutilized Sites
- Affordability
- Lower
- Moderate
- Above- Moderate
- Pending Projects
- Affordability
- Lower
- Above-Moderate

FIGURE 1N-5 SANGER SITES INVENTORY (DETAIL 4 OF 4)



Source: City of Sanger, CA, 2023. ESRI, 2023. PlaceWorks, 2023



- City Limits
- Sphere of Influence
- Vacant and Underutilized Sites
- Affordability
- Lower
- Moderate
- Above- Moderate
- Pending Projects
- Affordability
- Lower
- Above-Moderate

Adequacy of Public Facilities

The City of Sanger provides water service for residents. Existing water facilities include eight groundwater wells, a network of water mains with line sizes ranging from 2 to 12 inches, and two storage tanks with a capacity of 150,000 gallons. As of the adoption of the City's 2020 Urban Water Management Plan, the system provides potable water to 6,498 single-family connections and 44 multifamily service connections. The City has projected demand for 8,390 single-family service connections and 57 multifamily service connections by 2035, which is a greater number of additional connections than would be required by the RHNA. It is estimated that demand for potable, raw, and other nonrecycled non-potable water for all use types will be 2,607 million gallons in 2035, which is within the estimated groundwater capacity for the same year. Therefore, it is anticipated that the available groundwater and water distribution capacity will be sufficient to accommodate the projected new housing development. Regardless, the City will monitor water capacity and improve the system, as feasible, to accommodate the total RHNA. The City also controls and administers the wastewater system in the city. According to the 2020 Urban Water Management Plan, the wastewater treatment plan has a design capacity of 1.3 million gallons per day. According to the City Engineer, this is sufficient to accommodate the RHNA. The wastewater collection system will need to be improved and extended as development occurs. These costs are paid for by new development.

SECTION 1N-3: LOCAL ASSESSMENT OF FAIR HOUSING

Introduction

Assembly Bill (AB) 686 requires that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under California law, AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”¹

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Although this is the Housing Element for the City of Sanger, Government Code Section 65583(c)(10) requires all local jurisdictions to address patterns locally and regionally to compare conditions at the local level to the rest of the region. To that end, a Multijurisdictional Housing Element was completed for the cities of Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma, and the County of Fresno, including a regional Assessment of Fair Housing, and each participating jurisdiction prepared a local AFH.

This section is organized by fair housing topics. For each topic, the regional assessment is first, followed by the local assessment. Strategies to address the identified issues are included throughout the section. Through discussions with housing service providers, fair housing advocates, and this assessment of fair housing issues, the City of Sanger identified factors that contribute to fair housing issues. These contributing factors are in **Table 1N-16, Factors Contributing to Fair Housing Issues**, with associated actions to meaningfully affirmatively further fair housing related to these factors. Additional programs to affirmatively further fair housing are in **Section 1N-1, Action Plan**.

This section also includes an analysis of the Housing Element’s sites inventory as compared with fair housing factors. The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the distribution of projected units by income category and access to high resource areas and other fair housing indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing.

¹ California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update)*, April 27, 2021, preface page, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

Outreach

Community Workshop

On August 30, 2022, the City of Sanger held an in-person Community Workshop to provide information on the Housing Element and solicit input from the community. The City notified the community of this meeting with flyers distributed in English and Spanish through the Fresno Council of Governments (FCOG) listserv of regional stakeholders and community-based organizations (CBOs) and through the Fresno County Authority. Staff also posted flyers in English and Spanish at City Hall, the Recreation Center, and to a Facebook event page that advertised that the meeting would provide Spanish language interpretation, refreshments, and activities for children. Flyers were also sent out through the Fresno Housing Authority to affordable housing residents.

A total of nine participants attended the workshop. During the workshop, participants expressed a need for all types of housing and discussed challenges in adding new housing resources, aging housing stock and infrastructure, lack of private investment, and concerns about an ongoing trend of investors purchasing property and flipping lower-priced market-rate units, thereby reducing the supply of naturally affordable housing stock in the city. Throughout the workshop, participants also mentioned a lack of, and need for, workforce housing, programs to help households move out of affordable rental units to homeownership, and larger housing units to alleviate overcrowding and address the needs of larger and extended families. Participants also expressed concern about a need for improved accessibility for amenities such as parks and greenspace in concert with residential development. Alternative forms of housing, including the feasibility of short-term rentals for unhoused individuals, mixed-use residential potential, and implementation of accessory dwelling units (ADUs) were identified as opportunities for housing in Sanger. Participants also suggested that Housing Element flyers be included in the water bills and posted on other social media platforms, such as Instagram and Nextdoor, for greater reach.

The last part of the workshop was spent discussing the issue of annexations to the city, larger specific plan projects, and accessibility to resources in new subdivisions at the fringes of the city.

Following the workshop, the City posted English and Spanish copies of the workshop presentation on the Fresno County Multijurisdictional Housing Element Update website for residents to access at their convenience. Feedback received during this workshop was used to inform this AFH as well as associated programs, as identified in in **Table 1N-16, Factors Contributing to Fair Housing Issues**.

Programs to Address Community Workshop Comments

- Per Program 1, the City will continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region.

- Per Program 2, the County of Fresno and cities within the county shall work together at least once during the planning period to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the City/County Memorandum of Understanding (MOU). The MOU encourages urban development to take place where urban services and facilities are available or planned, which will address community concerns of the availability of infrastructure and amenities such as parks and greenspace.
- Per Program 10, which addresses the needs of households with extremely low incomes, the City will support the development or rehabilitation of single-room occupancy (SRO) units and/or other units affordable to extremely low-income households, such as supportive and multifamily units, by continuing to seek and pursue State and federal funds to offer a variety of incentives and other concessions.
- Per Program 12, the City will take several steps to encourage the construction of ADUs, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households. In addition, to facilitate ADU production, per **Program 16**, the City will amend the Zoning Code to be consistent with all State legislation related to ADUs. Per Program 22, the City will seek funding for targeted assistance for property owners and landlords of rental properties throughout Sanger for home rehabilitation and improvements.
- Per Program 27, the City will promote available homebuyer resources on the City's website and at public counters.
- Per Program 29, the City will facilitate place-based revitalization and improve access to healthy outdoor spaces and reduce exposure to pollutants for new housing by evaluating transitional buffers between residential and agricultural uses and highways and working with developers as projects are proposed to mitigate impacts associated with emissions from agricultural industries and traffic and facilitate access to healthy outdoor spaces.

Planning Commission and City Council Meetings

A joint study session was held with the Planning Commission and City Council at a special meeting on October 6, 2022, to discuss the Housing Element update and process. The Planning Commission and City Council received presentations about the Public Review Draft Housing Element at regular meetings on September 28th and October 5th 2023, respectively. All meetings were open to the public and held in person. No public comment related to fair housing concerns was received at the meetings.

Consultations

During the Housing Element update process, staff reached out to stakeholder organizations to offer the opportunity for each to provide one-on-one input on housing needs and programs in Sanger. A representative from the Building Industry Association (BIA) of Fresno/Madera Counties, was interviewed on November 22, 2022.

The stakeholder described the rising cost of housing, the shortage of affordable housing available in the city, multifamily or single-family unit types, as well as the economic disadvantages to market-rate developers to build affordable housing. They also discussed the challenges of State regulations, such as potential incompatibility of State regulations (i.e., building standards and prevailing wage requirements) and local development patterns. The BIA representative expressed that Sanger's more limited services, employment opportunities, and public facilities compared to northern cities means that home prices are naturally lower, though developer interest is also more limited, particularly as higher densities are required for affordable housing that are often not congruent with the city's current development patterns. In addition to these constraints on development, the stakeholder emphasized water access issues as additional costs to development in Sanger.

Programs to Address Consultation Comments

- Per Program 5, the City will continue to monitor water and wastewater capacity and apply for funding and make improvements, as appropriate and feasible, as well as complete rehabilitation of existing water wells 7A and 25 and development of new water wells 22 and 19.
- Per Program 7, the City will continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households. The City will meet with these groups more frequently if development rates increase.
- Per Program 10, the City will expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing.
- Per Program 17, the City will encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing mobility opportunities for seniors and persons with disabilities.
- Per Program 18, the City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers.
- Per Program 19, the City will analyze housing-related development fees, particularly for multifamily housing, on an annual basis to ensure they do not unduly constrain development.
- Per Program 27, the City will improve access to higher-opportunity areas for lower-income households by encouraging voucher acceptance in higher-resource neighborhoods (i.e., Washington Middle neighborhood and Faller Park neighborhood).

Fair Housing Issues

Since 2017, the Tax Credit Allocation Committee (TCAC) and California Department of Housing and Community Development (HCD) have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators to provide evidence-based research for policy recommendations. This effort has been dubbed “opportunity mapping” and is available to all jurisdictions to assess access to opportunities within their community.

The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide strong access to opportunity for residents or, conversely, provide low access to opportunity. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low-resource areas and areas of high segregation and poverty and to encourage better access for lower-income households and communities of color to housing in high-resource areas. TCAC/HCD categorized census tracts into high-, moderate-, or low-resource areas based on a composite score of economic, educational, and environmental factors that can perpetuate poverty and segregation, such as school proficiency, median income, and median housing prices. The TCAC/HCD Opportunity Maps use a regional index score to determine categorization as high, moderate, and low resource.

Areas designated as “highest resource” are the 20.0 percent highest-scoring census tracts in the region. It is expected that residents in these census tracts have access to the best outcomes in terms of health, economic opportunities, and education attainment. Census tracts designated “high resource” score in the 21st to 40th percentile in the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. “Moderate resource” areas are in the top 30.0 percent of the remaining census tracts in the region, and those designated “moderate resource (rapidly changing)” have experienced rapid increases in key indicators of opportunity, such as increasing median income, home values, and an increase in job opportunities. Residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education, or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). Low-resource areas score in the bottom 30.0 percent of census tracts and indicate a lack of access to positive outcomes and poor access to opportunities. The final designation are areas identified as having “high segregation and poverty”; these are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30.0 percent of the population in these areas is below the federal poverty line (\$27,750 annually for a family of four in 2022).

As seen in Figure 3-1, Regional TCAC/HCD Opportunity Areas, most of Fresno County, particularly in the incorporated cities, is a mix of low-resource or moderate-resource areas and areas of high segregation and poverty, with pockets of high-resource designations. The northwest and southeast portions of Sanger are considered areas of high segregation and poverty as of TCAC’s 2021 assessment, while the northeast and southwest portions are moderate to high resource. These differences are discussed throughout the assessment.

Patterns of Integration and Segregation

At the time this analysis was initially performed (fall 2022 through spring 2023), HCD's AFFH Data Viewer included the 2021 TCAC/HCD Opportunity Map. Therefore, the following assessment of fair housing is based on data from 2021. However, since the time of writing, the AFFH Data Viewer was updated with the 2022 TCAC/HCD Opportunity Map followed by the subsequent 2022 COG Geography TCAC/HCD Opportunity Map, which is based on a similar formula but compares each tract to those within the COG region rather than regions defined by TCAC. In the case of Fresno County, the comparison region changed from the Central Valley Region to the boundaries of Fresno COG, resulting in internal comparisons of Fresno County cities and communities.

At the COG level, the data for Fresno County presents a potentially skewed perspective as most cities in the county have small populations, housing stocks, and employment centers compared to the cities of Fresno and Clovis. Fresno and Clovis, as the two largest cities in the county and among the largest in the region, provide access to educational and economic opportunities that are not typically found outside of large cities. Further, both, though particularly Clovis, include affluent neighborhoods that influence TCAC scores. Therefore, access to resources using this methodology appears to weigh proximity to Fresno and Clovis more heavily than local resources. For example, in the 2021 TCAC/HCD Opportunity Map, the community of Biola and the City of Kingsburg are both designated as moderate to highest resource areas based on local context. However, in the 2022 COG Geography TCAC/HCD Opportunity Map, both are designated as low-resource areas. The number of jobs, school performance, environmental conditions, median incomes, and other factors that are included in the Opportunity Map methodology did not change significantly between 2021 and 2022 in these communities. The primary driver of the change in resource area designation is likely based on proximity to resources and opportunities in the major cities of Fresno County. As many communities in the county are largely rural and agricultural in nature, most local resources have more limited capacity, but do serve the local population.

Given the potential limitations of an internal comparison, FCOG opted to maintain the analysis based on a larger geographic comparison to other jurisdictions in the Central Valley Region to reflect the interconnectedness of economies in this region, and similarities between the size and nature of many communities. However, where HCD has determined significant changes in resource area designation between the 2021 TCAC/HCD Opportunity Map and 2022 COG Geography TCAC/HCD Opportunity Map (i.e., high resource to low resource, or vice versa), the analysis notes the differences, potential causes, and strategies to address local discrepancies in access to opportunities.

The 2021 TCAC/HCD Opportunity Map designates the city as High Segregation and Poverty in the northwest and southeast areas, high opportunity in the southwest quadrant, and moderate in the northeast quadrant. In comparison, the 2022 COG Geography TCAC/HCD Opportunity Map designates the northwest quadrant as high opportunity, with no changes to the remainder of the city. However, in the northwestern quadrant, south of the Fowler Switch Canal, there are several neighborhoods with less positive indicators of quality of life and indicators of segregation, such as a low median income, high proportion of renters, high poverty rates, moderate anticipated economic outcome and environmental scores, and a high proportion of non-White population. Based on these characteristics, these neighborhoods may have lower access to resources for residents in the regional context, consistent with the definition of an Area of High

Segregation and Poverty rather than high opportunity. However, it is worth noting that the use of the TCAC/HCD Opportunity Maps are just the basis of the Assessment of Fair Housing, and a more detailed analysis of specific conditions within the jurisdiction provides a more comprehensive understanding of current patterns. The Opportunity Maps, and the full Assessment, inform programs to improve access to resources throughout the city.

Income Distribution

The City of Sanger is comprised of four census tracts, all of which include unincorporated areas outside of the city boundaries, and 13 block groups, 5 of which include unincorporated areas. The San Joaquin Valley Railroad divides the city into east and west sections. Locally, the TCAC/HCD Opportunity Area Maps designate two census tracts as High Segregation and Poverty, although data at the block group level further defines where the concentrations of protected populations are most likely to exist within these two census tracts (**Figure 1N-6, Local TCAC/HCD Opportunity Areas**). This designation is identified within the northwest neighborhoods (including Reagan, Jenni Park, Sanger, and Jackson neighborhoods), which encompass the 130-unit Vista del Monte Mobile Home Park, affordable Elderberry at Bethel complex, a number of market rate apartment complexes, and two units of public housing and the southeast JFK Park neighborhood, which includes three affordable housing complexes: Unity Estates and Sanger Crossing I and II Apartments. The northeastern census tract is designated moderate resource, including the Wilson and Jefferson residential neighborhoods, the Memorial Village affordable housing complex, and five public housing units in the vicinity of Cesar Chavez Park in the Pinedale single-family residential neighborhood. The southwest tract has been designated a high resource area and includes the Sanger West, Lincoln, Madison, Orchard Park, and Washington neighborhoods; Sanger High School; Washington Academic Middle School; Lincoln and Madison Elementary Schools; and several small parks.

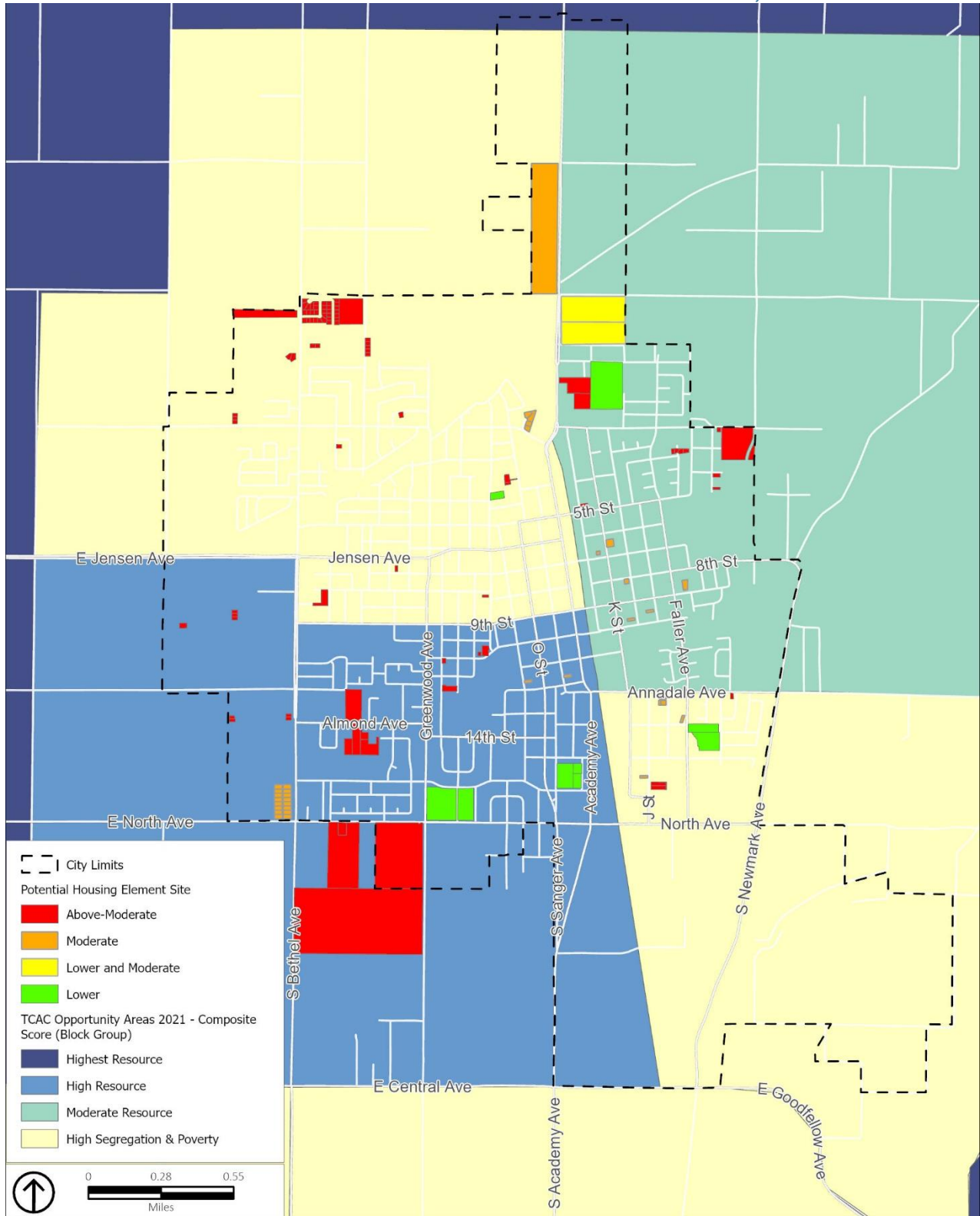
The American Community Survey (ACS) estimates that, in 2020, the citywide median household income was \$52,349, below both the statewide median of \$78,672 and the Fresno County median of \$57,109. The City of Sanger's census tracts for which median household incomes fall below \$30,000 are in the two block groups on either side of the San Joaquin Valley Railroad in the southern and southwestern area of the city (**Figure 1N-7, Local Median Income**). The block group to the east of the rail line, bounded by East Annadale Avenue to the north, Faller Avenue to the east, and North Avenue to the south, encompasses the JFK Park neighborhood and three affordable housing complexes, with a median income of \$19,444. This block group is designated by TCAC and HCD as an Area of High Segregation and Poverty by the U.S. Department of Housing and Urban Development (HUD). The western block group encompasses the Lincoln neighborhood with a median income of \$26,286; however, it falls within a TCAC/HCD -designated high resource area. Both areas are characterized by older single family detached and smaller multifamily properties adjacent to the San Joaquin Valley rail line where the majority of the city's industrial uses are also found. Block groups to the east, west, and north of these two neighborhoods generally have median household incomes between \$31,000 and \$55,000. Additionally, most of the northeast census tract, with a TCAC/HCD moderate designation, and central downtown block groups designated high segregation and poverty have median incomes in this category. These neighborhoods also include, in total, two affordable housing developments and several public housing units within the single-family Pinedale neighborhood, which is likely to contribute to the lower incomes in this area.

Slightly higher-income blocks group are east and west of the central city neighborhoods, with median incomes at \$55,341 on the east side and \$61,435 to the west. Higher incomes are found in the neighborhoods northwest of Holt Avenue at the northwest edge of the city, with a median income of \$73,546, although this block group is included in the northwest census tract TCAC/HCD designated as high segregation and poverty. The highest median income is found along the western and southern perimeter of the city in the Sanger West and Orchard Park neighborhoods with a median income of \$85,222 and a high resource designation. These neighborhoods are further from commercial uses, in planned residential subdivisions with larger lots. A median income is not identified in the block group bounded by Canal Drive, Jensen Avenue, Academy Avenue, and portions of 3rd Street, 5th Street, O Street, Greenwood Avenue and Hawley Avenue, although it falls within the High Segregation and Poverty designated area in the northwest census tract.

Access to opportunity areas does not consistently correspond to income in Sanger, which may reflect differences in access to other opportunity area factors. While the TCAC/HCD designations on the east side of the city reflect median incomes and TCAC/HCD Economic domain scores, the TCAC/HCD Educational Domain Score is between the 50th and 75th percentile in the southeastern High Segregation and Poverty census tract (**Figure 1N-8, Local TCAC/HCD Economic Domain Score**, and **Figure 1N-9, Local TCAC/HCD Educational Domain Score**). The incomes in the TCAC/HCD high resource designation at the southwest quadrant of the city range from \$26,286 to \$85,222, with Economic Domain scores between the 25th and 50th percentile. In contrast, in the High Segregation and Poverty area in the northwest, the Economic Domain Score falls between the 50th to 75th percentile, with incomes ranging between \$30,833 and \$73,546. Additionally, the entire west side falls within the TCAC/HCD Education Score Domain 50th to 75th percentile regardless of high resource or High Segregation and Poverty designations.

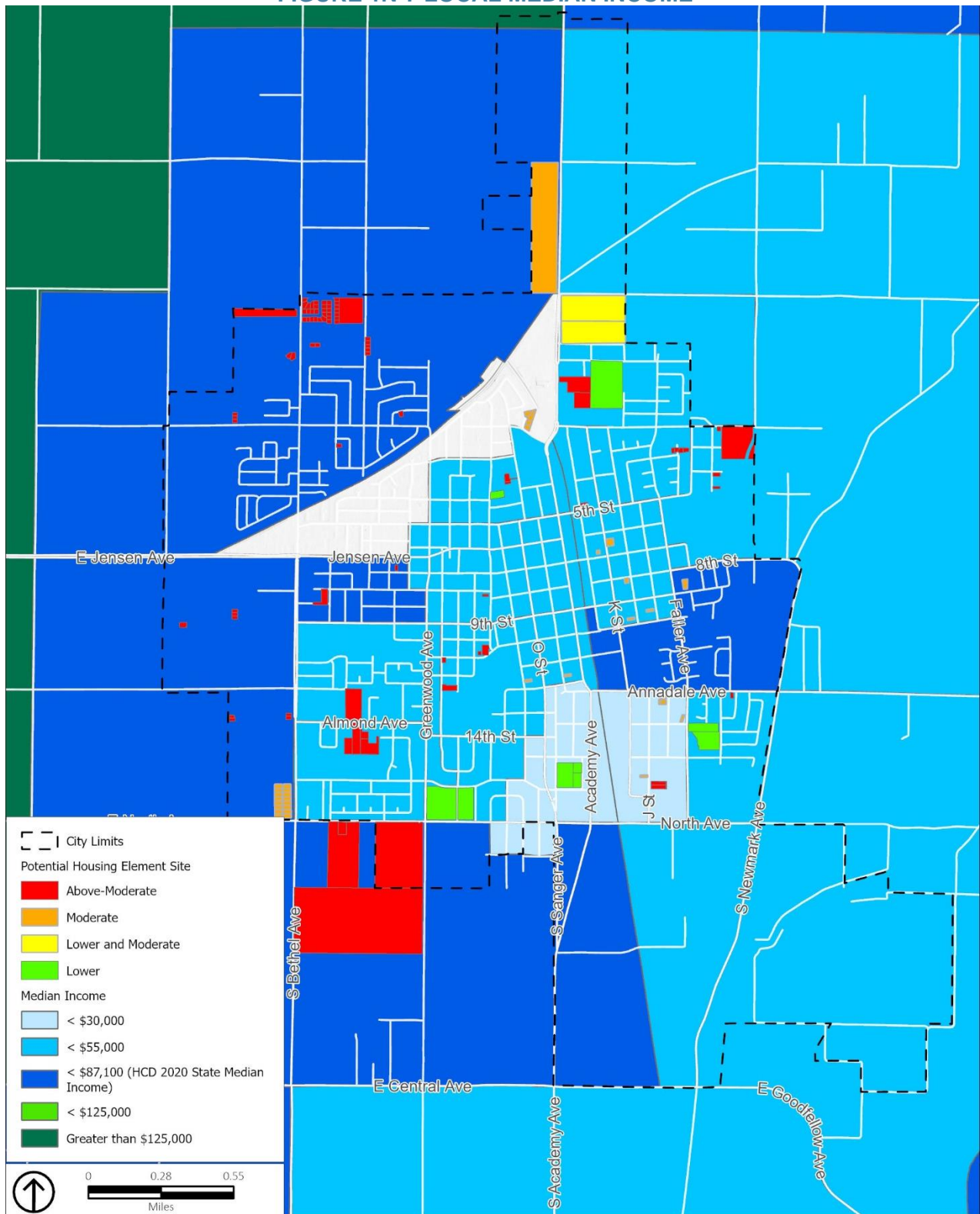
According to the ACS, in 2020, 19.7 percent of households in Sanger had an income below the poverty level, or less than 30 percent AMI, which is considered extremely low income. The highest rate of poverty (46.5 percent) is found in the city's southeast census tract in the vicinity of industrial and agricultural uses (**Figure 1N-10, Local Poverty Rate**). As described previously, housing typology and the availability of income-restricted affordable housing in this neighborhood support that housing is likely more affordable in this area. The west side of the city has poverty rates of 28.6 percent in the northwest tract and 23.2 percent in the southwest tract, which includes the other lowest income block group, yet has also been designated as a TCAC high resource area. The lowest rate of poverty (19.5 percent) in the city is found in the northeast census tract, which corresponds to low incomes and a moderate TCAC resource opportunity designation. Overall, households in Sanger living in poverty are most likely to live in or near the rail transportation and shipping corridor, industrial and agriculturally related processing uses, and the commercial core of the city as well as corresponding to the location of affordable housing resources.

FIGURE 1N-6 LOCAL TCAC/HCD OPPORTUNITY AREAS, 2021



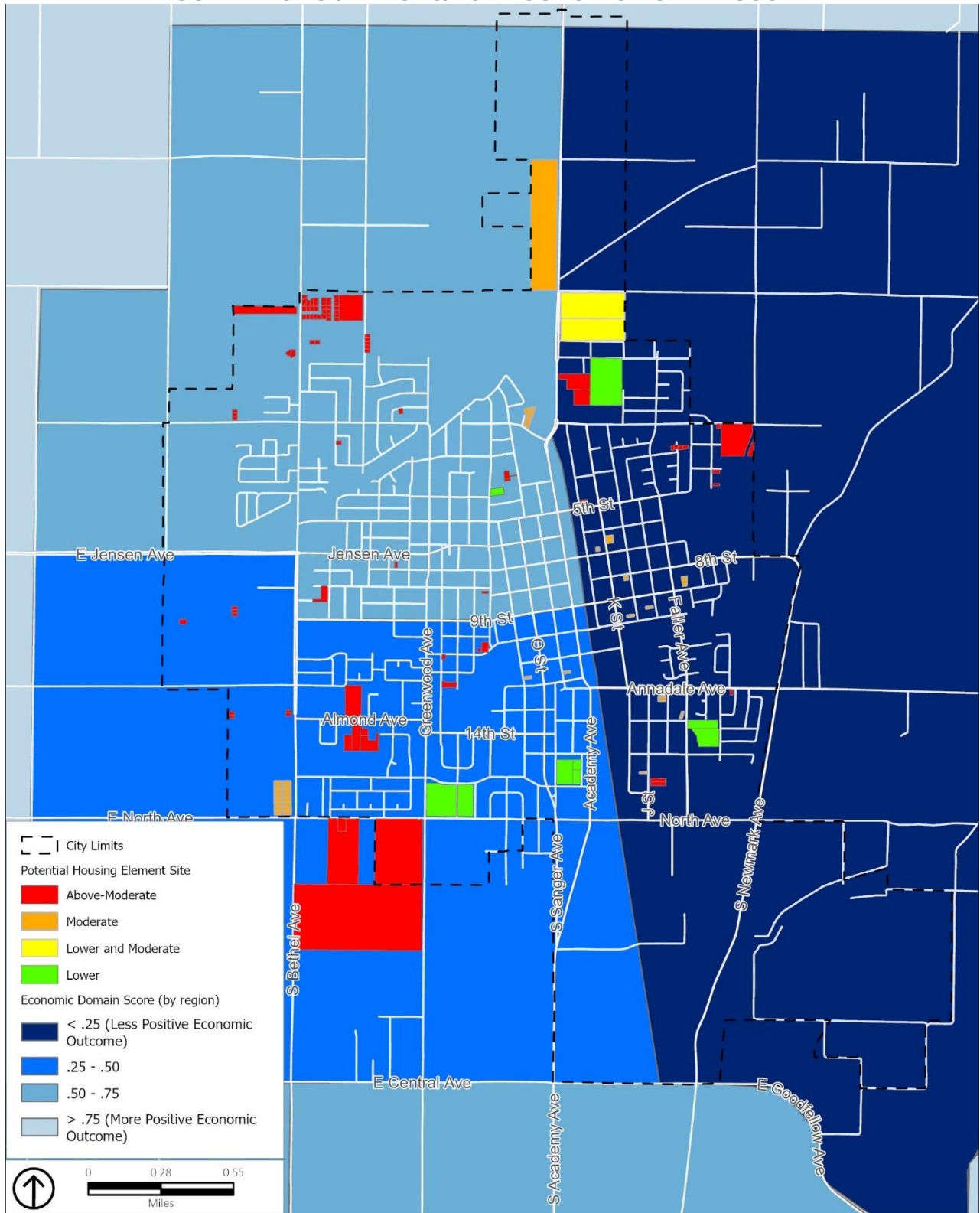
Source: California Tax Credit Allocation Committee, 2021; City of Sanger, 2023; Placeworks, 2023

FIGURE 1N-7 LOCAL MEDIAN INCOME



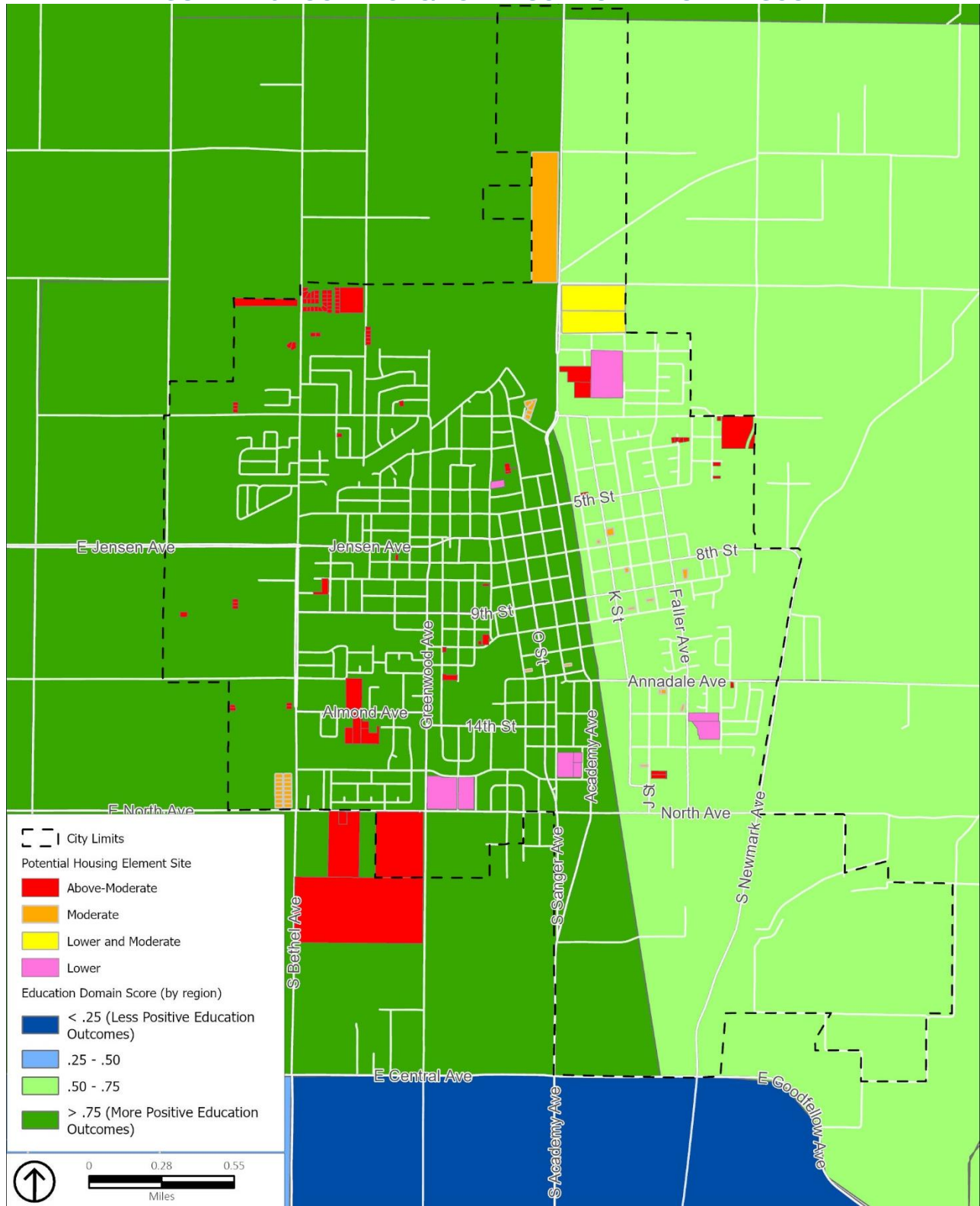
Source: US Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placeworks, 2023

FIGURE 1N-8 LOCAL TCAC/HCD ECONOMIC DOMAIN SCORE



Source: California Tax Credit Allocation Committee, 2021; City of Sanger, 2023; Placeworks, 2023

FIGURE 1N-9 LOCAL TCAC/HCD EDUCATIONAL DOMAIN SCORE



Source: California Tax Credit Allocation Committee, 2021; City of Sanger, 2023; Placeworks, 2023

The spatial distribution of household income in the City of Sanger has shifted noticeably between 2014 and 2020, although block group data is not available for 2014, so specific comparisons cannot be made. Overall, in 2014 the eastern side of the city had median incomes below \$40,000, with a median income of \$38,426 in the northeast tract and \$29,883 in the southeastern tract. However, the poverty rates in 2014 differed from those in 2020—the northeast census tract had the highest rate of poverty in the city at 35.2 percent, compared to the lowest rate of poverty in 2020, and the southeastern tract had a poverty rate of 29.5 percent compared to 46.5 percent in 2020. Neighborhoods on the west side of the city, which generally correlated to higher median income block groups based on 2016-2020 ACS data were also the city’s higher-income areas in 2014, although median incomes on the western side of the city have increased significantly over time with construction of new market rate housing. This indicates that the City of Sanger has distinct higher- and lower-income areas, which have shifted over time, with median incomes varying within a census tract based on proximity to noncommercial uses, affordable housing complexes, and the San Joaquin Valley Railroad as well as newly developing market rate subdivisions at the outskirts of the city. There is an Area of High Segregation and Poverty in the southeastern census tract, where three of the affordable housing properties are located, and fair housing issue to be addressed.

Programs to Address Patterns of Integration and Segregation: Income Distribution

- Per Program 7, the City will continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households.
- Per Program 12, the City will take several steps to encourage the construction of ADUs, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households. In addition, to facilitate ADU production, per **Program 16**, the City will amend the Zoning Code to be consistent with all State legislation related to ADUs.
- Per Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes.
- Per Program 16, the City will amend the Zoning Code to be consistent with the latest State legislation related to ADUs, ensuring that ADUs are permitted in all zones that permit single-family or multifamily uses, and permit the construction of a junior accessory dwelling unit (JADU) on each lot in addition to an ADU, in accordance with California Government Code Section 65852.2.
- Per Program 18, the City will create additional opportunities for infill development and affordable housing, by revising maximum lot coverages in certain areas and facilitating lot consolidations.
- Per Program 27, the City will improve access to higher-opportunity areas for lower-income households by encouraging voucher acceptance in higher-resource neighborhoods.

Racial and Ethnic Characteristics

The City of Sanger's largest demographic group is Hispanic, comprising 82.6 percent of the city's population, placing the City of Sanger with a moderate proportion of Hispanic residents among Fresno County jurisdictions, with six jurisdictions having higher representations and eight having lower proportions of Hispanic residents. Overall, non-White only residents, including Hispanic, comprise 88.2 percent of the city's population. White non-Hispanic residents comprise 11.8 percent, followed by Asian at 3.1 percent, and Other Race at 1.6 percent, with all other racial and ethnic groups represented by smaller populations, each comprising less than 1 percent of the city's population.

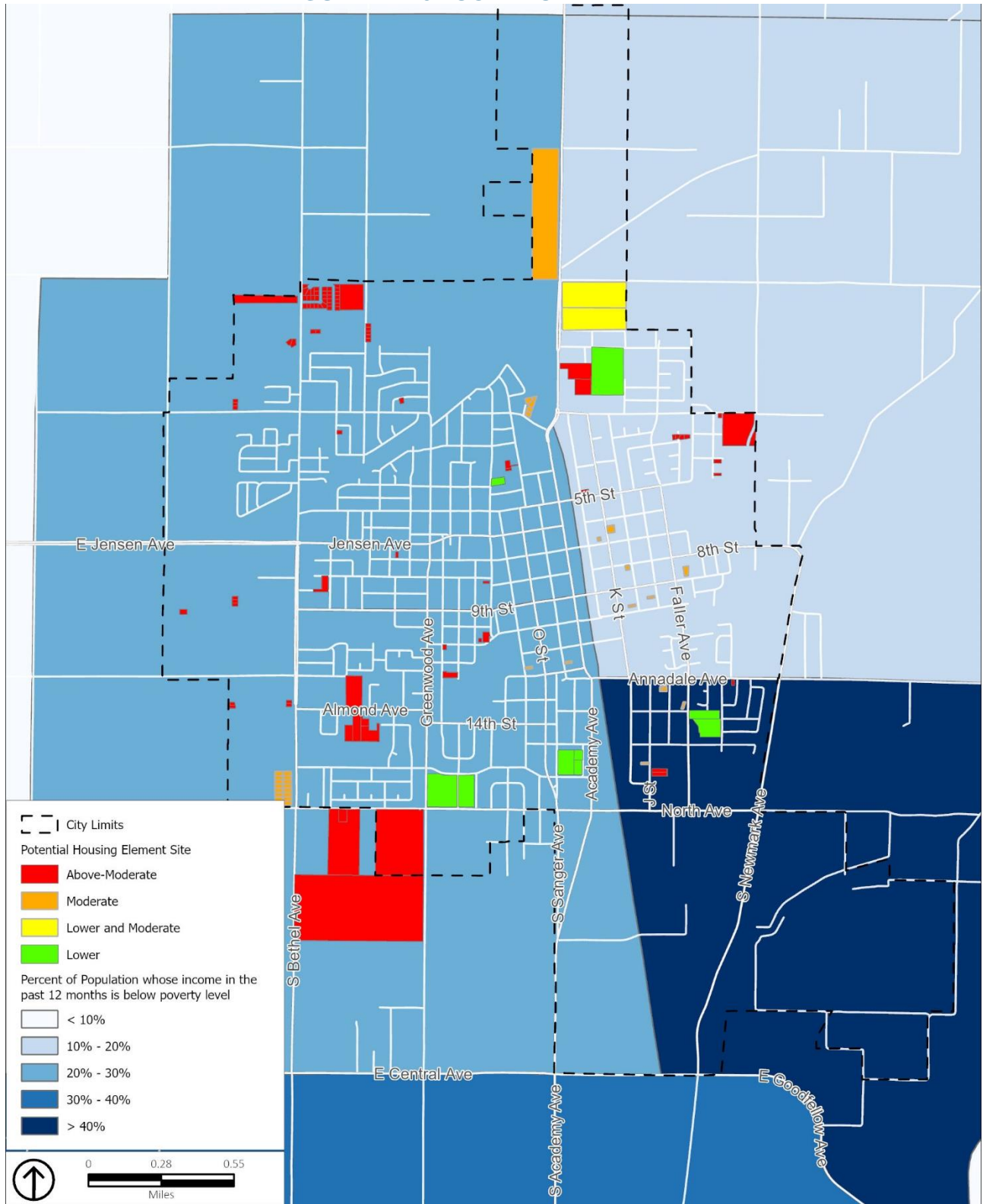
There appears to be a pattern indicating a fairly even spatial distribution of demographic groups within the City of Sanger (**Figure 1N-11, Local Racial Demographics**). All but the northwest block group have rates of non-White populations above 81.0 percent. Within the northwest block group, inclusive of the Reagan, Jenni Park, and upper Jackson neighborhoods, there is a 73.8 percent representation of non-White populations (66.7 percent Hispanic, 7.0 percent other races and ethnicities), which is the lowest in the city, although these neighborhoods are included in the High Segregation and Poverty designation. The highest concentrations of non-White populations, primarily Hispanic, are found on the eastern side of the city, ranging from 92.1 to 98.2 percent. High concentrations of non-White populations, from 91.3 to 96.1 percent of the population, are also found in the generally older central city and southern areas east of the San Joaquin Valley Railroad, corresponding to lower median incomes.

In 2021, both the southeast and northwest quadrants of the city were designated Areas of High Segregation and Poverty by TCAC, but as of 2023 only the southeast quadrant included this designation. The northeast quadrant is designated an area of high opportunity as of the 2022 and 2023 assessments. Area of High Segregation and Poverty are areas with a non-white population of 50 percent or more where 40.0 percent or more of individuals are living at or below the poverty line (**Figure 1N-12, Area of High Segregation and Poverty**). This shift may be related to a shift in TCAC's methodology, which compared tracts to jurisdictions within the COG rather than the state as a whole, as it did in 2021. Patterns in median incomes in the area experienced limited change between the 2010-2014 and 2017-2021 ACS, and patterns of segregation were the same between 2010 and 2020, according to the Othering and Belonging Institute Analysis. Though the southeast side of the city has one more subsidized housing building than the other three quadrants, this is not a significant difference, and public housing is concentrated on the city's northeast side. The City's one emergency shelter building is also not located in the southeast quadrant. Most housing units on the southeast side were built between 2000 and 2009, which is also true of much of the rest of the city, with the exception of older areas in the central areas of the city. The southeast side does not have a higher rate of units lacking complete plumbing or kitchen facilities as compared to other census tracts in the city. Much of this census tract's land area is in the unincorporated county, which is largely agricultural. The portion of the census tract that is in the city is located on the outskirts of the city, where there are industrial and agricultural uses and limited housing, so most households included in the relevant data are in the neighborhood bordered by E. Annandale Ave., S. Newmark Ave., North Ave., and Academy Ave. This neighborhood includes resources such as John F. Kennedy Park and preschool and childcare facilities. While there are no schools within this area, Jefferson Elementary School is very close to this neighborhood.

Though environmental evaluation scores under the CalEnviroScreen 4.0 analysis are negative in the southeast quadrant and indicate that the area is a disadvantaged community under SB 535, the southwest quadrant is also considered a disadvantaged community and the north side of the city has less positive CalEnviroScreen scores that are slightly below the disadvantaged community threshold. The Area of High Segregation and Poverty is therefore not considered to be notably more disadvantaged than neighboring parts of the community despite having higher levels of poverty.

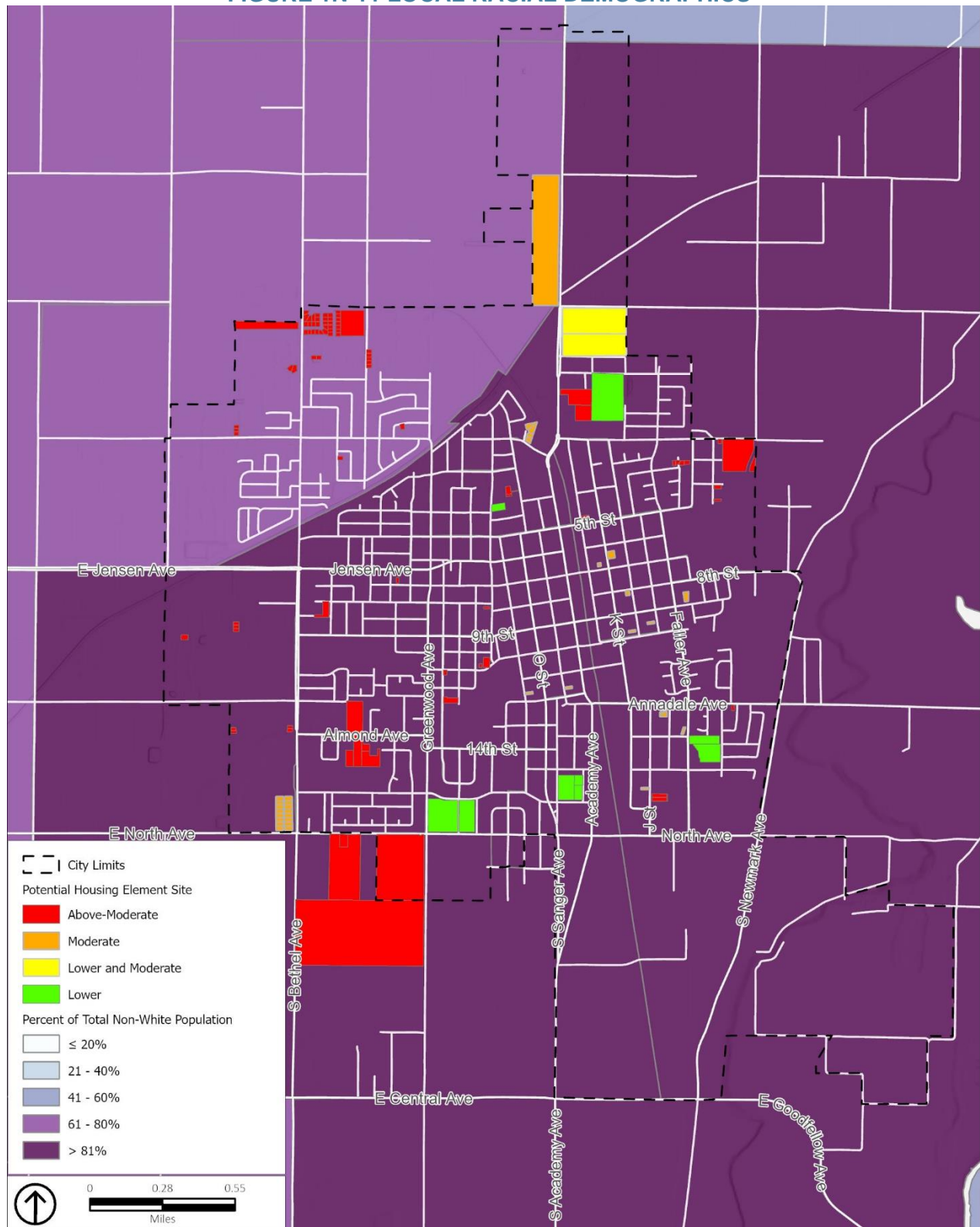
There are no portions of the city identified as an RCAA, defined as census tracts where the median income is more than 150 percent of the local council of governments' median income and where the percentage of the population that identifies as White is more than 1.25 times the average percentage of the population that identifies as White in all tracts in the region.

FIGURE 1N-10 LOCAL POVERTY RATE



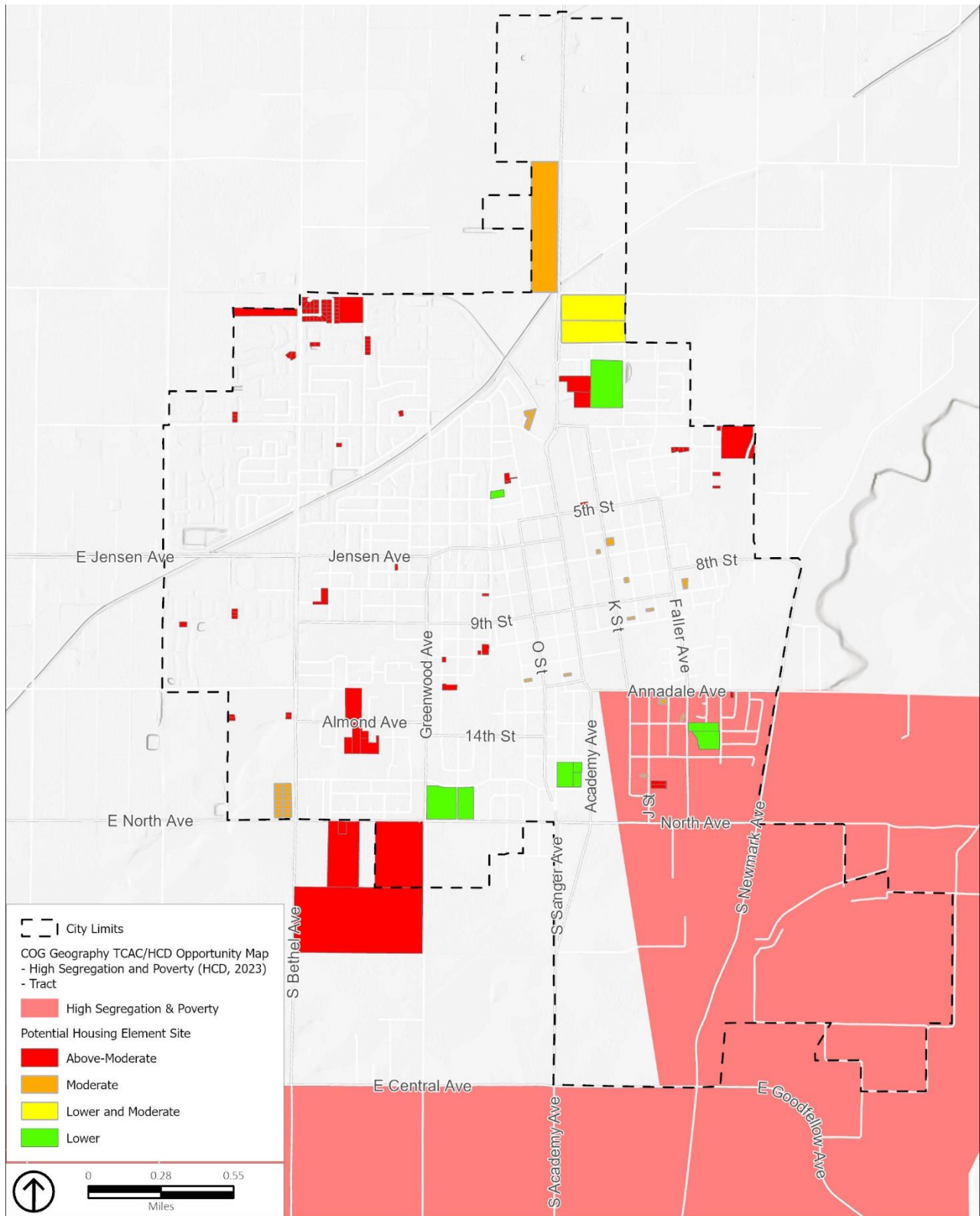
Source: US Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placeworks, 2023

FIGURE 1N-11 LOCAL RACIAL DEMOGRAPHICS



Source: Esri, 2018; City of Sanger, 2023; Placeworks, 2023

FIGURE 1N-12 AREAS OF HIGH SEGREGATION AND POVERTY, 2023



Source: U.S. Census; City of Sanger, 2023; Placemarks, 2023, TCAC 2023

The correlation between diversity and income is not consistent throughout the city. The block groups corresponding to the highest income neighborhoods along the western and southern perimeter of the city have a representation of non-White residents at 88.1 percent, although this includes the highest proportion of Asian residents in the city, at 10.6 percent and second lowest proportion of Hispanic residents, at 73.9 percent of the residents.

The proportion of non-White groups in the City of Sanger remained relatively consistent between 2010 and 2020. The proportion of White non-Hispanic residents increased slightly, from 14.6 percent to 15.0 percent, with marginal changes in other racial and ethnic groups. The proportion of persons identifying as Hispanic has remained constant.

Programs to Address Patterns of Integration and Segregation: Race and Ethnicity

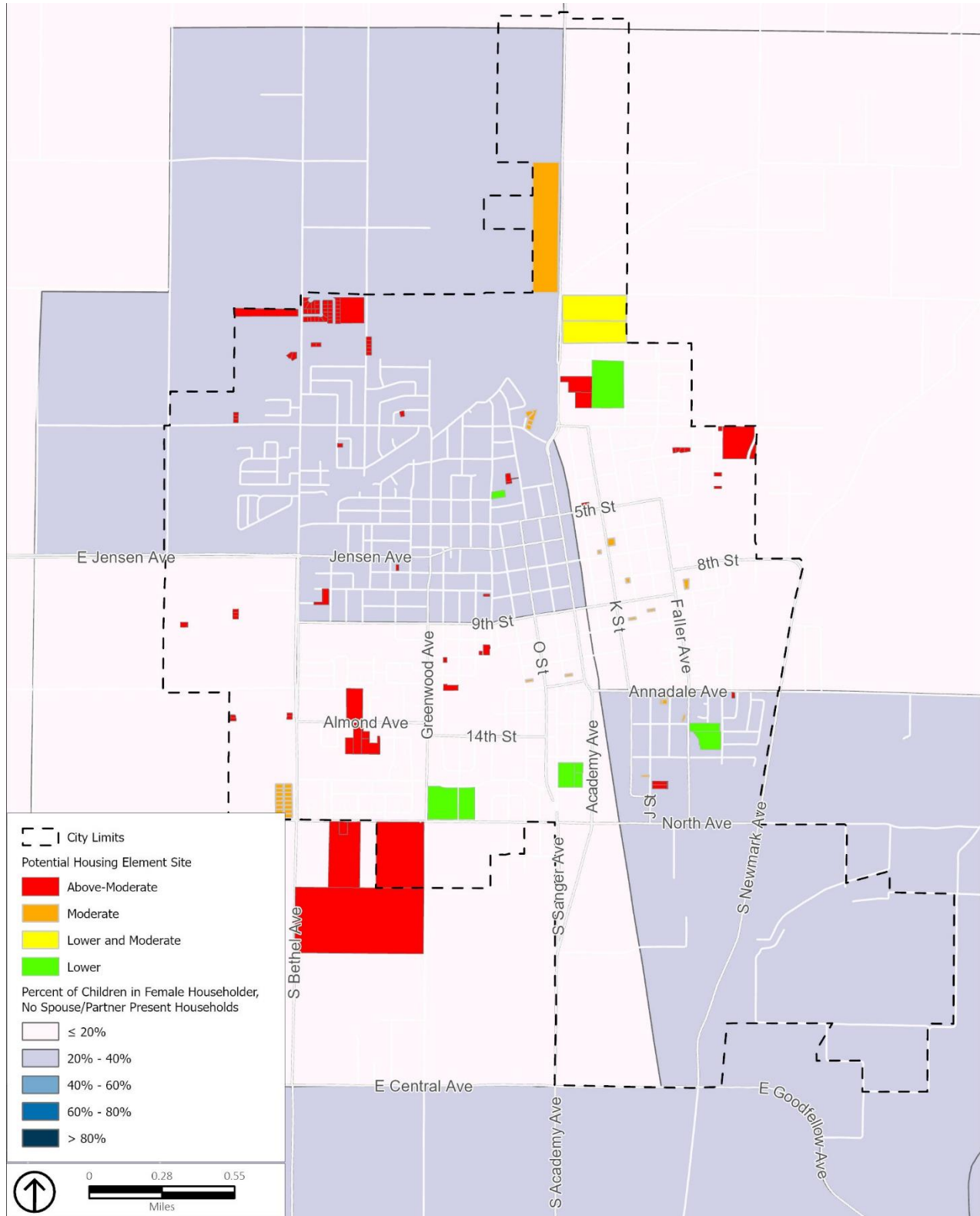
- Per Program 1, the City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- Per Program 12, the City will at least annually, publish informational materials pertaining to ADUs through a combination of media, including the City’s social media accounts and the bilingual Inside Sanger Newsletter.
- Per Program 22, the City will promote available housing rehabilitation resources through the City’s bilingual newsletter and in areas of need to assist in reducing displacement risk for homeowners and their households by improving living conditions and enabling them to stay in their home and community.
- Per Program 23, the City will promote available housing rehabilitation resources through the City’s bilingual newsletter and in areas of concentrated renter households or older housing stock to assist in reducing displacement risk and promote place-based revitalization for residents by improving living conditions and enabling them to stay in their home and community.
- Per Program 28, the City will improve fair housing outreach capacity and multilingual accessibility to all public resources, information, and meetings, including fair housing resources to address discrimination and access to resources. The City will also coordinate with local fair housing providers to conduct biannual trainings for landlords and tenants on fair housing laws, rights, and responsibilities and ongoing access to legal counseling. Per **Program 16**, the City will adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law.
- Per Program 29, the City will ensure program availability and funding announcements are made available in Spanish and translation is available at public meetings.

Familial Status

Like several other jurisdictions in Fresno County, the majority of households in Sanger are family households (83.5 percent). Family households are defined by California law as a household of two or more persons, regardless of relationship status. The City of Sanger's rate of married couple households is 46.2 percent, one of the lowest in the county, and an additional 11.4 percent of households are unmarried couples. Approximately 38.8 percent of the population over age 18 in the northeastern census tract are living in married-couple families, and 8.1 percent in unmarried-couple families. The proportion of the population over age 18 living in married-couple families in the southeastern census tract is 34.4 percent, with 7.5 percent living in unmarried couple arrangements. Approximately 39.6 percent of the population over age 18 in the northwestern side live in married-couple families, with 14.3 percent in unmarried couple families, and 38.6 percent of the population over age 18 in the southwestern side live in married-couple families, with 4.3 percent in unmarried couple families. A notable proportion of the population over age 18 in this census tract, 17.5 percent, are children of the householder still living at home. There does not appear to be a distinct correlation between TCAC/HCD designations and married- and unmarried-couple family composition, with all TCAC/HCD designations showing between 34.4 and 40.0 percent of the population over age 18 (note: not households) in a couple, although the west side has a slightly higher proportion of married-couple families compared to the east side.

Approximately 25.9 percent of City of Sanger households are family households headed by single adults, a larger proportion than both the Fresno County rate of 22.2 percent and 21.0 percent in California. The City of Sanger's proportion of single female-headed households is 26.3 percent of total households, of which 32.7 percent live alone, 36.4 percent have their own children, 29.3 percent live with other related children or relatives, and 1.5 percent live with housemates. Single male-headed householders comprise 16.1 percent of total households, of which 49.1 percent live alone, 5.7 percent live with their own children, 43.6 percent live with other children or relatives, and 1.5 percent with housemates. As shown on **Figure 1N-13, Percentage of Children in Female-Headed Households in Sanger**, between 20.0 and 40.0 percent of female headed households with children reside in the census tracts corresponding to the TCAC/HCD High Segregation and Poverty designation, with rates below 20.0 percent in the moderate and high resource designations. Also correlating to TCAC/HCD areas of High Segregation and Poverty designations, a larger proportion of persons living alone (8.8 percent) reside in the southeast tract, which has the greatest number of affordable rental properties compared to the northeast tract (5.9 percent). In contrast, a larger proportion of persons over age 18 live alone (9.9 percent) in the northwest portion of the city, with the Elderberry at Bethel affordable housing complex and the Vista del Monte Mobile Home Park, compared to 5.9 percent in the southwest tract of the city.

FIGURE 1N-13 PERCENTAGE OF CHILDREN IN SINGLE-PARENT FEMALE-HEADED HOUSEHOLDS IN SANGER



Source: U.S. Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placemarks, 2023

Programs to Address Patterns of Integration and Segregation: Familial Status

- Per Program 7, the City continues to have needs for affordable housing for lower-income households, especially for seniors, persons with disabilities (including persons with developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households.
- Per Program 16, the City will adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law.

Approximately 25.9 percent of female-headed households in Sanger have incomes below the poverty line, just above the Fresno County rate (34.0 percent), and significantly higher than the statewide rate of 21.5 percent. The higher proportion of the population over age 18 residing in single female headed households in the TCAC/HCD areas of High Segregation and Poverty and the presence of the majority of affordable housing complexes in these areas of the city suggest that a concentration of single parent households in poverty may reside in these neighborhoods, particularly in the southeastern census tract. The slightly higher rates of single female-headed households with their own children in the City of Sanger (9.6 percent of total households) and single female-headed households with other relatives and child arrangements compared to in Fresno County and statewide, indicates that single-parent, female-headed households may have more access to affordable housing in the City of Sanger rather than elsewhere in the county. In addition, surrounding neighborhoods have moderate and high resource designations, so proximity to these opportunities may offer benefits to single female householders with children if housing opportunities are available elsewhere in the city.

Single-person households constitute 16.5 percent of total households, compared to 29.1 percent of households in Fresno County overall and 23.7 percent of households statewide. Seniors living alone comprise 9.6 percent of households both county- and statewide, and constitute 9.2 percent of the City of Sanger’s households and 39.0 percent of all seniors in the city. Of the seniors living alone, 55.0 percent are homeowners, and the remaining 45.0 percent are renters. This slightly lower representation of seniors living alone in the City of Sanger reflects the overall low-to-moderate presence of seniors in the city, where seniors comprise 9.5 percent of the total population and 23.5 percent of the total households, lower than five of the other jurisdictions in the county.

Disability Rates and Services

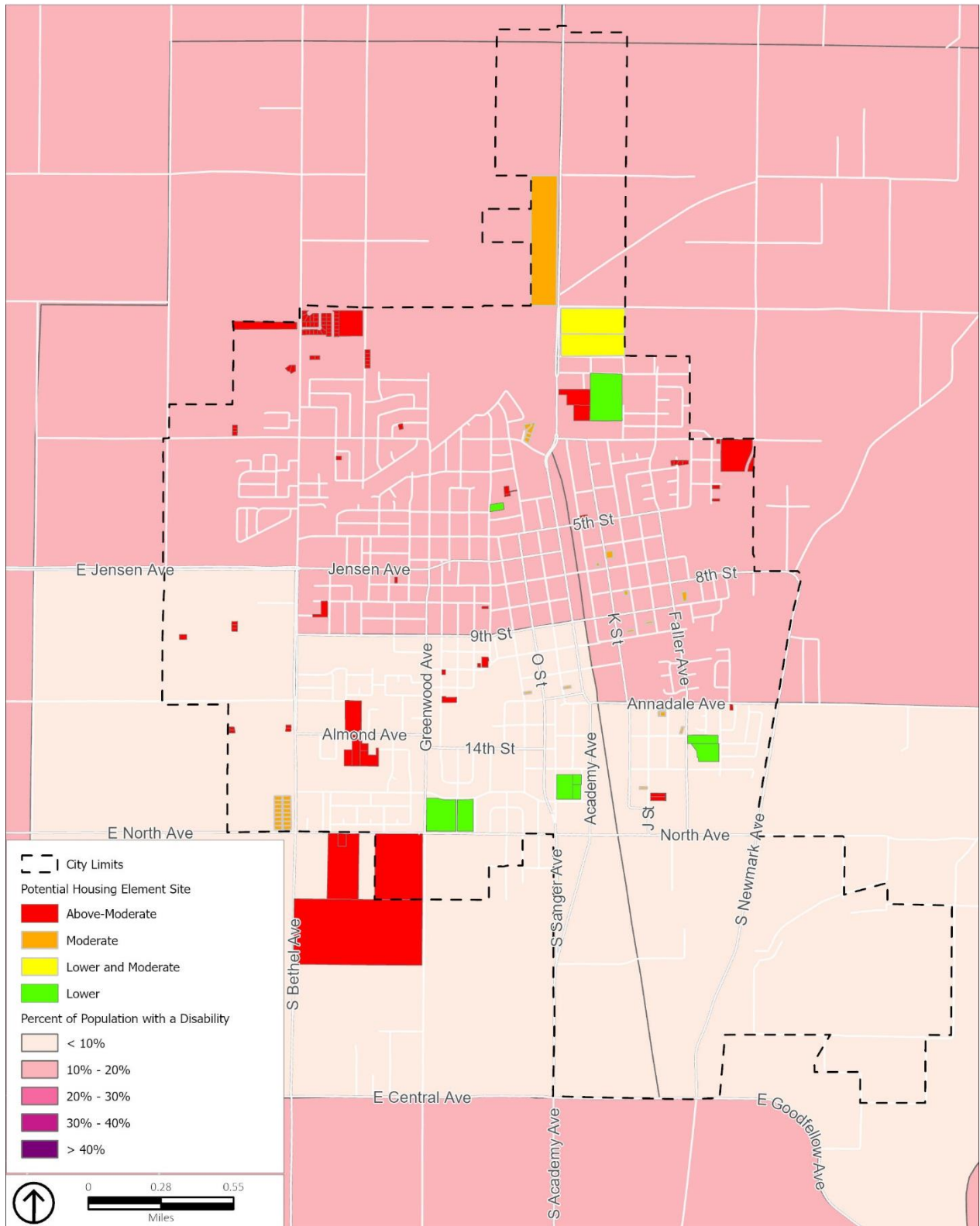
Persons with disabilities typically have special housing needs due to physical or developmental capabilities, fixed or limited incomes, and higher health costs. Seniors typically experience disabilities at higher rates. Approximately 9.2 percent of the City of Sanger’s population lives with one or more types of disabilities, below both the Fresno County rate of 12.9 percent and statewide rate of 10.7 percent. Although there is a fairly low population of older residents (9.5 percent of population) in the city, 43.8 percent of the senior population in the City of Sanger experiences one or more disabilities. Only the cities of Kingsburg, Fresno, Fowler, and Coalinga have higher rates of seniors with a disability. However, the presence of three licensed care facilities in the city may partially contribute the high incidence of seniors with disabilities in the City of Sanger.

In the City of Sanger, the proportion of residents living with disabilities occurs in different proportions between the northern and southern sides of the city, rather than between east and west, as exhibited by other socioeconomic characteristics. However, seniors consistently represent a large percentage of the persons with disabilities, which is fairly consistent among all four census tracts. It should be noted again that all four census tracts in the city include unincorporated land, primarily agricultural homesteads, outside of the city boundaries that may influence the findings. The southern census tracts have a lower proportion of persons with disabilities, and the southwestern census tract has a disability rate of 7.6 percent, of whom 39.4 percent are seniors (**Figure 1N-14, Percentage of the Population with a Disability in Sanger**). Similarly, the disability rate in the southeastern census tract is 7.4 percent, of whom 40.2 percent are seniors. Although seniors comprise only 8.4 percent of the southeastern portion of the city, 35.5 percent of the seniors report a disability. In contrast, on the northwestern side of the city, the overall rate of disability is 13.6 percent, and 43.0 percent of those are seniors. Seniors comprise a larger proportion of the population in this tract compared to southern portions of the city, at 11.9 percent of the population, and 49.3 percent of this age cohort experiences one or more disabilities. Within the northeastern tract, the overall rate of disability is 12.9 percent. While seniors comprise 11.1 percent of the population in this area, 45.2 percent of this age cohort experiences one or more disabilities, representing 39.1 percent of total persons with disabilities in this tract.

The spatial distribution of City of Sanger residents living with disabilities has shifted between 2014 and 2020, decreasing throughout the two southern census tracts from 2014, from 11.2 percent in the southwest tract to 7.2 percent, and 10.9 percent in the southeastern tract to 7.4 percent in 2020. Conversely, disability rates increased in the northern census tracts. The rate in the northeastern side of the city increased slightly since 2014, from a disability rate of 12.2 percent to 12.9 percent in 2020, with seniors comprising 51.9 percent of total disabilities in this tract. The northwestern side had a disability rate of 10.3 percent in 2014 compared to 13.6 percent in 2020, with seniors comprising 67.8 percent of total persons with disabilities in this tract. Additionally, in 2014, seniors constituted a larger proportion of the population, at 14.1 percent, with 49.8 percent experiencing a disability. The relationship between seniors and rates of disability has remained fairly consistent over the years, with the exception of the high incidence of disabilities among seniors in the northwestern tract, so it is likely that the shifts between the northern and southern census tracts may be attributed to other factors.

As shown on Table 2-32, Disability by Type (2020), in Section 2: Housing Needs Assessment, ambulatory disabilities were the most prevalent disability type, reported by 54.1 percent of individuals with a disability in Sanger, followed by cognitive difficulties at 38.7 percent, independent living problems at 37.6 percent, and hearing difficulties at 25.9 percent. Vision difficulties and self-care problems were reported by 19.4 percent and 22.8 percent of the population with a disability, respectively. The City of Sanger has a small population of residents with developmental disabilities (1.5 percent of total population), of which approximately 50.0 percent are under 18 years of age and live at home with parents or a caregiver.

FIGURE 1N-14 PERCENTAGE OF THE POPULATION WITH A DISABILITY IN SANGER



Source: U.S. Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placeworks, 2023

Residents with disabilities in the City of Sanger are served by the Fresno County Senior Resource Center, which operates an Adult Protective Services program, assisting both disabled adults and seniors with all requests for assistance. The Fresno County Human Services System, Department of Adult Services, also provides housing and basic needs assistance to elderly persons. The Fresno/Madera Area Agency on Aging provides connections to programs, services, and resources that elderly residents can use to maintain and improve their quality of life as they age. Sanger residents also have access to the Dial-A-Ride program, operated by the local Fresno County Rural Transit Agency (FCRTA) subsystem, which offers transportation services to the elderly (65+), disabled, low income, and general public. Dial-A-Ride services are wheelchair equipped and operate Monday through Friday between 8:30 am and 4:15 pm, with fares at \$1.00 one-way or \$2.00 round trip. For ongoing care, there are four adult residential care facilities in Sanger with a combined 20 beds, and three elderly assisted living facilities with a combined capacity of 56 beds.

Programs to Address Patterns of Integration and Segregation: Disability

- Per Program 7, the City will pursue partnerships with the Central Valley Regional Center to identify funding opportunities and promote housing for persons with disabilities.
- Per Program 10, the City will expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing.
- Per Program 16, the City will adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law.
- Per Program 17, the City will encourage housing developers to include mobility-impaired accessibility in their project designs and prioritize these types of projects to increase housing mobility opportunities for seniors and persons with disabilities. In addition, through Program 18, the City will ensure that its reasonable accommodation policies, practices, and procedures do not pose barriers to applicants and provide information to individuals with disabilities based on the guidelines from HCD. Furthermore, the City will include accessibility considerations along with neighborhood improvements in the preparation of the City’s capital improvement plan and budget.
- Per Program 22, the City will conduct targeted outreach to inform property owners of rehabilitation assistance in neighborhoods with concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, and to owners of older housing units, which are in the city’s original downtown core square mile area and scattered throughout the city.
- Per Program 23, the City will promote housing rehabilitation resources through the City’s bilingual newsletter and in areas of concentrated renter households or older housing stock to assist in reducing displacement risk and promote place-based revitalization for residents by improving living conditions and enabling them to stay in their home and community.

Access to Opportunity

Transit Mobility

Transit mobility refers to an individual's ability to navigate the city and region on a daily basis to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit.

Sanger residents are served by FCRTA, which provides fixed-route service on the Orange Cove Transit and Sanger-Reedley Transit lines (see **Figure 1N-15, Transit Mobility**). Since January 26, 1992, in compliance with requirements of the Americans with Disabilities Act (ADA), FCRTA's fixed-route service has been able to deviate from its specified route on a demand-responsive basis up to a three-quarter (3/4) mile in either direction (1-1/2 mile path) to pick-up or drop-off a disabled passenger.

Orange Cove Transit provides weekday service between Sanger, Orange Cove, Reedley, Parlier, and Fresno. Buses make two round trips daily, originating in Orange Cove and stopping in Reedley and Parlier before making four stops in Sanger at Best Buy Liquor, the Sanger Community Center, Sanger City Hall, and Sanger Hospital at approximately 8:00 a.m. and 1:45 p.m., then traveling on to Fresno. Return service departs from Fresno at approximately 10:00 a.m. and 3:45 p.m., arriving in Sanger at approximately 10:40 a.m. and 4:30 p.m. before traveling on to Parlier, Reedley, and Orange Cove. Service is provided on 30-passenger, ADA, and wheelchair-accessible buses. Monthly passes for general service between Sanger and Fresno are priced at \$80.00, with discounted fares available for senior, youth, and disabled residents at \$40.00 monthly.

The City of Sanger and the FCRTA also operate an Express Transit Route from the Sanger Community Center to Reedley College on weekdays. The service is open to Sanger residents who are attending Reedley College. Prepaid passes cost \$17.50 each, which covers 10 one-way fares. Buses make six round trips between Sanger and Reedley College at regular intervals during the school day.

With daily access to the cities of Fresno and Reedley, the FCRTA also provides Sanger residents with access to employment opportunities and connections to regional transit services, including Amtrak, Greyhound, and Fresno Area Express (FAX), which in turn provide connections within the metropolitan Fresno area and between Stockton, Bakersfield, and other regional hubs. While some mobility within the city is provided by the three stops in the Jensen Avenue corridor, FCRTA routes primarily serve intercity transportation needs. As such, additional transportation alternatives may be needed to complement the fixed-route transportation system.

In 2023, FCRTA released a public draft of its 2024-2028 Short Range Transit Plan (SRTP). As part of the plan's public outreach process, members of the public expressed concerns they had about the current state of the transit network and suggested possible changes to the transit and transportation system that would benefit them. Two of the primary comments received as part of the agency's workshops were a desire to see extended weekend and evening service to support farmworkers and an interest in seeing better collaboration between the County and the Transit agency. In an online survey for the same study, many

expressed a desire to see demand-response transit expanded to better serve rural areas that are not well served by fixed-route transit. The SRTP noted that the Measure C sales tax measure indicated that providing funding for expanded rural fixed-route service was an approved funding goal, along with providing free transit service for seniors.

In 2018 FCRTA successfully applied to FCOG for a Regional Sustainable Infrastructure Planning Grant and was awarded \$160,000 to fund a study analyzing the feasibility of expanding FCRTA’s Rural Transit service and creating new service regions for FCRTA’s Rural Transit service throughout Fresno County. As identified in the *FCRTA Electric Vehicle Rideshare/Carshare/Rural Transit Expansion Plan*, December 2020, social service organizations have voiced the concern that many of their clients have limited or no access to a vehicle and reside outside of a one-half mile service area of an existing transit route, which can impact their quality of life. In October 2022, FCRTA launched a pilot of an electric car-based carshare program in Biola, where subsidized rides would be provided in electric vehicles driven by professional drivers hired through MV Transportation. The project is funded by Measure C sales tax funds and a donation from the League of Women Voters, and the agency hopes to expand to other parts of Fresno County as drivers are hired and trained. However, at the time of the project’s launch, FCRTA noted that the project was having a hard time hiring enough qualified drivers for the program².

Green Raiteros is an indigenous, community-led rideshare service based in Huron that serves Fresno, Madera, Kings, and Kern Counties. The group is part of The Latino Equity Advocacy & Policy Institute (LEAP Institute), a 501(c)3 non-profit public benefit organization. The service is funded by both public and private grants and was initially built on the existing network of retired farmworkers that had been providing transportation services on an informal basis. The group owns ten electric vehicles that are used to provide the service and was able to secure four high-speed chargers. The program expressly includes in its mission dual goals of improving local health outcomes by connecting rural residents with health services and providing quality transportation services for farmworkers. Other community-based rideshare programs were forced to close during the pandemic, such as the Van y Viene service in Cantua Creek³. However, the success of Green Raiteros suggests that there is a demand for this type of service in more rural areas that could be met with community leadership.

Vanpool services are also available to farmworkers in the County, who may not reside in proximity to a bus stop that provides a connection to employment sites, as their work sites may change depending on the crop harvest schedule. The California Vanpool Authority is a public transit agency governed by a consortium of public agency board members, including Fresno County COG. The California Vanpool (CalVans) program provides qualified agricultural workers with safe, affordable vans they can use to drive

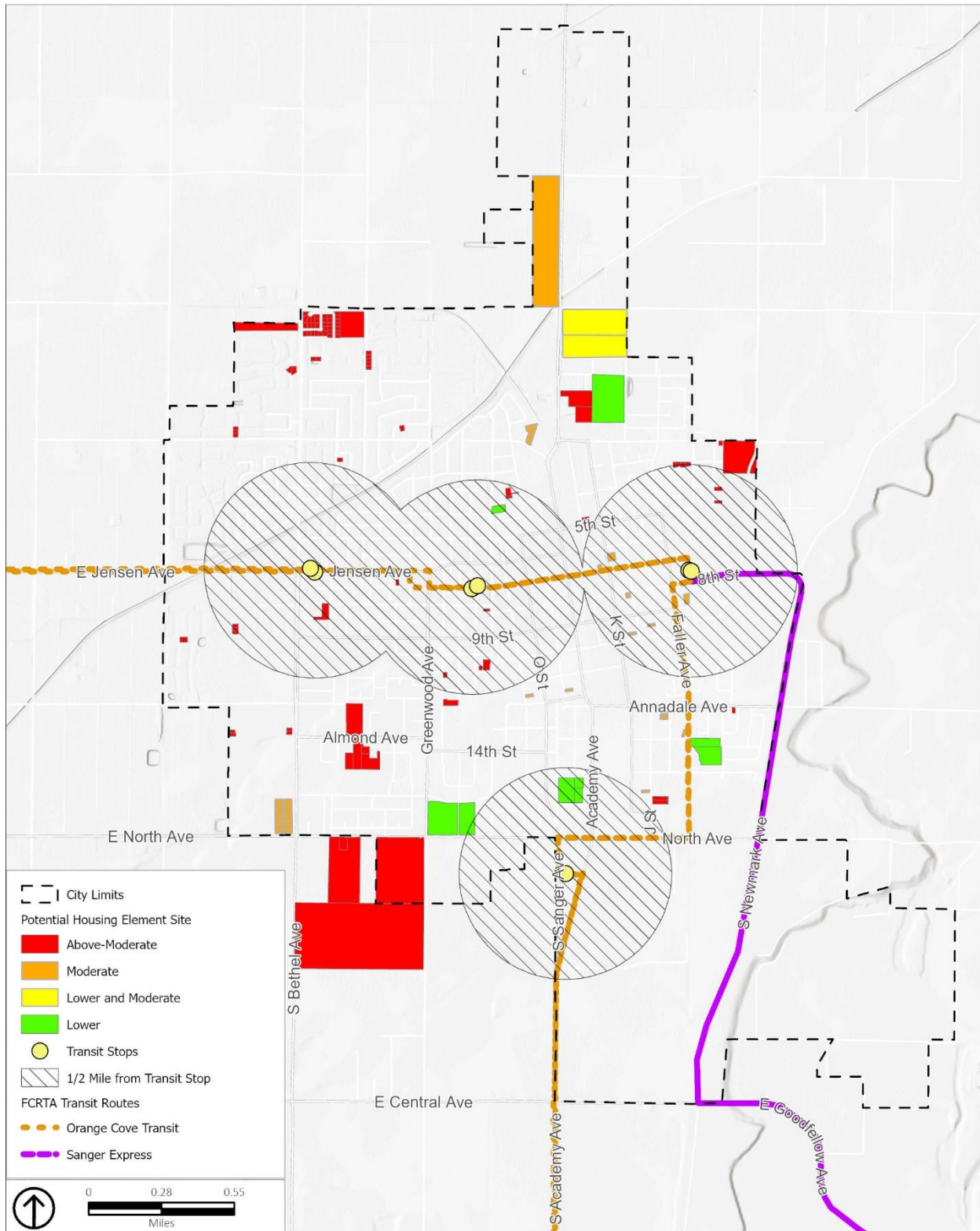
² Diaz, L.S. (2022, October 17). “EV Ride-Sharing Coming to Rural Fresno County, Calif.” GovTech. <https://www.govtech.com/fs/ev-ride-sharing-coming-to-rural-fresno-county-calif>

³ Ortiz-Briones, M.G. and Garibay, C. (2022, February 26). “Fresno County Rural Residents Face Transportation Gaps. How Electric Rideshare Programs Help”. Fresno Bee. <https://www.fresnobee.com/fresnoland/article255313821.html>

themselves and others to work. A one-time start-up grant provided money to set-up the CalVans program and to purchase the 15-passenger vans, which have since been remodeled to carry eight passengers and the driver. The money to sustain and expand the program comes from the riders themselves, who generally pay less than \$2.00 to ride in a CalVans vanpool. The fee covers the Agency's cost of maintaining and insuring the vans, as well as the cost of replacing vehicles based on established safety criteria. Drivers receive no compensation, training and operating their vanpool on a voluntary basis.

As of 2020, FCRTA is the Consolidated Transportation Services Agency (CTSA) for the rural areas of Fresno County and administers funding for these services. In 2021, Fresno Economic Opportunities Commission was awarded a contract to provide transit services in coordination with local human services agencies. As of August 2023, a Joint RFP has been issued by FCRTA and the City of Fresno to provide social services transportation services in both the rural areas of Fresno County and the Fresno metropolitan area. Additionally, the Fresno COG is currently updating the Fresno County Coordinated Human Services Transportation Plan, which will identify strategies for improving transportation options for seniors, persons with disabilities, low-income individuals, veterans, unhoused persons, and youth.

FIGURE 1N-15 TRANSIT MOBILITY



Source: U.S. Census; City of Sanger, 2023; PlaceWorks, 2023, TCAC 2023.

AllTransit is a transit and connectivity analytic tool developed by the Center for Neighborhood Technology for the advancement of equitable communities and urban sustainability. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. AllTransit scores geographic regions (e.g., cities, counties, Metropolitan Statistical Areas) on a scale of 0 to 10, with 10 being complete transit connectivity. **Figure 1N-16, Jurisdictional AllTransit Performance Score**, shows Sanger’s AllTransit Performance score, including metrics representing average household transit access. Sanger’s score is 0.9, demonstrating “very low” connectivity. **Table 1N-9, Fresno County Jurisdictions AllTransit Performance Scores**, shows transit accessibility in Sanger relative to other Fresno County jurisdictions. Sanger’s score is consistent with comparable Fresno County jurisdictions, which are typified by smaller rural and semi-rural communities. However, as described in Section 3: Regional Assessment of Fair Housing, the AllTransit methodology may not fully reflect the transit opportunities available through private service providers. Among Fresno County jurisdictions, the City of Fresno represents an outlier both in terms of population size, degree of urbanization, and transit accessibility.

Table 1N-9 Fresno County Jurisdictions AllTransit Performance Scores

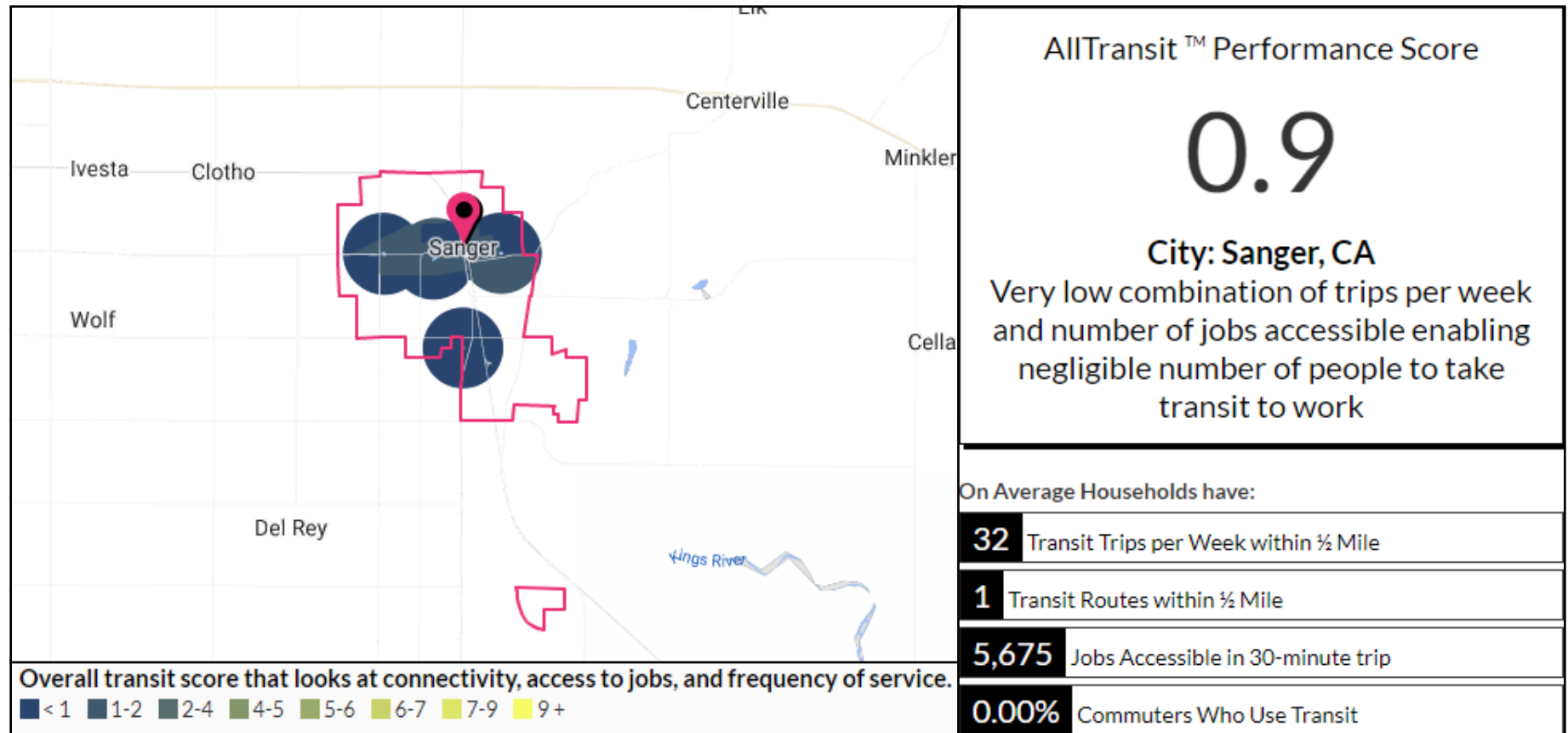
Jurisdiction	Score
City of Fresno	5.0
Fresno County	3.2
Reedley	2.2
Fowler	1.5
Huron	1.2
Clovis	1.1
Coalinga	1.1
Parlier	1.0
Firebaugh	1.0
Mendota	0.9
Sanger	0.9
Selma	0.7
Kingsburg	0.7
Kerman	0.1
San Joaquin	0.0

Source: AllTransit.cnt.org, 2022

Programs to Address Access to Opportunity: Transit Mobility

- Per Program 29, the City will work with Fresno County Rural Transit Agency (FCRTA) and other jurisdictions in the county to develop a fact sheet, or similar informational materials, of FCTA programs to be posted on the City’s website, social media, and in public buildings by January 2026, and advertised annually in the City’s newsletter to help connect seniors and other residents to services in the city and throughout the county.

FIGURE 1N-16 SANGER ALLTRANSIT PERFORMANCE SCORE



Source: AllTransit.cnt.org, 2022

Housing Mobility

Approximately 41.3 percent of occupied households in Sanger are renter-occupied. Rates of renter occupancy are evenly distributed in Sanger, with rates of renter-occupancy ranging between 36.8 and 47.4 percent in the city's three census tracts. Rates are lowest (36.8 percent) in areas on the northwest side of the city. As shown in Section 2: Housing Needs Assessment, Table 2-18, for 2022 the California Department of Finance (DOF) reported an overall vacancy rate of 3.2 percent in Sanger. Vacancy data is not available by tenure through the DOF; however, the 2020 ACS 5-year estimate indicates a rental vacancy rate of 2.1 percent and an ownership unit vacancy rate of 0.2 percent, with an overall vacancy rate of 4.8 percent. A healthy housing market is generally considered to have a 5.0 percent vacancy rate. ACS 5-year estimate vacancy rates draw on large sample sizes and may not precisely represent vacancy on the ground. Instead, these rates are presented as general estimates indicating approximate conditions in the local housing market.

In Sanger, a substantial proportion of vacant properties were categorized as "other vacant," a category of properties that are vacant but not available for rent or purchase. Properties may be categorized as "other vacant" due to factors such as ongoing legal proceedings, active renovation or repair, abandonment, or an owner's preference for vacancy. These categories of vacancy are accounted for in the overall vacancy rate estimate but are not included in the rental and ownership vacancy rate estimates, which only consider units immediately available for rent or purchase.

Sanger's low rental vacancy rate indicates a tight rental market with few housing mobility opportunities for current and prospective renters. Similarly, the very low ownership unit vacancy rate indicates an absence of available homes for sale in Sanger for prospective homebuyers.

The 2020 ACS 5-year estimate indicates that median gross rent is \$950 in Sanger, slightly lower than \$1,029 reported for Fresno County (see Section 2: Housing Needs Assessment). Sanger's vacancy rates and median rent are consistent with several other comparable Fresno County jurisdictions (see Section 2: Housing Needs Assessment). This suggests that residents in Sanger have similar mobility options overall as in other parts of the region. Median rent in Sanger rose from \$771 in 2010 to \$950 in 2020, an increase of 23.2 percent over the ten-year period, indicating that renting costs have risen in recent years. As found in Section 2: Housing Needs Assessment, Table 2-22, Home Sales Recorded in 2021-22, home prices in Sanger decreased by 7.3 percent between 2021 and 2022.

Consistent with the pattern of renter occupancy described previously, households utilizing Housing Choice Vouchers are found at slightly higher rates on the northeast side of the city (5.5 percent of households) relatively to the northwest and south sides of the city (4.3 and 4.6 percent, respectively).

While rent is relatively affordable in Sanger, rental costs have risen over the last ten years. Additionally, a shortage of available housing units for rent and for sale may indicate limited mobility options for prospective and existing Sanger residents seeking ownership opportunities.

Programs to Address Access to Opportunity: Housing Mobility

- Per Program 7, the City will expand the City’s affordable housing inventory by 605 units over the next eight years, 206 extremely low-income, 206 very low-income, and 193 low-income units, at least 50 of which include accessibility modifications to facilitate housing mobility for lower-income households and special-needs groups.
- Per Program 10, the City will provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.
- Per Program 12, the City will encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes, such as the Washington Middle neighborhood and Faller Park neighborhood, to reduce concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park) through the following actions, which are aimed at providing an increased supply of affordable units throughout the city, thereby increasing access to resources and facilitating housing mobility opportunities for lower-income households.
- Per Program 18, the City will support two lot consolidations during the planning period to improve housing mobility, reduce displacement risk, and increase the supply of affordable housing in higher-opportunity areas.
- Per Program 20, the City will facilitate construction of 10 very low-income units and 10 low-income units to increase housing mobility opportunities, prioritizing new opportunities in higher-resource areas.
- Per Program 21, the City will develop 50 units over the planning period; of these, 25 units will be in higher-opportunity areas to promote access to resources and mobility for target households.
- Per Program 25, the City will promote available homebuyer resources on the City’s website and at public counters.
- Per Program 27, the City will work with the Housing Authority to disseminate information to 7 landlords and property owners on incentives for participating in the Housing Choice Voucher (HCV) program throughout the city to promote housing mobility opportunities for all residents.

Employment Opportunities

The HUD jobs proximity index measures employment accessibility in residential neighborhoods by calculating distances to potential job locations in the area, with larger employment centers weighted more heavily, and factoring in the population size of the local workforce. According to this index, most residential areas in Sanger score between the 8th and 66th percentiles, with the highest scores at the southeastern side of the city, and the lowest scores on the north side, generally north of Jensen Avenue and 9th Street (**Figure 1N-17, Jobs Proximity Index**). The wide range of scores indicates that the index may not accurately represent access to employment opportunities for Sanger residents.

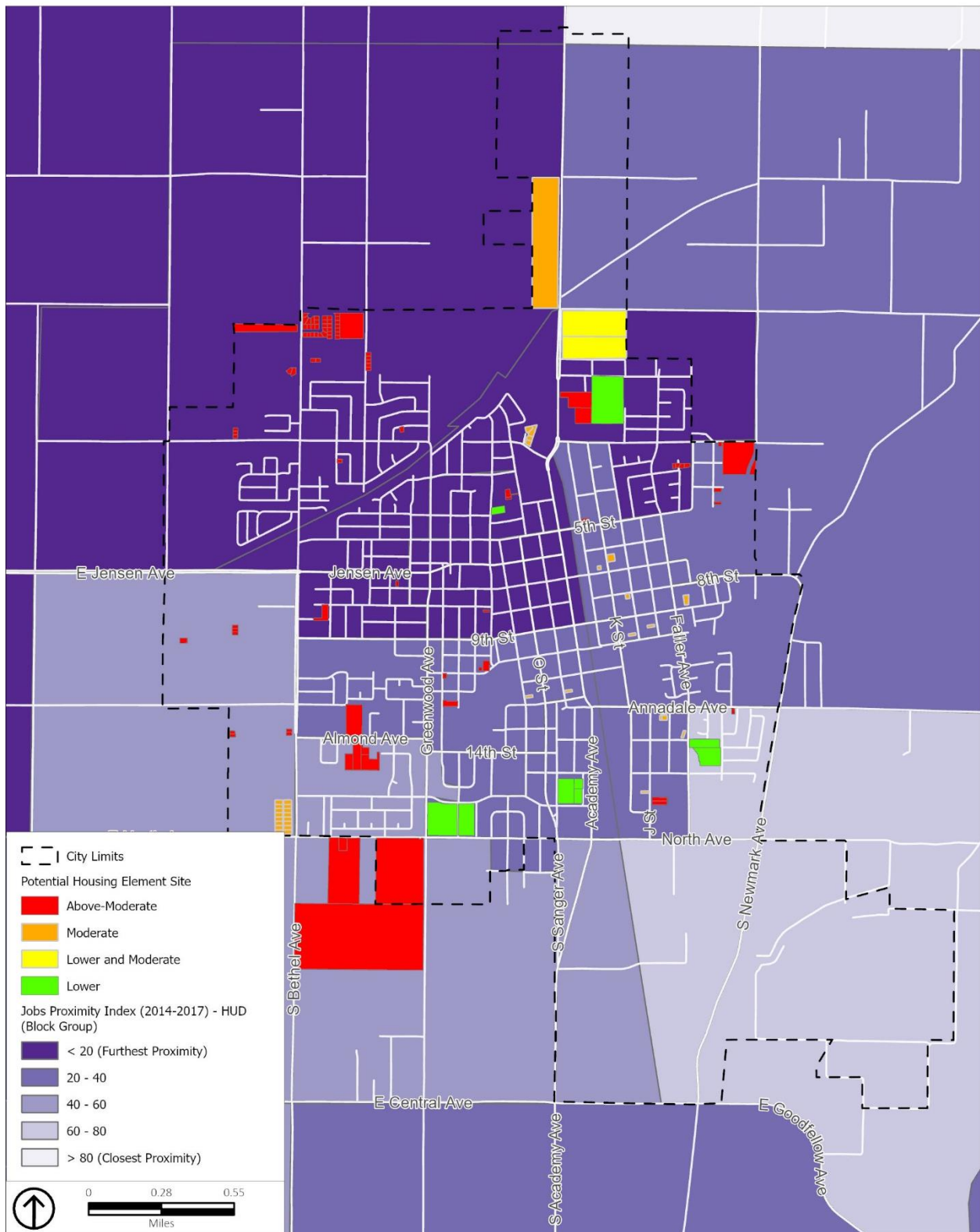
Approximately 84.1 percent of Sanger residents commute outside of the city for work, with 15.9 percent of residents both living and working within city limits. This figure has remained consistent over time—in 2010, 84.0 percent of Sanger residents commuted outside of the city for work.⁴ Sanger residents primarily work in Health Care and Social Assistance (15.4 percent), Agriculture, Forestry, Fishing and Hunting (13.1 percent), Educational Services (10.1 percent), and Manufacturing (9.8 percent).⁵ Sanger is in a central location in Fresno County relative to several other jurisdictions. In the city, approximately 75.2 percent of residents live within 24 miles of their workplace, an area that includes the cities of Fresno, Reedley, Selma, and Parlier, each of which have jobs that employ Sanger residents. Approximately 33.5 percent of Sanger residents live within 10 miles of their place of employment, while 17.3 percent travel more than 50 miles to work. According to the ACS, the jobs-housing ratio in Sanger leans toward a greater supply of jobs than housing units, at 0.81, improving slightly from a ratio of 0.77 in 2010. A low jobs-housing ratio may indicate an inadequate supply of housing for employees in Sanger. Interestingly, the high proportion of residents commuting outside of the city for work may indicate that the jobs in Sanger are not aligned with the interests, skills, or needs of residents, with cumulatively larger job market in nearby jurisdictions drawing many residents to seek employment elsewhere.

Commercial activity within Sanger is focused along Academy Avenue, with additional commercial uses on Seventh Street and Jensen Avenue, and industrial uses clustered in the southern area of the city along the rail line. Given the nature of the resident workforce's main industries and the consistent resident-employment outflow over time, Sanger residents will likely continue to work outside of the city. The City's zoning map (**Figure 1N-18, Zoning in Sanger**) shows that most land in the city is designated for residential uses. The prevalence of residential uses, high rate of out-commuting workers, and relatively close proximity to the city of Fresno indicate that HUD's jobs proximity index formula may not accurately capture access to regional employment opportunities for some Sanger residents.

⁴ U.S. Census Bureau, LEHD Origin-Destination Employment Statistics (2002-2019), LODES 7.5, Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, 2022, accessed September 2022, <https://onthemap.ces.census.gov>.

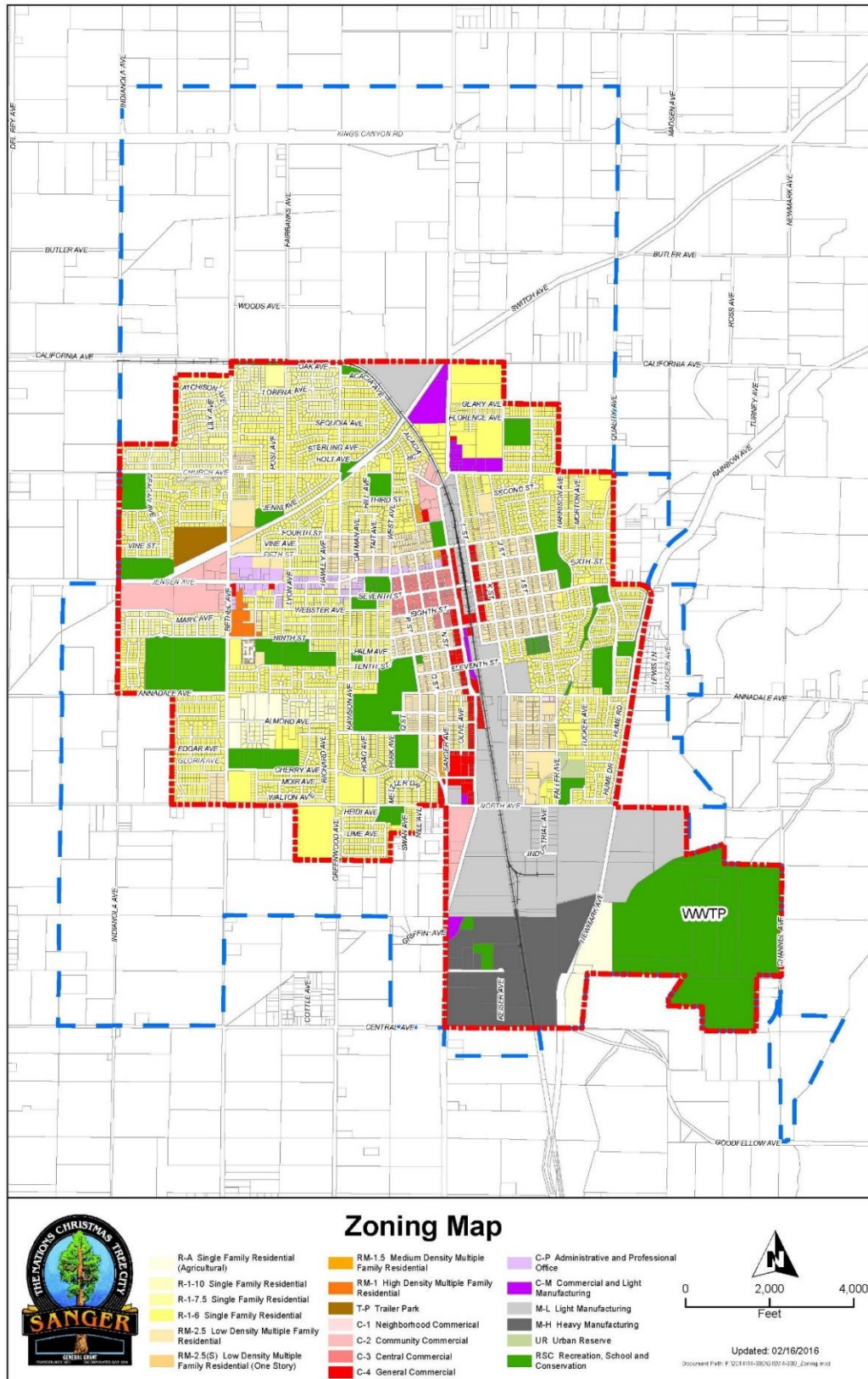
⁵ U.S. Census Bureau, LEHD Origin-Destination Employment Statistics (2002-2019), LODES 7.5, Washington, DC: U.S. Census Bureau, Longitudinal-Employer Household Dynamics Program, 2022, accessed September 2022, <https://onthemap.ces.census.gov>.

FIGURE 1N-17 JOBS PROXIMITY INDEX



Source: U.S. Department of Housing and Urban Development (Longitudinal Employer Household Dynamics 2014-2017); City of Sanger, 2023; Placemarks, 2023

FIGURE 1N-18 ZONING IN SANGER



Source: City of Sanger, 2016; accessed October 2022

Educational Opportunities

Sanger students are served by the Sanger Unified School District (SUSD), which has 19 public schools reported on by the California Department of Education (CDE), including several alternative education programs. While in the SUSD, several of these schools are in unincorporated communities. Those that serve Sanger residents are listed in **Table 1N-10, School Performance Scores in Sanger, 2019**. The alternative education programs, including Sanger Community Day school, typically serve students who have had trouble in traditional school environments. While these schools have limited data on performance scores for English Language Arts (ELA) and Mathematics, they offer a valuable resource for students to continue their education in a supportive environment. Sanger residents also have access to the Sanger Adult School, which is not within the scope of CDE performance metrics but provides educational opportunities aimed at job and career training, high school equivalency, citizenship, English as a second language, and other programs.

Of the 12 schools within Sanger city limits for which and math performance scores were available in 2019, CDE reported that Ronald W. Reagan Elementary, Sanger High, Hallmark Academy Charter, and Sanger Academy Charter scored above state grade-level standards for ELA. All other scores for all schools in the SUSD were below the state-grade level standards for English language arts, math, or both.

The proportion of each school's population that was considered socioeconomically disadvantaged in 2019 varied substantially, ranging from 60.0 percent at Sanger Academy Charter to 92.6 percent at Wilson Elementary. Sanger Academy Charter is in an area with a median household income of \$50,313 and a TCAC/HCD Education Domain Score in the 75th percentile. Wilson Elementary is in an area with a median household income of \$46,250 and the TCAC/HCD Educational Domain Score is in the 50th percentile. In the SUSD, the spatial distribution of schools in relation to household median income is consistent with school performance and projected educational outcomes, with schools in higher-income areas outperforming schools in lower-income areas. Students living in different parts of Sanger have different levels of access to higher-performing schools. Within the City of Sanger, TCAC/HCD Education Domain Scores vary—the north/northwest side is in an area with a TCAC/HCD Educational Domain score between the 50th and 75th percentiles, and the southeast side of the city scores in the 39th percentile (**Figure 1N-9, Local TCAC/HCD Educational Domain Score**).

Programs to Address Access to Opportunity: Educational Opportunities

- Per program 29, the City will meet with school district representatives by June 2025 to analyze whether there are links between housing stability and school performance, with an emphasis on schools with high proportion of socioeconomically disadvantaged students. Furthermore, the city will work with the school district to assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers to facilitate positive learning environments citywide.

Table 1N-10 School Performance Scores in Sanger, 2019

School Name	ELA Score	Math Score	Chronic Absenteeism Rate	Suspension Rate	Socioeconomically Disadvantaged	Foster Youth	English Learners
Sanger Community Day	-	-	60.0%	23.0%	95.1%	7.3%	17.1%
Jackson Elementary	-31.8	-38.9	9.5%	0.4%	81.0%	1.5%	18.2%
Jefferson Elementary	-23.5	-42.8	8.6%	0.0%	92.3%	0.5%	47.6%
Kings River High (Continuation)	-105.5	-186.9	-	19.9%	88.9%	0.0%	8.9%
Lincoln Elementary	-16.3	-47.8	8.7%	0.5%	89.8%	0.6%	43.1%
Madison Elementary	-2.7	-12.1	7.3%	0.4%	81.6%	0.7%	16.9%
Ronald W. Reagan Elementary	+3.1	-14.2	5.3%	0.0%	61.3%	0.8%	10.1%
Sanger High	+33.3	-38.3	-	7.1%	73.0%	0.5%	6.2%
Washington Academic Middle	-24.1	-47.4	7.4%	7.2%	72.8%	0.9%	13.5%
Wilson Elementary	-20.0	-36.6	12.0%	0.6%	92.6%	2.1%	40.7%
Hallmark Academy Charter (Home School/Virtual)	+34.1	-21.3	0.0%	0.0%	38.7%	0.0%	3.6%
Sanger Academy Charter School (K-8)	+32.9	+13.9	2.2%	0.3%	60.0%	0.0%	16.1%
John S. Wash Elementary	+25.5	+16.8	4.2%	0.4%	53.1%	0.9%	13.6%
Sanger West High	-	-	-	-	-	-	-

Source: California Department of Education, 2019

Environmental Health

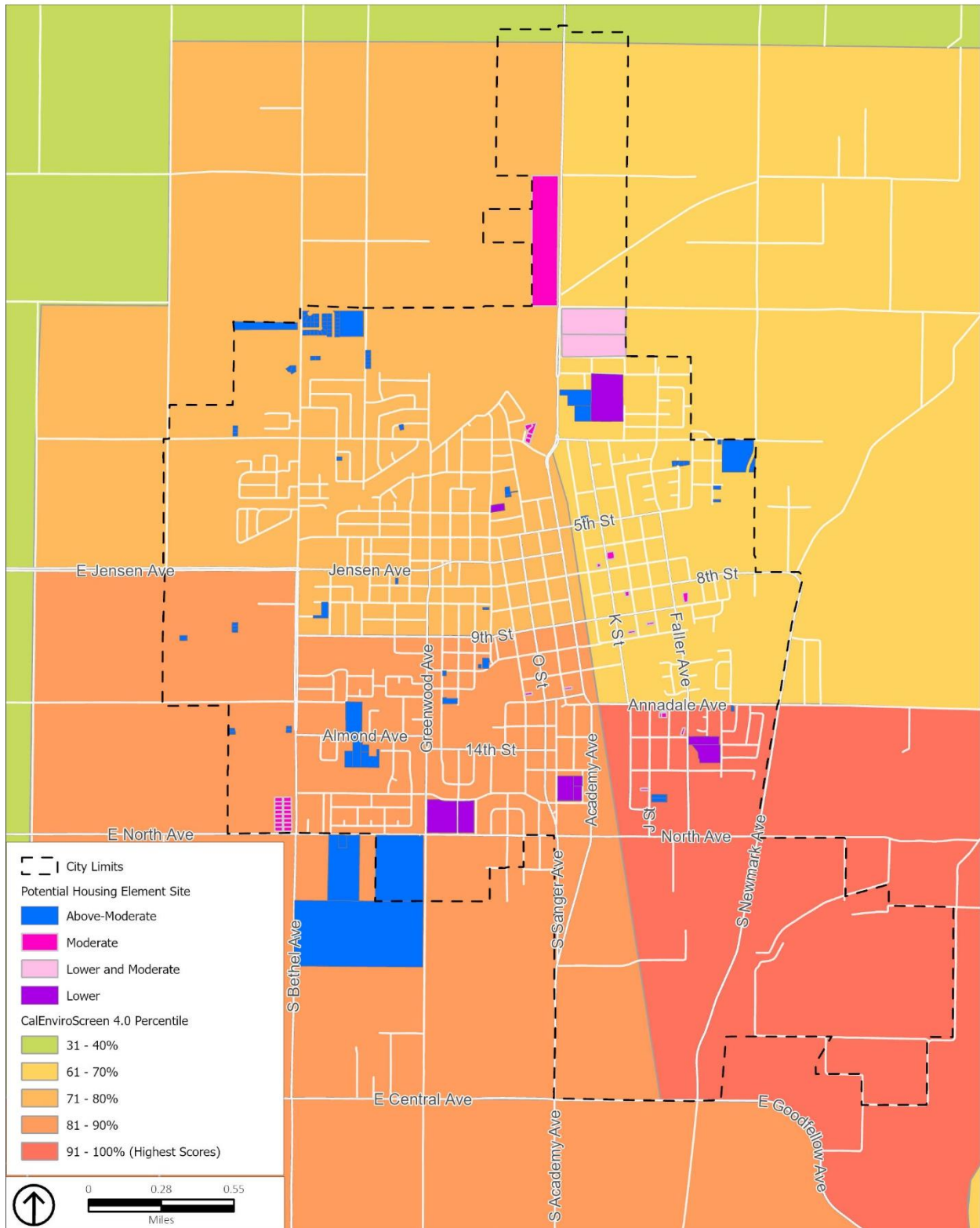
The Office of Environmental Health Hazard Assessment (OEHHA) reports CalEnviroScreen 4.0 scores demonstrate relatively adverse environmental conditions for census tracts in and around Sanger, which score between the 66th and 91st percentiles (**Figure 1N-19, CalEnviroScreen Scores**). In Sanger, areas on the southeast side of the city have more adverse environmental conditions compared to other areas, especially the northwest side, which has the least adverse conditions. This pattern is consistent with the spatial pattern demonstrated by other indicators of access to opportunity. The northwest section of the city sees the highest median household incomes citywide (approximately \$61,000 to \$85,000), consists almost exclusively of single-family residential uses, and is more isolated from commercial and industrial uses compared to other sections of the city. The southeast side of the city is the location of the majority of the city's industrial uses as well as several affordable housing complexes and has the city's lowest median household incomes (approximately \$19,000 to 49,000) and lower TCAC/HCD Education scores. Relative to other Fresno County jurisdictions, Sanger has a wider range of Environmental scores, indicating that residents in different areas of Sanger have widely varying access to positive environmental conditions, and that the spatial distribution of positive and adverse environmental outcomes is consistent with other fair housing indicators.

The primary indicators leading to high scores as reported by OEHHA's CalEnviroScreen, are, in order of significance, ozone, PM_{2.5}, pesticides, drinking water contaminants, solid waste, and lead in housing. Sanger is in a sparsely populated area, with few industrial uses and relatively low pollution from vehicular emissions. However, commercial agriculture and natural resource extraction close to Sanger may contribute to adverse environmental conditions. As described previously, the southeast sections of Sanger have more adverse fair housing conditions and fall within the boundaries of areas considered SB 535–qualifying disadvantaged communities, representing the 25 percent highest scoring census tracts in CalEnviroScreen 4.0, census tracts previously identified in the top 25 percent in CalEnviroScreen 3.0, and census tracts with high amounts of pollution and low populations. This data indicates that, compared with statewide averages, Sanger is an area of potential concern regarding fair housing, a disproportionate exposure to environmental hazards, and a concentration of vulnerable populations.

Programs to Address Access to Opportunity: Environmental Health

- Per Program 28, the City will facilitate place-based revitalization and improve access to healthy outdoor spaces and reduce exposure to pollutants for new housing by evaluating transitional buffers between residential and agricultural uses and highways and working with developers as projects are proposed to mitigate impacts associated with emissions from agricultural industries and traffic and facilitate access to healthy outdoor spaces.
- Per Program 30, the City shall promote environmental justice and maintain and revitalize neighborhoods citywide, with a particular focus on areas of lower opportunity and concentrated poverty, including in Reagan, Jenni Park, Sanger, and Jackson neighborhoods.

FIGURE 1N-19 CALENVIROSCREEN SCORES



Source: CalEnviroScreen 4.0; City of Sanger, 2023; Placeworks, 2023

Disproportionate Housing Need and Displacement Risk

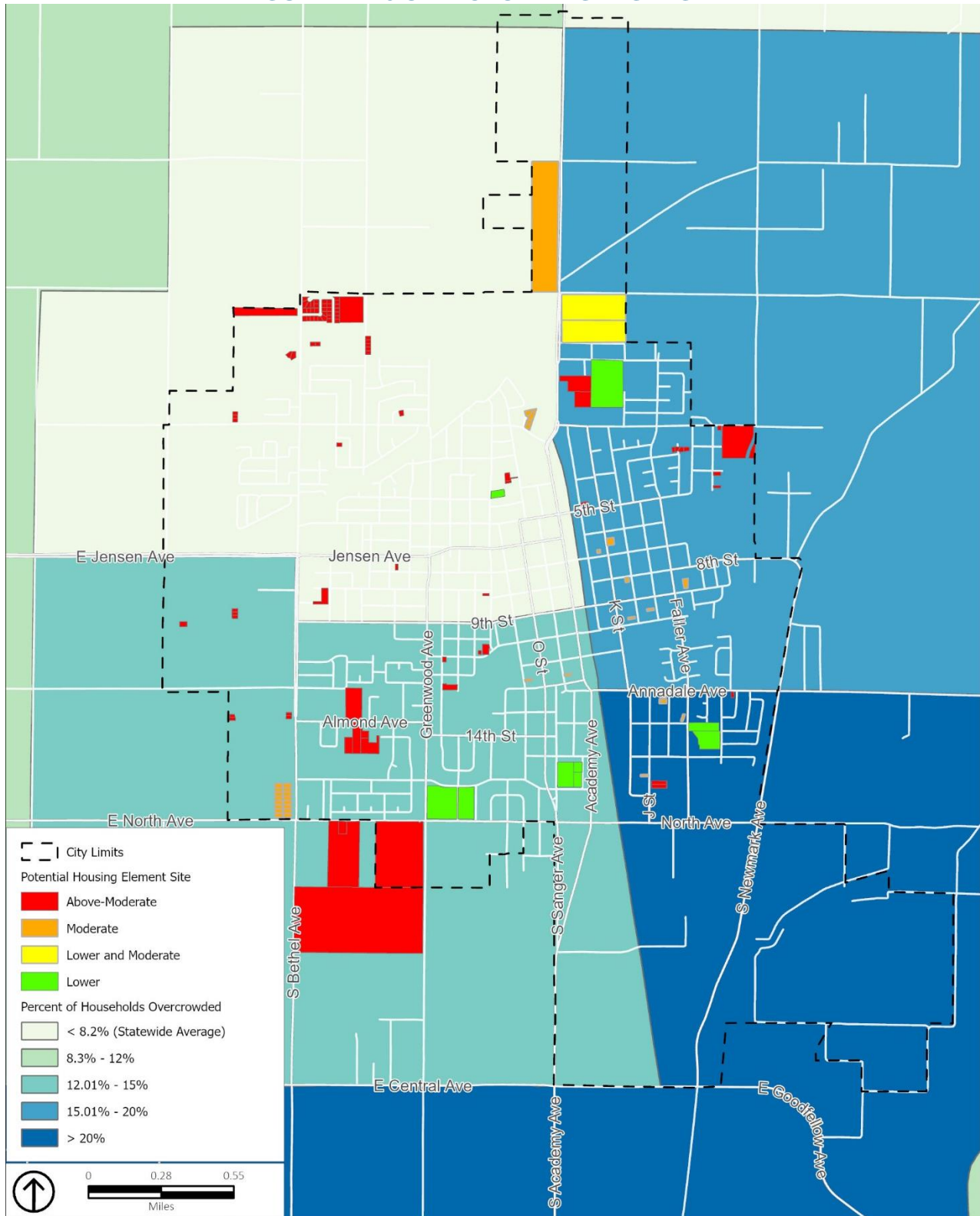
Overcrowding

Overall, approximately 8.7 percent of households in Sanger are considered overcrowded, which is a higher proportion than in Fresno County as a whole (6.1 percent). However, 2.6 percent of Sanger households are considered severely overcrowded, which is less than the 3.6 percent of households in Fresno County. Overcrowding is notably higher among renters in Sanger, of whom 12.0 percent are overcrowded, than among homeowners, of whom 6.4 percent are overcrowded, despite homeowners representing 58.7 percent of all households in Sanger.

As shown in **Figure 1N-20, Overcrowding in Sanger**, the ACS estimates that there is a notably higher rate of overcrowding east of the original Southern Pacific Railroad lines, particularly south of Annadale Avenue. East of the railroad but north of Annadale Avenue, overcrowding was estimated to impact 17.0 percent of households, while south of Annadale Avenue, 24.8 percent of households experienced overcrowding. In contrast, west of the railroad and north of Jensen Avenue and 9th Street, 6.6 percent of households were overcrowded, and south of Jensen Avenue and 9th Street, 13.7 percent of households were overcrowded. Although a handful of Fresno County jurisdictions have higher rates of overcrowding than Sanger, including Firebaugh, Huron, Mendota, Orange Cove, San Joaquin, and Selma, Sanger residents are more likely to be impacted by overcrowding than most cities in Fresno County. According to the 2016-2020 ACS, approximately 69.2 percent of housing units in Sanger have three or more bedrooms, which typically reduces the need for occupants to share rooms. Therefore, the rate of overcrowding may be attributed to the cost of housing rather than the availability of larger units. High costs may prevent lower-income households from securing larger units even when available.

The rate of overcrowding in Sanger has slightly decreased over time, from 9.1 percent in 2010 to 8.7 percent in 2020. Additionally, in 2010, 3.4 percent of households were considered severely overcrowded, compared to 2.6 percent in 2020. This decrease has exclusively affected homeowners, with 7.6 percent of homeowners experiencing overcrowding in 2010, and 6.4 percent experiencing overcrowding in 2020. In contrast, the percentage of renters experiencing overcrowding has increased significantly, from 8.4 percent in 2010 to 12.0 percent. The growing concentration of overcrowding in renter households, though still low, may reflect the high costs of rental units or that occupants, such as children or couples, share rooms.

FIGURE 1N-20 OVERCROWDING IN SANGER



Source: U.S. Department of Housing and Urban Development, 2020; City of Sanger, 2023; Placeworks, 2023

Overpayment

In Sanger, 20.5 percent of households are cost burdened, and 18.1 percent are severely cost burdened, for a total of 38.6 percent of all households (**Table 1N-11, Cost Burden in Sanger, 2010-2018**). Of these households, approximately 61.2 percent are renters, though renters comprise only 41.3 percent of households in the city. In total, 25.5 percent of renters are cost burdened and 27.6 percent are severely cost burdened, compared to 16.5 percent and 10.4 percent of homeowners, respectively. The disproportionately high rate of overpayment among renters is reflected on **Figure 1N-21, Percentage of Renters Overpaying**, and **Figure 1N-22, Percentage of Homeowners Overpaying**. In Sanger, renter overpayment is highest in the southwest quadrant, south of 9th Street and west of the railroad, where 66.8 percent of renters are overpaying. In contrast, in the same area, 35.6 percent of homeowners are overpaying. In the western portion of the city, homeowner overpayment rates are comparatively low. However, in the southeast quadrant, south of E. Annadale Avenue and east of the railroad, 53.6 percent of homeowners and 59.7 percent of renters are overpaying. This area has a relatively small residential area, but the high rates of overpayment in this area reflect the significantly high rate of poverty (46.5 percent of the population).

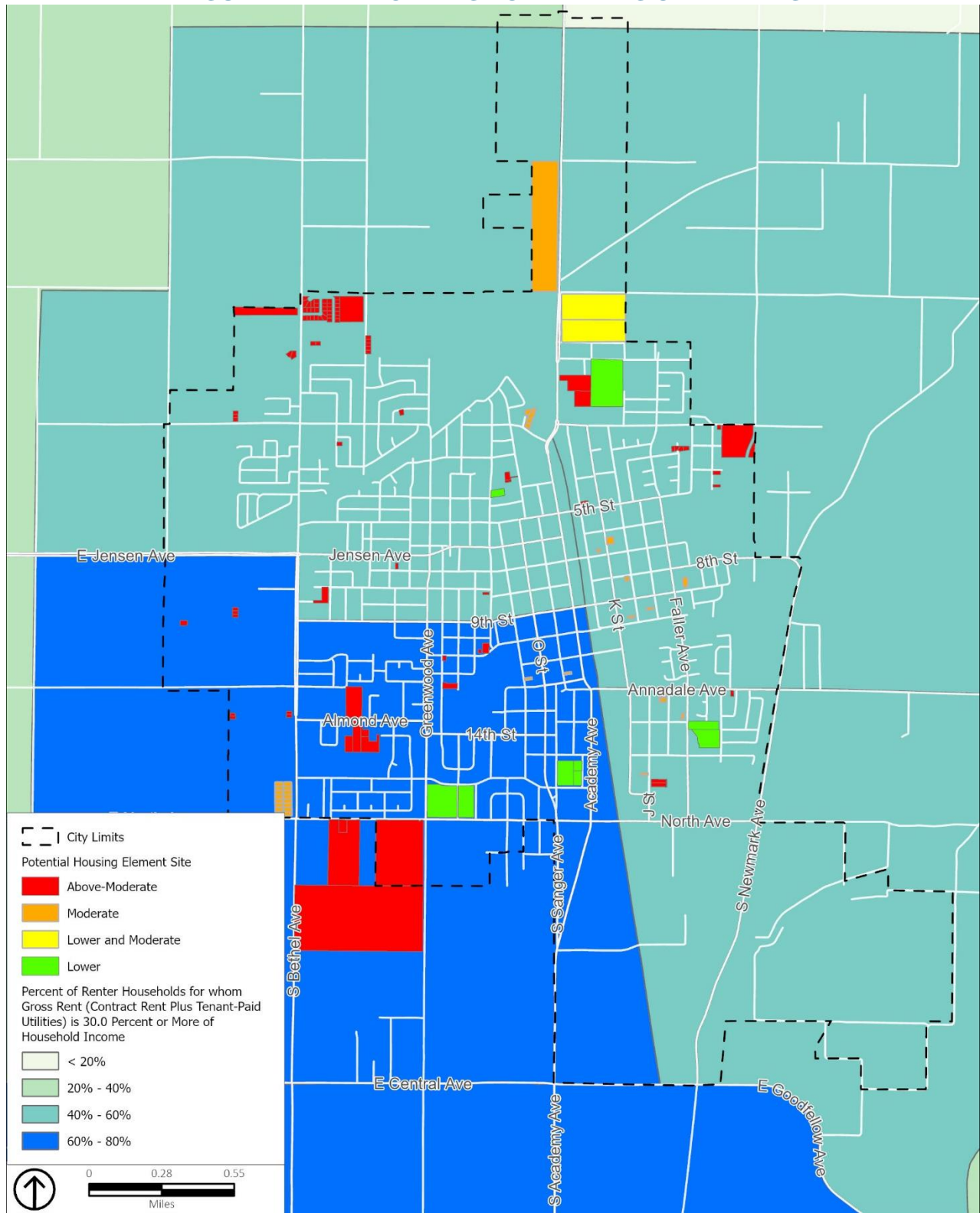
Table 1N-11 Cost Burden in Sanger, 2010-2018

Household Type	Cost Burdened			Severely Cost Burdened		
	2010	2018	Percent Change	2010	2018	Percent Change
All Households	24.7%	20.5%	-4.2%	23.5%	18.1%	-5.5%
Renters	24.4%	25.5%	1.1%	26.6%	27.6%	1.0%
Homeowners	25.2%	16.5%	-8.7%	21.2%	10.4%	-10.8%
Lower-Income Households	29.6%	32.0%	2.5%	43.1%	38.8%	-4.4%
Renters	29.3%	33.4%	4.1%	41.9%	41.8%	-0.1%
Homeowners	29.8%	29.0%	-0.8%	45.1%	33.0%	-12.1%
Moderate-Income Households	32.8%	38.6%	5.8%	17.2%	0.0%	-17.2%
Renters	27.0%	50.0%	23.0%	0.0%	0.0%	0.0%
Homeowners	36.1%	26.8%	-9.3%	23.7%	0.0%	-23.7%
Above Moderate-Income Households	17.0%	4.7%	-12.2%	1.5%	1.3%	-0.3%
Renters	13.3%	2.1%	-11.2%	0.0%	0.0%	0.0%
Homeowners	18.7%	5.7%	-12.9%	2.2%	1.6%	-0.6%

Sources: CHAS 2006-2010 and 2014-2018

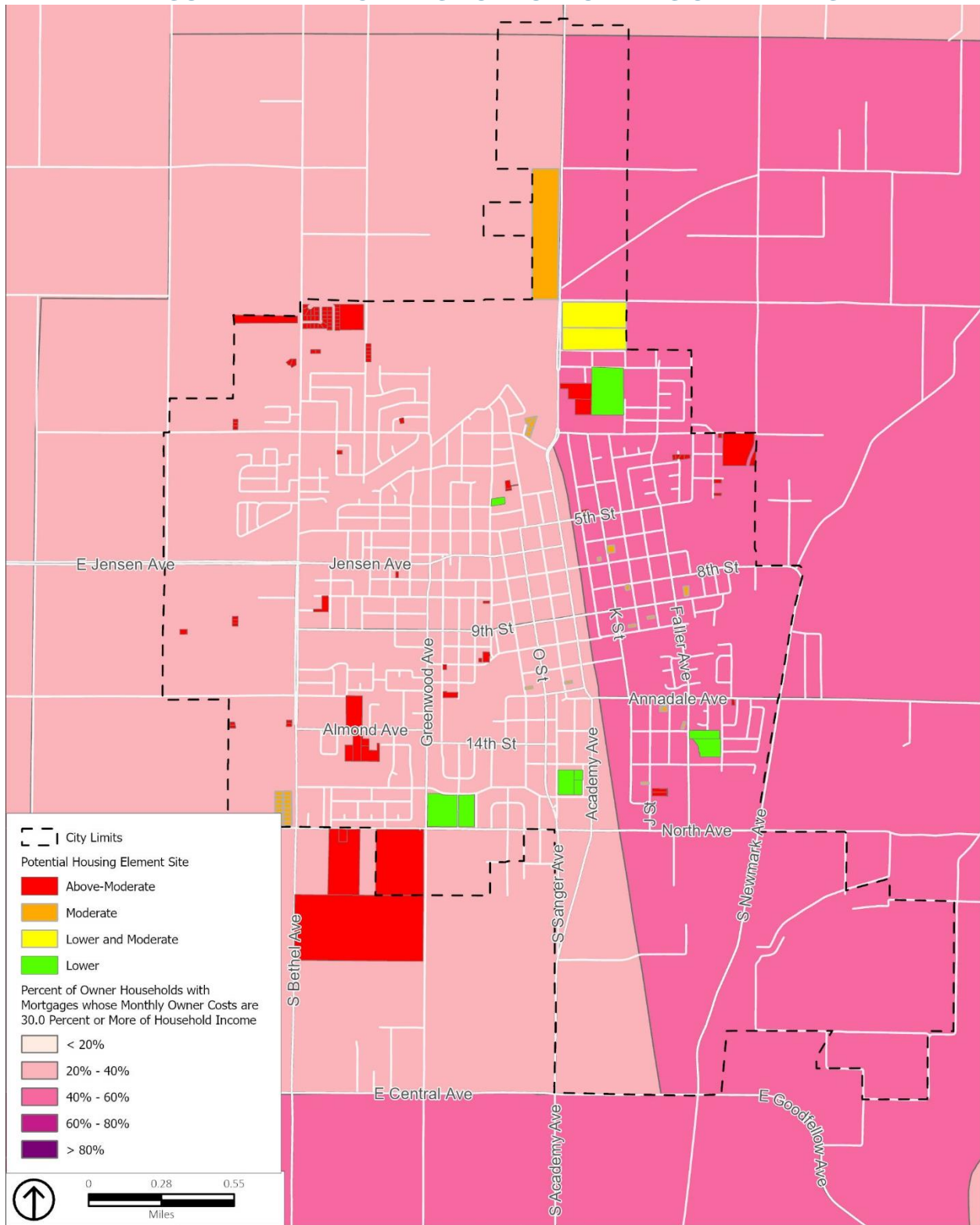
As discussed in the Overpayment section of the Housing Needs Assessment, overpayment often impacts lower-income households at a higher rate due to financial constraints and other limitations. Therefore, these households are most at risk of displacement resulting from more limited ability to respond to changes in income or rent. In Sanger, 32.0 percent of all lower-income households are cost burdened, and 38.8 percent are severely cost burden—a total of 70.8 percent of all lower-income households experience some degree of cost burden (**Table 1N-11, Cost Burden in Sanger, 2010-2018**). Lower-income renters experience overpayment at a slightly higher rate, with 33.4 percent of renters overpaying compared to 29.0 percent of homeowners. Moderate-income households have a similarly high rate of overpayment, though none were reported to experience severe overcrowding in 2018.

FIGURE 1N-21 PERCENTAGE OF RENTERS OVERPAYING



Source: U.S. Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placemarks, 2023

FIGURE 1N-22 PERCENTAGE OF HOMEOWNERS OVERPAYING



Source: U.S. Census (American Communities Survey 2015-2019); City of Sanger, 2023; Placeworks, 2023

Since 2010, there has been a decrease in severe overpayment among all households, primarily among lower- and moderate-income homeowners (**Table 1N-11**). The most significant decrease was for moderate-income homeowners, 23.7 percent of whom were estimated to be severely cost burdened in 2010. By 2018, 26.8 percent are estimated to be overpaying but none severely overpaying. Overpayment among above moderate-income households has also decreased across this period at a similar rate across tenures. No income groups or tenures experienced an increase in overpayment rates between 2010 and 2018.

While home value data from 2010 is not available, in May 2014, the median home value in Sanger was \$191,248, which had increased by 103.2 percent to \$388,560 in 2022, for an average annual increase of 12.9 percent, according to Zillow. Nevertheless, despite this increase in home values, overpayment rates have decreased. Data on rental prices in Sanger are more limited, but it can be assumed that housing price increases have impacted rental units as well, particularly given the rising rates of overpayment among renters. The ACS estimates that the median gross rent increased from \$861 in 2015 to \$950 in 2020, for an average annual increase of 2.1 percent.

Programs to Address Disproportionate Housing Need and Displacement Risk: Overcrowding and Overpayment

- Per Program 7, the City will provide incentives to builders to provide housing with multiple bedrooms affordable to lower- and moderate-income households, aiming for construction of at least 20 units that meet these sizes, to meet the needs of female-headed, single-parent, and large-family households of all income levels (possible incentives will include reduced setbacks, reduced parking requirements, and technical assistance with applications for funding).
- Per Program 9, the City will annually reach out to affordable housing developers to gather interest and input on how to best implement this program and will provide information on available funding.
- Per Program 12, the City will take several steps to encourage the construction of ADUs, thereby addressing overcrowding and overpayment and increasing access to resources and facilitating housing mobility opportunities for lower-income households. In addition, to facilitate ADU production, per Program 16, the City will amend the Zoning Code to be consistent with all State legislation related to ADUs. Per Program 13, the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.
- Per Program 25, the City will promote the availability of homebuyer resources, particularly in areas with concentrations of renters, particularly lower-income renters who may be overpaying, by providing multilingual informational materials at public buildings and community locations and will post the program on the City's website.

- Per Program 27, the City will work with the Housing Authority to disseminate information to landlords and property owners on incentives for participating in the HCV program throughout the city to promote housing mobility opportunities for all residents and reduce overpayment.

Substandard Housing Conditions

Approximately 62.9 percent of Sanger’s housing units are over 30 years old, and 34.2 percent of units are over 50 years old (**Table 2-19**, Age of Housing Stock (2020), in Section 2: Housing Needs Assessment). Older units are more frequently subject to maintenance issues than newer housing stock. Even units that are not urgently in need of repair may benefit from energy-efficiency improvements to reduce energy usage and related climate impacts. While there is a concentration of units built in the early 1900s east of the railroad to Faller Avenue and north of 8th Street, and the oldest neighborhoods tend to be adjacent to the railway, there are older units scattered throughout much of Sanger. The median income throughout Sanger is at or below the state median, indicating that households throughout the city may not have the financial capacity to complete needed repairs on aging homes.

Another measure of substandard housing conditions is the presence of kitchen and plumbing facilities. The 2015–2019 ACS estimated that 45 owner-occupied and 45 renter-occupied units in Sanger lack a complete kitchen or plumbing. All of these units are occupied by lower-income residents and account for approximately 1.2 percent of Sanger’s total housing stock, 1.5 percent of renter-occupied units, and 1.0 percent of owner-occupied units. Though owner- and renter-occupied units lack complete kitchens or plumbing at a similar rate, lower-income households appear to be disproportionately burdened by housing conditions.

Programs to Address Disproportionate Housing Need and Displacement Risk: Substandard Housing Conditions

- Per Program 22, the City will conduct targeted outreach to inform property owners of rehabilitation assistance in neighborhoods with concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty shown on Figure 3-1, Regional TCAC/HCD Opportunity Areas, and to owners of older housing units, which are in the city’s original downtown core square mile area and scattered throughout the city.
- Per Program 23, the City will promote available housing rehabilitation resources in areas of concentrated renter households or older housing stock to assist in reducing displacement risk and promote place-based revitalization for residents by improving living conditions and enabling them to stay in their home and community.
- Per Program 24, the City’s Code Enforcement division will continue to use code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with City codes and refer income-eligible households to County housing rehabilitation programs and promote targeted assistance for property owners and landlords of rental properties for assistance in making the code corrections.

Homelessness

In January 2022, the Fresno-Madera Continuum of Care (FMCoC) published its Homeless Census and Survey Report (Point-in-Time [PIT]) count, which estimated 3,938 persons experiencing homelessness in Fresno County. Of that number, 1,728 persons were sheltered homeless and 2,210 were unsheltered homeless (**Table 2-35**, Total Unsheltered and Sheltered Homeless Count: Fresno County (2022), in Section 2: Housing Needs Assessment). Of this population, 3,397 individuals were counted in the city of Fresno, and the remaining 541 in the remainder of the county.

Throughout the FMCoC area, which includes Madera County, approximately 60.0 percent of the homeless population identified as male, 29.0 percent as female, and 1.0 percent as transgender. Approximately half of the population identified as Hispanic, 6.0 percent identified as Native American or Alaska Native, 3.7 percent as Asian, 15.6 percent as Black or African American, 0.8 percent as Native Hawaiian or Pacific Islander, 60.6 percent as White, and 12.8 percent as multiracial or another race. Additionally, 205 people, or 4.9 percent of the homeless population, were veterans, 15.0 percent were survivors of domestic violence, and 19.0 percent had a serious mental illness. Though the age of homeless persons was reported generally, the senior population was not identified. The PIT report does not differentiate the characteristics of the homeless population in Fresno County, so it is assumed that these statistics generally represent the Fresno County population. Further, the 2022 PIT does not identify the locations of individuals in the remainder of the county. However, in 2021 the County of Fresno released a Homelessness Update that identified 15 homeless persons in Sanger, approximately 7.7 percent of the homeless population in the “rural informal county,” which includes the cities of Coalinga, Firebaugh, Fowler, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, Sanger, and Selma and the unincorporated communities of Raisin City and West Park.

As of January 2024, according to the City’s Police Department and Code Enforcement staff, areas where homeless community members tend to congregate include the Sanger Park area and along the railroad. Additional areas where homeless community members congregate include the area behind the shopping center on the northwest corner of Bethel and Jensen Avenues, along the canal. Sanger Park, the nearby section of the railroad, and the area behind the shopping center are all located in close proximity to resources such as grocery stores, convenience stores, and low-cost fast-food restaurants. Sanger Park and the nearby stretch of railroad are also near an urgent care center and HOPE Sanger, which serves homeless families and individuals with meals, social services, and a limited amount of temporary housing.

Table 1N-12, Demographic Characteristics of the Homeless Population, 2022, shows the proportion of each of the protected characteristics identified in the 2022 PIT compared to the proportion of each Fresno County jurisdiction’s population to identify whether any protected classes are disproportionately represented as part of the homeless population. The percentages for a protected characteristic population in **bold** mean they are overrepresented in the homeless population compared to that jurisdiction’s total population. It is worth noting that, given the small size of the homeless population in Sanger, it is unlikely that all protected characteristics are represented. However, without data available at the jurisdiction level, it is assumed that the percentages of each protected class apply to the local homeless population.

Table 1N-12 Demographic Characteristics of the Homeless Population, 2022

Jurisdiction	Veteran	Mental Disability	Hispanic	Native American/ Alaska Native	Asian	Black/ African American	Native Hawaiian/ Pacific Islander	White	Other/ Multiple Races
Total Homeless	4.9%	19.0%	50.0%	6.0%	3.7%	15.6%	0.8%	60.6%	12.8%
Clovis	7.0%	4.7%	32.7%	0.2%	10.7%	2.6%	0.2%	49.5%	4.0%
Coalinga	4.4%	5.1%	62.0%	2.0%	1.9%	2.9%	0.5%	28.2%	2.6%
Firebaugh	1.3%	2.2%	94.1%	0.0%	0.1%	0.0%	0.0%	5.8%	0.1%
Fowler	6.4%	3.9%	65.2%	0.3%	9.9%	0.4%	0.0%	19.8%	4.4%
Fresno	5.1%	6.3%	49.7%	0.5%	14.0%	6.9%	0.1%	26.1%	2.7%
Huron	1.1%	1.8%	94.5%	1.8%	0.0%	0.3%	0.0%	3.4%	0.0%
Kerman	3.9%	5.7%	81.7%	0.0%	4.4%	0.3%	0.0%	12.0%	1.4%
Kingsburg	7.0%	4.0%	47.7%	0.0%	7.9%	0.3%	0.0%	41.0%	2.7%
Mendota	0.5%	2.2%	96.0%	0.1%	0.0%	0.0%	0.0%	3.6%	0.3%
Orange Cove	7.0%	2.6%	95.3%	0.0%	0.0%	1.2%	0.3%	3.0%	0.1%
Parlier	1.1%	2.4%	97.7%	0.0%	0.2%	0.0%	0.0%	1.8%	0.2%
Reedley	4.1%	4.0%	79.3%	0.2%	2.3%	1.5%	0.1%	14.2%	2.4%
Sanger	3.6%	3.6%	80.5%	0.5%	3.0%	0.0%	0.3%	15.0%	0.7%
San Joaquin	0.8%	1.5%	97.5%	0.0%	0.0%	1.0%	0.0%	1.5%	0.0%
Selma	3.6%	3.5%	85.0%	0.1%	1.8%	0.9%	0.0%	10.7%	1.6%
Unincorporated County	5.7%	4.8%	47.7%	0.6%	7.5%	2.0%	0.1%	39.6%	2.5%

Sources: FCOG Data Packet, 2022; Fresno/Madera Continuum of Care, 2022; 2016-2020 ACS

As seen in **Table 1N-12, Demographic Characteristics of the Homeless Population, 2022**, all protected characteristics are overrepresented in the majority of Fresno County jurisdictions, and individuals with mental disabilities and residents that identify as Native American, Alaska Native, Black, African American, Native Hawaiian, Pacific Islander, White, or Other/Multiple Races are overrepresented in all Fresno County jurisdictions. Homelessness is often a cross-jurisdictional issue; therefore, the City participates in and offers several homelessness resources and programs, available regionally, that are identified in **Table 1N-13, Services to Address Homelessness**.

Table 1N-13 Services to Address Homelessness

Service/Resource	Description	Operator	Location
Multi-Agency Access Program (MAP Point)	Traveling food truck and fixed locations that provide linkage to government resources and services (housing, behavioral health, physical health, food linkages, and transportation) at no cost to all residents of Fresno County	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide Physical locations: Firebaugh, Fowler, Fresno, Huron, Kerman, Mendota, Parlier, and Reedley
Fresno County Behavioral Health WARM Line	Available during weekday business hours for non-emergency emotional and coping support for residents throughout the county	Fresno County Department of Behavioral Health	Countywide
Multi-Agency Response to Community Homelessness (MARCH)	Countywide collaboration to address homelessness through coordination of resources regionally and cross-jurisdictionally, engagement of the community, attracting private funding to support community-specific programs, and inclusion of rural representatives selected by FCOG	FCOG/Jurisdictions	Countywide
Turning Point of Central California	Mental health services including a full-service partnership program	Contracted by Fresno County Department of Behavioral Health	Countywide
Fresno County Department of Social Services Homeless Assistance	Temporary housing, permanent housing, or arrears payments for families eligible for CalWorks once during a 12-month period	Fresno County Department of Social Services	Countywide
Catholic Charities	Clothing, shelter, diapers, a food pantry, rent and mortgage assistance, DMV ID vouchers, application assistance for CalFresh and food stamps, application assistance for PG&E discounts, assistance with immigration services, and senior companionship assistance. Also has a Rural Outreach Program to serve residents throughout the region and work with migrant farmworkers.	Catholic Charities	Countywide Physical location: City of Fresno

SECTION 1N-3: LOCAL ASSESSMENT OF FAIR HOUSING

Service/Resource	Description	Operator	Location
Emergency Housing Voucher	Assist persons experiencing, at-risk of becoming, or recently homeless and those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking	Fresno Housing and FMCoC	Countywide
United Way	Emergency informational services to connect persons in need with Homeless Prevention Programs, food and shelter assistance, help with landlord-tenant issues, legal services referrals, and more	United Way	Countywide
Groceries2Go	Provides grocery boxes of shelf-stable food items through an appointment-based system.	Central California Food Bank	Countywide
CalFresh Enrollment Assistance	Application assistance and assistance navigating the CalFresh process.	Central California Food Bank	Countywide
Fresh Produce Distribution	Mobile Pantry Program and Neighborhood Markets operating out of self-contained vehicles that travel to rural and remote areas throughout the county. A schedule of distribution locations is available online.	Central California Food Bank	Countywide
Senior Hunger Program	Food boxes to senior-serving partners tailored to the dietary needs of seniors.	Central California Food Bank	Countywide
Partner Feeding Sites	Provides food to over 220 sites including churches, community centers, and other organizations to feed hungry residents in local neighborhoods	Central California Food Bank	Countywide
USDA Partnership	Distribute food acquired by the USDA to 47 organizations in Fresno County.	Central California Food Bank	Countywide
Fresno County Food Map	Online service mapping locations of feeding sites, food banks, etc.	Fresno County	Countywide
Projects for Assistance in Transition from Homelessness (PATH)	Street outreach for people experiencing or at risk of homelessness and referrals to housing resources, medical care, mental health counseling, and social services.	Fresno County Department of Behavioral Health (funding)/ Kings View Corporation (operation)	Countywide
HOPE Sanger	Provides meals and other necessities to homeless persons and families in need. Provide referrals for mental health, extended housing, substance abuse, rent and utility assistance.	HOPE Sanger	Sanger
HOPE Sanger Temporary Housing	17 rooms (single and double with kitchenettes)	HOPE Sanger	Sanger

Emergency shelters also include Marjaree Mason Center, Fresno Rescue Mission, Evangel Home Inc., and Plaza Terrace.

Programs to Address Disproportionate Housing Need and Displacement Risk: Homelessness

- Per Program 1, the City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- Per Program 3, the City will monitor the demographic composition of the unhoused population to identify needs for targeted resources and determine what efforts to take, such as providing education on financial assistance and programs available.
- Per Program 7, the City will continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households.
- Per Program 10, the City will provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.

Farmworkers

As discussed in the Regional Assessment of Fair Housing, farmworkers are considered a special-needs group because they traditionally earn low wages and often migrate between farms, resulting in many farmworkers living in overcrowded and substandard housing conditions. Although Fresno County's overall economy has historically been largely based on agricultural operations, the number of farmworkers living in each of the jurisdictions in the county in more recent years varies depending on location, size, and diversification of their individual economic base. Further, prior to the COVID-19 pandemic, the industry started shifting toward recruiting and employing H-2A visa workers, many of whom are from Mexico and Central America. However, farmworkers are essential to Fresno County's and Sanger's economies as well as to local and national food supplies, and their needs for safe and affordable housing resources must be addressed.

The 2017 Census of Agriculture identified 535 farm operations within the 93657 zip code that includes the City of Sanger. However, zip code 93657 also includes unincorporated Fresno County land beyond the Sequoia National Forest. It is also worth noting that there are 49 farm operations west of Sanger in the adjacent zip code 93737 and 300 farm operations southwest of the city of Fresno between Fresno and

Fowler in zip code 93725. It is likely that some portion of the farm operations in these zip codes, particularly in the areas closest to Fowler, employ farmworkers that reside or use resources in the city.

According to the 2016-2020 ACS, Sanger has 10.6 percent of its labor force employed in agriculture, forestry, fishing and hunting, and mining, a lower proportion than in most other jurisdictions in Fresno County (see **Table 2-39**, Estimated Farmworkers 2020, in the HNA). While it is possible that not all the workers in Sanger in this sector are engaged in farm labor, the data allows comparisons between jurisdictions and within Sanger to gauge segments of the population at risk of overpayment, overcrowding, substandard housing conditions, or displacement.

Based on the most recent (2022) farmworker employment figures collected by the California Employment Development Department (EDD), as discussed in the HNA and shown on Figure 2-7, Farmworkers in Fresno County, there are 96,300 farmworkers employed throughout the county, yet housing facilities for only 2,540 occupants were contracted, according to the HCD Employee Housing Facilities Permit Services database. Although this is equivalent to only about 2.6 percent of farmworker employment countywide, it is important because H2-A workers must be provided with housing accommodations by H2-A employers and farm operators. The seasonal and often migrant nature of farm labor, and accounting for undocumented workers, suggest that this data likely underrepresents the actual farmworker population because undocumented residents do not often participate in traditional data collection methods.

The Phase 1 COVID Farmworker Survey by the California Institute for Rural Studies, published in February 2021, estimates that undocumented workers comprise approximately 50 percent of workers statewide. They are predominantly Mexican, and the majority are Mixteco and Trique indigenous non-Spanish-speaking people. Most of the farmworkers in the San Joaquin Valley have been working the fields for at least a decade and have established families in the vicinity of their workplace.⁶

Between September 2021 and January 2022, Fresno County conducted a Farmworker Survey and a Farmworker Employer Survey. A second round of each survey was conducted between February 2022 and July 2022. In total, the County surveyed 240 farmworkers, and 170 farm employers. Of the respondents countywide, 18 (7.6 percent) lived in Sanger. According to the survey, 55.6 percent of all respondents reported being citizens, 38.2 percent reported being permanent residents, 16.0 percent identified their status as undocumented workers, 6.3 percent did not respond, and 1.3 percent had H-2A visa status. In Sanger, 55.6 percent (10) of respondents were citizens, 38.9 percent (7) were permanent residents, and one respondent did not respond to this question. Therefore, it is likely that the survey's representation of undocumented workers throughout the Fresno County region may apply to the farmworker population in Sanger and surrounding communities.

⁶ Greenberg, Michael, 2018, "In the Valley of Fear," *The New York Review*.

According to California EDD, the most recent data from 2014 measured median wage for farmworkers at \$13.44 per hour, or approximately \$25,804 per year for full-time work, which is considered extremely low income, correlating with the 2019 poverty threshold of \$25,750. Seasonal workers without a year-round income could have lower incomes. The median income in Sanger is \$52,349, and 19.7 percent of the population live below the poverty threshold. While 80.5 percent of the households in Sanger are Hispanic, 90.0 percent of the total households in poverty are Hispanic households. The Farmworker Survey found that 99.6 percent of farmworkers surveyed countywide are Hispanic. When the ACS 2016-2020 data that 10.6 percent of the labor force in Sanger is employed in agriculture are combined with the above poverty and EDD wage data, it suggests that a majority of the labor force employed in agricultural industries is Hispanic (see **Table 2-10**, Employment by Industry, of the HNA), and it is likely that many of these workers have incomes below the poverty threshold.

The Employee Housing Facilities Permit Services database reports five units of employer-provided farm housing with total capacity for five workers in the vicinity of Sanger (**Table 1N-14, Farmworker Housing Resources in Sanger**). The Gill Farms units are in zip code 93725, approximately six miles southwest of Sanger in unincorporated county, but between the cities of Fresno, Fowler, and Sanger in an area designated by TCAC/HCD as Highest Resource, and therefore presumed to have more favorable access to opportunities. There are no H-2A visa housing resources in Sanger and the surrounding areas. While the proportion of persons engaged in the agricultural industries in Sanger is not extremely high, the lack of farmworker housing facilities, paired with the high proportion of Hispanic households in poverty, suggests that the farmworkers residing in the city may have difficulty finding affordable, appropriately sized housing.

Table 1N-14 Farmworker Housing Resources in Sanger

Name of Facility	Location	No. of Rooms	Maximum Occupancy
On-Site Farmworker Housing Facilities			
Gill Farms	7223 E Muscat Ave-Unincorporated	1	5
H-2A Visa Farmworker Housing Facilities			
N/A			

Note: Facilities reported in operation as of December 31, 2022.

Source: HCD Employee Housing Facilities Permit Services database, January 2023.

Given the shortage of farmworker housing units in Sanger, many farmworkers are likely forced to pay market rate for their housing or find other options, such as sleeping in vehicles or garages. In Sanger, the few farm labor housing facilities generally are not suitable for families. Farmworkers that are citizens and permanent residents may have access to federally or locally assisted affordable multifamily housing opportunities, although they must compete with other lower-income households for the limited number of units. There are 348 affordable HUD, US Department of Agriculture (USDA), State, or locally assisted affordable housing opportunities in the city, and HCVs are used at 140 rental units. For undocumented

workers, options are more limited, and a large portion of farmworkers, even permanent residents, may live in spaces not intended for habitation, such as shacks, outbuildings, and sheds, and converted garages, often in severely overcrowded conditions.

Permanent resident farmworker households are included in ACS estimates and therefore part of Comprehensive Housing Affordability Strategy (CHAS) housing need estimates. Consequently, the housing needs of lower-income farmworker households would not be differentiated from other lower-income households experiencing overpayment, overcrowding, and substandard housing (30.7 percent of households citywide). With 10.6 of the labor force in Sanger reported to be employed in agricultural operations and similar fields, farmworkers may comprise a majority of extremely low- and very low-income households experiencing one or more of these housing problems in the city. Based on the Fresno County Farmworker Survey, 81.7 percent of respondents from throughout the county reported incomes below \$2,500 per month, which corresponds to an extremely low-income household of four. Of the respondents identifying Sanger as their place of residence, 61.0 percent reported that their income was below \$2,500 monthly, and the remainder did not respond to the income question. Given this, it is likely that farmworkers in Sanger earn similar wages to those countywide and would have difficulty finding affordable housing.

Based on socioeconomic and demographic characteristics of the farmworker population in Fresno County, it is likely that many farmworkers in Sanger reside in the older neighborhoods with lower median incomes and high poverty rates south of Annadale Avenue and north of North Avenue on either side of the San Joaquin Valley Railroad. The lowest-income block group also corresponds to three affordable multifamily housing complexes and is designated by TCAC/HCD as High Segregation and Poverty. These neighborhoods also have over 90.0 percent Hispanic households and are identified by HUD as an Area of High Segregation and Poverty, although the affordable housing complexes may influence this concentration.

Citizens, noncitizens with permanent status, and H-2A visa workers are eligible for public housing, HCVs, USDA rural rental assistance, and Section 8 project-based rental assistance. Section 214 of the Housing and Community Development Act of 1980, as amended, makes certain categories of noncitizens eligible for assistance, including most categories of immigrants, but excludes unauthorized immigrants (e.g., undocumented) and those in temporary status (e.g., tourists and students). Section 214 applies to specific programs, primarily federal rental assistance programs administered by HUD and the USDA, including Public Housing, HCV, Section 8 project-based rental assistance programs, and rural rental assistance. Undocumented residents are subject to eligibility requirements based on whether Section 214-covered programs are administered by HUD or USDA, which implement different regulatory treatment for mixed-status households depending on householder status. For HUD Section 214 projects, an ineligible noncitizen may reside with family members who are eligible to qualify for affordable housing (such as an undocumented single parent with U.S. citizen children or an undocumented worker married to an eligible householder), although Section 8 benefits are prorated depending on the number of undocumented household members. For USDA Section 214 projects, an undocumented householder would not be eligible to participate in the HCV program, and therefore would not qualify to live in an USDA-assisted affordable multifamily housing complex, although none are located in Sanger. However, a family with an eligible

householder that includes undocumented household members (such as a U.S. citizen householder married to an undocumented worker) would qualify to reside in these properties and receive full HCV benefits. This population of assistance-ineligible households is considered underserved and at higher risk of overpayment, overcrowding, and displacement compounded by the legal complexities of eligibility and language barriers.

Similar to most jurisdictions in Fresno County, the majority of the residential opportunities in Sanger are single-family detached and attached units, which comprise 82.0 percent of the housing stock. However, 28.3 percent of multifamily units, excluding duplex units, are deed restricted or subsidized as affordable. While Sanger has a relatively small proportion of mobile homes (2.5 percent of the housing stock), these units are naturally more affordable than single-family residential units and may serve as a valuable housing resource for workers unable to qualify for market rate or affordable rental housing, or other accommodations.

The high renter rate in single-family neighborhoods may support findings of the Farmworker Survey, where respondents countywide indicated their preference for single-family units regardless of owner or renter status. According to the survey, 95.6 percent of the renters responded that they desired to be homeowners. Further, 78.4 percent of the farmworker renter households consisted of three or more persons, of which, 93.6 percent had resided in the U.S. for 10 or more years, 3.7 percent less than 10 years, and 2.7 percent did not respond. The prevalence of households with three or more persons, coupled with the longevity in the U.S. of the majority of the renters and the preference for single-family-unit type, further substantiate the need for housing to accommodate families.

Of those farmworkers surveyed who live in Sanger, 67.0 percent are homeowners, all but one of whom have lived in the United States for between 25 and 50 years and identify as either citizens or permanent residents. The other respondent reported having lived in the United States for over 15 years. The remaining respondents were renters, expressing a desire to be homeowners but could not attain that goal. A 2022 median-priced home priced at \$371,000 (see **Table 2-22**, Home Sales Recorded in 2021-22, in the HNA) is currently more than the majority of households in the city can pay, including farmworkers, given the representational incomes reported in the Farmworker Survey.

Average household size is slightly higher in Sanger (3.6 persons) than in the county and state overall; further, 25.6 of the households in the city have more than five persons. The Farmworker Survey found that the average household size among farmworkers was 3.9 persons, slightly larger than in Sanger. Average household size in the two lowest-income block groups in the city range from 3.9 persons west of the railroad to 4.3 persons east of the railroad where the affordable housing complexes are located. Average household size in the lower-income block groups in the city range between 4.0 and 4.5 persons. Similar to other cities in Fresno County, homeowner households have a larger household size (3.7 persons per household) than renters (3.4 persons per household). In Sanger, 44.8 percent of rental units have three or more bedrooms, some of which may be single-family units, whereas 87.5 percent of owner-occupied units have three or more bedrooms, which typically better accommodate larger households without overcrowding. Farmworker survey results indicated that 58.4 percent of the farmworkers in the county were living in overcrowded conditions, with renter households facing greater challenges finding affordable larger options. The rate of

overcrowding citywide is 11.3 percent, higher than the county and statewide average. Of the total households in the city, 8.2 percent are overcrowded homeowners and 18.0 percent are overcrowded renters.

The rate of overcrowding in the census tract with larger household size (24.8 percent) correlates with the location of the majority of affordable multifamily rental complexes in the southeastern portion of the city. The rate of overcrowding is 13.7 percent in the northeastern tract where the affordable multifamily rental Memorial Village is located, suggesting that farmworker households and other large households, particularly renters, may face challenges finding adequately sized units within their ability to pay in Sanger, resulting in households sharing a dwelling or multiple family members sharing rooms.

***Programs to Address Disproportionate Housing Need and Displacement Risk:
Farmworkers***

- Per Program 1, the City will continue to participate in the countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues, including disadvantaged unincorporated communities (Senate Bill [SB] 244), infrastructure challenges, farmworker housing, homelessness, and fair housing.
- Per Program 7, the City will continue to seek partnerships and meet at least every other year with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing, with an emphasis on housing opportunities for very low- and extremely low-income households, as well as special-needs populations, such as seniors, persons with disabilities (including developmental disabilities), farmworkers, female-headed and single-parent households, persons experiencing homelessness, and extremely low-income households.
- Per Program 8, the City will reach out to local farm employers to identify housing needs and seek funding to support development and will also continue to offer incentives such as density bonuses, streamlined processing, and the minor deviation process to facilitate development of farmworker housing.
- Per Program 9, the City will annually reach out to affordable housing developers to gather interest and input on how to best implement this program and will provide information on available funding.
- Per Program 10, the City will provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.

- Per Program 16, the City will address the following development standards and barriers to special-needs housing opportunities: **Employee Housing:** Treat employee/farmworker housing that serves six or fewer persons as a single-family structure and permit it in the same manner as other single-family structures of the same type within the same zone across all zones that allow single-family residential uses. Treat employee/farmworker housing consisting of no more than 12 units or 36 beds as an agricultural use and permit it in the same manner as other agricultural uses in the same zone, in compliance with the California Employee Housing Act, and allow for a streamlined, ministerial approval process for projects on land designated as agricultural or land that allows agricultural uses (Health and Safety Code Sections 17021.5, 17021.6, and 17021.8).

Displacement Risk

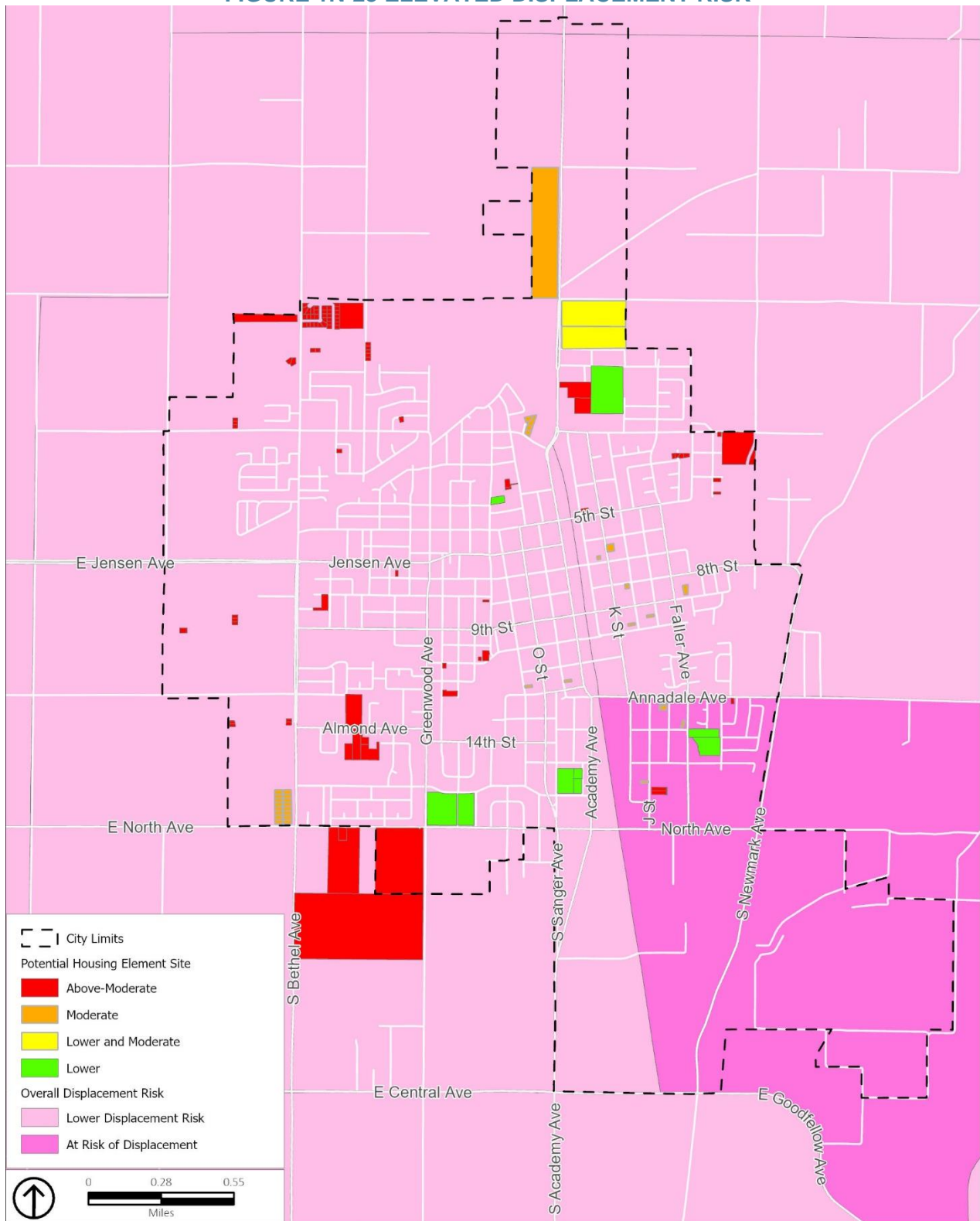
The Urban Displacement Project, a joint research and action initiative of the UC Berkeley and the University of Toronto, analyzes income patterns and housing availability to determine the level of displacement risk at the census tract level. Levels of displacement risk range from “probable displacement” to “extreme displacement,” with four total levels of displacement risk if risk is present. In Sanger, the southeastern portion of the city (south of E. Annadale Avenue and east of the railroad), in a tract extending beyond city limits, the Urban Displacement Project estimates that 64.4 percent of households are low-income, using ACS data. In contrast, in the remainder of the city, approximately 39.0 percent to 46.9 percent of households are lower income. Given this, the Urban Displacement Project estimates that there is a “probable displacement” risk in this portion of the city (**Figure 1N-23, Elevated Displacement Risk**).

Further, the Urban Displacement Project has identified large portions of the city as “vulnerable community” (**Figure 1N-24, Vulnerable Community Designation**). Vulnerability is defined as areas in which the share of very low-income residents is above 20 percent and the tract meets at least two of the following criteria:

- Share of renters is above 40 percent.
- Share of people of color is above 50 percent.
- Share of very low-income households that are severely rent burdened households is above the county median.
- They, or areas in close proximity, have been experiencing displacement pressures.

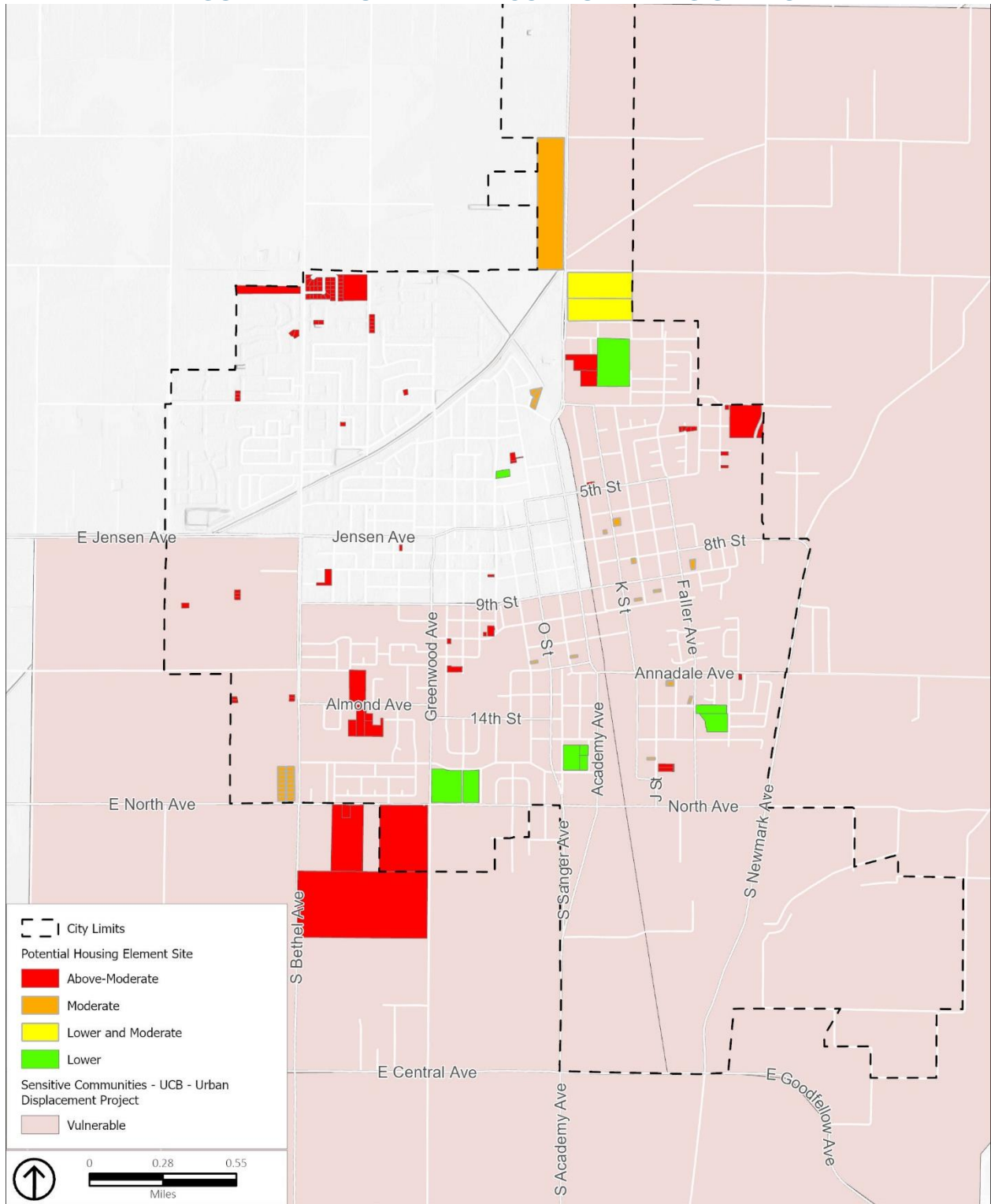
Displacement pressures are defined as a percentage change in rent greater than the county median for rent increases. The Jackson and Jenni Park neighborhoods in northwest Sanger are the only areas without vulnerability designations. Though the Urban Displacement Project does not specify the conditions that led to the vulnerability determination for Sanger, it can be assumed that residents in most areas of Sanger experience heightened displacement risk compared to residents in the northwest area and elsewhere in the county due to a combination of incomes and housing prices.

FIGURE 1N-23 ELEVATED DISPLACEMENT RISK



Source: U.S. Census; City of Sanger, 2023; Placemarks, 2023

FIGURE 1N-24 VULNERABLE COMMUNITY DESIGNATION



Source: UC Berkeley Urban Displacement Project; City of Sanger, 2023; Placeworks, 2023

As found in the analysis of overpayment, for-sale home costs have increased by an average of 12.9 percent annually since 2014, and rental costs have increased by an average of 2.1 percent annually since 2015. In contrast, the ACS estimates that, since 2014, the median income in Sanger has increased by an average of 4.1 percent annually. When comparing change in median income to change in home prices, it is clear that the increase in home values far outpaces any changes in wages, suggesting that home purchases and costs for ownership units in Sanger may have resulted in increased displacement risk for current and prospective homeowners. In comparison, countywide, median incomes have increased by approximately 4.4 percent annually, and rents have increased by 3.2 percent on average, so rent increases have remained below the increase in wages. Though Zillow does not report countywide home values, the ACS estimates that these have increased by an average of 3.9 percent annually. Therefore, in contrast to conditions in Sanger, there may be a moderate decrease in displacement risk countywide due to home costs.

Disaster-Driven Displacement Risk

The Federal Emergency Management Agency (FEMA) maintains official floodplain maps. FEMA determines areas subject to flood hazards and designates these areas by relative risk of flooding on a map for each community, known as the Flood Insurance Rate Map (FIRM). A 100-year flood is defined as a flood event that has a 1.0 percent chance of occurring in any given year.

Principal flooding problems lie along the San Joaquin and Kings Rivers, smaller perennial streams in the Sierra Nevada foothills, and to areas in western Fresno County, which includes the cities of Huron and Mendota that become flooded from streams flowing east from the Coast Range. Friant and Pine Flat Dams, upstream reservoirs, and stormwater detention/retention facilities operated by the Fresno-Clovis Metropolitan Flood Control District have minimized flooding problems in highly urbanized areas in the valley, which includes Sanger.

FEMA has identified the 100- and 500-year flood-prone areas in the Sanger vicinity. The major source of flood threat in Sanger is the Kings River. This threat is confined mostly within the floodplain of the river, located east of the urban area, at a lower elevation. The General Plan minimizes the risk of flooding from the river by prohibiting most kinds of development near the river. There are several other minor, isolated areas prone to flooding around the community, including land on the east side of the San Joaquin Valley Railroad along K Street; land between Bethel Avenue and Rawson Avenue running diagonally northward between Almond Avenue and 9th Street; and an area south of Almond Avenue. These can generally be corrected by properly designing local drainage improvements and elevating pad heights. Residential development can occur within these zones, although it does add an additional constraint, as FEMA requires developers to obtain a flood zone elevation certificate when they apply for their permit, which may increase the cost of a development. These certificates require elevating the developed area (i.e., house pad) above the known flood level of that particular flood zone. The sites inventory for Sanger does include a few vacant sites within the FEMA 100-year flood zone, but it does not rely on these sites to meet its RHNA in any of the income categories.

***Programs to Address Disproportionate Housing Need and Displacement Risk:
Displacement Risk***

- Per Program 8, the City will provide technical support and offer incentives to housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including HCD and USDA Rural Development loans and grants and other funding sources that may become available.
- Per Program 9, the City will annually reach out to affordable housing developers to gather interest and input on how to best implement this program and will provide information on available funding.
- Per Program 10, the City will provide financial support annually, as available, to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households, to mitigate risk of displacement and support housing stability for extremely low-income households, persons with disabilities, farmworkers, and persons experiencing homelessness.
- Per Program 12, the City will identify incentives for construction of ADUs with new development, which may include differing collection times for impact fees for the square footage associated with the ADU.
- Per Program 13, the City will require replacement housing units subject to the requirements of California Government Code Section 65915(c)(3) on sites identified in the sites inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years.
- Per Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes and target development in higher opportunity areas (i.e., the Washington Middle neighborhood and Faller Park neighborhood) by identifying sites for higher-density development and mixed-income development to reduce displacement risk, promote inclusion, and support integration of housing types based on income.
- Per Program 17, the City will assist five residents with reasonable accommodation requests to reduce displacement risk and encourage three accessible units to improve housing mobility.
- Per Program 18, the City will meet with local developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units and consider additional incentives brought forth by developers.
- Per Program 22, the City will target promotion through the City's bilingual newsletter and areas of need to assist in reducing displacement risk for homeowners and their households by improving living conditions and enabling them to stay in their home and community.

- Per Program 23, the City will target promotion through the City’s bilingual newsletter and in areas of concentrated renter households or older housing stock to assist in reducing displacement risk and promote place-based revitalization for residents by improving living conditions and enabling them to stay in their home and community.
- Per Program 24, the City will facilitate place-based revitalization and assist in reducing displacement risk for residents by improving living conditions and enabling them to remain in their home and community.
- Per Program 25, the City will promote available homebuyer resources on the City’s website and at public counters.
- Per Program 26, the City will assist five lower-income residents annually in need of assistance with energy-efficiency improvements to reduce displacement risk due to housing costs.
- Per Program 28, the City will provide fair housing information on the City’s website and in printed materials available in public buildings in both English and Spanish.
- Per Program 29, the City will improve access to resources and reduce displacement risk resulting from a variety of factors.

Other Relevant Factors

In addition to the indicators analyzed above, several other factors can influence housing mobility and access to opportunity in a jurisdiction. For example, historical development patterns may have resulted in neighborhoods that are largely or exclusively made up of single-family homes, or historical discrimination may have influenced a city’s racial and ethnic composition. Further, given current market trends, newer market rate neighborhoods may not be financially accessible to lower-income households without overpayment or overcrowding. Other factors may include public and private investment, local regulatory or economic development plans, and historical policies. Factors that are considered relevant vary between jurisdictions and are described at the local level, following.

Land Use and Zoning Patterns

According to the 2016-2020 ACS, approximately 80.8 percent of the housing units in Sanger are single-family units, inclusive of single family attached units, indicating a significantly higher proportion of single-family units relative to other Fresno County jurisdictions. Duplex, triplex, and fourplex structures make up approximately 10.9 percent of Sanger’s housing units. Conversely, only 4.6 percent of the housing stock is multifamily units in structures of five or more units. Mobile homes, a housing type that is often naturally more affordable, comprise 2.5 percent of the housing stock, a smaller proportion than other Fresno County jurisdictions, with the majority of the units in the Vista del Monte Mobile Home Park. According to the 2016-2020 ACS, although the majority of the occupied housing stock (78.3 percent) is comprised of single-family detached and attached unit types, 30.5 percent of the occupied single-family detached and attached housing stock in Sanger is occupied by renters, indicating that a significant portion of the housing stock is available as rental property, regardless of unit type.

Though single-family zoning can create desirable places to live in many areas of the state, higher entry costs associated with this housing type can pose a barrier to access for lower- and some moderate-income households, restricting access to economic, educational, and other opportunities that may be available in predominantly single-family neighborhoods. In the City of Sanger in October 2022, there were smaller, older homes listed on Zillow.com that may provide home-ownership opportunities for lower-income households to live in the single-family areas in the northwestern and southeastern quadrants of the city, but in the center of the city along the San Joaquin Valley Railroad and on the south side of the Fowler Switch Canal, areas that include industrial and other non-residential uses, TCAC and HCD have designated these tracts as areas of High Segregation and Poverty, and they therefore may not offer more positive access to educational, services, employment, and business resources than multifamily neighborhoods. However, as discussed in the Patterns of Integration and Segregation section, block group level data further define which single-family or multifamily type neighborhoods have concentrations of poverty or non-White households, because there are distinct differences in income, diversity scores, and other factors.

Affordable housing development in the current market typically requires higher density zones to support construction; therefore, zones limited to single dwelling units on each lot generally do not support affordable development. As shown on **Figure 1N-18, Zoning in Sanger**, there are two zones for higher density multifamily housing, and one zone for low-density multifamily housing. Low Density Multiple Family Residential (RM-2.5) and Medium Density Multiple Family Residential (RM-1.5) accommodate a variety of housing types—such as small-lot single-family homes, detached zero lot line developments, duplexes, triplexes, fourplexes, townhouses, condominiums, and garden apartments—designed to architecturally complement surrounding single-family neighborhoods and provide a transition from lower-density residential neighborhoods to higher-density multifamily development and commercial areas. Residential High Density Multifamily (RM-1) also accommodates duplexes to fourplexes, apartment buildings, and condominiums.

The RM-1 zone is concentrated along the east side of Bethel Avenue between 9th Street and Jensen Avenue. However, this zone allows a range of housing types to support income-integration adjacent to service and employment opportunities in areas with commercial and office to the north and west. However, as discussed below, there are also a number of multiple family complexes in the vicinity of Bethel Avenue in the RM-2.5 zone, including the affordable Elderberry at Bethel complex and the Sanger Wedgewood Commons senior complex.

Additional RM-2.5 parcels are scattered throughout the city, particularly within older neighborhoods adjacent to commercial uses along both sides of the San Joaquin Valley Railroad and surrounding the central downtown commercial core. These older neighborhoods contain a mix of detached units and small multifamily structures, primarily duplexes to fourplexes, serving as a transition between nonresidential uses and lower density single-family zoned neighborhoods. The affordable Memorial Village is on a large RM-2.5 parcel in the northeast portion of the city, and RM-2.5 parcels with a mix of product types extend to 10th Street and east to Faller Avenue adjacent to general commercial uses. RM-2.5 parcels are also clustered in the southeast corner of the city adjacent to light industrial uses, including the affordable Unity Estates, Sanger Crossing I and II Apartments, and a mix of detached single-family and small multifamily

housing types. This section of the city has been identified as an Area of High Segregation and Poverty, although this designation includes predominantly industrial, open space and recreation land, and agricultural uses outside of the city.

When compared to **Figure 1N-6, Local TCAC/HCD Opportunity Areas**, this distribution is consistent with a countywide pattern finding multifamily housing and zones primarily in low- and moderate-resource areas and, in the case of Sanger, within areas of High Segregation and Poverty. However, this pattern is not consistently applicable to zoning regulations in Sanger. Though most multifamily housing types and the majority of affordable housing complexes are in High Segregation and Poverty areas, a concentration of households with a median-income below 50.0 percent of the AMI is in the southwest quadrant in a high-resource designation. However, no affordable multifamily complexes are in this tract, suggesting that more affordable product types in that part of the city are older, single-family units in the vicinity of the rail line and industrial uses, some of which may have been converted to rentals, or smaller multifamily type units. Unlike in other Fresno County jurisdictions, where the highest density zones include the sites of affordable housing complexes, the greater share of lower density multifamily zones in Sanger have supported affordable development and are adjacent to major transportation routes, central and general commercial, and light industrial zones.

Programs to Address Other Relevant Factors: Land Use and Zoning Patterns

- Per Program 4, the City will monitor the availability of sites appropriate for lower-income housing in keeping with state “no net loss” provisions (Government Code Section 65863), if development projects are approved at densities lower than anticipated in the sites inventory, and, if necessary, rezone sufficient sites to accommodate the RHNA within 180 days, ensuring that there is sufficient higher-density residential land available in areas throughout the city to deconcentrate poverty.
- Per Program 14, the City will encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes.
- Per Program 16, the City will amend the Municipal Code and add City website links to the Zoning Ordinance portion of the Municipal Code for easy access by citizens and the development community.
- Per Program 21, the City will adopt all portions of the Sanger Design Guidelines as part of the Zoning Ordinance and develop objective design guidelines and standards to provide clear and objective standards related to single-family, multifamily, and mixed-use residential developments.

Historical Development Patterns

In 1887, the Southern Pacific Railroad determined that a depot for shipping agricultural products was needed at the location that eventually became the city of Sanger, at the current intersection of L Street and 7th Street. Railroad officials named the depot “Sanger Junction” in honor of Joseph Sanger, one of the founding administrators of the new railroad line, although he never actually visited the settlement. Wheat was the first major agricultural crop in the area, but when wheat was no longer a profitable crop, the lumber industry expanded, constructing the world’s longest lumber flume in 1890, from Sequoia Lake to Sanger,

and attracting families that had been in grain farming in other areas of the valley. As the central core of the settlement grew with the increasing numbers of employees from the flume and lumber mills, more housing became a necessity, and residential blocks began to develop around the business district.

The original footprint of the city was established along the railroad tracks, similar to many of the jurisdictions in Fresno County that were dependent on the extension of the Southern Pacific Railroad. The original town was bounded on the west by Pattison Avenue (now West Avenue), Harrison Avenue on the east, 11th and 13th Streets to the south, and First Street (now Church Street) to the north.

The city incorporated in 1911. During the transformation of Sanger from a small rail stop settlement to an established city, Sanger's growth trended toward the west, with the main commercial district aligned with the location of the rail depot between 7th and 8th Streets. Subsequent additions followed traditional grid patterns. By 1923, the city had reached its current eastern boundary and expanded west as far as Bethel Avenue, south to Annadale Avenue, and north to Holt and Sterling Avenues. Residential development in the older portions of the city were a mix of single family detached units and small multifamily structures, with no apparent development standards between lots as to unit type. These areas presently offer the most affordable market rate resale and rental prices, although many of the properties are older than 50 years and may need maintenance and various levels of repair. Development has continued to the north, southwest, and west of the original town site, with limited residential growth to the southeast and the most recent residential subdivisions along the perimeter of the city.

Public Investment Patterns

Public and private investment typically includes construction, maintenance, and improvements to public facilities, including infrastructure, acquisition of land, and major equipment. Historically, investment in Sanger has been prioritized based on need and available funding, which has prevented disinvestment in any particular area of the city. Any infrastructure or facilities in need of improvement are identified for investment in the City's annual budget, which identifies capital improvement projects; these projects are funded from a variety of sources that can each be used for specific purposes. The funds are allocated to improve roadways and other transportation infrastructure, complete water and sewer infrastructure projects, rehabilitate park facilities, and other projects, including:

- **Water and Sewer Infrastructure.** The City has identified funding to rehabilitate city wells and expand water and sewer capacity to support future residential and commercial development.
- **Parks and Recreation.** The City's Park Maintenance Division maintains landscaped areas, parks, recreational trails, and reservoir sites to provide safe outdoor recreational spaces for residents and visitors. Further, the City has allocated funding for improvements to Veterans Park, the Community Center pool, and Cesar Chavez Park lighting.
- **Safe Routes to School.** The City continued to fund and work with the Sanger Unified School District to implement programs to promote Safe Routes to School in an effort to improve access to school and safety for children and parents navigating the city to access educational facilities.

- **Roadway and Transportation Infrastructure Improvements.** To facilitate community revitalization and improve navigability, the City has invested in reconstruction of transportation infrastructure and roadways citywide as need arises, including closing gaps on sidewalks for pedestrian safety, improvements to the Fowler Canal Trail and Bethel Bike/Pedestrian Trail, and repaving various roads.

Priority is based on projects that will result in the greatest community benefit, mitigate existing issues, and address public demand and need. Funding is prioritized by three major objectives:

- Creating more public facilities, public safety, and recreational amenities for residents of the city.
- Expanding the capacity of the water, sewer, and roadway infrastructure network.
- Preparing for expansion of the city's development within and at the perimeter of the city, particularly the northern edge in preparation for the North Academy Corridor Master Plan.

Therefore, there has not been disproportionate investment or disinvestment in any particular area of the city. The annual capital improvements program provides funding for new facilities to handle expanding growth and targets the central, older core of the city with roadway improvements, parks improvements and general maintenance, and infrastructure rehabilitation throughout the city.

The Sanger Housing Authority's (SHA) mission is to provide for the effective expansion and maintenance of Sanger's affordable housing stock, with emphasis on meeting the needs of Sanger's lower-income residents. The programs currently being pursued by SHA are construction of Sanger Crossing I and II and Memorial Village. Sanger Crossing I and II is an affordable apartment community on SHA-owned land at the corner of North Avenue and J Street, within the Area of High Segregation and Poverty, to provide homes for 80 very low- and low-income families in a gated campus-like setting, with amenities for residents of varying ages, abilities, and family composition. Memorial Village is a Fresno County Housing Authority reconstruction project for low-income families that will demolish 33 units and replace them with 54 modern housing units with on-site amenities.

Local Knowledge

The North Academy Corridor Master Plan, adopted in March 2022, is intended to guide urban development in a planning area centered on Academy Avenue, north of the existing Sanger city boundary, extending to the intersection of Academy Avenue and State Route 180 (Kings Canyon Road). The master plan designates several land use categories: Highway Commercial, General Commercial, Retail Mixed Use, and Public Facilities. Opportunities for residential uses are included in the Retail Mixed-Use designation, which applies to 90 acres. Residential components are subject to zoning standards of the RM-1.5 district (medium density multiple-family residential) and may not exceed more than 45.0 percent of the site. The potential for mixed-income affordable and market-rate higher density residential uses in the Sanger North Academy Corridor Master Plan will foster housing mobility opportunities for existing and future residents at all income levels while providing increased access to commercial, service, and recreation resources and expanding locally based employment opportunities.

Established in August 2022, the Sanger North Academy Corridor Enhanced Infrastructure Financing District (Sanger EIFD) charges the Public Financing Authority with evaluating strategic approaches for using the future tax increment revenue stream for specific infrastructure projects, in accordance with the approved Infrastructure Financing Plan. The EIFD establishes a funding mechanism that can facilitate the construction of infrastructure improvements in the North Academy Corridor without increasing taxes or fees.

Programs to Address Other Relevant Factors: Place-Based Revitalization

- Per Program 24, the City will improve housing conditions in areas of need and will facilitate place-based revitalization and assist in reducing displacement risk for residents by improving living conditions and enabling them to remain in their home and community.
- Per Program 29, the City will prioritize projects that facilitate place-based revitalization and stimulate access to economic opportunities through the City's Capital Improvement Plan, such as projects that improve public infrastructure in deteriorating or underserved areas.

Enforcement and Outreach Capacity

Compliance with Fair Housing Laws

In addition to assessing demographic characteristics as indicators of fair housing, jurisdictions must identify how they currently comply with fair housing laws or identify programs to achieve compliance. The City of Sanger enforces fair housing and compliance with fair housing laws and regulations through a twofold process: review of local policies and codes for compliance with state law, and referral of fair housing complaints to appropriate agencies. The following identify how the City complies with fair housing laws:

- **Density Bonus Law (Government Code Section 65915).** The City has included **Program 16** to amend the density bonus ordinance to allow up to a 50.0 percent increase in project density depending on the proportion of units that are dedicated as affordable, and up to 80.0 percent for projects that are completely affordable, in compliance with state law.
- **No-Net-Loss (Government Code Section 65863).** The City has identified a surplus of sites available to meet the Regional Housing Needs Assessment allocation. In total, the City's surplus unit capacity is 614, composed of 37 lower-income units, 207 moderate-income units, and 370 above moderate-income units.
- **Housing Accountability Act (HAA) (Government Code Section 65589.5).** The City does not condition the approval of housing development projects for very low-, low-, or moderate-income households or emergency shelters unless specified written findings are made. Further, the City currently allows emergency shelters by right, without limitations, in the ML zoning district.
- **Senate Bill 35 (Government Code Section 65913.4).** The City will comply with SB 35 by establishing a written policy or procedure, as well as other guidance as appropriate, to streamline the approval process and standards for eligible projects by September 2023 (**Program 16**).

- **Senate Bill 330 (Government Code Section 65589.5).** The City complies with SB 330,, relying on regulations set forth in the law for processing preliminary application for housing development projects, conducting no more than five hearings for housing projects that comply with objective general plan and development standards, and making a decision on a residential project within 90 days after certification of an environmental impact report or 60 days after adoption of a mitigated negative declaration or an environmental report for an affordable housing project. The City has included **Program 16** to formalize this process by establishing a written procedure to be made available on the City’s website and at public counters.
- **California Fair Employment and Housing Act (FEHA) and Federal Fair Housing Act.** The City provides protections to residents through referrals to legal assistance organizations, such as California Rural Legal Assistance, and has included **Program 28** to refer residents with fair housing questions or issues to the Fair Housing Council of Central Valley (FHC-CC), California Rural Legal Aid (CLRA), and other fair housing organizations.
- **Review Processes (Government Code Section 65008).** The City reviews affordable development projects in the same manner as market-rate developments, except in cases where affordable housing projects are eligible for preferential treatment, including but not limited to residential sites subject to Assembly Bill (AB) 1397.
- **Assembly Bill 686 (Government Code Section 8899.50).** The City has completed this Assessment of Fair Housing and identified programs to address identified fair housing issues in **Table 1N-16, Factors Contributing to Fair Housing Issues.**
- **Equal Access (Government Code Section 11135 et seq.).** Upon request, the City provides translation services for all public meetings and materials and offers accessibility accommodations to ensure equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of membership or perceived membership in a protected class.

Fair Housing Outreach

Regional outreach efforts for the Multi-Jurisdictional Housing Element included interviewing Fair Housing of Central California (FHCC) for feedback on housing need, fair housing concerns, and opportunities to affirmatively further fair housing throughout the county. FHCC is a nonprofit, civil rights organization dedicated to the elimination of discrimination in housing and the expansion of housing opportunities for all persons. They accomplish this through advocacy, assistance for victims of discrimination, and enforcement of fair housing laws.

In response to the request for input, FHCC noted that the most common fair housing issues reported throughout Fresno County are discrimination on the bases of disability and race. Further, they expressed concern about the aging multifamily housing stock becoming uninhabitable due to physical conditions. However, given the shortage of affordable housing in the region, FHCC noted that many units that have already physically deteriorated are still occupied, posing a risk to occupants. Discrimination by landlords

or agents as well as deliberate segregation has resulted in fair housing concerns, particularly for protected and special-needs populations, such as persons with disabilities and lower-income households.

FHCC emphasized a need for more government involvement in enforcement of fair housing laws. Currently, affordable housing options are often concentrated in specific neighborhoods. When developers are encouraged to continue to build affordable units in these areas as a result of zoning or other government regulations, this results in either intentional or unintentional segregation based on income. When asked about opportunities for local governments to actively improve outreach regarding fair housing and to combat existing issues, FHCC identified several opportunities, including local rent controls to manage affordability and reduce displacement risk, code enforcement to ensure a safe and habitable housing stock, funding fair housing groups such as FHCC to enforce fair housing laws, and adjusting regulations or encouraging development of a variety of unit types and sizes throughout the jurisdiction to promote mobility and integration.

In response to the feedback received, the City has included Program 28 to improve fair housing outreach capacity and multilingual accessibility to all public resources, information, and meetings, including fair housing resources. This program also includes steps to establish a procedure to connect residents with fair housing organizations, make information readily available and accessible on the City's website and in public buildings, and conduct biannual trainings for landlords on fair housing laws, rights, and responsibilities.

Discrimination Cases

In its 2020 Annual Report, the California Civil Rights Department (previously Department of Fair Employment and Housing) reported that it received nine housing complaints from residents of Fresno County, approximately 1.0 percent of the total number of housing cases in the state that year (880). As part of the Fair Housing Assistance Program (FHAP), the Civil Rights Department also dual-files fair housing cases with HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO), reporting them by the origin of the issue.

HUD FHEO reported that there were three cases filed by residents of the City of Sanger between January 13 and April 2021. Two of these cases were closed following "no cause" determinations. The third alleged discrimination, on the basis of familial status, was withdrawn by the complainant without a resolution. Five inquiries were made, none of which included a basis for potential discrimination. Of these inquiries, two were determined to not have a valid basis and the other three were not pursued as the claimant failed to respond to HUD. While there were few formal cases in Sanger, this does not necessarily mean that there is no discrimination. In some cases, residents may be hesitant to report discrimination, such as in the case of undocumented residents that fear retaliation or may not be aware of fair housing legal assistance available to them.

Programs to Address Enforcement and Outreach Capacity

- Per Program 16, the City will adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law.
- Per Program 28, the City will provide fair housing information on the City’s website and in printed materials available in public buildings in both English and Spanish and will coordinate with the Housing Authority, FCOG, and other Fresno County jurisdictions to develop Spanish-language printed materials.
- Per Program 29, the City will ensure program availability and funding announcements are made available in English and Spanish and translation is available at public meetings.

Sites and Fair Housing Analysis

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for housing elements to analyze the location of lower-income sites in relation to areas of high opportunity.

Table 1N-15, RHNA Capacity by Census Tract in Sanger, presents the RHNA capacity by census tract in the city, and the existing conditions of each tract as they relate to indicators of fair housing. **Figure 1N-25, Census Tracts in Sanger**, shows the location of each census tract within the city. There are four census tracts in Sanger, all of which include housing inventory sites. It is worth noting that each tract includes land within the city as well as land within adjacent unincorporated county. Median income, non-White population, and jobs proximity index data are available at the block group layer; therefore, ranges are shown under each tract to reflect the variations in quality of life indicators at a more detailed level within a census tract. As shown, sites with unit capacity at each individual income level are identified within all four census tracts; however, there are two sites in census tract 62.02 where lower- and above moderate-income unit capacity are co-located.

APPENDIX 1N: CITY OF SANGER

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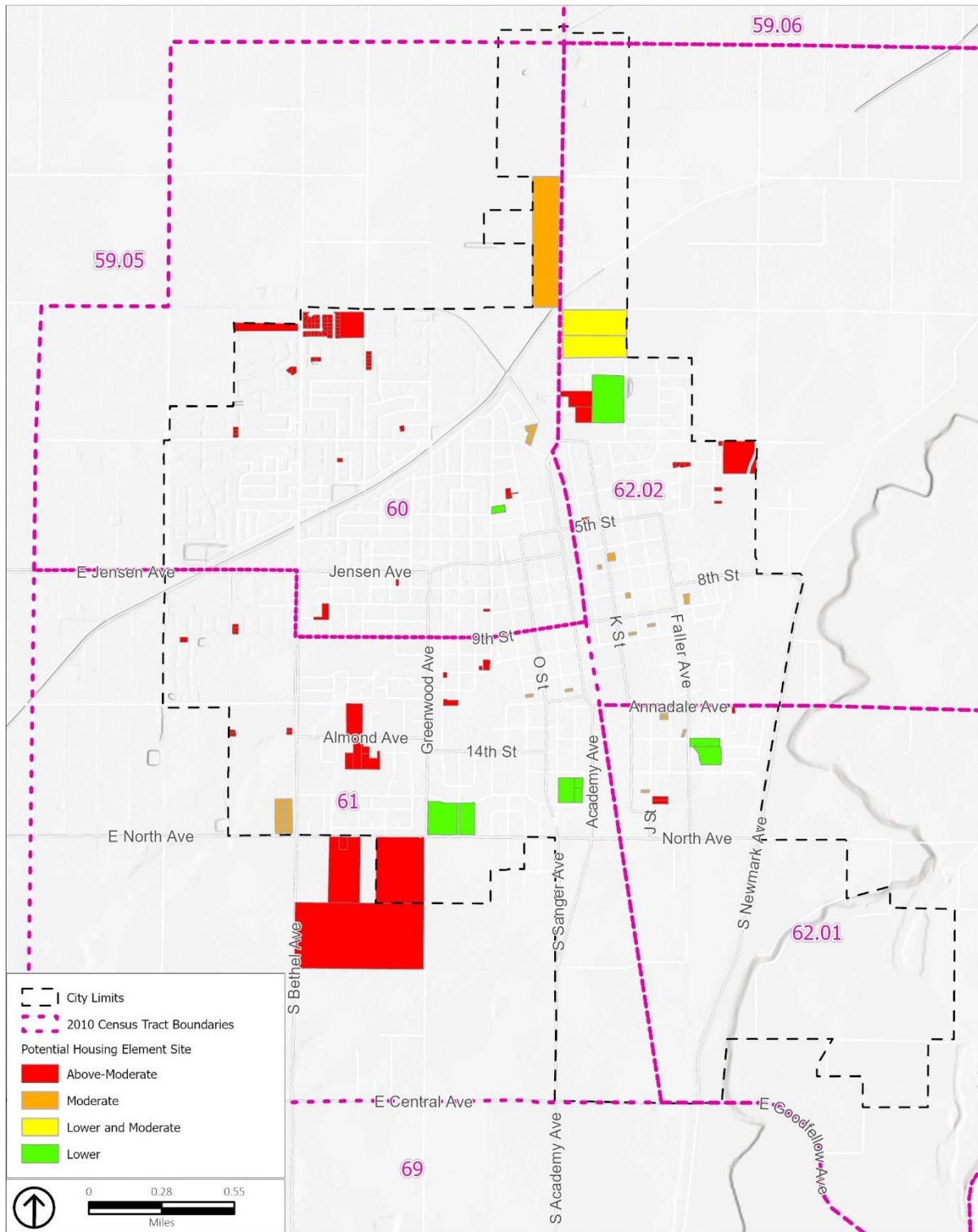
Table 1N-15 RHNA Capacity by Census Tract in Sanger

Census Tract	Existing Households	RHNA Capacity			AFFH Indicators												
					Integration and Segregation						Access to Opportunity			Displacement Risk			
		Low	Mod.	Above Mod.	Median Income	Poverty Rate	Low- to Moderate-Income Population	Non-White Population	Disability Rate	High Segregation and Poverty Status	Resource Designation	Jobs Proximity Index	CalEnviroScreen Percentile	Overcrowding Rate	Renter Overpayment Rate	Homeowner Overpayment Rate	% Renter Households
60	3,033	17	242	138	\$30,833 - \$73,546	28.6%	30.3%	73.8 - 91.3%	13.6%	No	High Segregation & Poverty	8 to 16	70.5	6.5%	42.4%	33.8%	36.8%
61	2,210	253	60	686	\$26,286 - \$85,222	23.2%	50.5%	84.3% - 96.1%	7.6%	No	High Resource	31 to 43	82.8	13.7%	66.8%	35.6%	43.8%
62.01	678	114	12	6	\$19,444 - \$49,397	46.5%	69.4%	92.1% - 98.2%	7.4%	Yes	High Segregation & Poverty	40 to 66	90.2	24.8%	59.7%	53.6%	52.3%
62.02	1,681	256	144	205	\$40,111 - \$55,341	19.5%	67.5%	86.9% - 97.3%	12.9%	No	Moderate Resource	13 to 33	68.4	17.0%	46.8%	42.2%	47.3%

Source: 2015-2019 ACS and City of Sanger 2023

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FIGURE 1N-25 CENSUS TRACTS IN SANGER



Source: U.S. Census; City of Sanger, 2023; Placeworks, 2023

As identified in the analysis of Patterns of Integration and Segregation, there is one tract (62.01) in southeast Sanger that meets the criteria of being considered an Area of High Segregation and Poverty (**Figure 1N-12**). This concentration of poverty (46.5 percent) and non-White population (92.1 to 98.2 percent depending on block group) includes land east of the San Joaquin Valley Railroad and south of Annadale Avenue in the older portions of the city where residential neighborhoods are adjacent to industrial uses along the railroad line; compounded by a 24.8 percent overcrowding rate, a high CalEnviroScreen score in the 90th percentile, ranking the tract as a disadvantaged community, and a high proportion of renters, of which, 59.7 percent are cost burdened. To reduce the displacement risk for lower-income households as well as foster income integration and mixed-income neighborhoods, 5.7 percent of the RHNA unit capacity is identified in this tract, including 10.8 percent of lower-income unit capacity, 3.7 percent of moderate-income unit capacity, and 2.3 percent of above moderate-income unit capacity.

The tract with the highest percentage of RHNA unit capacity (45.0 percent) is tract 61 in the southwest quadrant of the city, designated High Resource, which includes five block groups within the area west of the San Joaquin Valley Railroad and south of West 9th Avenue/East Jensen Avenue, extending to the western and southern boundaries of the city. The side of this tract west of Greenwood Avenue (block groups 3, 4, and 5) generally includes residential subdivisions with newer, larger homes, whereas the John F. Kennedy Park and Washington Middle School neighborhoods (block groups 2 and 1) include a mix of older and smaller single-family and small multifamily residential units with industrial and commercial uses separating the residential areas from the railroad line. In this tract, the City has identified capacity for 27.8 percent of lower-income unit capacity, 20.1 percent of moderate-income capacity, and 72.8 percent of above moderate-income capacity. This tract includes the block group with the highest median income along the western edge of the city; as well as the second-lowest income in the city in the Kennedy Park neighborhood (west of the San Joaquin Valley Railroad generally between 12th Street to the north, Metzler Drive/Kister/P and O Streets to the west, and the City's southern boundary). The overall poverty rate is 23.2 percent, populations of color range from 84.3 percent in the western neighborhoods to 96.1 percent in the Kennedy Park neighborhood, and homeowners are the predominant tenure, although the proportions of each indicator vary within the individual block groups. Overcrowding is relatively low at 13.7 percent; however, renter overpayment is the highest in the city at 66.8 percent, compared to a homeowner overpayment rate of 35.6 percent. The unit capacity in the affordable multifamily Cherry Crossings pipeline project in block group 2 provides opportunities for cost-burdened lower-income residents of the census tract who might be at risk of displacement, as well as any lower-income household, to live in primarily single-family homeowner, higher-resource neighborhoods while providing additional rental housing to help reduce high renter overpayment rates in the southwest quadrant of the city. Overall, unit capacity in this tract will include multifamily and single-family residential development, access to a variety of amenities, including parks, educational facilities, and commercial resources. The inclusion of lower-income unit capacity will foster improved housing mobility and access to opportunities for lower-income residents, and additional housing stock to provide mobility options for existing and future moderate and higher-income households in a high-resource designated area.

Tract 62.02, designated as a moderate resource tract, also identifies a significant portion of the RHNA unit capacity (31.5 percent) east of the San Joaquin Railroad, and north of Annadale Avenue, where several newer residential subdivisions are being built east and north of existing light industrial and business corridor supporting services uses. The tract is 67.5 percent low/moderate income, with the lowest poverty rate in the city (19.5 percent), a moderate CalEnviroScreen score, and moderate rates of renter and homeowner cost burden, which are likely to vary based on income and tenure distribution among the four block groups. This tract is projected to accommodate 59.2 percent of lower-income capacity, including two large adjoining vacant sites between Geary Avenue and East California Avenue off Academy Avenue (41.9 percent of lower-income unit capacity in the tract); and south of Florence Avenue, co-sited with 3.8 percent above moderate-income unit capacity, also off of Academy Avenue (58.1 percent of lower-income unit capacity in the tract), both in the northeast corner of the city (block group 2). Block group 2 is a moderate-income area (\$52,199), predominantly non-White, and renters comprise only 29.7 percent of the households, suggesting that while cost-burdened renters may reside in this area, it is unlikely that there is a sizeable concentration of lower-income households at risk of displacement. The identification of lower-income unit capacity in this developing portion of the city will provide housing mobility opportunities for lower-income households and combat patterns of concentrated poverty in the Areas of High Segregation and Poverty and foster improved access to resources and opportunities for lower-income households in a moderate-resource area. The remaining 6.2 percent of above moderate-income unit capacity is identified in block group 1 at the edge of Church Avenue and South Quality Drive, and 6.3 percent of moderate-income unit capacity in scattered sites within block group 3.

Tract 62.01 is also designated by TCAC/HCD as an Area of High Segregation and Poverty. In this tract, approximately 69.4 percent of the population are lower- and moderate-income households. In the JFK Park block group 1 bounded by the San Joaquin Railroad to the west, Faller Avenue to the east, Annadale Avenue to the north and North Avenue to the south, the median income is \$19,444, with a predominantly non-White population (98.2 percent of the population). There are three affordable multifamily complexes with 164 deed-restricted units in this neighborhood, which may contribute to the extremely low median income and correlate with the concentration of poverty found in this block group. The eastern and southern portion of this tract has a median income of \$49,397, with a non-White population of 92.1 percent. As discussed previously, this tract has the highest rate of overcrowding in the city (24.8 percent), high rates of homeowner and renter overpayment, a high CalEnviroScreen score, and 46.5 percent of the population has incomes below the poverty threshold, indicating characteristics of vulnerability to displacement and disproportionate housing need. The City has identified a total of 5.7 percent of the RHNA capacity in this tract. To reduce displacement risk for these households, the City proposes 10.8 percent of lower-income unit capacity to facilitate housing mobility in the approved Newmark Villages pipeline project, as well as 3.7 percent of moderate-income and 2.3 percent of above moderate-income unit capacity to facilitate mixed-income and more integrated, diverse neighborhoods, combat patterns of concentrated poverty, and foster improved access to resources and opportunities for lower-income households.

The northwest quadrant of the city is included in Tract 60, encompassing the land north of 9th Street and west of the San Joaquin Valley Railroad, extending to the northern and western boundary of the city. This tract's low/moderate income rate is the lowest in the city (30.3 percent), with incomes ranging between \$30,833 and \$38,558 in the more centrally located block groups 2 and 3 along the railroad route to \$73,546 northwest of the Fowler Switch Canal in block group 1. Although the anticipated economic outcome is in the 51st percentile, the education performance score is high in the 85th percentile, and the environment score is 56th percentile, and CalEnviroScreen 4.0 does not qualify the tract as a disadvantaged community, and the overall rates of overcrowding and cost-burdened households are the lowest in the city, Tract 60 was designated Area of High Segregation and Poverty according to the 2021 TCAC/HCD methodology. However, the individual block groups within the tract vary widely in their quality-of-life indicators. The median income in block group 1 falls in the moderate category, the non-White population is the lowest in the city (73.8 percent), 78.0 percent of the households are homeowners, and the proportion of the households with incomes roughly equivalent to 30.0 percent of the AMI is 17.8 percent. In contrast, in block groups 2 and 3, the population with incomes roughly equivalent to 30.0 percent of the AMI is higher (31.6 and 37.7 percent, respectively), between 58.9 and 62.6 percent of the households are renters, the non-White populations range between 87.5 and 91.3 percent, and the median incomes fall into the very low- and low-income categories (2020 HCD income limits). One site with 2.0 percent of the lower-income capacity has been identified in block group 3 to add affordable housing stock for lower-income households at risk of displacement as well as housing mobility opportunities for lower-income households. Block group 4 is a transitional neighborhood between the lower- and higher-income neighborhoods in this tract; the median income is estimated at \$40,161 (2014-2018 ACS), 82.6 percent of the populations is non-White, 32.9 percent of the population have incomes roughly equivalent to 30.0 percent of the AMI, and over 53.0 percent of the households are renters. The Elderberry at Bethel affordable multifamily complex is in this block group, possibly contributing to the lower income. The City has identified 17.8 percent of the total unit capacity in Tract 60. Potential for 64.9 percent of moderate-income units are distributed in block group 1 at the far northern tip of the city, with an additional 4.9 percent in the vicinity of the Academy and Church Avenues junction in block group 4, which facilitates income integration. Above moderate-income unit capacity (16.3 percent) has been identified in block group 1 to provide homeowner mobility opportunities for higher-income households with direct access to nearby Fresno and Clovis on California Avenue.

The City has included **Program 14** to support construction of higher-density housing in areas with better access to opportunities and encourage integration of a variety of unit types to facilitate mixed-income neighborhoods, combat patterns of income segregation, and provide housing mobility opportunities for a range of households. The distribution of sites identified in **Table 1N-15** is based on the availability of sites and potential for development during the planning period, including five pipeline projects.

Figures 1N-26 through 1N-36 compare the distribution of projected units by income category of the following indicators compared to citywide patterns to understand how the projected locations of units will affirmatively further fair housing: TCAC opportunity areas, median income, predominant population, disability rates, educational score, environmental health, and overpayment. The following sites inventory discussion includes an analysis of the number of projected units by income category, total RHNA capacity, and city acreage by income category to further assess the potential impacts of the sites inventory to

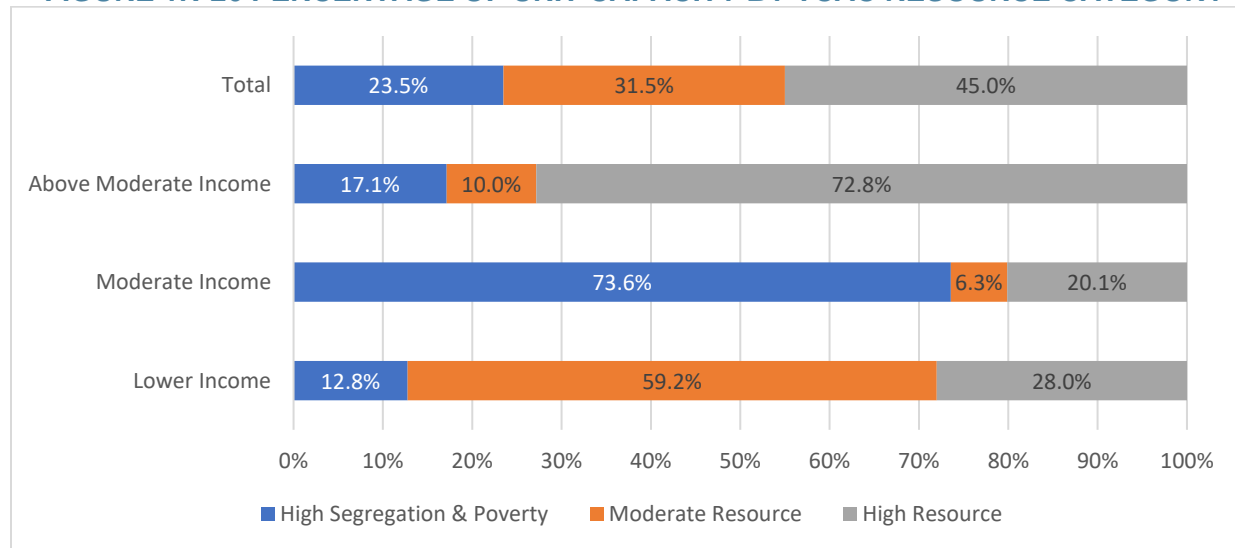
affirmatively further fair housing.

Potential Effect on Patterns of Integration and Segregation

TCAC Resource Category

Figure 1N-26, Percentage of Unit Capacity by TCAC Resource Category, presents the breakdown of unit capacity in Sanger by resource opportunity designation compared to citywide patterns. Approximately 45.0 percent of the total unit capacity identified to meet the RHNA is in a high resource area, with 31.5 percent in the moderate-resource designation, and 23.5 percent in the Areas of High Segregation and Poverty. As there are no low-resource areas or highest-resource areas designated in the city, those designations are not reflected on **Figure 1N-26**.

FIGURE 1N-26 PERCENTAGE OF UNIT CAPACITY BY TCAC RESOURCE CATEGORY



Sources: California Tax Credit Allocation Committee, 2021; City of Sanger, 2023

The high-resource area in Sanger is in the southwestern quadrant of the city. Opportunity for 28.0 percent of total lower-income unit capacity has been identified on vacant parcels, therefore not risking displacement of existing residents. Cherry Crossings is a pipeline site in the lower-income Lincoln Park neighborhood, approved for 21.6 percent of the lower-income unit capacity in the higher-resource designation (6.1 percent of total lower-income unit capacity). The remaining 78.4 percent of the lower-income unit capacity in the high-resource area is projected on a site at the corner of North Avenue at Greenwood Avenue in the southern end of the city. Proximity to the above moderate-income Serenade and Somerset pipeline projects encourages integrated income neighborhoods, while reducing potential for further concentration of poverty and segregation of populations of color in the Area of High Segregation and Poverty and providing housing mobility opportunities in higher-resource neighborhoods. Moderate-income development potential (19.0 percent of total moderate-income unit potential) is also identified in the high-resource designation in the more recently developing southwest corner of the city. The majority of above moderate-income unit capacity, providing housing mobility opportunities for higher-income households (65.3 percent of total above moderate-income unit capacity) is identified on approved Serenade and Somerset pipeline project

sites (89.7 percent of above moderate-income unit capacity in the high-resource area), with scattered infill sites comprising the remainder of above moderate-income units in this resource designation (7.5 percent of the total above moderate-income unit capacity).

The northeast quadrant, east of the San Joaquin Valley Railroad and north of Annadale Avenue, is designated a moderate resource area, with an associated anticipated economic outcome score of 19th percentile and an educational performance score in the 58th percentile. Approximately 31.5 percent of the total unit capacity is distributed within this area, including 59.2 percent of lower-income unit capacity at the northeastern corner of the city in the vicinity of future commercial, office, business park, and other amenities. In addition, 37.5 percent of the above moderate-income RHNA capacity in this moderate-resource designation is co-sited with lower-income units, which encourages future integration of higher- and lower-income housing mobility opportunities in moderate-resource areas. The remainder of the above moderate-income unit capacity is distributed to a site at the eastern edge of Church and Quality Avenues in a neighborhood with generally lower median incomes, also fostering income-integrated neighborhoods as well as housing mobility opportunities. Inclusion of 6.3 percent of the total moderate-income unit capacity, is scattered throughout the quadrant, helping to facilitate mixed-income neighborhoods in lower-income block groups and providing moderate-income housing mobility opportunities.

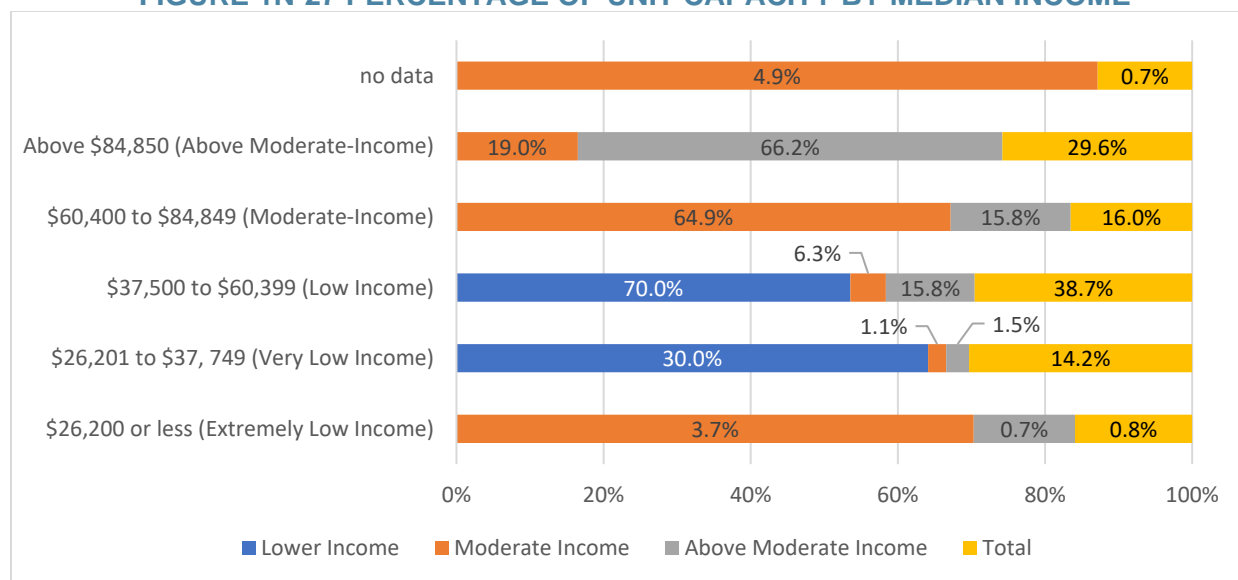
Sites within the Area of High Segregation and Poverty account for 23.5 percent of the total capacity to meet the RHNA, including 12.8 percent of lower-income unit capacity, 73.6 percent of moderate-income unit capacity, and 17.1 percent of above moderate-income unit capacity. The moderate- and above moderate-income sites help to facilitate mixed-income neighborhoods and encourage future integration in areas that are currently designated as pockets of poverty and high rates of non-White populations, while the lower-income units counter potential displacement of existing residents by increasing the stock of affordable housing opportunities. However, while the northwestern quadrant of the city is designated an Area of High Segregation and Poverty, it is likely based more heavily on the income, racial and ethnic characteristics of the population in the Washington neighborhood that encompasses some of the oldest residential stock in the city (built in the 1920s), and the proximity of these neighborhoods to manufacturing, light industrial and service commercial uses adjacent to the San Joaquin Valley Railroad between 9th and 3rd Streets. The recent influx of higher-income households and lower concentrations of communities of color in the newer Reagan and Jenni Park neighborhoods in the northwest corner of the city, in which the recent home prices are affordable only to moderate- and above moderate-income households, may not be reflected in this determination, as available datasets used in the methodology typically lag by two years. Other overall quality of life indicators discussed in the tract analysis, such as anticipated economic outcome in the 51st percentile, the education performance score in the 85th percentile, the environment score is 56th percentile, the area does not qualify as a disadvantaged community, and the overall rates of overcrowding and cost-burdened households are the lowest in the city may not be reflected; therefore, the designation may not adequately capture conditions in this area undergoing rapid change.

Income

As previously discussed, Sanger is a community with a range of household income levels distributed between higher- and lower-income sections of the city, where median incomes may range over \$50,000 between block groups within a single census tract (**Figure 1N-7, Local Median Income**). The lower-income neighborhoods generally feature older, small-lot residential housing with some smaller multifamily properties interspersed in the residential fabric, and larger multifamily developments, including affordable housing complexes, while the higher-income neighborhoods feature larger homes on larger lots in primarily planned subdivisions, most of which have been built within the past 30-year period, although a few pockets of larger homes affordable to moderate- and above moderate-income households that were built during the 1960s are found interspersed in lower-income areas.

As shown in **Figure 1N-27, Percentage of Unit Capacity by Median Income**, a larger percentage of the unit capacity (53.7 percent) has been identified on sites within the lower-income categories. Capacity for all of the lower-income units is identified on sites at or below the 2020 Fresno County low-income category, which expands the more affordable housing stock resources in very low-income neighborhoods (Cherry Crossing pipeline project with 6.1 percent of lower-income unit capacity, Site 52 in the Lincoln neighborhood with 21.9 percent of lower-income unit capacity, and Site 17 with 2.0 percent of lower-income unit capacity in the Jackson neighborhood) and provides mobility opportunities for residents who want to move yet remain within their existing neighborhoods, thereby preventing displacement. Additionally, it facilitates deconcentration of lower-income households from the portions of the city with a median income at the poverty threshold to neighborhoods with higher median incomes. The inclusion of 11.1 percent of the moderate-income unit potential in scattered vacant sites and 18.0 percent of above moderate-income units in neighborhoods incomes below the low-income threshold will help to facilitate mixed-income neighborhoods and encourage future income integration in areas that are currently designated as an Area of High Segregation and Poverty or those with a predominance of lower-income households, and also has the potential to raise the overall income and stimulate place-based revitalization in existing lower-income neighborhoods.

FIGURE 1N-27 PERCENTAGE OF UNIT CAPACITY BY MEDIAN INCOME



Sources: 2015-2019 ACS; 2020 State Median Income Limits, City of Sanger, 2023.

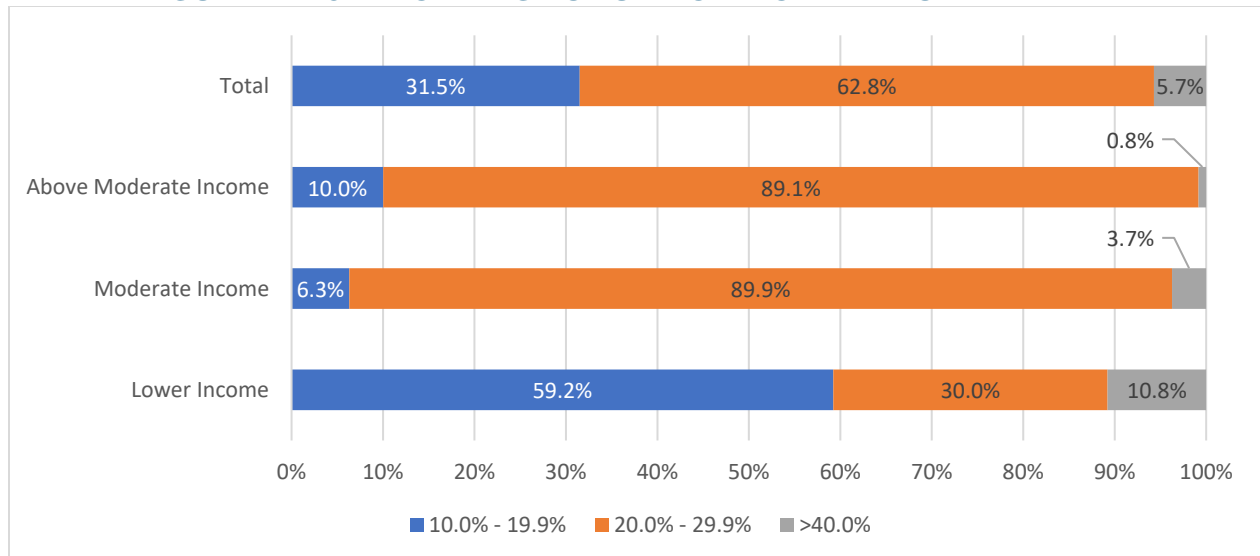
Conversely, 45.6 percent of the total unit capacity is identified in neighborhoods in the Reagan and Jenni Park neighborhoods in the northwest quadrant, Sanger West and Orchard Park in the southwest quadrant, and the older central Sanger neighborhood (block group 5 in Tract 60) west of Academy Avenue, which have median incomes predominantly in the moderate- and above moderate-income range. This includes identification of sites for 83.9 percent of moderate-income unit capacity (77.4 percent of which is identified on a site within the recently annexed land north of California Avenue), and 82.0 percent of above moderate-income unit capacity (81.6 percent of which is included in the approved Somerset and Serenade pipeline projects), fostering additional housing mobility opportunities in higher-income areas.

As presented in **Figure 1N-28, Percentage of Unit Capacity by Poverty Rate**, approximately 31.5 percent of RHNA unit capacity is identified in the northeast quadrant with poverty rates between 10.0 and 19.9 percent (**Figure 1N-10, Local Poverty Rate**), and 62.8 percent of the RHNA capacity is identified in the northwest and southwest tracts with poverty rates of between 20.0 and 29.9 percent. The remainder of the unit capacity (5.7 percent) is identified in the southeast census tract corresponding to the Area of High Segregation and Poverty designation where 46.5 percent of the population has an income below the poverty threshold. Just under 60.0 percent of lower-income unit capacity is identified on sites in the northeastern tract to encourage the development of housing mobility opportunities for lower-income households in more stable neighborhoods while reducing the concentration of households in poverty in the Areas of High Segregation and Poverty. An additional 30.0 percent of the lower-income site capacity (Cherry Crossing and Site 52) is projected to increase affordable housing stock in the southwestern high resource tract within lower-income Lincoln Park neighborhoods. Benefits are twofold; reduce the risk of displacement of current cost burdened and/or overcrowded households in poverty within the Lincoln Park neighborhood to allow them to remain in their neighborhood, and foster housing mobility opportunities for lower-income households in a higher-resource neighborhood while reducing the concentration of households in poverty in the Areas of High Segregation and Poverty. The remaining 10.8 percent of lower-income unit capacity

is proposed in the Newmark Villages approved pipeline project in the southeast Area of High Segregation and Poverty with an existing need for an increased supply of affordable housing for lower-income and overcrowded households to remain in their neighborhoods and reduce risk of displacement. Construction of these lower-income units in these areas will help to alleviate existing patterns of overpayment and overcrowding and encourage place-based revitalization through development of vacant parcels, providing new, safe housing in areas of more concentrated poverty.

In addition to these lower-income units, a small proportion of moderate- and above moderate-income units (3.7 and 0.8 percent of unit capacity respectively) are projected in Areas of High Segregation and Poverty neighborhoods to affirmatively further fair housing through infill of vacant parcels to encourage more mixed-income neighborhoods and promote place-based revitalization. In addition, the City has included **Program 12** to actively promote construction of ADUs in moderate-resource and high median income areas and monitor affordability of new ADUs to lower- and moderate-income households.

FIGURE 1N-28 PERCENTAGE OF UNIT CAPACITY BY POVERTY RATE



Sources: 2015-2019 ACS; City of Sanger, 2023.

The combination of this program and facilitating the development of high-density housing, in a community that has historically been dominated by single-family units in the higher-income and higher-resource areas of the city, will help ameliorate patterns of segregation. The development of these sites with a mix of housing units will make Sanger more accessible to households with a wider range of incomes, while simultaneously increasing housing mobility opportunities and de-concentrating areas of poverty and low-income households.

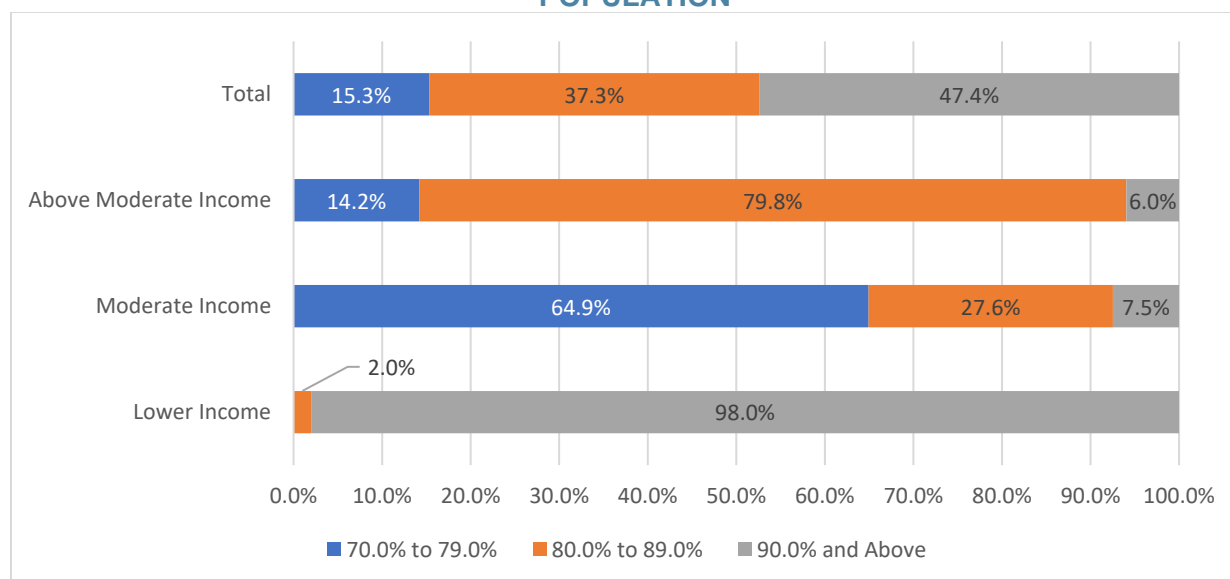
Race and Ethnicity

As discussed previously, Sanger is among Fresno County's moderately diverse jurisdictions, with communities of color comprising 79.1 percent of the population. As shown in **Figure 1N-11, Local Racial Demographics**, there is a pattern of lower concentrations of non-White households at the city's northern,

western, and eastern edges, coinciding with areas of relatively higher income, and more racially segregated areas closer to the city's central older neighborhoods and those southeast of the San Joaquin Valley Railroad, generally coinciding with Areas of High Segregation and Poverty, lower-income neighborhoods, and Area of High Segregation and Poverty. However, while over one-quarter of the population in the northwest Reagan, Jenni Park, and upper Jackson neighborhoods are White non-Hispanic, the highest in the city, with overall higher median incomes, they are included in the tract designated Area of High Segregation and Poverty. Additionally, earlier analysis also indicates that a correlation between rates of diversity and income is not consistent in Sanger. Within the highest-income Sanger West and Orchard Park neighborhoods, although the Hispanic population is lower than in the remainder of the city, the non-White population rates approach 90.0 percent due to a higher Asian population.

As shown in **Figure 1N-29, Percentage of Unit Capacity by Percentage Non-White Population**, 47.4 percent of the capacity to meet the RHNA is in areas where more than 90.0 percent of the population identifies as non-White, including 59.2 percent of the lower-income unit capacity in the northeast Wilson neighborhood, with site 3 contiguous to 6.0 percent of above moderate-income unit capacity; 10.8 percent in the southeast JFK neighborhood in the Newmark Villages pipeline project; and 20.0 percent in the southwest Lincoln neighborhood, including the Cherry Crossings pipeline project; as well as 7.5 percent of moderate-income unit capacity on scattered sites north of Faller Park and near the Newmark Villages pipeline project in the southeast Area of High Segregation and Poverty.

FIGURE 1N-29 PERCENTAGE OF UNIT CAPACITY BY PERCENTAGE NON-WHITE POPULATION



Sources: Esri, 2018; City of Sanger, 2023.

This offers an opportunity for lower-income, non-White households that may have been priced out and excluded from housing mobility opportunities in higher-resource areas to access affordable housing while facilitating income integration and reducing concentrations of non-White populations in the older central and southeastern areas of the city designated as an Area of High Segregation and Poverty. The unit capacity

in the southeast tract increases housing resources for residents who may otherwise be priced out and are vulnerable to displacement in their own neighborhoods.

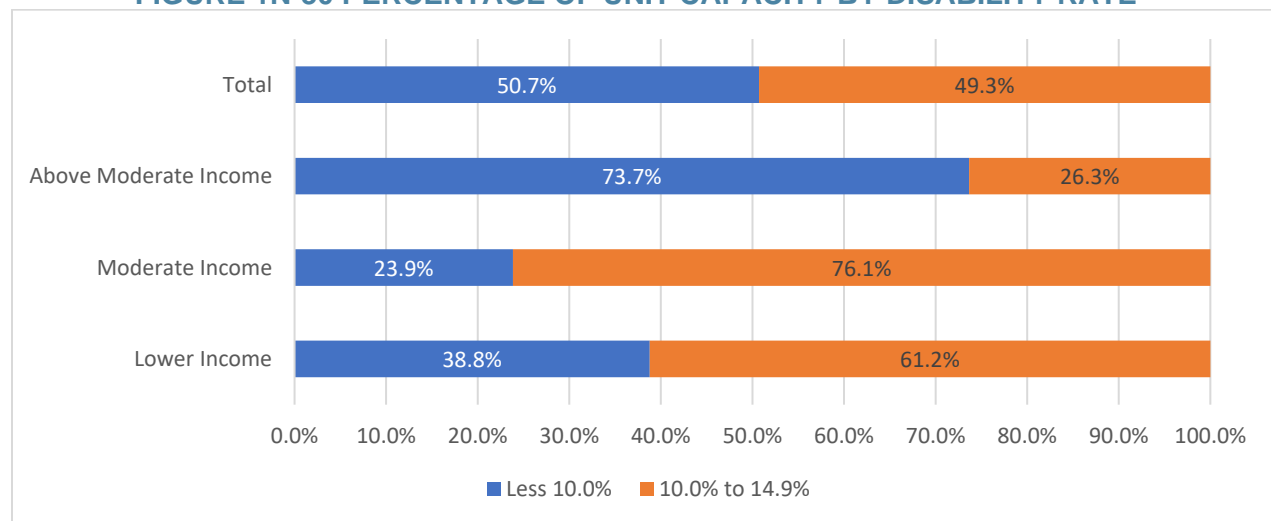
The majority of higher-income unit capacity (79.8 percent) is identified on sites in areas that have non-White populations between 80.0 and 90.0 percent. The approved Somerset and Serenade pipeline projects (66.2 percent of total above moderate-income unit capacity) are within the Orchard neighborhood, which has a high median income and a more diverse racial and ethnic distribution as discussed previously, which will provide housing mobility opportunities for higher-income existing and future residents. Additional above moderate- and moderate-income units in areas with lower proportions of non-White population, primarily in the developing northern edges of the city, will increase housing mobility opportunities in higher-income areas.

Disability

Approximately 9.2 percent of Sanger's population lives with one or more types of disability, as shown on **Figure 1N-14, Percentage of the Population with a Disability in Sanger**. As discussed previously, data indicates that a smaller proportion of residents in Sanger's southern census tracts are living with disabilities compared to residents who are living with a disability in northern areas. Rate of disability corresponds to concentrations of seniors, with seniors comprising an average of 11.5 percent of the population in the northern two tracts, of which, 45.2 to 49.3 percent experience a disability.

As illustrated by **Figure 1N-30, Percentage of Unit Capacity by Disability Rate**, approximately 50.7 percent of the total unit capacity identified in the sites inventory is in areas in which fewer than 10.0 percent of residents have a disability in the southwest and southeast tracts of the city, and 49.3 percent is in the northern tracts, in which 10.0 to 14.9 percent of residents have a disability. As stakeholders identified, high housing costs and a shortage of permanently supportive housing in the county has generally increased displacement risk for residents with disabilities and presents a barrier to persons with disabilities.

FIGURE 1N-30 PERCENTAGE OF UNIT CAPACITY BY DISABILITY RATE



Sources: 2015-2019 ACS; City of Sanger, 2023.

Approximately 28.0 percent of the lower-income unit capacity and 17.8 percent of moderate-income capacity is identified at the southern end of the high resource southwest tract in the vicinity of the developing commercial node at the southern entry to the city. Additional 10.8 percent lower-income unit capacity in the Newmark Villages pipeline project and 6.8 percent infill sites moderate-income unit capacity in the southeastern tract, also with access to these commercial uses, will help to improve access for and accommodate the needs of persons living with disabilities, who benefit from close access to services and amenities as well as proximity to transit.

The majority of the lower-income unit capacity (61.2 percent), as well as 76.1 and 26.3 percent of moderate- and above moderate-income unit capacity, respectively, has been identified on sites where the rate of disabilities ranges from 10.0 to 14.9 percent of the population, providing housing mobility and additional housing supply opportunities in the northern tracts for all income categories, with convenient access to California Avenue to access additional services and health facilities in Fresno and Clovis to the northwest.

Familial Status

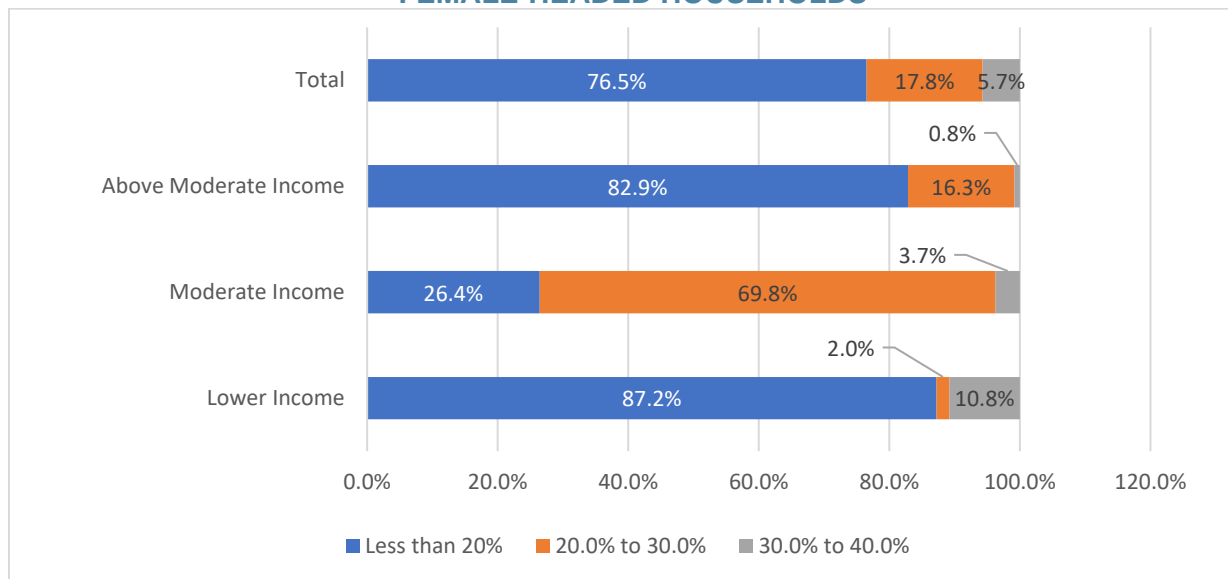
As previously discussed, 9.6 percent of the households in the city are single females with children, of whom, 35.9 percent had incomes below the poverty level, which suggests that single-parent, female-headed households may have more limited access to housing, or conversely, single-parent, female-headed households may have more access to affordable housing in Sanger than elsewhere in the county. The spatial distribution of single-parent, female-headed households with children is generally consistent with Areas of High Segregation and Poverty, and the presence of many affordable housing complexes and older residential housing stock (**Figure 1N-13, Percentage of Children in Single-Parent Female-Headed Households in Sanger**). Combined with income distribution and poverty rate, it is likely that a concentration of single-parent households in poverty may reside in the JFK neighborhood.

As presented in **Figure 1N-31, Percentage of Unit Capacity by Percentage of Children in Female-Headed Households**, approximately 10.8 percent of lower-income unit capacity (Newmark Villages) is in areas with the highest rate of children in female-headed households. Housing unit potential on these sites increases the opportunities for female-headed households currently experiencing overpayment and/or overcrowding to acquire affordable and adequately sized housing with access to developing commercial uses at the southern entry to the city. In the northwestern Area of Segregation and Poverty, 27.4 percent of children reside in a single female-headed household. A small lower-income site (2.0 percent of total lower-income unit capacity) is identified in the vicinity of Sanger Park in the older central Jackson neighborhood, as well as 64.9 percent of moderate-income unit capacity in a large site at the northern tip of the city in the developing Northwest Sanger neighborhood, with the remaining 4.9 percent distributed among infill sites.

The majority of unit capacity is identified in the moderate- and high-resource areas of the city, including 87.2 percent of lower-income, 26.4 percent of the moderate-income anticipated units, and 82.9 percent of above moderate-income unit capacity in the areas with representations of children in female-headed households below 20.0 percent. These pipeline and potential units will increase housing mobility opportunities for single, female-headed households at all income levels, as well as all other household types, to find appropriate units within Sanger, while contributing toward de-concentration of high rates of poverty,

inclusive of female-headed households with children with incomes below the poverty level. Overall, female-headed households of any economic status will have access to new housing opportunities, as well as other single-parent households, persons living alone, seniors, lower-income families, and other households.

FIGURE 1N-31 PERCENTAGE OF UNIT CAPACITY BY PERCENTAGE OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS



Sources: 2015-2019 ACS; City of Sanger, 2023.

Potential Effect on Access to Opportunity

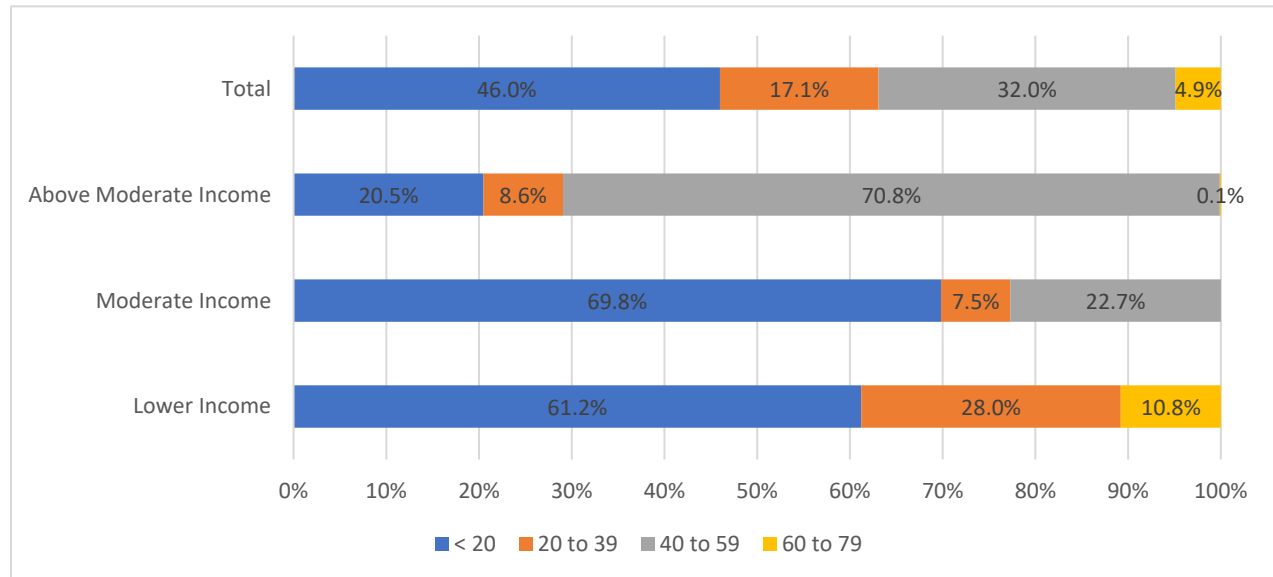
Job and Transit Proximity

Sanger residents are served by FCRTA, which provides fixed-route service on the Orange Cove Transit and Sanger-Reedley Transit lines. However, some neighborhoods remain less accessible by transit, including those north of Church Avenue, in the JFK neighborhood between Annadale and North Avenue, east of Faller Avenue, and in the southwest portion of the city. According to the jobs proximity index, most residential areas in Sanger score between the 8th and 66th percentiles, with the highest scores at the southeastern side of the city, and the lowest scores on the north side, generally north of Jensen Avenue and 9th Street (**Figure 1N-16, Jobs Proximity Index**).

As shown on **Figure 1N-32, Percentage of Unit Capacity by Jobs Proximity Index Scores**, 4.9 percent of the RHNA unit capacity in the Newmark Villages pipeline project (10.8 percent of lower-income unit capacity) is advantageously located in the area with the highest jobs proximity index score. As the city is predominantly residential, siting of an additional 32.0 percent unit capacity (22.7 moderate- and 70.8 percent above moderate-income) in the higher-proximity areas in the southwest will aid in improving access to employment opportunities both inside and outside of the city and will locate housing near more highly

trafficked areas that are currently serviced by intra-city transit providers, providing close proximity to transit for occupants of these units.

FIGURE 1N-32 PERCENTAGE OF UNIT CAPACITY BY JOBS PROXIMITY INDEX SCORES



Sources: US Department of Housing and Urban Development (2014-2017); City of Sanger, 2023.

While a greater share of lower-income (61.2 percent), moderate-income (69.8 percent) and above moderate-income (20.5 percent) unit capacity is projected in developing northern areas of the city scoring below the 20th percentile, these units provide improved housing mobility opportunities for all residents, with automobile access to Fresno and Clovis to the northwest along California Avenue. An additional 17.1 percent of the units are identified in areas with jobs proximity index scores between the 20th and 40th percentile, which includes the lower-income Cherry Crossings pipeline project and site 52 in the southwest Lincoln neighborhood, and in the northeast Wilson neighborhood, scattered moderate-income infill sites and an above moderate-income site at the corner of Quality Avenue and Church Avenue (8.6 percent above moderate-income unit capacity).

The lower scores in the northern portion of the city may partially be attributed to the differential in the type of employment the residents of these areas are engaged in, compared to the types of employment available within the city, as Sanger has been transitioning into a bedroom community in the Fresno metropolitan area. When considering where to locate future housing for all income levels, and particularly lower-income units, sites in the southern portion of the city, the downtown, and in the vicinity of Jensen Avenue offer the most convenient access to jobs available within the city and transit to other parts in the region. Further, construction of these sites will help to further improve the jobs-housing ratio with residential development in and near commercial and transit corridors, thus improving jobs proximity for current and future residents of Sanger.

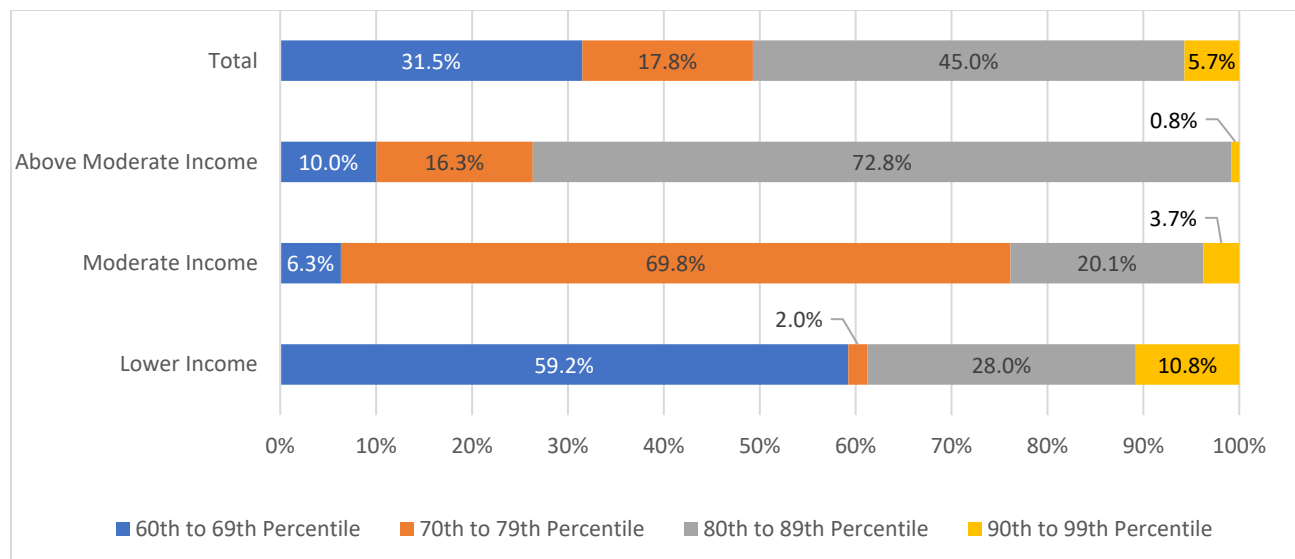
Environmental Health

As previously discussed, and shown on **Figure 1N-19, CalEnviroScreen Scores**, the two census tracts south of East Jensen and East Annadale Avenues score between the 82nd and 90th percentiles for environmental conditions, compared to the 70th percentile in the northwest corner and the 68th percentile in the northeastern communities, placing them within the boundaries of areas considered SB 535-qualifying disadvantaged communities, the 25 percent highest-scoring census tracts in CalEnviroScreen 4.0. This indicates that, compared with statewide averages, portions of Sanger represent an area of potential concern regarding fair housing and disproportionate exposure to environmental hazards and a concentration of vulnerable populations.

This pattern is consistent in the spatial pattern demonstrated by other indicators of access to opportunity, such as median household income, poverty status, single-parent households, overcrowding, tenure, and household size found in the southeast Area of High Segregation and Poverty. Although scores in the southwest side qualify as a disadvantaged community, proximity to agricultural operations, manufacturing and industrial uses, and the less positive quality of life indicators in the Lincoln neighborhoods likely contribute to the higher scores, as the Orchard Park and West Sanger neighborhoods have more positive quality of life indicators and the highest median incomes in the city. This indicates that residents in Sanger may have varying access to environmental conditions, depending on the area of the city in which they live.

As presented in **Figure 1N-33, Percentage of Unit Capacity by CalEnviroScreen Percentiles**, approximately 31.5 percent of the sites inventory capacity has been identified in neighborhoods scoring in the 60th to 69th percentiles in the northeast quadrant of the city. These sites have capacity for 10.0 percent of above moderate-income unit capacity, 6.3 percent of the moderate-income capacity, and 59.2 percent of lower-income capacity, including co-sited low- and above moderate-income sites. The majority of moderate-income unit potential and 16.3 percent of above moderate-income unit capacity has been distributed in areas scoring below the 75th percentile the northwest quadrant and far northern portion of the city.

FIGURE 1N-33 PERCENTAGE OF UNIT CAPACITY BY CALENVIROSCREEN PERCENTILES



Sources: CalEnviroScreen 4.0, 2021; City of Sanger, 2023.

Approximately one-half of site capacity for all income levels (50.7 percent) is identified in areas scoring at or above the 75th percentile. Development potential in the higher-scoring (disadvantaged community) areas is envisioned to improve environmental conditions through incorporation of outdoor spaces, transitional buffers, and screening between residential and nonresidential uses, and promotion of pedestrian and bicycle facilities, thus promoting environmental sustainability. Investment in the least positive-scoring areas through development of vacant sites with capacity at all income levels will encourage place-based revitalization in older neighborhoods and will increase the supply of affordable housing in an area susceptible to displacement due to housing costs while also encouraging income integration. Above moderate-income capacity (72.8 percent) is identified in the southwestern side of the city in the approved Somerset and Serenade projects and scattered infill sites will provide above moderate-income housing mobility opportunities in the high-resource area of the city. Additionally, 28.0 percent of the lower-income unit capacity in the Cherry Crossings pipeline project and Lincoln neighborhood site facilitates housing mobility opportunities in the higher-resource area and promotes a reduction of concentration of poverty and lower-income households in the Areas of High Segregation and Poverty neighborhoods.

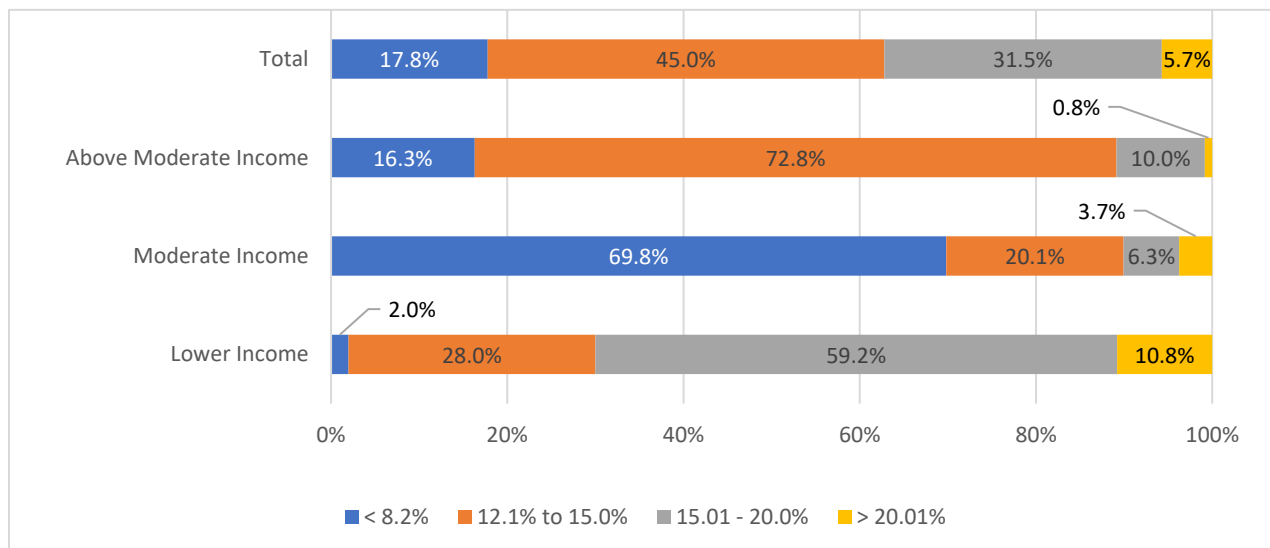
Potential Effect on Displacement Risk

Overcrowding

As discussed previously, the rate of overcrowding is highest in the southeast Area of High Segregation and Poverty neighborhoods (**Figure 1N-20, Overcrowding in Sanger**), with 24.8 percent of households experiencing this problem. As presented in **Figure 1N-34, Percentage Unit Capacity by Overcrowding**, the largest proportion of the unit capacity, 45.0 percent, is identified in areas of the city with lower overcrowding rates (between 12.1 and 15.0 percent) in the southwest tract; including 28.0 percent of lower-income unit capacity in the Cherry Crossings pipeline project and site 52, scattered vacant infill sites with

20.1 percent of moderate-income unit capacity, and 72.8 percent of above moderate-income unit capacity in the approved Serenade and Somerset pipeline projects, as well as the approved Star multifamily project and scattered vacant sites in the vicinity of Washington Academic Middle School. In contrast, 5.7 percent of total unit capacity is distributed in areas with the highest rates of overcrowding in the southeast Area of High Segregation and Poverty to help to alleviate this issue by increasing the affordable housing supply, including 10.8 percent of lower-income units in the Newmark Villages pipeline project and 3.7 percent of moderate-income units on vacant infill sites. The majority of the lower-income capacity (59.2 percent) is distributed in the northeast tract, in which 17.0 percent of households are overcrowded, which will ease pressure on the housing stock, thus potentially reducing displacement risk and overcrowding for these households as more units become available, in addition to providing housing mobility opportunities in a moderate-resource neighborhood. The inclusion of 10.0 percent of above moderate-income sites in this quadrant of the city, 37.5 percent of which are co-sited with lower-income unit capacity, will foster more income-integrated housing development, with the remainder of the above moderate-income unit potential increasing housing mobility options for higher-income households, while encouraging more income integration in the generally low- to moderate-income Wilson neighborhoods.

FIGURE 1N-34 PERCENTAGE UNIT CAPACITY BY RATE OF OVERCROWDING



Source: CHHS 2020; City of Sanger, 2023

Overpayment

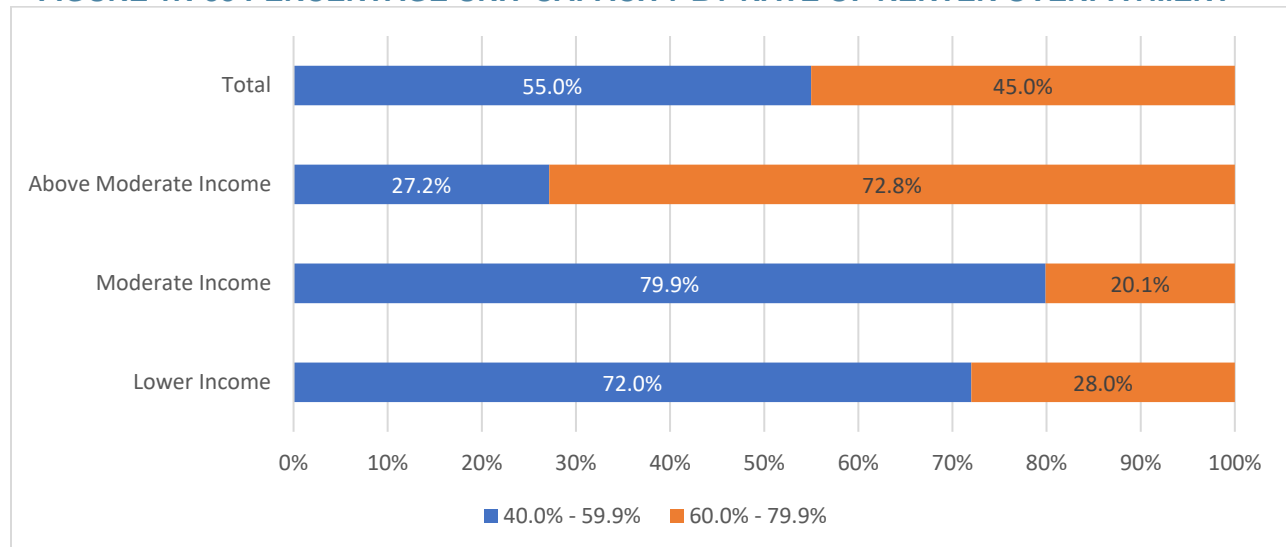
Owners and renters throughout Sanger are overpaying for housing, likely due to increases in housing costs that have outpaced wage increases, with 38.6 percent of the households experiencing some level of overpayment, as shown by **Figure 1N-21, Percentage of Renters Overpaying**, and **Figure 1N-22, Percentage of Homeowners Overpaying**. Lower- and moderate-income households are most at risk of displacement due to overpayment, particularly renter households. Moderate-income renters often are most impacted by rising rental costs as their incomes exceed thresholds for rental assistance, yet market-rate rental prices exceed their ability to pay without experiencing overcrowding and/or overpayment, therefore

increasing the risk of displacement. Additionally, previous analysis identified that special-needs populations, including female-headed households, large families, persons with disabilities and seniors, often fall into the lower-income category and may be particularly at risk of displacement when housing opportunities at affordable costs, sizes, or access to resources are not available.

Renter overpayment is highest in the southwest quadrant, whereas homeowner overpayment is relatively low compared to other areas of the city. Renter overpayment in the JFK neighborhood in the southeastern quadrant of the city is also high, corresponding to the highest representation of renters, low median income, a severe overcrowding rate, and high poverty rates. In the northwestern quadrant of the city, renter and homeowner overpayment rates are comparatively low, whereas in the northeast quadrant fairly comparable to the adjacent western tract, although homeowners experience overpayment at a higher rate.

As shown in **Figure 1N-35, Percentage Unit Capacity by Rate of Renter Overpayment**, the distribution of RHNA unit capacity identifies a total of 45.0 percent of unit capacity in areas with the highest rates of renter overpayment, including 28.0 percent of lower-income units, 20.1 percent of moderate-income units, and 72.0 percent of above moderate-income unit capacity. The siting of the above moderate-income units in these neighborhoods will facilitate income-integration although likely will not be developed as rentals. An increase in the supply of lower- and moderate-income units (72.0 percent of lower-income and 79.9 percent of moderate-income unit capacity) in the northern tracts, particularly those in close proximity to commercial and services in the downtown, will help to alleviate conditions that contribute to overpayment by reducing the gap between supply and demand for this type of housing.

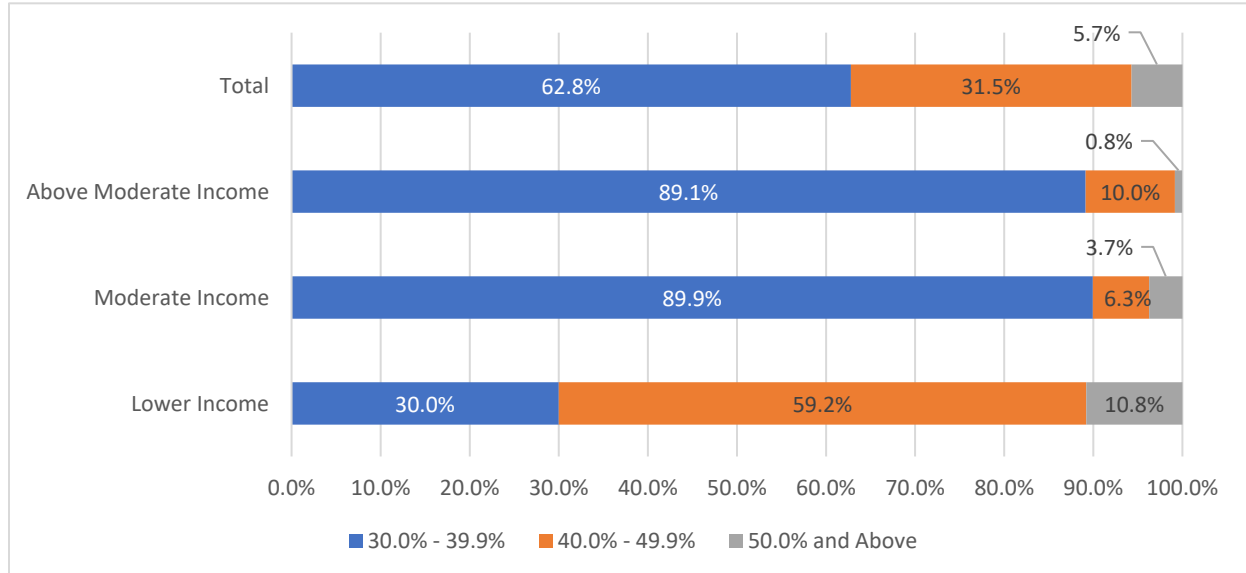
FIGURE 1N-35 PERCENTAGE UNIT CAPACITY BY RATE OF RENTER OVERPAYMENT



Sources: 2015-2019 ACS; City of Sanger, 2023.

Although all census tracts in Sanger have homeowner overpayment rates above 30.0 percent, the highest rates of homeowner overpayment are found in the southeast Area of High Segregation and Poverty (see **Figure 1N-36, Percentage Unit Capacity by Rate of Homeowner Overpayment**). The City has identified 5.7 percent of the unit capacity within this tract, including 10.8 percent of lower-income unit and 3.7 percent of moderate-income unit potential, although less than 1.0 percent of above moderate-income unit capacity is identified as infill sites. The greatest proportion of higher-income unit potential for both moderate- and above moderate-income units is identified in the southwest tract. While typically these units are unaffordable to cost-burdened households, they will provide housing mobility opportunities for higher-income households that may be overpaying due to limited availability of housing stock, while lower- and moderate-income housing units can help alleviate overpayment. Zoning for high-density multifamily (RM-1.5 and R-1), which is applicable to the 59.2 percent of lower-income unit capacity in the northeastern tract, as well as any sites for lower-income units, allows for development of unit types for rental or homeownership, which could potentially reduce the rate of cost-burdened lower-income homeowners and provide additional affordable opportunities for renters seeking to become homeowners. Sites for new units have been identified across a range of overpayment rates for both owners and renters with the intent of increasing the supply of affordable housing for all income categories, thus reducing risk of displacement due to overpayment for all Sanger residents.

FIGURE 1N-36 PERCENTAGE UNIT CAPACITY BY RATE OF HOMEOWNER OVERPAYMENT



Sources: 2015-2019 ACS; City of Sanger, 2023.

Special-needs groups that may be disproportionately affected by high housing costs include large families, single-parent households, and seniors. As discussed in the overcrowding analysis, large family households often face housing challenges due to a lack of adequately sized affordable housing available. The higher costs of homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden and increase the risk of housing insecurity. As well, a higher proportion of female single parents, often below the poverty threshold, reside within the two Area of High Segregation and Poverty tracts. However, the identification of 80.0 percent of lower-income unit capacity within the tracts designated moderate and high resource provides additional housing supply to alleviate overpayment suggests that single female householders with children may be able to obtain housing in the vicinity of higher resource opportunities.

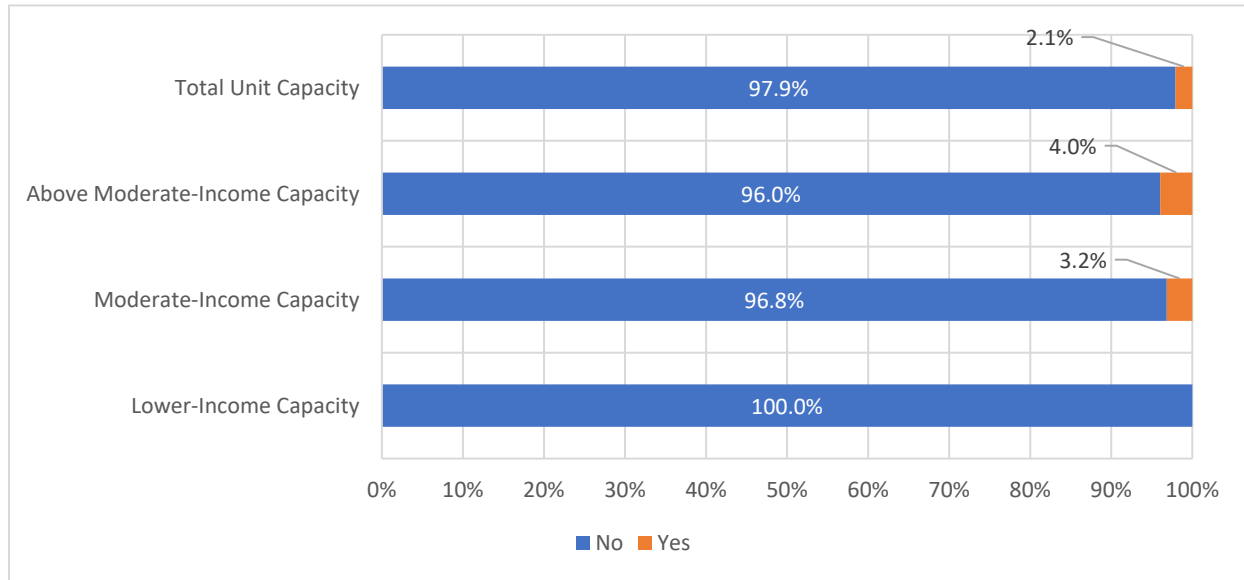
Seniors often face increased displacement risk due to overpayment as this population more frequently relies on fixed incomes, such as retirement savings or social security, with approximately 36.0 percent of seniors falling in the extremely low-income category. Additionally, almost three-quarters of all seniors are homeowners, a portion of which are likely to be lower income, indicating a need for affordable ownership units that accommodate the needs of seniors, as well as other persons with disabilities or special needs. Therefore, the addition of these units will help to alleviate existing overpayment by offering lower- and moderate-income units to current and future residents where there is need and increasing the housing stock overall to alleviate the demand on an existing shortage of housing at affordable price points, as well as responding to meeting demand of special-needs populations. Further, the site capacity and distribution of units by income category will facilitate mobility opportunities for all households.

Disaster-Driven Displacement Risk

FEMA determines areas subject to flood hazards. Stormwater detention/retention facilities operated by the Fresno-Clovis Metropolitan Flood Control District have minimized flooding problems in the Fresno/Clovis metropolitan area. However, there are a few areas of Sanger where land depressions may be subject to the 100-Year Flood Zone designation, including land on the east side of the San Joaquin Valley Railroad along K Street; land between Bethel Avenue and Rawson Avenue running diagonally northward between Almond Avenue and 9th Street; and an area south of Almond Avenue. Residential development can occur within this zone; however, FEMA requires developers with property within to obtain a flood zone elevation certificate when they apply for their permit which requires elevating the developed area above the known flood level.

A total of 2.1 percent of the total unit capacity is allocated within areas identified by FEMA as subject to flooding during a 100-year flood event (see **Figure 1N-37, Percentage Unit Capacity by Flood Hazard**). Approximately 4.0 percent of above moderate-income unit capacity and 3.2 percent of moderate-income unit capacity have been identified on sites wholly or partially within this zone, no lower-income units have been identified in a hazard area. Appropriate certification and construction mitigation measures will be taken as part of the permitting process for these sites. Additionally, there are no identified sites designated by CalFire within a High or Moderate Fire Hazard Zone

FIGURE 1N-37 PERCENTAGE UNIT CAPACITY BY FLOOD HAZARD



Sources: Federal Emergency Management Agency (FEMA); City of Sanger, 2023.

Contributing Factors

Through discussions with stakeholders, fair housing advocates, and this assessment of fair housing issues, the City identified factors that contribute to fair housing issues, as shown in **Table 1N-16, Factors Contributing to Fair Housing Issues**. While there are several strategies identified to address the fair housing issues, the most pressing issues are the presence of High Segregation and Poverty conditions and characteristics and a citywide disproportionate housing need for lower- and moderate-income households. The combination of these factors present challenges to housing and economic mobility in the short and near term for many households, particularly lower-income households. Prioritized contributing factors are **bolded** in **Table 1N-16** and associated actions to meaningfully affirmatively further fair housing related to these factors are ***bold and italicized***. Additional programs to affirmatively further fair housing are included in **Section 1N-1, Action Plan**.

Table 1N-16 Factors Contributing to Fair Housing Issues

AFH Identified Fair Housing Issue	Contributing Factor	Meaningful Actions
Disparities in access to economic and educational opportunities	<p>Low jobs-housing ratio, indicating insufficient employment availability</p> <p>Limited transit connectivity</p> <p>Uneven distribution of jobs proximity index scores</p> <p>Low-scoring school performance</p> <p>Uneven spatial distribution of high-performing schools in relation to lower-income communities</p>	<ul style="list-style-type: none"> • Meet with school district to analyze whether there are links between housing stability and school performance and assist in securing grant funding for teacher recruitment and retention bonuses, classroom materials, and other incentives for teachers (Program 29). • Work with FCRTA and other jurisdictions to develop a fact sheet, or similar informational materials, of FCTA programs (Program 29).
Displacement risk and/or limited housing mobility opportunities for lower- and moderate-income households	<p>Low housing vacancy rate for both owners and renters</p> <p>Rising rental prices</p> <p>Shortage of units in a range of sizes and price points</p>	<ul style="list-style-type: none"> • Provide financial support to organizations that provide counseling, information, education, support, housing services/referrals, and/or legal advice to extremely low-income households (Program 10). • <i>Encourage a variety of housing types to address the housing needs of a variety of household types, sizes, and incomes (Program 14).</i> • <i>Meet with developers and property owners to discuss development opportunities and incentives for lot consolidation to accommodate affordable housing units (Program 18).</i> • Promote available housing rehabilitation resources through the City's bilingual newsletter and in areas of high segregation and poverty, areas with concentrated renter households and areas with older housing stock (Program 23).
Area of High Segregation and Poverty	<p>Concentration of affordable housing complexes</p> <p>High costs of housing resulting in increased overpayment for renters</p> <p>Shortage of affordable housing stock for lower-income homebuyers</p>	<ul style="list-style-type: none"> • Encourage the construction of ADUs, particularly in predominantly single-family neighborhoods with higher median incomes (Program 12). • Promote rehabilitation assistance in neighborhoods with concentrations of lower-income households (e.g., in the John F. Kennedy Park and Lincoln Park neighborhoods), as well as areas of high segregation and poverty and areas with older housing units, which are in the city's original downtown core square mile area and scattered throughout the city (Program 22).

AFH Identified Fair Housing Issue	Contributing Factor	Meaningful Actions
		<ul style="list-style-type: none"> • <i>Promote the availability of the County’s Homebuyer Assistance Program (HAP), particularly in areas with concentrations of renters targeting lower-income renters who may be overpaying (Program 25).</i> • <i>Work with developers of multifamily and affordable housing projects to identify site opportunities in higher-resource areas and areas with higher median incomes to develop mixed-income housing in high-resource areas (i.e., Washington Middle neighborhood and Faller Park neighborhood) (Program 7).</i> • <i>Improve access to higher-opportunity areas for lower-income households by encouraging voucher acceptance in higher-resource neighborhoods (i.e., Washington Middle neighborhood and Faller Park neighborhood). (Program 27)</i>
Disproportionate housing need for persons with disabilities	Shortage of supportive units Concentration of persons with disabilities in the southeastern area	<ul style="list-style-type: none"> • Encourage developers to include accessibility in their project designs and prioritize these types of projects and ensure that the City’s reasonable accommodation policies, practices, and procedures do not pose barriers to applicants (Program 17). • <i>Pursue partnerships with the Central Valley Regional Center to identify funding opportunities and promote housing for persons with disabilities (Program 7).</i> <i>Expand regulatory incentives for the development of units affordable to extremely low-income households and housing for special-needs groups, including persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing. (Program 10).</i> • Adopt a broadened definition of “family” that provides zoning code occupancy standards specific to unrelated adults and complies with fair housing law. (Program 16). • Advertise Fresno County Housing Assistance Rehabilitation Program (HARP) and Fresno County Rental Rehabilitation Program (RRP) specifically to persons with disabilities who may need home accessibility modifications by partnering with the Central Valley Regional Center. (Programs 22 and 23).

APPENDIX 1N: CITY OF SANGER

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SECTION 1N-4: CONSTRAINTS

Land Use Controls

General Plan

Analysis

The 2035 Sanger General Plan was adopted in February 2020. As listed and described in **Table 1N-17**, the Plan contains five residential designations that range in density from 0.8 to 43.6 dwelling units per acre (du/ac).

The General Plan includes nonresidential designations that allow residential uses, including the Retail Mixed-Use and the Agriculture/Urban Reserve designations. However, there is not currently any land in the city that is designated Agriculture/Urban Reserve under the General Plan. In the High Density Residential designation, the City allows for increased density, beyond the 43.6 du/ac maximum, for senior housing, with the issuance of a conditional use permit (CUP).

Table 1N-17 General Plan Residential Designations

Designation	Maximum Density (du/ac)	Typical Uses	Compatible Zoning
Residential Designations			
Low Density	0.8 to 4.4 du/ac	This designation should be limited to lands where it is advantageous to keep residential densities very low to protect resources or to reduce exposure of higher population concentrations to potential impacts, such as flooding. It may also be applied to rural residential areas within the Sphere of Influence or where old County subdivisions exist.	R-A R-1-10
Medium Low Density Residential	4.5 to 5.8 du/ac	This designation shall be reserved for single-family residential developments and other complimentary uses that are typically associated with single-family neighborhoods, such as churches, day-care centers, community centers, parks, and schools. Neighborhoods will be characterized by attractive, shady, tree-lined streets, and homes with generous front porches, garages set back behind the front of the house, and traditional architectural stylings.	R-1-10 R-1-7.5
Medium Density Residential	7.3 to 17.4 du/ac	This designation is intended to provide for attractive multiple-family residential neighborhoods as well as mobile home parks. To the extent practical, multifamily residential development should be designed to have the appearance of single-family homes, with useable front porches, parking to the rear, and ample landscaping, along shady, tree-lined streets.	R-1-6 RM-2.5 T-P
Medium High Density Residential	17.4 to 29 du/ac	This designation is intended to provide for attractive multiple-family residential neighborhoods as well as mobile-home parks. To the extent practical, multifamily residential development should be designed to have the appearance of single-family homes, with useable front porches, parking to the rear, and ample landscaping, along shady, tree-lined streets.	RM-2.5 RM-1.5 T-P

Designation	Maximum Density (du/ac)	Typical Uses	Compatible Zoning
High Density Residential	29 to 43.6 du/ac	This designation is intended to provide for attractive higher-density multiple-family residential areas. Dwellings should be designed to blend well with surrounding areas, with attractive architecture, landscaping, and related improvements along shady, tree-lined collector or arterial roadways.	RM-1.5 RM-1
<i>Mixed-Use Designations</i>			
Retail Mixed Use (RMU)	17.4 to 29 du/ac	The retail mixed-use designation is intended to build in flexibility for future projects to meet the changing needs of the city and the marketplace. It includes land along the north Academy Avenue corridor and other selected locations in the northern part of the community.	RMU
Agriculture Urban Reserve (AE-20)	-	This designation is applied to lands that are being, or have the capacity to be, actively farmed, but are within the planning area and may be eventually developed. This designation can be combined with other designations, as appropriate. For instance, it may be warranted to designate future residential lands as “Low Density Residential – Reserve” – in instances where it would not be appropriate to develop the land for a significant period of time.	UR

Source: City of Sanger, 2022.

Conclusion

The General Plan land use designations allow for a mixture of housing types and lot sizes, and the densities are sufficiently high to allow the development of affordable housing for all income levels.

Recommended Action

None required.

Zoning Ordinance

Analysis

The City’s Zoning Ordinance provides for 10 residential districts and encourages mixed-use development in the Retail Mixed-Use (RMU) district to promote a walkable environment in a locale where residential uses are in close proximity to places of employment and commerce (**Table 1N-18**).

Table 1N-18 Zoning Districts Residential Uses

Zoning District	Allowable Density (du/ac)	Purpose
Single Family Residential Agriculture (R-A)	1.2 du/ac	The R-A district is intended to provide for the development of one-family residential estate homes in a semi-rural environment on lots not less than 36,000 square feet in area with not more than one dwelling unit permitted on any lot. All regulations for this district are deemed to be necessary for the protection of the quality of the residential environment and for securing the health, safety, and general welfare of residents.
Single-Family Residential (R-1-10)	4.3 du/ac	The R-1-10 district is intended to provide for the development of one-family residential homes at urban standards on lots not less than 10,000 square feet in area, not more than one dwelling unit permitted on any lot. All regulations for this district are deemed to be necessary for the protection of the quality of the residential environment and for the securing of the health, safety, and general welfare of residents.
Single-Family Residential (R-1-7.5)	5.8 du/ac	The R-1-7.5 district is intended to provide for the development of single-family residential homes at urban standards on lots not less than 7,500 square feet in area, with not more than one dwelling unit permitted on any lot. All regulations for this district are deemed to be necessary for the protection of the quality of the residential environment and for securing the health, safety, and general welfare of residents.
Single-Family Residential (R-1-6)	7.2 du/ac	The R-1-6 single-family residential district is intended to provide for the development of one-family residential homes at urban standards on lots not less than 6,000 square feet in area, not more than one dwelling unit permitted on any lot. All regulations for this district are deemed to be necessary for the protection of the quality of the residential environment and for securing the health, safety, and general welfare of residents.
Multi-Family Residential (RM-2.5)	17.4 du/ac	The RM-2.5 district is intended to provide for the development of low-density multiple-family residential structures where such buildings are reasonably spaced on the lot to provide for light, privacy, air, safety, and insulation against transmission of sound, on lots not less than 6,000 square feet in area.
Multi-Family Residential (RM-2.5) (s)		The RM-2.5(s) district is intended to provide for the development of low-density multiple-family residential structures, limited to one story in height, where such buildings are reasonably spaced on the lot to provide for light, privacy, air, safety, and insulation against transmission of sound, on lots not less than 6,000 square feet in area.
High Density Multi Family Residential (RM-1.5)	29.0 du/ac	The RM-1.5 district is intended to provide for the development of medium-density multiple-family residential structures for purposes of rental or sale to permanent occupants on lots not less than 7,500 square feet in area.
High Density Multi Family Residential (RM-1.5) (s)		The RM-1.5(s) district is intended to provide for the development of medium-density multiple-family residential structures, limited to one story in height, for the purpose of rental or sale to permanent occupants of lots not less than 7,500 square feet in area.
High Density Multi Family Residential (RM-1)	32.7 du/ac	The RM-1 is intended to provide for high-density multiple-family residential developments on lots not less than 10,000 square feet in area.

Zoning District	Allowable Density (du/ac)	Purpose
Mobile Home Park (T-P)	18.2 du/ac	The T-P district is intended to provide for the accommodation of residential mobile homes in unified parks of not less than 1.5 acres in area. The district is herein deemed to be a multiple-family residential district, and a mobile home is herein deemed to be a dwelling.
<i>Nonresidential Districts</i>		
Retail Mixed Use	20.9 du/ac	The retail mixed-use designation is intended to build in flexibility for future projects to meet the changing needs of the city and the marketplace. It includes land along the north Academy Avenue corridor and other selected locations in the northern part of the community. The residential component of any mixed-use development shall be limited to no more than 45 percent of the site.
Urban Reserve (UR)	--	The UR designation is intended to be used to reserve in a substantially undeveloped state areas planned for future urban use where, because the areas lack public facilities or services, or because the need for urban expansion within them is not immediate, it is necessary to prevent the development of uses or structures that might be premature or conflict with the future planned urban use of the areas.
Central Commercial District (C-3)	--	The C-3 designation is generally applied to properties in downtown Sanger allowing permitted uses in the C-2 zone plus health clubs, labs, lodges/meeting halls, and print shops, among others.
Administrative and Professional Office District (C-P)	--	The C-P designation is intended to provide for the development of an integrated professional district wherein all of the related types of uses and facilities may be located.

Source: City of Sanger, 2022.

Conclusion

The zoning designations allow for a mixture of housing types and lot sizes, and the densities are sufficiently high to allow the development of some affordable housing for all income levels.

Recommended Action

None required.

North Academy Corridor Master Plan

Analysis

In February 2020, the City adopted the North Academy Corridor Master Plan to guide urban development within a planning area centered on Academy Avenue, north of the existing Sanger city boundary, extending to the intersection of Academy Avenue and State Route 180 (Kings Canyon Road). The annexation and development of this corridor was selected by the Sanger City Council as one of its top land use goals for action. It is important to note that the annexation of these lands is guided by a Memorandum of Understanding between the City of Sanger and Fresno County.

The Master Plan provides for residential development as a component of larger projects in the Retail Mixed-Use (RMU) district, as outlined in **Table 1N-18**. The residential component of any mixed-use development can be accommodated vertically or horizontally but is limited to no more than 45 percent of a given parcel (or contiguous parcels).

Conclusion

The City’s Zoning Ordinance provides for a range of housing options.

Recommended Action

While the Zoning Ordinance currently allows for a variety of housing types, the City has identified the following amendments to further facilitate residential development (**Program 16**):

- Create an R-1-5 district allowing 5,000-square-foot residential lots.
- Revise RM zones to not allow single-family residential subdivisions, and instead prioritize middle-density development.
- Amend the Neighborhood, Community, Central, and General Commercial districts, and the Administrative and Professional Office districts, to allow second floor and above residential units by-right.

Residential Development Standards

Analysis

Table 1N-19 shows residential development standards in Sanger in zones that permit residential uses. Consistent with Government Code Section 6590.1(a)(1) related to transparency requirements, the zoning and development standards for all parcels in the City are available on the City’s website: (See “Municipal Code” on the panel on the left) <https://www.ci.sanger.ca.us/164/Code-Enforcement>

Table 1N-19 Residential Development Standards, Sanger

District	Density	Minimum Lot Area (square feet [sq. ft.])	Building Coverage	Building Height (feet)	Minimum Lot Dimensions (feet)				Minimum Yard Requirements (feet)		
					Width	Depth (Local Street)	Depth (Major Street)	Depth (Railroad right-of-way)	Front	Side	Rear
R-A	One unit/lot (1.2 to 4)	36,000 sq. ft.	30%	35 ft.	130	170		-	35	15	20
R-1-10	One unit/lot (4.3units/ac)	10,000 sq. ft.	40%	35 ft.	70	110	120	-	25	7	15
R-1-7.5	One unit/lot (5.8)	7,500 sq. ft.	40%	35 ft.	65	100	120	-	25	7	15
R-1-6	One unit/lot (7.2 units/ac)	6,000 sq. ft.	40%	25 ft.	60	100	120	-	20	5	10
RM-2.5/ RM-2.5 (s)	2,500 sq. ft. lot area/ unit (17.4 units/ac)	6,000 sq. ft.	45%	35 ft. ^{1,2}	60	Not to exceed a depth to width ratio of 2½		-	20	5	15
RM-1.5/ RM-1.5(s)	1,500 sq. ft. lot area/ unit (29.0 units/ac)	7,500 sq. ft.	50%	35 ft. ^{1,2}	60	100	120	-	15	5	15
RM-1	1,000 sq. ft. lot area/ unit (32.7 units/ac)	10,000 sq. ft.	60%		65	100	120	150	15	5 ⁷	15 ⁷
T-P ³	2,400 sq. ft./unit (18.2 units/ac)	1.5 acres	55%	35 ft.	No requirements		-	-	15	5	10
RMU	One unit/1,500 sq. ft. lot area (29.0 units/ac.)	No requirements	50%	35 ft.	Extend the full width or depth of the lot				20	5 ⁴	10 ⁵
C-P	2,500 sq. ft. lot area/ unit	10,000 sq. ft.	50%	35 ft. ²	65	110	120	130	15	See note ⁶	10
C-3	Development standards of RM-2.5 apply to multifamily residential uses in this district, provided that any residential use in the same structure as a commercial use shall not be located on the ground floor.										

¹The RM-1.5(s) and RM-2.5(s) districts limit building height to one story, not to exceed 20 feet.

² Buildings over 2 stories/35 feet require a Conditional Use Permit.

³ standards listed apply to mobile home park areas, (as opposed to individual mobile home lot within a park); however, height limit applies to all buildings and structures in a park.

⁴ 15 ft. when abutting the street for street side yards on corner lots; 10 ft. when abutting a residential district.

⁵ 15 ft. when rear of the RMU abuts a residential district.

⁶10 ft. when abutting a C district, 10% of lot width when abutting a R district (between 5 and 10 feet).

⁷ For buildings over 2½ stories or 35 feet in height, the required side and rear yards shall be increased at the rate of three inches for each foot of building height above said 35 feet.

Source: Sanger Zoning Ordinance, 2022.

Parking

Table 1N-20 shows the residential parking requirements in Sanger. Parking requirements for multifamily units are the same as single-family units. While the requirement of two spaces per unit may be appropriate for larger multifamily units, it may be excessive for studio and one-bedroom units. The Housing Element includes **Program 16** to review parking requirements for multifamily uses and adopt reduced standards for smaller multifamily units.

Table 1N-20 Residential Parking Requirements

Residential Use	Required Parking Spaces
Single-family units	2 per unit, 1 must be covered
Multifamily units	2 per unit, 1 must be covered
Mobile Home Parks (in T-P District)	1 per unit
Accessory Dwelling Unit	1 additional space
Emergency Shelter	1 parking space for each employee or volunteer on duty when the shelter is open to clients, plus 1 parking space for every family sheltered, and 1 space for every 3 nonfamily beds.
Convalescent Homes	1 parking space for each 2.5 beds or fraction thereof.

Source: Sanger Zoning Ordinance, 2022.

Open Space and Park Requirements

The City's Development Code requires at least 200 square feet of landscaped and useable recreational and leisure areas per unit, accessible to all dwelling units in a development. Balconies and patios may contribute to this requirement, as specified in Section 90-337. Other than that, the City's Development Code does not contain standards for minimum open space requirements per dwelling unit; however, the City does require park improvements for subdivisions or fees in lieu of improvements.

Typical Densities for Development

The City of Sanger is a small city in Fresno County, east of the City of Fresno and surrounded by agricultural land. Single-family residential occurs most often in the R-1-6 zone district, with lots ranging from 7,500 to 10,000 square feet historically. Recent development standards allow 5,000-square-foot minimum lot sizes, which has increasingly become the more common lot size in new projects.

Recent multifamily residential projects include:

- Blossom Trail Commons, 55 units built in 2017 in the RM-2.5 zone at a density of 12.8 du/ac.
- Sanger Crossing 1 & 2, 81 units built in 2021 in the RM-2.5 zone at a density of 16.3 du/ac.
- Newmark Villages 1, 72 units approved in 2021 in the RM-1 zone at a density of 20.1 du/ac.

In the previous planning period, no sites identified to accommodate the lower-income Regional Housing Needs Assessment allocation (RHNA) in the inventory were developed below the minimum allowable density of the zone in which the site is located. During the previous planning period, the City received a couple requests to develop multifamily projects at densities lower than intended in the RM-1 zone. In these instances, the City asked the developer to revise their application, which they did. The City offers minor deviations where necessary to ensure density can be achieved. The City received no requests to build single-family homes in zones intended for multifamily development.

Cumulative Impact of Development Standards

As shown in **Table 1N-21 Cumulative Impacts Analysis, by Zone**, the City evaluated the cumulative impact of its land use controls that limit sites' building envelope (setbacks, private open space, and parking) and lot coverage restrictions. Based on this evaluation, none of the land use controls in conventional residential zoning districts would prevent an applicant from reaching the maximum density allowed for single-family developments in single-family zones and multifamily developments in all zones where multifamily is allowed, or otherwise constrain housing development. Current development standards for the residential and non-residential zones that permit multifamily housing were applied to hypothetical sites representing common parcel sizes in each respective zone. The results confirmed the above conclusion, and each scenario achieved the respective zone's maximum allowable density.

In the R-2.5 zone (2,500 square feet lot area per unit; maximum 17.4 units per acre), the City analyzed development feasibility on the minimum parcel size, 6,000 square feet, and on a parcel that is approximately one-half acre. Sites larger than one-half acre were not evaluated, as development standards do not become more restrictive as parcel size increases. Although the code requires 2,500 square feet of lot area per unit, per code section 90-334, an additional unit may be built if the residual lot area is equal to, or greater than, 1,250 square feet. While this may restrict maximum achievable density on smaller lots in the zone in principle, in practice, the vast majority of lots zoned RM-2.5 are larger than 6,250 square feet (minimum lot area required to develop three units; resulting density of 20.9 units per acre). With this in mind, the maximum density can be achieved with a mix of one-, two-, and three-bedroom units served by the required covered/garaged and uncovered (screened) parking.

The R-1.5 zone (1,500 square feet lot area per unit; maximum 29 units per acre) is the City's medium density multifamily designation and is intended to allow for a broader range of product types. Once again, development feasibility on the minimum parcel size, 7,500 square feet, was evaluated. The city also evaluated development on a parcel that is approximately one-half acre. In both scenarios, the maximum density can be achieved with a mix of studio, one-, and two-bedroom units served by the required covered/garaged and uncovered (screened) parking.

The City's code also contains R-2.5(s) and R-1.5(s) zones, which are equivalent to the R-2.5 and R-1.5 zones, respectively, in all ways except for maximum height. The (s) suffix restricts development to a single story, which would prohibit achieving maximum density in the R-1.5(s) zone only. Only one parcel in the city is currently zoned with an (s) designation as of December 2023 and the City does not intend to apply

either designation in the future. Additionally, existing development on this parcel is two stories, which emphasizes the City's commitment to discontinuing the use of this zone for future development. Therefore, the results of the analysis are not summarized in the tables below.

The R-1 zone (1,000 square feet lot area per unit; maximum 32.7 units per acre) is the highest density residential designation. The City evaluated development feasibility on the minimum parcel size, 7,500 square feet, as well as a parcel that is approximately one-half acre. In both scenarios, the maximum density can be achieved with a mix of studio, one-, and two-bedroom units served by the required covered/garaged and uncovered (screened) parking.

The RMU zone (1,500 square feet lot area per unit; maximum 29 units per acre) permits a combination of commercial, office and residential uses on the same site or within the same building. The residential component of a mixed-use project may not exceed 45 percent of the floor area. The City evaluated development on a parcel that is approximately one-quarter acre and a parcel that is approximately one-half acre. In both scenarios, the maximum density can be achieved with a mix of studio and one-bedroom units served by the required covered/garaged and uncovered (screened) parking.

The City also permits multifamily residential development in two commercial zones, C-P and C-3. Projects that are 100 percent residential are allowed in both zones; however, multifamily residential in the C-3 zone is only allowed with a Conditional Use Permit. Multifamily residential is allowed by-right in the C-P zone. Development in the C-3 zone is guided by the same standards as the R-2.5 zone and was therefore not analyzed separately. The City analyzed development feasibility in the C-P zone (2,500 square feet lot area per unit) on a minimum lot size parcel, 10,000 square feet, and a parcel that is approximately one-half acre. In both scenarios, the maximum density can be achieved with a mix of two-, three-, and four-bedroom units served by the required covered/garaged and uncovered (screened) parking.

As shown in **Table 1N-21 Cumulative Impacts Analysis, by Zone**, the first step in the analysis was to determine the allowable building footprint given the site size and the maximum lot coverage. The next step was to determine the maximum allowed developable envelope given the lot coverage, setback, open space (if applicable), and parking requirements. Covered parking was subtracted from the maximum building footprint to determine the occupiable area on the first floor. In all scenarios, uncovered parking could be accommodated in the residual building envelope area and did not encroach into required setbacks. Occupiable area on the second floor, and additional floors, was set equal to the first floor building footprint, including parking area. Average unit size was calculated by dividing the total occupiable building area by the permitted number of units (site acreage * density). Density bonus units are not factored into the calculations.

Table 1N-21 Cumulative Impacts Analysis, by Zone

Cumulative Impacts Analysis, by Zone	Scenario 1	Scenario 2
RM-2.5		
Square footage:	7,500	22,000
Length (feet):	100	200
Width (feet):	75	110
Lot coverage:	0.45	0.45
Number of stories (35 ft max):	2	2
Maximum building footprint, given lot coverage requirements:	3,375	9,900
Maximum building envelope given setbacks and parking (see below for spaces per unit)	2,715	7,920
<i>Covered parking spaces per unit:</i>	<i>1</i>	<i>1</i>
<i>Area required for covered parking (sqft):</i>	<i>660</i>	<i>1,980</i>
<i>Parking type:</i>	<i>Garage</i>	<i>Garage</i>
Maximum occupiable building square footage:	6,090	17,820
Number of units:	3	9
Average unit square footage:	2,030	1,980
Achievable Density (units per acre):	17.4	17.8
Permitted Density (units per acre):	17.4	17.4
RM-1.5		
Square footage:	7,500	22,000
Length (feet):	100	200
Width (feet):	75	110
Lot coverage:	0.50	0.50
Number of stories (35 ft max):	2	2
Maximum building footprint, given lot coverage requirements:	3,750	11,000
Maximum building envelope given setbacks, parking (see below for spaces per unit) and private open spaces (10-20% of unit size):	2,650	7,700
<i>Covered parking spaces per unit:</i>	<i>1</i>	<i>1</i>
<i>Area required for covered parking (sqft):</i>	<i>1,100</i>	<i>3,300</i>
<i>Parking type:</i>	<i>Garage / Carport</i>	<i>Garage / Carport</i>
Maximum occupiable building square footage:	6,400	18,700
Number of units:	5	15
Average unit square footage:	1,280	1,247
Achievable Density (units per acre):	29.0	29.7
Permitted Density (units per acre):	29.0	29.0
RM-1		
Square footage:	10,200	43,750
Length (feet):	120	250
Width (feet):	85	175
Lot coverage:	0.60	0.60
Number of stories (70 ft max):	2	2
Maximum building footprint, given lot coverage requirements:	6,120	26,250
Maximum building envelope given setbacks, parking (see below for spaces per unit) and private open spaces (10% of unit size):	4,360	18,990
<i>Covered parking spaces per unit:</i>	<i>1</i>	<i>1</i>

SECTION 1N-4: CONSTRAINTS

Cumulative Impacts Analysis, by Zone	Scenario 1	Scenario 2
<i>Area required for covered parking (sqft):</i>	1,760	7,260
<i>Parking type:</i>	Garage / Carport	Garage / Carport
Maximum occupiable building square footage:	10,480	45,240
Number of units:	8	33
Average unit square footage:	1,310	1,371
Achievable Density (units per acre):	34.2	32.9
Permitted Density (units per acre):	32.7	32.7
RMU		
Square footage:	22,000	10,800
Length (feet):	200	120
Width (feet):	110	90
Lot coverage:	0.50	0.50
Number of stories (70 ft max):	2	2
Maximum building footprint, given lot coverage requirements:	11,000	5,400
Maximum building envelope given setbacks, parking (see below for spaces per unit) and private open spaces (10% of unit size):	7,700	3,860
<i>Covered parking spaces per unit:</i>	1	1
<i>Area required for covered parking (sqft):</i>	3,300	1,540
<i>Parking type:</i>	Garage / Carport	Garage / Carport
Maximum occupiable building square footage:	18,700	9,260
Maximum residential square footage (45% of gross)	8,415	4,167
Number of units:	15	7
Average unit square footage:	561	595
Achievable Density (units per acre):	29.7	28.2
Permitted Density (units per acre):	29.0	29.0
C-P		
Square footage:	10,200	22,000
Length (feet):	120	200
Width (feet):	85	110
Lot coverage:	0.50	0.50
Number of stories (70 ft max):	2	2
Maximum building footprint, given lot coverage requirements:	5,100	11,000
Maximum building envelope given setbacks, parking (see below for spaces per unit) and private open spaces (10% of unit size):	4,220	9,020
<i>Covered parking spaces per unit:</i>	1	1
<i>Area required for covered parking (sqft):</i>	880	1,980
<i>Parking type:</i>	Garage / Carport	Garage / Carport
Maximum occupiable building square footage:	9,320	20,020
Number of units:	4	9
Average unit square footage:	2,330	2,224
Achievable Density (units per acre):	17.1	17.8
Permitted Density (units per acre):	17.4	17.4

Source: City of Sanger, 2023

Conclusion

While the height within the RM-2.5(s) and RM-1.5(s) zones is limited to one story, the City will amend its Zoning Ordinance to increase height limits where needed to ensure that maximum allowed densities can be achieved. In the RM-1.5 and RM-2.5 zones, height is limited to 35 feet or 2.5 stories. The RM-1 district allows three-story structures with a CUP.

Recommended Action

The City has included **Program 16** to amend the Zoning Ordinance to reduce barriers to residential construction, including:

- Increasing allowable heights in the RM districts to permit three-story structures by-right.
- Revising parking standards for multifamily units to vary by unit type (i.e., parking demand for a studio unit differs from a three-bedroom unit).
- Revising maximum lot coverage areas to allow more lot coverage for residential units.
- Revising setbacks for residential garages, allowing habitable space closer to the street than the garage.

Local Ordinances

Analysis

There are no growth restrictions, moratoria on housing, short-term rental ordinances, or inclusionary requirements in Sanger that would limit the City's ability to meet its housing needs.

Conclusion

Local ordinances are not a constraint to development in Sanger.

Recommended Action

None required.

Density Bonus

Analysis

Under current State law (Government Code Section 65915), cities and counties must provide a density increase up to 80 percent over the otherwise maximum allowable residential density under the Municipal Code and the Land Use Element of the General Plan (or bonuses of equivalent financial value) when builders agree to construct housing developments with 100 percent of units affordable to low- or very low-income households. The City does not have a density bonus ordinance in the Municipal Code.

Conclusion

The City does not comply with State law.

Recommended Action

The Housing Element contains **Program 16** to adopt a density bonus ordinance in compliance with State law.

Zoning for a Variety of Housing Types

Analysis

Chapter 90 (Zoning) of the Sanger Municipal Code describes the City's regulations for residential development. The residential uses allowed in Sanger are shown in **Table 1N-22**.

Table 1N-22 Residential Uses Permitted by Zone

	UR	R-A	R-1-10	R-1-7.5	R-1-6	RM-2.5	RM-1.5	RM-1	T-P	RMU	C-P	C-3	ML
Single-Family Dwelling	CUP	P	P	P	P	P	P	P	-	-	-	-	-
Multifamily Housing	-	-	-	-	-	P	P	P	-	P	P	-	-
Apartment Hotels/ Single Room Occupancy Units ¹	-	-	-	-	-	-	-	-	-	-	-	P	-
Manufactured Housing	CUP	P	P	P	P	P	P	P	-	-	-	-	-
Mobile Home Park	-	-	-	-	-	-	-	-	CUP	-	-	-	-
Farmworker Housing	-	P	-	-	-	-	-	-	-	-	-	-	-
Emergency Shelters	-	-	-	-	-	-	-	-	-	-	-	-	P
Transitional Housing	-	P	P	P	-	P	P	P	-	-	-	-	-
Supportive Housing	-	P	P	P	-	P	P	P	-	-	-	-	-
Rest Home/ Residential Care Facility ³	-	-	-	-	-	-	CUP	-	-	-	P	-	-
Accessory Dwelling Unit ²	-	CUP	CUP	CUP	CUP	-	-	-	-	-	-	-	-

CUP = Conditional Use Permit required; P = Permitted

¹Not defined in the Municipal Code. Per Program 16, the City will define apartment hotels. The definition will make it clear that these are single-room occupancy units (SROs) or if they are defined as something else, the City will allow SROs in another zone.

²A draft update to the City's Accessory Dwelling Unit ordinance has been written and is anticipated to be adopted in 2024.

³Per **Program 16**, the City will allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Sections 1267.8, 1566.3, and 1568.0831, and allow residential care facilities, regardless of size, with an administrative approval process, in all zones that permit residential uses of the same type, in accordance with the City's definition of family.

Source: Sanger Zoning Ordinance, 2022.

The following is a description of the City's requirements for various housing types.

Multifamily

Multiple dwelling is permitted in the RM-2.5, RM-2.5(s), RM-1.5, RM-1.5(s), RM-1 districts, and RMU district.

Manufactured Housing

The Sanger Zoning Ordinance permits manufactured housing in all residential zone districts on lots where conventional single-family residential dwellings are allowed subject to the following provisions:

1. *Certification.* Manufactured housing that is proposed to be installed shall be certified under the National Manufactured Housing Construction and Safety Standards Act of 1974 as may be amended.
2. *Aesthetic features.* Manufactured housing shall comply with the City of Sanger Community Design Standards and Guidelines for Single Family Residential as expressed in Section 3-4, Aesthetic Requirements. Roof pitch shall be a minimum of 4:12.
3. *Architectural features.* Manufactured housing shall incorporate the use of composition asphalt shingle roofing materials with a minimum 25-year warranty. Eave overhang shall be a minimum of 16 inches. Siding materials shall be of a permanent material not to include aluminum or other metal.
4. *Structural features.* Manufactured housing shall be installed on a permanent foundation system in accordance with Health and Safety Code Section 18551 with the following provisions:
 - a. That the maximum distance between surface ground level to the floor of the manufactured housing unit be eight inches.
 - b. That a permanent continuous solid masonry continuous stem wall be constructed along the perimeter of the structure.
5. *Date of installation.* Manufactured housing shall be precluded from being installed if more than 10 years have elapsed between the date of manufacture of the manufactured housing and the date of application for the issuance of a permit to install the manufactured housing.

Farmworker/Employee Housing

The City's agricultural uses, especially fruit tree vineyards, may use seasonal labor. The American Community Survey (ACS), 2015-2020 (five-year estimates) reports that there were 1,600 agriculture jobs in Sanger in 2020. Since the ACS 2015-2020 data indicates a large number of agricultural jobs in Sanger, there is potential demand for seasonal farmworker housing because Sanger is surrounded by agricultural land. By the nature of the profession, it is difficult to determine the number of seasonal farm laborers that may be working in the agricultural areas surrounding the city.

Under California Health and Safety Code Section 17021.5 (Employee Housing Act), farmworker housing up to 12 units or 36 beds must be considered an agricultural use and permitted in any zone that permits agricultural uses. The City permits agricultural uses in the Urban Reserve (UR) and Single-Family Residential Agricultural (R-A) districts. Dwellings for hired agricultural employees on farms or ranches containing 10 acres or more and temporary farm labor camps are permitted in the R-A zone; however, the standards required by State law for farmworker housing in agricultural zones are not reflected in the Ordinance.

In addition, the Employee Housing Act requires employee housing for six or fewer employees to be treated as a single-family use and permitted in the same manner as other dwellings of the same type in the same zone.

Program 16 has been included to permit employee housing for six or fewer employees in all zones allowing single-family units and permit farm employee housing of up to 12 units or 36 beds in the R-A and UR zones.

Emergency Shelters

Emergency shelters are permitted by-right in the M-L zone. Government Code Section 65583(a)(4)(I) 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. To comply with State law, the City has included **Program 16** to amend the RM-2.5 zone to allow emergency shelters by-right, ensuring there is sufficient vacant land or redevelopment potential to accommodate shelter capacity to meet the homeless need. Per **Program 16**, the City will update its definition of “emergency shelter” to clarify that emergency shelters may include other non-permanent housing interventions, such as a navigation center, bridge housing, and respite or recuperative care.

According to the Fresno/Madera Continuum of Care, the homeless population in Sanger is estimated at 10 persons (February 2022). However, the Sanger Police Department estimates that there are 36 unsheltered individuals (April 2023). In 2023, the Point-in-Time count was based on zip code. 39 homeless individuals were counted in the zip code where Sanger is, however, it’s estimated that 9 were counted in the unincorporated portion of the zip code, indicating that 30 homeless individuals were counted in the City of Sanger. In compliance with Government Code Section 65583(a)(4)(I), there is ample land area to accommodate one or more facilities with 36 beds at 200 square feet per bed. A single facility with 36 beds could be accommodated in a building of approximately 7,200 square feet. In the M-1 or RM-2.5 zone, a facility this size could be constructed on a 0.25-acre lot while meeting development standards. As shown in **Table 1N-23**, there are four vacant parcels in the RM-2.5 zone and two vacant parcels in the M-1 zone that are larger than 0.25 acres. In accordance with Government Code Section 65583(a)(4)(J), the sites in **Table 1N-23** are near amenities and services that serve people experiencing homelessness.

Table 1N-23 Vacant Potential Emergency Shelter Sites

Assessor's Parcel Number	Acres	Zone	Resources
31516043	0.31	RM-2.5	Close to the Academy Avenue commercial corridor, less than one-quarter mile from a supermarket and pharmacy, and less than half a mile from Jackson Elementary School.
31516044	0.49	RM-2.5	Close to the Academy Avenue commercial corridor, less than one-quarter mile from a supermarket and pharmacy, and less than half a mile from Jackson Elementary School.
31516045	0.24	RM-2.5	Close to the Academy Avenue commercial corridor, less than one-quarter mile from a supermarket and pharmacy, and less than half a mile from Jackson Elementary School.
31516046	0.25	RM-2.5	Close to the Academy Avenue commercial corridor, less than one-quarter mile from a supermarket and pharmacy, and less than half a mile from Jackson Elementary School.
32006102	0.41	M-L	Near Sanger Park and the Academy Avenue commercial corridor.
32215009	0.54	M-L	Near Academy Avenue commercial corridor, a grocery store, an Adventist Health medical care facility, and an employment agency.
Total	2.24	-	-

Source: City of Sanger, 2023

The City also adopted objective managerial standards to encourage and facilitate the development of or conversion to an emergency shelter. Development standards for emergency shelters in Sanger include:

1. Emergency shelters must be spaced so that they are 300 feet from each other as measured from the exterior of the buildings or structures.
2. Maximum number of beds permitted in a shelter shall be in accordance with applicable fire/building code capacity but shall not exceed 21 beds.
3. At least one parking space for each employee or volunteer on duty when the shelter is open to clients, plus one parking space for every family sheltered and one space for every three nonfamily beds.
4. No less than 10 square feet of interior waiting and client intake space per bed. In addition, there shall be no less than two offices or cubicles in the shelter, and at least one must be an enclosed office with walls, a ceiling, and a door for purposes of maintaining privacy.
5. Adequate external lighting shall be provided for security purposes. The lighting shall be stationary, directed away from adjacent properties and public rights-of-way, and of an intensity compatible with the neighborhood.

6. A trash and recycle enclosure that is consistent with the City's specification.
7. Design must comply with the City's design standards and guidelines.

Requirements one and three are potentially constraining and are addressed with **Program 16**. The City will remove the requirement that emergency shelters must be a certain distance from other emergency shelters. The City will review parking requirements for emergency shelters to ensure that parking standards are sufficient to accommodate all staff, provided standards do not require more parking for emergency shelters than other residential or commercial uses in the same zone.

Low-Barrier Navigation Centers

Government Code Section 65662 requires that the development of low-barrier navigation centers be developed as a use by right in zones where mixed-uses are allowed or in nonresidential zones that permit multifamily housing. For a navigation center to be considered "low barrier," its operation should incorporate best practices to reduce barriers to entry, which may include, but are not limited to, the following:

- Permitting the presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth
- Permitting pets
- Providing the ability to store possessions
- Providing privacy, such as private rooms or partitions around beds in a dormitory setting or in larger rooms with multiple beds

Program 16 has been included to comply with State law.

Transitional and Supportive Housing

Government Code Section 65583(c)(3) requires that transitional and supportive housing types be treated as residential uses and subject only to those restrictions that apply to other residential uses of the same type in the same zone. Both transitional and supportive housing types must be explicitly permitted in the municipal code. The City permits transitional and supportive housing in the R-A, R-1-10, R-1-7.5, RM-2.5, RM-1.5, and RM-1 zones.

Program 16 has been included to ensure the City permits supportive housing in all zones where multifamily housing is permitted, in the same manner as similar uses, including nonresidential zones that permit multifamily housing.

Single-Room Occupancy Units

Government Code Section 65583(a)(1) requires the quantification and analysis of existing and projected housing needs of extremely low-income households. Elements must also identify zoning to encourage and facilitate supportive housing and single-room occupancy units (SRO).

Extremely low-income households typically comprise persons with special housing needs, including, but not limited to, persons experiencing homelessness or near-homelessness, persons with substance abuse problems, and farmworkers. The City currently has no provisions in the Zoning Ordinance to allow the development of SRO units. The Zoning Ordinance indicates that “Apartment Hotels” are permitted in the C-3 district, but Apartment Hotels are treated as a commercial use, and the term is not defined in the Zoning Ordinance.

Program 16 has been included to amend the zoning ordinance to identify a zone where SROs are permitted. “Apartment hotels” are permitted in the C-3 zone but not defined. The City will either define these as SROs or find a zone to permit SROs in another zone.

Group Homes

Health and Safety Code Sections 1267.8 and 1566.3 require local governments to treat group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. “Six or fewer persons” does not include the operator, the operator’s family, or persons employed as staff. Local agencies must allow these licensed residential care facilities in any area zoned for residential use and may not require licensed residential care facilities for six or fewer persons to obtain CUPs or variances that are not required of other family dwellings.

The City’s Zoning Ordinance permits state-licensed rest homes for 24 persons in the administrative and professional office district zone (C-P). The ordinance also conditionally permits rest homes, convalescent homes, and nursing homes in the RM-1 district. While there are various types of group living arrangements permitted in a few of the districts, the Zoning Ordinance does not contain a standard definition for group home, does not permit group homes of six or fewer and six or more persons in all zones allowing single-family uses, consistent with State law.

Program 16 has been included to allow residential care facilities for six or fewer persons, in accordance with Health and Safety Code Sections 1267.8, 1566.3, and 1568.0831, and allow residential care facilities, regardless of size, with an administrative approval process, in all zones that permit residential uses of the same type, in accordance with the City’s definition of family.

Accessory Dwelling Units

The City will be adopting an Accessory Dwelling Unit (ADU) ordinance in the beginning of 2024; a draft ordinance is expected to be available in early January 2024.

Conclusion

The City provides zoning for a variety of housing types; however, the Zoning Ordinance needs to be amended to fully comply with employee housing, transitional and supportive housing, SRO units, residential care facilities, and low-barrier navigation centers.

Recommended Action

The Housing Element includes **Program 16** to amend the Zoning Ordinance to address the development standards and barriers to special-needs housing:

- **Employee Housing.** Permit employee housing compliant with the State Employee Housing Act (Health and Safety Code Sections 17021.5 and 17021.6).
- **Residential Care Facilities.** Allow residential care facilities for six or fewer persons in accordance with Health and Safety Code Sections 1267.8, 1566.3, and 1568.08, and allow residential care facilities, regardless of size, with an administrative approval process, in all zones that permit residential uses of the same type, in accordance with the State’s definition of family.
- **Supportive Housing.** Allow supportive housing as a permitted use in zones where multifamily and mixed-use developments are permitted, including nonresidential zones permitting multifamily uses (Government Code Section 65583(c)(3)).
- **Emergency Shelters.** Amend the RM-2.5 zone to allow emergency shelters by-right, ensuring there is sufficient vacant land or redevelopment potential to accommodate shelter capacity to meet the homeless need.
- **Low-Barrier Navigation Centers.** Permit the development of low-barrier navigation centers to be developed in compliance with Government Code Section 65662, to allow low-barrier navigation centers by-right in zones where mixed-uses are allowed or in nonresidential zones that permit multifamily housing.
- **Single-Room Occupancy Units.** To encourage and facilitate the development of housing affordable to extremely low-income households and in accordance with Government Code Section 65583, the City will define SRO units and identify zones where they are permitted.
- **Accessory Dwelling Units.** The zoning code will be updated to amend the definition of second units to refer to ADUs and will amend the code to permit ADUs in all zones that permit single-family or multifamily uses, in accordance with California Government Code Section 65852.2.

On- and Off-Site Improvement Standards

Analysis

Site improvement is regulated by the Subdivision Ordinance, through conditions and standards imposed through the site plan review process, and through the City's Standard Specifications. Improvements include street construction; sewer, water, and drainage connections; required off-street parking; landscaping; walls; and fences.

Major improvements required by the City include:

- Local roads are improved to a 40-foot curb-to-curb width within an overall 60-foot right-of-way. Gutters and monolithic sidewalks in a 5-foot pattern are required on all local streets with a 5-foot landscape strip. Right-of-way may be reduced to 56 feet upon review and approval by the City Engineer.
- Major streets are developed to 70-, 80-, and 100-foot rights-of-way, depending on their classification. The subdivider is responsible for dedicating sufficient right-of-way adjacent to the project to provide one-half of the major street with two travel lanes, including curb, gutter, parking lane, sidewalk, and a 10-foot landscape strip on one side.
- A secondary (emergency) 20-foot access road may be required if the project has only one point of access.
- Sewer, water, and drainage lines are in streets or within easements within the project boundaries. Easements for underground electrical, natural gas, telephone, and cable facilities are provided as requested by the affected utilities.
- Decorative masonry block walls are required adjacent to major streets and between multifamily and single-family uses. Recent subdivision approvals have required such features as "open-ended" cul-de-sacs and paseos to commercial areas to encourage walking and bicycling. Minimum height is six feet, although the height may increase as needed for noise attenuation.
- To protect adjacent agricultural areas, a solid wood-reinforced fence a minimum of seven feet in height may be required along the common boundary between residential and agricultural uses.
- A landscaped strip 10 to 20 feet in width is required adjacent to major streets between the sidewalk and wall to include street trees, ground cover, and an automatic irrigation system.
- The front yards of all lots within new subdivisions must be landscaped. Two street trees are required on each lot within the subdivision.
- For multifamily projects approved with a site plan review, the developer must landscape all open space areas prior to occupancy.
- All lots within new residential projects must be served by connection to City water and sewer systems.

- To adequately provide water supply for use and safety purposes, it may be necessary for individual projects to dedicate a well site, install a well in the subdivision vicinity, or retrofit existing wells to increase flows from the wells.
- Fire hydrants are required in accordance with the requirements of the City Engineer and Fire Chief and the Standard Specifications.
- In areas lacking master drainage facilities, a temporary on-site ponding basin adequate to remove surface water and stormwater from the project is required.
- Streetlights and traffic signs are required in accordance with the City's Standard Specifications.
- All utilities are placed underground, in accordance with the requirements of the utility concerned, in either City street easements or appropriate utility easements.
- In accordance with the California Environmental Quality Act, the developer may be required to prepare special studies and to mitigate identified potential impacts, including traffic, noise, air quality, and cultural resources.

Conclusion

Development requirements of the City are comparable to surrounding cities. To reduce housing costs, the City does not require improvements other than those deemed necessary to maintain public health, safety, and welfare.

Recommended Action

None required.

Fees and Exactions

Analysis

Table 1N-24 shows the City of Sanger planning and permitting fees. Each project does not necessarily have to complete each step in the process (i.e., small-scale projects consistent with General Plan and zoning designations do not generally require Environmental Impact Reports, General Plan Amendments, Rezones, or Variances). Consistent with Government Code Section 65940.1(a)(1) related to transparency requirements, City fees are available on the City's website: <https://www.ci.sanger.ca.us/DocumentCenter/View/1765/Citywide-Master-Fee-Schedule-2021?bidId=>

Table 1N-24 Planning Fees

Category	Fee
Annexation	\$2,300
Site Plan	\$2,740
Conditional Use Permit	\$2,900
Variance Review	\$2,900
Tentative Tract Map Review	\$3,255
Final Parcel Map Check	\$3,460 + \$150 per parcel
Rezone/Pre-Zone Map Amendment	\$3,250
General Plan Amendment	\$2,040 (minimum deposit)
Negative Declaration	\$855
Environmental Impact Report Review	\$1,690 (minimum deposit)
Building Permit – multifamily development with total construction valuation greater \$1,000,000 ¹	\$8,050 (entire development)
Building Permit – single-family home with construction valuation \$100,001-\$500,000 per unit ¹	\$1,427
Plan Check Fee	65 percent of permit fee or \$110/hour, whichever is greater

¹Fees based on construction valuation, see Master Fee Schedule for other ranges of valuations and associated fees.

Source: City of Sanger, 2021.

Development impact fees, including school district fees, are shown in **Table 1N-25**. Fees are \$26,791 for a 2,000-square-foot, single-family unit and \$18,600 for a 1,000-square-foot, two-bedroom multifamily unit.

Table 1N-25 Development Fees for Single-Family and Multifamily Units, Sanger

Type of Fee	Cost Per Unit	
	Single-Family Unit	Multifamily Unit
Sewer	\$3,205	\$2,724
Sanitary Treatment	\$6,800	\$5,780
Sanitary Collection	\$1,642	\$1,356
Water	\$1,622	\$1,397
Storm Drain	\$5,475	\$2,290
Traffic	\$1,993	\$1,592
Recreation	\$2,490	\$631
Public Safety and Facility - Police	\$1,538	\$1,230
Public Safety and Facility - Fire	\$1,586	\$1,270
Solid Waste	\$440	\$330
Total	\$26,791	\$18,600

Source: City of Sanger, 2021.

In addition to City fees, several regional fees are also charged for residential development: Regional Transportation Mitigation and Indirect Source Review. For school fees, the Sanger Unified School District assesses a school impact fee of \$4.79 per square foot on all new residential development. Currently, there are no exemptions from the school impact fee; however, the school board will review and consider requests for exemption from the fee.

Table 1N-26 shows permit fees for single-family and multifamily prototype developments. Construction costs for a single-family home are approximately \$144 per square foot. This is based on costs calculated for a 2,000-square-foot, wood-framed, single-story, four-cornered home, of good quality construction including a two-car garage and forced air heating/cooling in Sanger. Estimated total construction costs for such a home are \$288,364. These construction costs include labor, materials, and equipment but do not include the cost of buying land.⁷ The City's plan check, permit, and impact fees account for an additional sum of \$29,146, or 10.11 percent of the estimated construction cost. The multifamily prototype is a 20-unit, two, three, four-bedroom, two-story multifamily housing development. Costs for multifamily construction are approximately \$136 per square foot. This is based on costs calculated for a two-story building in Sanger with 20 units and an average unit size of 1,000 square feet. The calculation is for a wood or light-steel frame structure, including forced air heating and cooling and constructed of good quality materials. The estimated construction cost of each unit is \$187,257, for a total construction cost for the building of \$2,745,140.¹ These construction costs include labor, materials, and equipment but do not include costs of providing parking or buying land. The City's plan check, permit, and impact fees account for an additional sum of \$389,793 (\$19,490 per unit), or 10.29 percent of the estimated construction cost.

Sanger's combined fees as a percentage of construction costs are comparable to those of neighboring jurisdictions:

- **Sanger:** 10.11% (single-family), 10.29% (multifamily)
- **Kingsburg:** 12.1% (single-family), 8.3% (multifamily)
- **Parlier:** 9.8% (single-family) 10.9% (multifamily)
- **Reedley City Center:** 4.2% (single-family), 6.9% (multifamily)
- **Reedley Expansion Area:** 6.5% (single-family), 12.4% (multifamily)
- **Reedley Infill Area:** 5.9% (single-family), 9.7% (multifamily)
- **Selma:** 11.1% (single-family), 13.7% (multifamily)

⁷ 2022 National Building Cost Manual and 2022 93622 zip code modifiers, Craftsman Book Company.

Table 1N-26 Example Construction and Fee Costs

Fee Description	Amount		
	Single-family	Multifamily	
		Entire 20-Unit Development	Per Unit
City Building Permit Fee	\$1,427	\$8,050	\$403
City Plan Check Fee	\$928	\$5,233	\$262
City Impact Fees	\$26,791	\$372,000	\$18,600
Total Sanger Fees	\$29,146	\$385,283	\$19,264
School District Fee (\$4.79/sq. ft.)	\$6,720	\$3,360	\$168
Transportation Mitigation Fee ¹	\$1,640	\$1,150	\$58
Indirect Source Review ²	N/A	N/A	N/A
Total Fees	\$37,506	\$389,793	\$19,490
Typical Construction Cost per Unit	\$288,364	\$3,745,140	\$187,257
Total Cost (Fees Plus Construction Cost per Unit)	\$325,870	\$4,134,933	\$206,747
Sanger's Fees as a Percentage of Total Cost	10.11%	10.29%	10.29%

¹ The regional impact fee is the RTMF (Regional Transportation Mitigation Fee) collected by the Council of Governments for all Fresno County cities.

² The Indirect Source Review fee is collected by the air district for projects larger than 50 units, which generally are about \$500/unit.

Source: City of Sanger, 2021.

Conclusion

Fees in Sanger are in keeping with the requirements of Assembly Bill (AB) 1600. The fee structure is designed to pay the cost to the City of providing services and is updated annually. City development impact fees are an estimated 10 percent of the construction costs for single-family and multifamily development. Planning fees in Sanger are very reasonable when compared to other surrounding communities. Because the City has a contract engineer, the fees include a consultant deposit, with any remaining funds returned to the applicant.

Recommended Action

None required.

Processing and Permit Procedures

Analysis

Table 1N-27 describes typical permit processing timelines for projects.

Table 1N-27 Local Processing Times, Sanger

Process	ADUs	Single-Family	Multifamily
Step 1: Site Plan Review	1-2 Months	Exempt	4 – 12 Months
Step 2: Building Permit*	~ 1 Month	~ 1 Month	~ 1 Month
Step 3: Plan Check*	2-5 Days	2-5 Days	5-10 Days
Processing Time	2-3 Months	~ 1 Month	5-13 Months

Source: City of Sanger, 2023

*Each plan check and building permit review occur concurrently to reduce the time for applicants. This estimate accounts for the time between approval and building permit issuance, assuming a complete and correct application at first submittal. The final length of time of time between a project's approval and building permit issuance is determined by the applicant. However, typical time between application and building permit issuance is less than a month for single-family units to up to approximately four months for subdivisions. If corrections are necessary after the City's initial review, the applicant will need to complete the corrections, and the timing for addressing corrections varies.

ADU Application and Review Process

The applicant files a Minor Site Plan Review application and planning staff reviews for completeness of submission. For all types of residential projects, staff do application completeness checks within a week of the receipt of submission, but it is often done either as soon as the submission is received, or even over the counter with applicants when they attempt to submit an incomplete application. Once complete, it is routed to City departments that have two weeks to review, after comments are received. To approve an ADU application, the proposed ADU must meet all applicable standards of the zoning ordinance and State ADU law. The approval process ensures that the proposed development is consistent with development standards and if so, the administrative entitlement is approved within State mandated timelines (typically taking less than 30 days). If noncompliant, staff drafts a comment letter and requests revisions from the applicant. If compliant, staff drafts an approval letter and required notices. Previously, notices were sent to surrounding property owners concurrently with an approval letter being sent to the applicant; however, the City recently eliminated this practice. The practice will be formally removed from the Municipal Code with the adoption of the pending ADU Ordinance update. A draft ordinance is expected to be available in January 2024. Processing timelines for ADUs are no more than 60 days, in compliance with State law. Applications for a Building Permit can be reviewed for plan check once a Multifamily Site Plan Review application is approved, then buildout of the project can occur. See the subsection that follows on Site Plan Review for multifamily and ADU projects. As shown in **Table 1N-27**, Site Plan Review for ADUs takes approximately from one to two months.

Multifamily Dwelling Application and Review Process

The applicant files a Site Plan Review application, and Planning staff reviews for completeness of submission. For all types of residential projects, staff do application completeness checks within a week of the receipt of submission, but it is often done either as soon as the submission is received, or even over the counter with applicants when they attempt to submit an incomplete application. The City offers optional, free preliminary project review. The development review committee holds a meeting every week to ensure that applications move along expediently and that all staff are aware of RHNA requirements. Planning staff explain the project and the related legal requirements to all City departments. Once the application is complete, it is routed to City departments, and they have two weeks to review. The departments provide non-binding recommendations. After comments are received, if the project does not meet the objective standards in the zoning code, staff drafts a comment letter and requests revisions from the applicant. If the project meets the objective standards in the zoning code, staff drafts an approval letter, conditions of approval, and required notices. Notices are sent out to surrounding property owners and an approval letter with conditions of approval is sent to the applicant. An Application for Building Permit can be reviewed for plan check once the Site Plan Review application is approved, conditions of approval may require various inspections or reviews throughout the process. As shown in **Table 1N-27**, Site Plan Review for multifamily projects take approximately 4 to 12 months.

All multifamily districts as well as the C-P district require that before any building or structure is erected on any lot in the district, a site plan must be submitted and approved pursuant to the provisions of Section 90-1009 of the zoning ordinance. Site plan review requires an application and fees as determined by the City's Planning Fee Study. Application requirements are intended to ensure that the project conforms to the zoning ordinance and guides the issuance of building permits. Requirements include all lot dimensions, architectural elevations, yards, spaces between buildings, walls and fences, parking, access, signs, lighting, street dedications, drainage, and landscaping.

Section 90-1010 contains required findings for site plan approval, which are summarized as follows. In approving the site plan, the decision maker must find that:

- The proposal is in compliance with the zoning ordinance;
- The following are so arranged that traffic congestion is avoided, pedestrian and vehicular safety are protected, and there will be no unreasonable impact on surrounding properties—facilities, improvements, and utilities; vehicle ingress, egress, and internal circulation; location of buildings; walls; landscaping.
- The proposed lighting is so arranged as to deflect light away from adjoining property;
- Proposed signs will not interfere with traffic or limit visibility;
- Conditions of approval are necessary to protect the public health, safety, and welfare, including – special yards; special fences and walls; landscaping and maintenance; regulating noise, odors, or electrical interference; requiring street dedications and improvements.

Section 90.1109(d) requires that within 40 days after submission of a complete site plan, the director must approve, approve with conditions, or disapprove the site plan. The director's decision may be appealed to the Planning Commission for a public hearing by either the applicant or a concerned citizen. In turn, the decision of the Planning Commission may be appealed to the City Council. Section 90.1109(d)(3) allows the director to refer a site plan directly to the Planning Commission for a public hearing and decision.

Section 90-1011(d) provides that the site plan will lapse and become void one year following the date on which the site plan review became effective unless a building permit is issued and construction is being diligently pursued.

Single-Family Dwelling Application and Review Process

The applicant files for a Building Permit application, and building staff reviews for completeness of submission. For all types of residential projects, staff do application completeness checks within a week of the receipt of submission, but it is often done either as soon as the submission is received, or even over the counter with applicants when they attempt to submit an incomplete application. The application is exempt from Site Plan Review. The application for a Building Permit is reviewed during a plan check for compliance with Zoning Ordinance, then buildout of the project. To approve an application for a single-family dwelling, the proposed project must be consistent with the development standards for the district it where it is proposed.

Public Hearings

Planning Commission public hearings are required for variances, CUPs, parcel maps, tentative tract maps, rezones, and General Plan amendments. The Commission's decision is final on variances, CUPs, and maps unless appealed to the City Council. Applications typically go to the Planning Commission public hearing within 45 to 60 days of submittal unless there is a requirement for a more detailed environmental assessment. A Council hearing, if required, is generally held within one to three weeks of the Planning Commission hearing. For smaller projects, public hearings are complete within 30 to 45 days.

Section Sec. 90-999 contains required findings for conditional use permit approval, which are summarized as follows. In approving the site plan, the decision maker must find that:

1. That the site for the proposed use is adequate in size and shape to accommodate the use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this chapter to adjust the use with land and uses in the neighborhood.
2. That the site for the proposed use relates to streets and highways adequate in width and pavement type to carry the quantity and kind of traffic generated by the proposed use.

3. That the proposed use will have no adverse effect upon adjoining or other properties. In making this determination, the commission shall consider the proposed location of improvements on the site; vehicular ingress, egress and internal circulation; setbacks; height of buildings; walls and fences; landscaping; outdoor lighting; signs; and such other characteristics as will affect surrounding properties.
4. That the proposed use is consistent with the objectives and policies of the city general plan.
5. That the conditions of approval are necessary to protect the public health, safety and general welfare. Conditions may include the following:
 - a. Requiring special yards, spaces and buffers.
 - b. Requiring fences and walls.
 - c. Requiring enclosure of storage areas and limitation on out of door display of merchandise.
 - d. Regulation of grading, surfacing, and drainage improvements.
 - e. Regulation of points of vehicular ingress and egress.
 - f. Regulation of signs.
 - g. Requiring landscaping and maintenance thereof.
 - h. Requiring maintenance of grounds.
 - i. Requiring fire prevention equipment and measures.
 - j. Regulation of noise, vibration, odors, etc.
 - k. Regulation of time, hours of days of operation, for certain activities.
 - l. Establishing a time period within which the proposed use shall be developed. See subsection 90-1001(a).
 - m. Regulation of the time period for which the use permit will be valid and the use may be operated. See subsection 90-1001(b).
 - n. Regulation of lighting.
 - o. Requiring a bond or deposit of money to assure faithful compliance and performance on the part of the applicant for the completion of street improvements and other facilities or the removal of such facilities.
 - p. Requiring street dedications and improvements, subject to the provisions of subsection 90-1011(c).
 - q. Requiring site plan review for a use, building or structure.

- r. Such other conditions as will facilitate development of the city in an orderly and efficient manner and in conformity with the policies and requirements set forth in this chapter and in the city general plan.

Through **Program 21** the City will revise or remove subjective standards in order to make them objective. This will include clarifying finding 1 to specify that determinations of adequacy of size and shape are based on the objective development standards described in the applicable chapters of the zoning code; clarifying finding 2 to reference the objective bases of street width and pavement adequacy in the Circulation Element; and clarifying finding 3 to specify that the finding will not preclude conditions for residential care facilities or necessary alterations for reasonable accommodations requests.

The City has no overlay zones, environmentally sensitive areas, or other procedures to delay project processing. The City considers all entitlement applications, including the environmental document, at single public hearings before the Planning Commission and City Council.

Approval to Building Permit

After the City approves a project, such as at Planning Commission or City Council hearing, it becomes the applicant's responsibility to initiate steps to secure building permits and construct the project. These steps include obtaining State or regional permits, and paying fees as outlined in a project's conditions of approval. Other necessary actions include:

- Completing construction drawings
- Recording subdivision (final) maps (applies to ownership projects)
- Retaining contractors
- Obtaining utility approvals, required easements, and rights of entry

The length of time between a project's approval and building permit issuance in many cases is determined by the applicant. The City's initial review for both civil plan and building permit approval is typically 12 to 16 weeks, with a subsequent review, if corrections are necessary, to be completed within 1 to 3 weeks. The time the applicant takes to make corrections between these reviews varies, but once a project begins the construction plan review process, the following general timelines can typically be achieved with responsive applicants:

- Civil plan approval (e.g., grading, water, sewer, streets): 3 to 6 months
- Building permit approval: 1 to 3 months

The noticing requirements for site plan review for all types of residential projects are the same and are subject to the same noticing timeline. The City is required to notify property owners of parcels within 300 feet of the subject property and allow for a 10-day appeal period. The City allows applicants to submit

building permits even prior to approval of their site plan; however, plan check is not done on them until after the appeal period has expired.

No public hearings are required for any type of residential project unless there are other entitlements involved (i.e., tentative parcel/tract map, variance, or CUP). The findings that must be made for approval are as follows:

- The proposal is in compliance with all applicable provisions of this chapter.
- The following are so arranged that traffic congestion is avoided, pedestrian and vehicular safety are protected, and there will be no unreasonable impact on surrounding properties.
 - Facilities, improvements, and utilities.
 - Vehicular ingress, egress, and internal circulation.
 - Location of buildings.
 - Location of service areas.
 - Walls.
 - Landscaping.
- The proposed lighting is so arranged as to deflect the light away from adjoining properties.
- The proposed signs will not by size, location, or lighting interfere with traffic or limit visibility.
- That the conditions of approval are necessary to protect the public health, safety, and welfare.

Senate Bill 330

Senate Bill (SB) 330, the Housing Crisis Act of 2019, established specific requirements and limitations on development application procedures. The bill allows housing developments for which a preliminary application is submitted that complies with applicable general plan and zoning standards is subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application. The City will continue to review all development projects in accordance with State laws and use the SB 330 preliminary application form prepared by the Department of Housing and Community Development. The City has included **Program 20** to continue to review projects in compliance with SB 330.

Senate Bill 35

Currently, the City of Sanger does not have a process for SB 35; however, should an affordable housing project make application for land within the city limits, the City would be obligated to process said project consistent with SB 35. The City has included **Program 20** to establish a process that specifies the SB 35 streamlining approval process and standards for eligible projects.

Variance

Variances are available for reduction in certain quantitative development standards in excess of 10 percent. One Public Hearing is required before the Planning Commission; decision can be appealed to the City Council. If a submission is found complete and compliant, the process may take approximately one to two months. A variance application requires the following:

- Name and address of the applicant;
- Statement that the applicant is the owner of the property or is the authorized agent of the owner;
- Address and legal description or the assessor's parcel number of the property;
- An accurate scale drawing of the site and variance proposed that adequately enables the Planning Commission to determine the compliance of the proposal with requirements;
- Evidence in the form of a statement showing the bases upon which the findings set forth in Section 90-1003 for granting a variance can be made;
- Any other data pertinent to the application that may be required by the City or submitted by the applicant.

Findings required include the following:

- That because of special circumstances applicable to the subject property, including the size, shape, topography, location, or surroundings, but not including monetary hardship, the strict application of the provisions of Section 90-1003 deprives the subject property of privileges enjoyed by a substantial number of other properties in the vicinity and under identical zoning district classification;
- That the granting of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity or district in which the property is located;
- That the granting of the variance will not adversely affect the City General Plan, any adopted specific plan, or the purposes of this chapter;
- That the granting of the variance will not constitute a grant of special privilege to the property owner; and
- That any conditions established by the commission for the variance are deemed necessary to protect the public health, safety, and general welfare.

Conditions for a variance may include the following:

- Requiring special yards, spaces, and buffers.
- Requiring fences and walls.
- Requiring enclosure of storage areas and limitation on out of door display of merchandise.
- Requiring grading, surfacing, and drainage improvements.
- Regulation of points of vehicular ingress and egress.
- Regulation of signs.
- Requiring landscaping and maintenance thereof.
- Requiring maintenance of grounds.
- Requiring fire prevention equipment and measures.
- Regulation of noise, vibration, odors, etc.
- Regulation of lighting.
- Requiring a bond or deposit of money to assure faithful compliance and performance on the part of the applicant for the completion of street improvements and other facilities or the removal of such facilities.
- Requiring street dedications and improvements, subject to the provisions of Subsection 90-1011(c).
- Regulation of the time period for which the variance shall be valid.
- Requiring site plan review for a use, building, or structure, and such other conditions as will make possible the development of the city in an orderly and efficient manner and in conformity with the intent and purposes set forth in this section.

Minor Deviation

Minor Deviations are available for reduction in certain quantitative development standards less than 10 percent. No Public Hearing is required and it's decided by the City's Director. With complete and compliant submission, the process may take approximately one to two weeks. The application requires only written submission of the request to the Director.

Findings required: No findings are required to be made.

Conclusion

The City does not have a lengthy project review process.

Recommended Action

The City has included **Program 20** to establish an application process related to SB 35.

Building Codes

Analysis

Sanger follows the 2022 California Building Code as established by State law and as such has little control over State standards. No amendments have been made by the City to the code. All new construction in the City is inspected in accordance with the code.

The City's code enforcement process is reactive and complaint-based. However, it is estimated that only 43 homes (0.5 percent of the housing stock) are in need of rehabilitation, and 7 (less than 0.1 percent of the housing stock) are in need of replacement. The neighborhoods with the greatest need for rehabilitation are in the southeast and central core. A more proactive code enforcement procedure is not necessary to ensure safe housing conditions in the city. However, as part of **Program 24**, the City will refer income-eligible households to County housing rehabilitation programs and will target assistance for property owners and landlords of rental properties for assistance in making any necessary code corrections. These efforts are expected to promote place-based revitalization and assist in reducing displacement risk for residents by enabling them to remain in their home and community.

Conclusion

No major local amendments to the building codes have been made that would significantly increase the cost of housing.

Recommended Action

None required.

Constraints on Housing for Persons with Disabilities

Analysis

California Building Code

Sanger follows the 2022 California Building Code. The City has not made any local amendments to the code, including any that would limit accommodation of persons with disabilities.

Definition of Family

"Family" is defined in the Sanger Zoning Ordinance as:

Family shall mean an individual or two or more persons related by blood, marriage or adoption, with or without the addition of not more than five foster children placed by the State department of social welfare or other public agency, or not more than three persons other than foster children, excluding servants, who are not related by blood, marriage, or adoption to the resident persons, living together in a single dwelling unit.

This definition exceeds the zoning power of a local jurisdiction and would be considered restrictive.

The City has included **Program 16** to amend the definition of family.

Zoning and Land Use Policies

As previously stated, Sanger does not have provisions for group homes or residential care facilities, including separation or site planning requirements, and has included **Program 16** to amend the Zoning Ordinance to comply with State law.

Reasonable Accommodation

The City adopted a reasonable accommodation ordinance in 2016, Zoning Ordinance Chapter 2, Section 90, to establish a procedure for persons with disabilities who are seeking equal access to housing. To make housing available to an individual with a disability, any eligible person may request a reasonable accommodation in land use, zoning, and building regulations, policies, practices, and procedures.

The written decision to approve, conditionally approve, or deny a request for a reasonable accommodation is based on the following findings, all of which are required for approval or conditional approval of a reasonable accommodation.

- Whether the housing in the request will be used by a person with a disability under the Americans with Disability Act (ADA);
- Whether the request for reasonable accommodation is necessary to make specific housing available to a person with a disability under the ADA;
- Whether the request for reasonable accommodation would pose an undue financial, administrative, or enforcement burden to the City;
- Whether the request for 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;
- Potential impact on surrounding area;
- Physical attributes of the property and structures; and
- Other reasonable accommodations that may provide an equivalent level of benefit.

In granting a request for reasonable accommodation, the director of the community development department or their designee, or the Planning Commission, may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings. The conditions shall also require that the accommodation be designed to be compliant with ADA standards subject to the issuance of a building permit. An applicant may appeal a denial. As part of **Program 17**, the City will amend its reasonable accommodations regulation in the Municipal Code to continue to permit applicants to appeal reasonable accommodations denials, but to prohibit third parties from appealing

reasonable accommodations decisions. Additionally, through **Program 17** the City will amend its reasonable accommodations regulations to remove required findings related to the potential impact on the surrounding area, physical attributes of the property and structures, and other reasonable accommodations that may provide an equivalent level of benefit. The City charges a fee to process an appeal. While the fee charged is limited to covering administrative costs, this could be a constraint for persons with disabilities. Therefore, per **Program 17**, the City will eliminate this fee.

Conclusion

Amendments to the City's Zoning Ordinance are required to address the definition of family, residential care facilities, and reasonable accommodation procedures.

Recommended Action

The Housing Element includes **Program 16** to amend the Zoning Ordinance to address the definition of family and residential care facilities, and **Program 17** to amend the reasonable accommodations procedure to review findings for approval for objectivity, remove additional conditions for approval, clarify that only applicants may appeal reasonable accommodations decisions, and remove the fee requirement for appeals.

Water and Sewer

Analysis

City of Sanger Public Works Department is responsible for providing domestic water service and wastewater collection and treatment. The City follows the practice of prioritizing water and sewer hook-ups for affordable projects (**Program 5**). The City completed an aboveground water storage tank in 2020. The City has been working on analysis of potential expansion of the existing wastewater treatment plan. The City is working on developing two new water wells. These projects result in increased capacity and service to the City of Sanger Water System. Construction has commenced on new water wells 22 and 19. Well 22 is being drilled as a pilot hole/production well and testing of the water sampled from the pilot hole drilling is currently underway. Well 19 is being drilled as a standalone test well that will be destroyed upon completion of all sampling and testing. Rehabilitations of existing wells 7A and 25 are currently underway as of May 2023. Upon completion of improvements to new well sites and/or existing sites to improve water capacity to a satisfactory level, the City will then have sufficient capacity for Housing Element sites. All improvements should be completed by summer 2024. According to the City Engineer, there is sufficient wastewater treatment capacity for Housing Element sites. Depending on the proposed project location, there may be a need to upgrade or build planned wastewater conveyance systems (i.e. pipelines) to serve new development.

Conclusion

The City must complete pending water system improvements to be able to serve Housing Element sites. The City's wastewater system is adequate to serve Housing Element sites.

Recommended Action

The Housing Element contains **Program 5** to commit to continuing to follow the practice of prioritizing water and sewer hook-ups for affordable projects and completing all improvements by summer 2024.

At-Risk Housing Units Analysis

As required by California Government Code Section 65583, the Housing Element must analyze the extent to which below-market-rate units are at risk of converting to market-rate housing. If there are at-risk units, the element should include programs to encourage preservation of these units or to replace any that are converted to market rate. The units to be considered are any units that were constructed using federal assistance programs, state or local mortgage revenue bonds, redevelopment tax increments, in-lieu fees or an inclusionary housing ordinance, or density bonuses. Housing is considered to be “at risk” if it is eligible to be converted to non-low-income housing due to: (1) the termination of a rental subsidy contract, (2) mortgage prepayment, or (3) the expiration of affordability restrictions. The time period applicable in making this determination is the 10-year period following the last mandated update of the Housing Element, which, in the case of all Fresno County jurisdictions, is December 31, 2023. **Table 1N-28** shows assisted housing units in Sanger. There are 348 assisted affordable units in Sanger. No units are at risk of expiring in the next 10 years. However, per **Program 11**, the City will continue to monitor these units and take action if projects become at risk of converting to market-rate housing.

Table 1N-28 Assisted Housing Developments, Sanger

Name	Address	Target Population	Funding Source	No. of Units	No. of Affordable Units	Affordable Units Expiration	Risk Level
Elderberry at Bethel	2505 Fifth Street	Senior	LIHTC	74	73	2058	Not at risk
Unity Estates Apartments	1410 J Street	Large Family	HUD, LIHTC	88	84	2059	Not at risk
Memorial Village	302 K Street	Large Family	HUD LIHTC	48	47	2070	Not at risk
Sanger Crossing Apartments	1620 J Street	Large Family	LIHTC	45	44	2069	Not at risk
Sanger Crossing Apartments II	NE Corner of J Street and North Avenue	Large Family	LIHTC	36	36	2074	Not at risk
Wedgewood Commons	2415 5th Street	Senior	Fresno Housing Authority	64	64	In perpetuity	Not at risk
Total				355	348		
Total At Risk				N/A	0		

N/A = Not applicable.

Source: California Housing Partnership Corporation, 2022.

Preservation Resources

The types of resources needed for preserving at-risk units fall into three categories: (1) financial resources available to purchase existing units or develop replacement units; (2) entities with the intent and ability to purchase and/or manage at-risk units; and (3) programs to provide replacement funding for potentially lost Housing Choice Voucher Program rent subsidies, otherwise known as the Section 8 program.

A variety of federal and state programs are available for potential acquisition, subsidy, or replacement of at-risk units. Due to both the high costs of developing and preserving housing and limitations on the amounts and uses of funds, a variety of funding sources would be required. Several sources of funding are available to Sanger for preservation of assisted multifamily rental housing units to assist with purchasing units or providing rental subsidies, including Community Development Block Grant (CDBG) or HOME funds. For older buildings with expiring affordability, funding for substantial rehabilitation may also give the City an opportunity to reinstate affordability requirements. The United States Department of Housing and Urban Development (HUD) may provide Section 8 Tenant Protection Vouchers to subsidize rents for tenants in properties at risk of loss because of expiration due to loss of affordability associated with mortgage prepayment.

When affordable housing units have the potential to convert to market rate, due typically to the expiration of an affordable housing agreement or expiration of funding, there is a risk that tenants in those affordable units will be displaced. Certain companies and organizations can be certified as eligible to purchase buildings where a federally assisted mortgage is due to be prepaid.

Qualified Entities

The following qualified entities were listed as potential purchasers of at-risk units in Fresno County:

- Fresno Housing
- Fresno Housing Authority
- ACLC, Inc.
- Better Opportunities Builder, Inc.
- Fresno County Economic Opportunities Commission
- The East Los Angeles Community Union (TELAC)
- ROEM Development Corporation
- Self-Help Enterprises
- Volunteers of America National Services
- L + M Fund Management LLC

The Section 8 Housing Choice Voucher Program is another affordability option that individuals may apply for through the Fresno Housing Authority (FHA). Section 8 increases affordable housing choices for very low-income households by allowing families to choose privately owned rental housing. Section 8–supported housing may be either project-based for a portion if it’s an entire apartment building, or subsidies may be provided in the form of vouchers for individual, independent units.

The FHA administers approximately 142 active housing choice vouchers in Sanger. As described in **Program 27**, the City will work with the Housing Authority to refer interested Housing Choice Voucher households to the County program with the goal of maintaining the 142 active Housing Choice Vouchers in Sanger and improve access to higher opportunity areas for lower-income households by encouraging voucher acceptance in higher resource neighborhoods (i.e., Washington middle neighborhood and Faller park neighborhood).

Strategies for Preserving Affordable Housing

Acquisition - For units at risk of conversion, qualified nonprofit entities must be offered the opportunity to purchase buildings to maintain affordability.

The factors that must be used to determine the cost of preserving low-income housing include property acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables, such as condition, size, location, existing financing, and availability of financing (governmental and market). A survey of for-sale properties was completed in January 2023. None were listed for sale in the City of Sanger. Outside of the City of Fresno, multifamily buildings in the county ranged from \$111,666 for a triplex within Reedley’s sphere of influence to \$156,225 per unit for a four-unit building in Selma. However, there were only five multifamily buildings for sale in Fresno County outside of the City of Fresno when the survey of prices was conducted in January 2023. Within the City of Fresno, prices for multifamily buildings ranged from \$73,331 per unit for a six-unit building to \$176,666 per unit for a different six-unit building. The largest complex was a 57-unit multifamily complex for \$143,859 per unit in the City of Fresno.

While most units listed for sale in January 2023 were in incorporated jurisdictions of Fresno County, purchasing residential units throughout Fresno County will likely have a similar price range. Additionally, if the property needs significant rehabilitation, or financing is difficult to obtain, it is important to consider these factors in the cost analysis. It is important to note that a major financing tool, Low Income Housing Tax Credits (LIHTC), currently do not prioritize acquisition and rehabilitation projects, but instead fund new construction projects. This makes the effort to preserve units much more difficult.

Preservation - Housing affordability can also be preserved by seeking alternative means of subsidizing rents, such as the Section 8 Housing Choice Voucher program described previously. Under Section 8, HUD pays the difference between what tenants can pay (defined as 30 percent of household income) and what HUD estimates as the fair-market rent on the unit. Based on HUD’s 2023 fair-market rents in Fresno County, the total cost to subsidize rental costs for a very low-income four-person household for 20 years would be \$39,120 for a two-bedroom home and \$151,920 for a three-bedroom home. This is typically done

through project-based contracts with the Housing Authority that administers a project-based program and has available vouchers.

Replacement with New Construction – Another alternative to preserve the overall number of affordable housing units in the county is to construct new units to replace other affordable housing stock that has been converted to market-rate housing. Multifamily replacement property would be constructed with the same number of units, with the same number of bedrooms and amenities as the one removed from the affordable housing stock.

The cost of new affordable housing can vary greatly depending on factors such as location, density, unit sizes, construction materials, type of construction (fair/good), and on- and off-site improvements. Based on the budget for a recent local affordable project for 36 assisted units, the cost to develop each unit would be \$286,534 per unit including the costs of buying land at an estimated \$635,000 per project but not including soft costs such as financing or architectural design, would cost an estimated \$10.3 million). Costs for multifamily construction are approximately \$144 per square foot. This is based on costs calculated for a two-story building in Sanger with 20 units and an average unit size of 1,000 square feet each. The total construction costs for the building are \$2,738,959 based on the total cost of building this development, it can be estimated that the per-unit cost to replace low-income housing would be \$131,017 per unit. These construction costs include labor, materials, and equipment but do not include costs of buying land or off-street parking.⁸

⁸2022 National Building Cost Manual and 2022 93657 zip code modifiers Craftsman Book Company.

APPENDIX 1N: CITY OF SANGER

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SECTION 1N-5: REVIEW OF PAST ACCOMPLISHMENTS

Analysis of Previous Housing Element

California Government Code, Section 65588(a)(2), Review and Revision, requires that each local government review its Housing Element as frequently as appropriate to evaluate the effectiveness of the Housing Element in attainment of the community's housing goals and objectives. This section reflects the actual housing activities that were accomplished since the 5th round Housing Element.

Effectiveness of Programs for Special Housing Needs

Special-needs populations include farmworkers, large families, female-headed, single-parent households, people experiencing homelessness, persons with disabilities, seniors, and households with extremely low incomes. As shown in greater detail in **Table 1N-29, Review of Past Accomplishments**, the City made a diligent, consistent effort to achieve its housing goals that address special housing needs through the implementation of policies and programs from the 5th cycle Housing Element. Following is a summary of the effectiveness of programs for special housing needs:

- The City worked with Fresno Housing Authority on the redevelopment of Memorial Village, which was later renamed as Blossom Trail Commons. The redevelopment increased the number of units from 35 to 55. The City worked with two affordable housing developers for the expansion of existing projects. One project (Phase II of Sanger Crossings) will result in 36 new deed-restricted, affordable multiple-family residential units, and the other project (Expansion of Unity Estates) will result in 10 new income-restricted multiple-family residential units. City staff also worked closely with an affordable housing developer to process a new 72-unit multiple-family project for the entitlement and preparation of an Affordable Housing and Sustainable Communities (AHSC) grant application.
- The City and Fresno County completed the Second Amendment to the 2005 Amended and Restated Memorandum of Understanding between the County and the City. This amendment added a provision to allow annexation for the purposes of achieving the goals of the Housing Element.
- Rezoning efforts accomplished by the City:
 - The City rezoned seven sites (totaling 54.09 acres) for high-density residential development (RM-1). Rezoned sites included the sites in the Faller and Almond project entitled for 72 multifamily units. The rezoned sites allow up to 22 units per acre. The rezoned sites can accommodate 1,188 lower-income (or moderate-income) units (54.09 acres at 22 units per acre). Since the 5th cycle carryover was 284 lower-income units and 169 moderate-income units, the rezoning has resolved the carryover.
 - The City completed a zoning ordinance amendment to require a minimum density of 20 units per acre in the RM-1 zone.

- Adopted Ordinances:
 - The City adopted a reasonable accommodation ordinance in 2016.
 - The City began preparing a new ADU ordinance to replace the secondary residences ordinance. The City anticipates adoption of the ordinance in early 2024; a draft ordinance is expected to be available in January 2024.
 - During the 6th cycle, the City will adopt a density bonus ordinance in compliance with State law, update its zoning ordinance to comply with the Employee Housing Act, define and regulate group homes and residential care facilities in compliance with State law, allow single-room occupancy units (SROs) in at least one zone, and amend the definition of family to remove barriers.
- In regard to water and sewer services:
 - The City has completed rehabilitation projects to two existing water wells and continues to evaluate existing wells.
 - The City completed an aboveground water storage tank in 2020. These projects result in increased capacity and service to the City of Sanger Water System.
 - The City grants priority water and sewer service to developments with lower-income units, in compliance with California Government Code Section 65589.7.
 - Construction has commenced on new water wells 22 and 19. Well 22 is being drilled as a pilot hole/production well, and testing of the water sampled from the pilot hole drilling is currently underway. Well 19 is being drilled as a standalone test well, which will be destroyed upon completion of all sampling and testing. Rehabilitation of existing wells 7A and 25 are currently underway (June 2023). All improvements should be completed by summer 2024.
 - The City worked with Self-Help Enterprises to develop infrastructure to deliver water to an existing disadvantaged unincorporated community. The City offers a density bonus and will streamline processing to facilitate the development of farmworker housing.
 - The City created a minor site plan review application with reduced fee (39 percent of site plan review application) and a minor conditional use permit application with a reduced fee (56 percent of conditional-use permit application). Minor applications are generally practical for infill projects. New fees were adopted in 2021, and routine fee assessment did not result in fee increases that unduly constrain housing development.
 - The City processed one tentative parcel map for residential purposes and processed four lot line adjustment applications for residential purposes. In 2019, the City received one tentative parcel map for multiple-family residential purposes. It proposed to accommodate the expansion of an existing income-restricted facility (Unity Estates) and was approved in 2020.

- In regard to specific special needs groups:
 - Seniors: Approximately 62.9 percent of Sanger’s housing units are over 30 years old, and 34.2 percent of units are over 50 years old. For the 9.5 percent of the City’s population that are seniors, 55 percent of whom are homeowners, home rehabilitation programs can help residents of older homes to make necessary safety and accessibility upgrades that will allow them to stay in their homes for longer. The City administered two County rehabilitation programs, including one for homeowners (Program 14).
 - Persons with Disabilities. The City adopted a reasonable accommodation ordinance in 2016, which creates a process to remove barriers to housing development for persons with disabilities (Program 11). The City actively advertised fair housing resources at the public counter, community service agencies, public libraries, and City website. These materials discourage discrimination based on disability and other protected characteristics (Program 21).
 - Farmworkers: Farmworkers can experience challenges in accessing affordable housing due to their typically lower incomes and can also face issues with substandard housing conditions. The City supports agencies and developers such as the Fresno Housing Authority and Self-Help Enterprises and worked with Self-Help Enterprises to develop infrastructure to deliver water to an existing disadvantaged unincorporated community, which can support farmworkers who may be more likely to live farther from existing services. The City offers a density bonus and will streamline processing to facilitate the development of farmworker housing (Program 8). The City also administered two County rehabilitation programs, including one for rental units (Program 15) which can improve housing conditions for these community members.
 - Large Households and Single-Parent Households (Female-Headed): Both large households and single-parent female-headed households can experience challenges in accessing affordable housing. The City participated in the San Joaquin Valley Affordable Housing Collaborative, worked with the Fresno Housing Authority on the development of the Blossom Trail Commons project, and continued to offer incentives and develop fee waivers, reductions, and/or deferrals to facilitate affordable housing development and special needs projects (Program 7). The City also worked with two affordable housing developers for the expansion of existing income-restricted projects and worked with another developer for the entitlement and preparation of an AHSC grant application for a 72-unit multifamily affordable housing project (Program 7). The City also administered two County rehabilitation programs, including one for rental units (Program 15) which can improve housing conditions for these community members. The City also administered a County Homebuyer Assistance Program (Program 17) and other first-time homebuyer resources (Program 18) which can help these households to access housing appropriate to their needs.

- Extremely Low-Income Households and Homeless Community Members: For extremely low-income households and households experiencing homelessness, Housing Choice Vouchers can provide housing mobility through access to housing that would otherwise be unaffordable. The City continued to refer households interested in Housing Choice Vouchers to the Fresno Housing Authority and to disseminate information about the voucher system to both interested households and to landlords interested in accepting the vouchers (Program 20).

Table 1N-29 Review of Past Accomplishments

Program	Evaluation	Recommendation
<p>Program 1: Regional Collaboration on Housing Opportunities</p> <p>The Multi-Jurisdictional Housing Element provides an opportunity for countywide housing issues and needs to be more effectively addressed at the regional level rather than just at the local level, and the 13 participating jurisdictions are committed to continuing the regional collaboration in the implementation of the Housing Element. By working together, the jurisdictions can share best practices, explore opportunities for further collaboration, and make the best use of limited resources.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • New Construction • Rehabilitation • The County of Fresno Public Works and Planning Department, with assistance from the Fresno COG, will take the lead in coordinating Committee meetings. • Continue to participate in the Countywide Housing Element Technical Committee to collaborate on housing program implementation and regional issues including, disadvantaged unincorporated communities (SB 244), infrastructure challenges, farmworker housing, homelessness, and fair housing. • The Countywide Housing Element Technical Committee will meet at least biannually to evaluate successes in implementation of programs and to identify gaps and additional needs. • The Committee will meet annually with the California Department of Housing and Community Development (HCD) to discuss funding opportunities and challenges in implementation of programs, and seek technical assistance from HCD and other State agencies in the implementation of housing programs and the pursuit of grant funding. • The Committee will meet periodically with Fair Housing of Central California to discuss fair housing issues and opportunities for education. • The Committee will advocate on behalf of the Fresno region for more grant funding for affordable housing and infrastructure improvements. 	<p>The City continued to participate in biannual Countywide Housing Element Technical Committee meetings. The City worked with Fresno Housing Authority on the redevelopment of Memorial Village, which was later renamed as Blossom Trail Commons. The City plans to develop a directory of services and resources for lower-income households.</p>	<p>Modify and Continue. New Program 1.</p>

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> Continue to seek partnerships with other jurisdictions in the region and other agencies (such as the Housing Authority), housing developers, community stakeholders, and agricultural employers/employees to explore viable options for increasing the availability of farmworker housing in suitable locations in the region. Develop a directory of services and resources for lower-income households available in the region, and review and update it annually. Make the directory available on City/County websites and at City/County offices. 		
<p>Program 2: Review Annexation Standards in Memorandum of Understanding</p> <p>All jurisdictions in Fresno County are subject to the City-County Memorandum of Understanding (MOU), which establishes procedures for annexation of land to cities. The City/County MOU encourages urban development to take place within cities and unincorporated communities where urban services and facilities are available or planned to be made available in an effort to preserve agricultural land. The MOU standards for annexation require that a minimum of 50 percent of annexation areas have an approved tentative subdivision map or site plan. While cities can take certain steps to “prezone” land in advance of annexation, the annexation of the land into the city limits is dependent upon private developers to request an annexation. In cities that are mostly built out within their current city limits, the MOU may limit the cities’ ability to accommodate future housing needs.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> The County of Fresno and the cities within the County shall work together to review and revise, as deemed appropriate by all parties, the standards for annexation contained in the Memorandum of Understanding between the County and the cities. 	<p>The City and Fresno County completed the Second Amendment to the 2005 Amended and Restated Memorandum of Understanding between the County and the City. This amendment added a provision to allow annexation for the purposes of achieving the goals of the housing element.</p>	<p>Modify and Continue. New Program 2</p>
<p>Program 3: Provision of Adequate Sites</p> <p>The City will provide for a variety of housing types and ensure that adequate sites are available to meet its Regional Housing Needs Allocation (RHNA) of 2,411 units. As part of this Housing Element update, the City has developed a parcel-specific inventory of sites suitable for future residential development. The suitability of these sites has been determined based on the development standards in place and their ability to facilitate the development of housing to meet the needs of the City’s current and future residents.</p>	<p>The City rezoned 54.09 acres for high density residential development (RM-1). The City continues to maintain the list of rezoned RM-1 properties and has provided the list to numerous interested parties upon request. The City processed an entitlement for a 100 percent affordable multifamily development on one of the sites that was rezoned.</p>	<p>Modify and Continue. Combine with Program 5. New Program 4.</p>

Program	Evaluation	Recommendation
<p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Maintain and annually update the inventory of residential land resources. • Provide the inventory on the City website and make copies available upon request. • Monitor development and other changes in the inventory to ensure the City has remaining capacity consistent with its share of the regional housing need. • Actively participate in the development of the next RHNA Plan to better ensure that the allocations are reflective of the regional and local land use goals and policies. 	<p>The City will continue to maintain and annually update the inventory of residential land resources. The inventory will be made available on the City website, and copies will be available upon request.</p> <p>The City participates in housing-related committees with Fresno COG. The City is actively participating in the development of the next RHNA Plan to better ensure that the allocations reflect the regional and local land use goals and policies.</p>	
<p>Program 4: Rezoning for RHNA</p> <p>The City's current sites capacity has a total shortfall of 1,456 units for meeting its Fourth and Fifth Cycle RHNA obligations. This shortfall is comprised of 796 lower-income units and 336 moderate-income units from the Fourth Cycle RHNA and 284 lower income units and 169 moderate-income units from the Fifth Cycle RHNA.</p> <p>To meet the shortfall, the City will rezone adequate acreage within its City Limits. Per State law, the City must rezone to accommodate the unaccommodated need from the Fourth Cycle RHNA within one year of the Housing Element adoption due date, and must accommodate the Fifth Cycle RHNA within three years of the actual Housing Element adoption date. In accordance with State law, the City will rezone enough land to cover the unaccommodated need from the Fourth Cycle of 796 lower-income units and 336 moderate-income units within one year of adoption of the Housing Element. The City will rezone enough land to cover the remaining Fifth Cycle unaccommodated need of 284 lower-income units and 40 moderate-income units within three years of adoption of the Housing Element. Sanger has identified 27 potential rezone sites, summarized in Table 2L-7 and shown in Figure 2L-1. These sites, if rezoned to RM-1.5, have a capacity for 3,523 units. Given the City's remaining need, the City will only need to rezone some of the candidate sites in order to meet its RHNA.</p> <p>Rezoning to accommodate the RHNA shortfall for lower-income units must meet the following requirements:</p>	<p>The City has rezoned 7 sites totaling 54 acres. This includes the sites rezoned for the 72 multifamily units entitled in the Faller and Almond project. The rezoned sites allow up to 22 units per acre. The rezoned sites can accommodate 1,188 lower-income (or moderate-income) units (54 x 22). Since the 5th cycle carryover was 284 lower income units and 169 moderate-income units, the rezoning has resolved the carryover. In accordance with Government Code Section 65584.09, the City no longer needs to consider the 4th cycle carryover.</p>	Delete.

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> Sites must be rezoned to permit owner-occupied and rental multi-family housing by right without discretionary review of the use or density; and Sites must be zoned with a minimum density of 20 units per acre and be large enough to accommodate at least 16 units per site. At least 50 percent of the lower income RHNA shortfall must be permitted on sites designated for exclusively residential uses. <p>Time Frame and Objectives:</p> <ul style="list-style-type: none"> Rezone enough land to cover the unaccommodated need from the Fourth Cycle of 796 lower-income units and 336 moderate-income units within one year of the Housing Element due date (i.e., December 31, 2016). Rezone enough land to cover the remaining Fifth Cycle unaccommodated need of 284 lower-income units and 40 moderate-income units within three years of adoption of the Housing Element. 		
<p>Program 5: Monitoring of Residential Capacity (No Net Loss)</p> <p>The City will monitor the consumption of residential acreage and development on non-residential sites included in the inventory to ensure an adequate inventory is available to meet the City’s RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.</p> <p>Time Frame and Objectives:</p> <ul style="list-style-type: none"> Develop and implement a formal evaluation procedure pursuant to Government Code Section 65863 by 2016. Monitor and report through the HCD annual report process. If rezoning/upzoning is required to replenish the sites inventory for meeting the RHNA shortfall, the sites shall be large enough to accommodate at least 16 units per site at a minimum density of 20 units per acre and shall be rezoned within two years. 	<p>The City continues to monitor its land inventory and submit Annual Progress Reports to HCD. The City provided data and information upon request throughout the planning period. No General Plan Amendments or Zoning Amendments have been proposed or processed that could impact reduction of capacity. The City discourages applications for development that would result in net loss of available sites. Informally, staff evaluate and monitor availability of adequate sites versus unmet need and report any changes in the City’s annual progress reports.</p>	<p>Modify and Continue. Combine with Program 3. New Program 4.</p>

Program	Evaluation	Recommendation
<p>Program 6: Water and Wastewater Service</p> <p>The development viability of the vacant sites in the inventory is directly linked to the availability and capacity of public facilities and services. The City continues to work to address water supply issues and infrastructure capacity limitations.</p> <p>Additionally, California Government Code Section 65589.7 requires water and sewer providers to establish specific procedures and grant priority water and sewer service to developments with units affordable to lower-income households. The statute also requires local governments to immediately deliver the housing element to water and sewer providers. The City is the water and wastewater provider in the city.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Continue to monitor water and wastewater capacity and apply for funding and make improvements, as appropriate and feasible, to better serve existing development and strive to accommodate the RHNA. • Establish procedures by the end of 2016 for granting priority water and sewer service to developments with lower-income units in compliance with California Government Code Section 65589.7. 	<p>The City continues to monitor domestic water production and wastewater treatment capacity. The City continually makes improvements to water production and wastewater treatment infrastructure. The City has completed rehabilitation projects to two existing water wells and continues to evaluate existing wells. As of 2021, the City was working on developing two new water wells.</p> <p>The City completed an above-ground water storage tank in 2020. These projects result in increased capacity and service to the City of Sanger Water System.</p> <p>As of 2023, the City was working on analysis of potential expansion of the existing wastewater treatment plant.</p> <p>The City grants priority water and sewer service to developments with lower-income units in compliance with California Government Code Section 65589.7.</p> <p>Construction has commenced on new water wells No. 22 and 19. Well 22 is being drilled as a pilot hole/production well, and testing of the water sampled from the pilot hole drilling is currently underway. Well 19 is being drilled as a standalone test well which will be destroyed upon completion of all sampling and testing. Rehabilitations of existing wells No. 7A and 25 are currently underway (May 2023). All improvements should be completed by Summer 2024.</p>	<p>Modify and Continue. New Program 5.</p>

<p>Program 7: Affordable Housing Incentives</p> <p>The City continues to have needs for affordable housing for lower income households, especially for seniors, disabled (including persons for developmental disabilities), farmworkers, the homeless, and those at imminent risk of becoming homeless. The City will continue to work with housing developers to expand affordable housing opportunities.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Continue to seek partnerships and regularly meet, at least annually, with other agencies (such as the Housing Authority), housing developers, community stakeholders, and employers to discuss and pursue viable opportunities for providing affordable housing. Work with property owners and developers on creative solutions for encouraging affordable housing on small sites in the inventory (i.e., less than 16 units per site). • Continue to offer fee waivers, reductions, and/or deferrals to facilitate affordable housing development and special needs projects, particularly those located on infill sites. • Continue to offer incentives such as density bonus and streamlined processing (such as pre-application consultation to identify potential issues early on and concurrent processing of required permits to the extent feasible) to facilitate the development of affordable housing, with an emphasis on housing opportunities for very low and extremely low income households, as well as special needs populations, such as the elderly, disabled (including developmentally disabled), farmworkers, the homeless, and those at risk of becoming homeless. • Continue to streamline the environmental review process for housing developments to the extent possible, using available State categorical exemptions and Federal categorical exclusions, when applicable. • Monitor the State Department of Housing and Community Development’s website annually for Notices of Funding Ability (NOFA) and, where appropriate, prepare or support applications for funding for affordable housing for lower income households (including extremely low income households), such as seniors, disabled (including persons with developmental disabilities), farmworkers, the homeless, and those at risk of homelessness. • Expand the City’s affordable housing inventory by 225 units over the next eight years – 50 extremely low income, 75 very low income, and 100 low income units. 	<p>The City participates in the San Joaquin Valley Affordable Housing Collaborative (SJVHC). The SJVHC is a regional nonprofit organization formed to specifically address housing issues in the eight-county San Joaquin Valley. The City continues to develop fee waivers, reductions, and/or deferrals to facilitate affordable housing development and special needs projects, particularly those on infill sites. The City continues to offer incentives, such as density bonus and streamlined processing and environmental review process for housing developments, to the extent possible. The City monitors the State Department of Housing and Community Developments website annually for NOFAs. The City applied and received SB 2 funding. The City continues to work with affordable housing developers to meet the goal to expand the City’s affordable housing inventory. The City worked with Fresno Housing Authority on the redevelopment of Memorial Village, which was later renamed as Blossom Trail Commons. The redevelopment increased the number of units from 35 to 55. The City worked with two affordable housing developers for the expansion of existing projects. One project (Phase II of Sanger Crossings) will result in 36 new deed-restricted affordable multi-family residential units, and the other project (Expansion of Unity Estates) will result in 10 new income-restricted multiple-family residential units. City staff also worked closely with an affordable housing developer to process a new 72-unit multiple family project for the entitlement and preparation of an AHSC grant application.</p>	<p>Modify and Continue. New Program 7.</p>
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Program	Evaluation	Recommendation
<p>Program 8: Farmworker Housing The farming industry is the foundation of the County’s economy base. According to the USDA, National Agricultural Statistics Service (NASS) 2012, about 58,600 workers were employed in farm labor throughout the County, indicating a significant need to provide housing for farmworkers and their families, particularly during peak harvest seasons.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Continue to support and encourage other agencies and housing developers, such as the Fresno Housing Authority and Self-Help Enterprises, in the application of funds for farmworker housing, including State HCD and USDA Rural Development loans and grants and other funding sources that may become available. Continue to offer incentives such as density bonus and streamlined processing to facilitate the development of farmworker housing. Annually monitor the status of farmworker housing as part of the City’s annual report to HCD on Housing Element progress and evaluate if City efforts are effective in facilitating the provision of farmworker housing. If appropriate, make necessary changes to enhance opportunities and incentives for farmworker housing development. 	<p>The City supports and encourages other agencies and housing developers, such as the Fresno Housing Authority and Self-Help Enterprises. The City worked with Self-Help Enterprises to develop infrastructure to deliver water to an existing disadvantaged unincorporated community. The City offers a density bonus and will streamline processing to facilitate the development of farmworker housing.</p>	<p>Modify and Continue. New Programs 8 and 9.</p>
<p>Program 9: Preserving Assisted Housing None of the assisted affordable rental projects in Sanger are at risk of converting to market rate housing by 2025. Nevertheless, the City will continue to monitor status of affordable housing projects and other affordable housing agreements (such as density bonus agreements).</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Continue to monitor status of affordable housing projects. If projects become at risk of converting to market-rate housing, contact nonprofit housing providers and the Fresno Housing Authority to pursue options to preserve the projects. 	<p>None of the assisted affordable rental projects in the City are at risk of converting to market rate housing by 2025. The City will continue to monitor status of affordable housing projects and other affordable housing agreements. If projects become at risk of converting to market-rate housing, the City will contact nonprofit housing providers and the Fresno Housing Authority to pursue options to preserve the projects.</p>	<p>Modify and Continue. New Program 11.</p>
<p>Program 10: Encourage and Facilitate Accessory Units (Second Units) A second unit (sometimes called an “accessory dwelling unit” or “granny flat”) 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. Second units can be an important source of affordable housing given that they typically are smaller and have no associated land costs. The City permits second units ministerially in all residential zones.</p>	<p>The City processed all applications for ADUs consistent with state guidelines. The City began preparing a new ADU ordinance to replace the secondary residences ordinance. The City anticipates adoption of the ordinance in Summer 2023. The City will post available ADU information on the city website. The City will</p>	<p>Modify and Continue. New Program 12.</p>

Program	Evaluation	Recommendation
<p>Time Frame and Objectives:</p> <ul style="list-style-type: none"> By 2018, consider fee reductions for second units. By 2019, implement a public education program advertising the opportunity for second units through the City website and at the planning counter. 	<p>continue to consider fee reductions for ADUs.</p>	
<p>Program 11: Zoning Code Amendments In compliance with State laws, the City will amend its Zoning Code to address the provision of a variety of housing options, especially housing for special needs groups. Specifically, the City will amend the Zoning Code to address the following:</p> <ul style="list-style-type: none"> Density Bonus: Consistent with Government Code, a density bonus up to 35 percent over the otherwise maximum allowable residential density under the applicable zoning district will be available to developers who provide affordable housing as part of their projects. Developers of affordable housing will also be entitled to receive incentives on a sliding scale to a maximum of three, where the amount of density bonus and number of incentives vary according to the amount of affordable housing units provided. Farmworker/Employee Housing: Comply the Employee Housing Act which requires farmworker housing up to 12 units or 36 beds be considered an agricultural use and permitted in any zone that permits agricultural uses, and employee housing for six or fewer employees are to be treated as a single family structure and permitted in the same manner as other dwellings of the same type in the same zone. Group Homes: Amend the Zoning Ordinance to allow group homes for six or fewer residents in all zones allowing single family residential uses. Additionally, amend the Zoning Ordinance to include provisions for larger group homes of seven or more residents. Second Units: Amend the Zoning Ordinance to allow second units as permitted by right in all zones allowing single family uses. Single Room Occupancy: Amend the Zoning Code to address the provision of SRO housing. Definition of Family: Remove the definition of family in the Zoning Code, or amend the definition to ensure it does not differentiate between related and unrelated individuals, or impose a numerical limit on the number of persons in a family. 	<p>The City completed the 2035 General Plan update. The City will conduct a comprehensive zoning ordinance update to be consistent with the 2035 General Plan update. The City will review development standards for multifamily units and amend the zoning ordinance. The City annually reviews the effectiveness and appropriateness of the zoning code and will process any necessary amendments to remove or mitigate potential constraints to the development of housing.</p> <p>In 2019, the City completed a zoning ordinance amendment to require a minimum density of 20 units per acre in the RM-1 zone.</p> <p>During the 6th cycle, the City will adopt a density bonus ordinance in compliance with State law, update its zoning ordinance to comply with the Employee Housing Act, define and regulate group homes and residential care facilities in compliance with State law, allow SROs in at least one zone, amend the definition of family to remove barriers.</p> <p>The City adopted a reasonable accommodation ordinance in 2016.</p> <p>The City began preparing a new ADU ordinance to replace the secondary residences ordinance. The City anticipates adoption of the ordinance in</p>	<p>Modify and Continue. New Program 16.</p>

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> • Reasonable Accommodation: Establish a reasonable accommodation procedure to provide flexibility in policies, rules, and regulations in order to allow persons with disabilities access to housing. <p>The City will continue to monitor the effectiveness and appropriateness of the Zoning Ordinance in facilitating housing for the homeless and other persons with special needs and make amendments as necessary.</p> <p>The City will also analyze development standards in multifamily zone districts as potential constraints to affordable housing as part of the comprehensive update of the Sanger Zoning Ordinance. The analysis will include the following recommendations:</p> <ul style="list-style-type: none"> • Review height limitations in RM-1.5 and RM-2.5 and consider options for increasing height limits to three stories. • Increase building coverage in the RM-2.5 district from 40 percent to 50 percent to provide for larger units and more flexibility in the placement of buildings. • Increase building coverage in the RM-1.5 district from 50 percent to 60 percent to provide for larger units and more flexibility in the placement of buildings. • Reduce the parking requirement in all multifamily districts from 2.0 spaces per unit to 1.5 spaces per unit (with reasonable accommodations for visitor parking) to reduce land area devoted to parking, reduce development costs, and increase the area to be developed with housing. <p>In addition, parking standards for multifamily uses were identified as a potential constraint. The City will review these standards and consider reduced parking requirements for smaller multifamily units.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Complete Zoning Ordinance updates for consistency with State law by December 2016. • Review development standards for multifamily units as part of a comprehensive Zoning Ordinance update in 2017. • Annually review the effectiveness and appropriateness of the Zoning Ordinance and process any necessary amendments to remove or mitigate potential constraints to the development of housing. 	Spring 2023.	

Program	Evaluation	Recommendation
<p>Program 12: Lot Consolidation and Lot Splits The City's vacant sites inventory is comprised of parcels of varying sizes, from small lots of less than half acre or large lots of over 20 acres; either case presents unique challenges to residential development, especially to multifamily housing development. The City will encourage lot consolidation or lot splitting to promote the efficient use of land for residential development pursuant to the Subdivision Map Act.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Assist interested developers/property owners in identifying opportunities for lot consolidation or lot splitting. • Process requests for lot consolidation and lot splitting concurrent with other development reviews. • Offer incentives to developers to promote parcel consolidation, such as priority permit processing and deferred development impact fees. • Encourage the use of master plans/specific plans to provide a cohesive development strategy for large lots. 	<p>In 2018, the City processed one tentative parcel map for residential purposes and processed four lot line adjustment applications for residential purposes. In 2019, the City received one tentative parcel map for multiple-family residential purposes. It proposed to accommodate the expansion of an existing income-restricted facility (Unity Estates) and was approved in 2020. All necessary entitlement applications for a given project are typically processed concurrently. Larger projects may request deferral of development impact fees, which would be evaluated case by case. The City encourages comprehensive planning of projects sites. Depending on size, location, and unique circumstances, the City may require a master plan/specific plan for a specific development.</p>	<p>Modify and Continue. New Program 18.</p>
<p>Program 13: Monitoring of Planning and Development Fees The City charges various fees to review and process development applications. Such fees may add to the cost of housing development.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> • Continue to monitor the various fees charged by the City to ensure they do not unduly constrain housing development. • As appropriate, consider incentives such as deferred or reduced fees to facilitate affordable housing development. 	<p>The City routinely evaluates various fees charged by the City. The City created a minor site plan review application with reduced fee (39% of site plan review application) and a minor conditional use permit application with a reduced fee (56% of conditional use permit application). Minor applications are generally practical for infill projects. New fees were adopted in 2021, and routine fee assessment did not result in fee increases that unduly constrain housing development.</p>	<p>Modify and Continue. New Program 19.</p>
<p>Program 14: Fresno County Housing Assistance Rehabilitation Program (HARP) This program provides loans to qualifying homeowners in the unincorporated County and participating cities for the improvement of their homes. The City is a participating city. Eligible improvements include energy efficiency upgrades and installations, health and safety and hazard corrections, and accessibility modifications. Loan terms under this program vary according to household income and the improvements and repairs that are needed.</p> <p><i>Time Frame and Objectives:</i></p>	<p>The City posts available housing rehabilitation resources on the City website and promotes these resources at the public counters. The City refers interested households to the County program, with the goal of assisting four low-income households during the planning period. Access to public counters was closed during much of 2020 and 2021 due to COVID restrictions. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes.</p>	<p>Modify and Continue. New Program 22.</p>

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> Promote available housing rehabilitation resources on City website and public counters. Refer interested households to County program with the goal of assisting four low income households during the planning period. 	The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	
<p>Program 15: Fresno County Rental Rehabilitation Program (RRP) This program provides no interest loans to qualifying property owners in the unincorporated County and participating cities for making improvements to their rental properties. The City is a participating city. Eligible improvements include repairing code deficiencies, completing deferred maintenance, lead-based paint and asbestos abatement, HVAC repairs, energy efficiency upgrades, accessibility modifications, and kitchen and bathroom upgrades.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Promote available housing rehabilitation resources on City website and public counters. Refer interested property owners to County program. 	The City promotes available housing rehabilitation resources on the City website and at the public counters. The City continues to refer interested property owners to the County program. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	Modify and Continue. New Program 23.
<p>Program 16: Code Enforcement The City's Code Enforcement is in charge of the enforcing the City's building codes with the objective of protecting the health and safety of residents.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Continue to use code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with city codes. Refer income-eligible households to County housing rehabilitation programs for assistance in making the code corrections. 	The City continues to use code enforcement and substandard abatement processes to bring substandard housing units and residential properties into compliance with City codes. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.	Modify and Continue. New Program 24.
<p>Program 17: Fresno County Homebuyer Assistance Program (HAP) City participates in the County's Homebuyer Assistance Program. This program assists lower income families with purchasing their first home by providing a zero interest, deferred payment loan that does not exceed 20 percent of the purchase price of the single family residence (plus loan closing costs). Households earning up to 80 percent AMI in unincorporated Fresno County and participating cities are eligible for this program.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Promote available homebuyer resources on City website and public counters. 	The City promotes available homebuyer resources on the City website and at the public counters. The City continuously refers interested households to the County program.	Modify and Continue. Combine with Program 19. New Program 25.

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> Refer interested households to County program with the goal of assisting four households. 		
<p>Program 18: First-Time Homebuyer Resources Sanger residents have access to a number of homebuyer assistance programs offered by the California Housing Finance Agency (CalHFA):</p> <ul style="list-style-type: none"> Mortgage Credit Certificate (MCC): The MCC Tax Credit is a federal credit which can reduce potential federal income tax liability, creating additional net spendable income which borrowers may use toward their monthly mortgage payment. This MCC Tax Credit program may enable first-time homebuyers to convert a portion of their annual mortgage interest into a direct dollar for dollar tax credit on their U.S. individual income tax returns. CalPLUS Conventional Program: This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalPLUS Conventional is fixed throughout the 30-year term. The CalPLUS Conventional is combined with a CalHFA Zero Interest Program (ZIP), which is a deferred-payment junior loan of three percent of the first mortgage loan amount, for down payment assistance. CalHFA Conventional Program: This is a first mortgage loan insured through private mortgage insurance on the conventional market. The interest rate on the CalHFA Conventional is fixed throughout the 30-year term. <p>CalHFA loans are offered through local loan officers approved and trained by CalHFA.</p> <p>Time Frame and Objectives:</p> <ul style="list-style-type: none"> Promote available homebuyer resources on City website and public counters in 2016. Annually review funding resources available at the state and federal levels and pursue as appropriate to provide homebuyer assistance. 	<p>The City promotes available homebuyer resources on the City website and at the public counters. The City annually reviews and pursues available state and federal funding resources and pursues as appropriate to provide homebuyer assistance. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.</p>	<p>Modify and Continue. Combine with Program 18. New Program 25.</p>
<p>Program 19: Energy Conservation The City promotes energy conservation in housing development and rehabilitation.</p> <p>Time Frame and Objectives:</p> <ul style="list-style-type: none"> Consider incentives to promote green building techniques and features in 2017, and as appropriate adopt incentives by 2018. Continue to promote and support Pacific Gas and Electric Company programs that provide energy efficiency rebates for qualifying energy-efficient upgrades by providing a link on the City website and making brochures available at City counters. 	<p>The City continues to promote and support Pacific Gas and Electric Company programs that provide energy-efficiency rebates for qualifying energy-efficient upgrades. The City provides a link on the City website and makes brochures available at City counters. Residential solar panel permits receive expedited review and approval per California law.</p>	<p>Modify and Continue. New Program 26.</p>

Program	Evaluation	Recommendation
<ul style="list-style-type: none"> Expedite review and approval of alternative energy devices (e.g., solar panels). 		
<p>Program 20: Housing Choice Vouchers The Housing Choice Voucher (HCV) Program extends rental subsidies to extremely low and very low income households, including families, seniors, and the disabled. The program offers a voucher that pays the difference between the current fair market rent (FMR) as established by the HUD and what a tenant can afford to pay (i.e. 30 percent of household income). The Fresno Housing Authority administers the housing choice voucher program in Fresno County.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Provide information on the HCV program on City website and public counters in 2016. Refer interested households to the Fresno Housing Authority and encourage landlords to register their properties with the Housing Authority for accepting HCVs. Work with the Housing Authority to disseminate information on incentives for participating in the HCV program throughout city neighborhoods with varying income levels to promote housing opportunities for all city residents. 	<p>Interested households are referred to the Fresno Housing Authority, and landlords are encouraged to register their properties with the Housing Authority for accepting HCVs. The City continues to work with the Housing Authority to disseminate information on incentives for participating in the HCV program throughout city neighborhoods with varying income levels to promote housing opportunities for all city residents. Staff turnover and limited funding for staff time have precluded the ability to consistently track and report program outcomes. The City will continue to seek ways to implement programs efficiently and create systems for record keeping.</p>	<p>Modify and Continue. New Program 27.</p>
<p>Program 21: Fair Housing Residents in the Central Valley, including Fresno County, can access fair housing services provided by the Fair Housing Council of Central Valley (FHCCC). FHCCC offers mediation, counseling, advocacy, research, and fair housing training and workshops for residents as well as housing providers. Other fair housing resources include the Fresno Housing Authority, Fair Housing and Equal Opportunity (FHEO) division of HUD, and the State Department of Fair Employment and Housing (DFEH). The City will assist in promoting fair resources available in the region.</p> <p><i>Time Frame and Objectives:</i></p> <ul style="list-style-type: none"> Participate in the Fresno Urban County's efforts in updating the Analysis of Impediments to Fair Housing Choice required by the CDBG program. Work collaboratively with other jurisdictions in the region to provide education to lenders, real estate professionals, and the community at large. Actively advertise fair housing resources at the public counter, community service agencies, public libraries, and City website. Refer fair housing complaints to HUD, DEFH, Fair Housing Council of Central California, and other housing agencies, as appropriate. 	<p>The City works on the MJHE through Fresno COG. The MJHE facilitates participation in the Fresno Urban County's efforts in updating the Analysis of Impediments to Fair Housing Choice required by the CDBG program and works collaboratively with other jurisdictions in the region to provide education to lenders, real estate professionals, and the community at large.</p> <p>The City actively advertises fair housing resources at the public counter, community service agencies, public libraries, and City website. The City refers fair housing complaints to HUD, DEFH, Fair Housing Council of Central California, and other housing agencies, as appropriate.</p>	<p>Modify and Continue. New Program 28.</p>

APPENDIX 1N: CITY OF SANGER

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SECTION 1N-6: PUBLIC OUTREACH AND ENGAGEMENT

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

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

To meet the requirements of state law, the City of Sanger completed the public outreach at both the local level and as part of the regional Fresno County Multi-Jurisdictional Housing Element effort to encourage community involvement. These efforts included:

- Regional Project Website
- Stakeholder Consultations and Focus Groups
- Study Sessions with Planning Commissions, City Councils, and the County Board of Supervisors
- Community Workshops
- Community Survey

Regional efforts included three sets of community workshops, consultations, and a community survey, all of which are discussed in detail in Chapter 1: Regional Housing Element Public Outreach.

Planning Commission and City Council Meetings

A joint study session was held with the Planning Commission and City Council at a special meeting on October 6, 2022, to discuss the Housing Element update and process. Staff presented an overview of the Housing Element update process and the required contents of the element, discussed early strategies and possible sites to meet the City’s RHNA, reviewed new state laws, and solicited feedback from the City Council, Planning Commission, and community members on these strategies and other housing needs in Sanger. There were no questions or comments from Council or Commission members. No public comments or questions were received during the study session.

The Planning Commission and City Council received presentations about the Public Review Draft Housing Element at regular meetings on September 28th and October 5th 2023, respectively. All meetings were open to the public and held in person. No public comment related to fair housing concerns was received at the meetings.

Planning Commissioners had the following questions at the meeting on September 28, 2023:

- What are Single Room Occupancy units?
- Why is there a concentration of people with disabilities in part of the City?
- On what grounds can a project be denied?
- Are there penalties for not meeting the RHNA?

The Mayor, City Attorney and City Council Members had the following questions and comments at the meeting on October 5, 2023:

- What are the penalties for noncompliance with SB 166, no net loss legislation?
- It is challenging to obtain approval of annexations from LAFCO without firm commitments from developers, however the City is interested in encouraging housing, providing services and making land available through annexation. What can be done to encourage interest from developers?
- It is noticeable that the pipeline projects are key to meeting the RHNA.
- As a council, it is hard to balance needs.
- Will the 7th cycle RHNA be an even bigger rate of increase (as compared with the change from the 5th to the 6th cycles)?
- The City could use more senior housing.
- Is any rezoning recommended?

Community Workshop

A community workshop was held on August 30, 2022, from 6:00 to 7:30 pm. To invite the community to the event, the following outreach efforts were conducted:

- Flyers in English and Spanish were distributed through the Fresno COG email list and a list of regional stakeholders and CBOs, including Leadership Council for Justice and Accountability, which represents community members from Tombstone.
- Flyers were posted at City Hall and the Rec Center.
- Eventbrite registration pages were created in both English and Spanish along with a Facebook event.
 - The Eventbrite and Facebook pages advertised that Spanish language interpretation, refreshments, and activities for kids would be provided.
- Flyers were sent out through the Fresno Housing Authority to residents of affordable housing.
- Flyers were posted on the City's Facebook page.

In the presentation, members of the public were introduced to the process of developing the Housing Element both for the region and for the City of Sanger. They were also given information about current housing conditions in the region and in Sanger and were invited to participate in a discussion about local housing needs. The discussion was prompted by the following questions:

- What do you think are the most critical housing issues in your community?
- What do you think are the housing types most needed in the community?
- When assessing new housing development that might be built in the next 8 to 10 years, what should be the community's most important consideration?
- Is there anything else that you can share regarding additional housing opportunities in the community?
- Any suggestions for soliciting additional Housing Element feedback?

Nine community members attended the workshop. Attendees expressed concerns about the lack of multifamily units, as single-family homes predominate across the city, and about the age of existing housing stock. They also would like to see more workforce housing developed along with larger homes and SROs. Community members also indicated that there aren't currently steps in place for unhoused people or low-income households currently living in affordable units to get into housing or market-rate housing. Participants were concerned about water access and were interested in seeing more green spaces and amenities like a skate park. Residents from the unincorporated area of Tombstone expressed interest in opportunities for ADUs.

Stakeholder Interviews

Throughout the summer and fall of 2022, several interviews were conducted with stakeholders who work in areas such as housing, homelessness, and other social services in Sanger and throughout the Fresno County area. Summaries of their responses are below.

Leadership Counsel for Justice and Accountability

On August 26, 2022, a panel of three advocates from the Leadership Counsel for Justice and Accountability (LCJA), Jovana Morales-Tilgren, Karla Martinez, and Mariana Alvarenga, was interviewed regarding local housing issues. The advocates noted that many in the area want to be homeowners and apply to regional first-time homebuyer programs, but the barrier of citizenship prevents them from accessing those resources. Undocumented community members would like to be able to stay in Fresno but have a difficult time purchasing a home. Many community members have also expressed a desire to see more apartments built for young adults and students who want to be able to move out of their families' homes. At present, they can't afford to. Lots of community members that the LCJA works with would like to live in areas of opportunity. Inclusionary zoning would help to create these opportunities.

The cost of housing forces many in the region to stay in substandard housing because there aren't affordable alternatives for them to move to. Overcrowding is a major issue in the area, with some homes housing ten or more people per unit. There isn't enough space to build enough housing, and there has been some downzoning in the city of Fresno. Seniors and those with disabilities have a particularly difficult time finding housing. Without social security numbers, people can't apply for affordable rental housing. Other members of the community have evictions on their records that they don't know about or have poor credit or criminal records, and these prevent them from accessing quality housing. The advocates suggested that an affordable housing directory would help community members to identify what affordable housing is available or which buildings will accept Section 8 vouchers.

Many mobile homes are in poor condition, and some residents can't make repairs because of how the home was built. For some in multifamily buildings, exterior conditions suggest a building in good repair, but the interior of the units are uninhabitable due to mold, holes in the wall, or broken HVAC systems. There isn't much pressure for landlords to respond to tenant requests, or they want tenants to be responsible for the problems. Funding is needed to help make these repairs for the sake of the tenants, which could come from fines paid by code violators. Any system of code violation would need to be established in such a way as to prevent retaliation toward residents.

Lack of infrastructure access is also a major concern. Some parts of the county have dry wells, and some housing projects have been denied because of a lack of water access. The distance between some communities and essential services can also cause an issue, as it can take an hour by bus to reach an appointment. Investment is needed in areas where lack of reliable water access is a major concern.

The COVID-19 pandemic exacerbated existing poverty conditions, and many in the community are behind on bills for rent or electricity, or don't have reliable access to food. Local rent has increased exponentially while incomes have not. Additionally, overcrowding prevented quarantining.

BIA of Fresno/Madera Counties

The president of the Building Industry Association of Fresno/Madera Counties (BIA), Mike Prandini, was interviewed in November 2022. The BIA is an industry organization that represents builders, developers, subcontractors, and affiliated businesses in the residential, commercial, and industrial building industry throughout the region.

The current shortage of housing has created demand, which can be a positive for BIA's members. Most jurisdictions have sufficient available land to build new housing. Kingsburg was identified as an outlier in this, as they have a growth limitation ordinance, so the two builders that work in the area have been able to work but at a slower pace. The statewide move to require all-electric utilities rather than gas is a concern. For market-rate housing, the State's vehicle miles traveled (VMT) regulations are a large barrier, as transit isn't reliable, and a car is necessary to get around. Builders have to pay a fee to get around the cost of mitigating car miles unless City Councils can make a finding of an unavoidable impact. For affordable housing, the prevailing wage requirements are a barrier to development due to the increased cost.

Infrastructure costs also affect both types of projects. Streamlining tools help with increasing costs, but not enough. A lack of local water access is also a barrier to development. He expressed concern that the State assigned the RHNA without this in mind. There may not be enough water access to support the housing development that the State is looking to see.

In his experience, single-family homes are in greatest demand. There is a lot of demand for low-income housing projects, but these aren't financially viable for developers without government subsidy. However, including government subsidy in projects increases the overall cost to build, as it triggers prevailing-wage requirements. A recent affordable development in the City of Fresno cost around \$400,000 per unit to build. Condo-style projects are also a possibility, but in his experience, they don't tend to be successful in this region. To keep prices within reach of local residents, recent projects have needed to be built at higher densities. A typical project is between 8 and 15 units per acre on small lots, with single-family homes built as two-story structures in order to reach 1,200 or 1,300 square feet. Developers need to build higher-density projects to spread out the cost of infrastructure among a larger number of units. Demand isn't as high in smaller communities as it is in the Cities of Fresno and Clovis. These cities have better access to jobs, education, and medical centers. VMT mitigation costs increase in communities that are far from these economic centers, so it's less of an issue in closer communities like Sanger, Reedley, Kingsburg, Fowler, and Kerman. Coalinga is too far away from the economic center of the region, which causes challenges. Many residents of Mendota and San Joaquin have incomes that are too low to afford development at its current costs. He indicated that more downpayment assistance and maintenance programs are needed throughout the region. Fresno Housing Authority has some, but they're limited.

Fair Housing of Central California

A representative from Fair Housing of Central California (FHCCC) was interviewed on September 27, 2022. The organization works to eliminate housing discrimination and expand housing opportunities to all persons. The FHCCC receives fair housing complaints and tracks them by location, zip code, gender, race or ethnicity, and type of complaint. The most common fair housing issue that clients report is discrimination related to disability or race. She expressed concern that fair housing practices are not really embraced by local government, and that cities should avoid promoting the development of new housing in neighborhoods where segregation is deliberately continued by landlords and real estate agents. Her clients prefer decent, affordable, and accessible housing, but as the cost of purchasing a home increases, opportunities decline. She feels there is adequate rental housing in the community, including for seniors and persons with disabilities, but affordability and accessibility remain barriers.

Fresno Madera Continuum of Care

As a representative for the Fresno Madera Continuum of Care (CoC), Laura Moreno was interviewed in October 2022. Ms. Moreno is a program manager for Fresno County's Department of Social Services (DSS). The CoC does not provide direct services, but instead is a collaborative of agencies that work together to provide homeless services. At present, there is insufficient low-income housing for those who

are homeless. Many people in the region are on a fixed income, including disability or social security, and cannot afford housing.

Law Office of Patience Milrod

Fresno-area civil rights attorney Patience Milrod was interviewed on October 31, 2022. While Ms. Milrod supports the continued attention to inclusionary housing, she has concerns about the passive language of “facilitate” and “encourage” that has been common in past Housing Elements. She identified code enforcement as a strategy for improving housing quality that could be strengthened. At present, rents are increasing while the quality of housing is decreasing and there isn’t a lot of energy locally to correct that imbalance. This particularly hurts lower-income households. With more aggressive code enforcement in place, she suggested that some landlords may decide that the cost of maintaining their property isn’t worthwhile and may choose to sell to a community land trust or Habitat for Humanity rather than entering receivership. She would like to see that as a specific goal. The biggest barrier to finding affordable, decent housing in the region that she identified was that lower-cost housing tends to also be low quality or ill maintained. However, she cautioned that the supply problem won’t be solved with suburban or exurban single-family dwelling units. There’s also local disinclination to build lower-income housing in areas of opportunity. She suggested that cities should ask for affordability covenants in perpetuity and highlighted the land trust model as a way to enable that.

Central Valley Urban Institute

On September 7, 2022, Eric Payne, the executive director of the Central Valley Urban Institute (CVUI), was interviewed. The CVUI is an advocacy organization working throughout the Fresno area. He indicated that there may be opportunities to increase affordable housing stock production, particularly in infill areas and brownfields, as well as to increase homeownership through programs like the downpayment assistance program. However, he expressed concerns about high building costs, lack of financing, and poor leadership in the area. Community members would like to see intergenerational housing, middle-income housing, and “missing-middle” sized housing as well as housing to end homelessness, particularly among college-aged youth. At present, he does not believe that there are adequate opportunities for homeownership or adequate rental housing. The largest barriers are access to credit, lack of financial education, and existing housing cost burden. There is a lack of investment in programs that serve low- to moderate-income communities.

Resources for Independence Central Valley

On November 1, 2022, a representative from the organization Resources for Independence Central Valley was interviewed. The representative expressed concern about laws in the City of Fresno that prevent homeless community members from camping or living in their cars. Homelessness is increasing, but the City is investing resources in enforcing these laws rather than providing assistance. There is funding to move homeless people around, but not to improve anyone’s living situation. Access to Section 8 can be a challenge, as the waiting list can be four or five years long. Additionally, rental housing can require incomes of two to three times the rent, which can be a barrier to some who need to access rental housing. For those

who may be able to access housing, some landlords levy additional fees during the application process that can present a prohibitive cost. Credit checks are becoming a barrier for residents to get into housing. Community members with disabilities can experience additional challenges trying to find homes that have necessary accessibility features. Homeowners with disabilities end up needing to make expensive home improvements in order to make their homes accessible for themselves. For renters, these improvements may be more challenging to implement, and those who use service or support animals may experience discrimination against pets. There isn't enough higher-density housing, housing near transit or major transportation corridors, or housing in good repair.

Llaves de tu Casa Iniciativa

As a follow-up to the region-wide stakeholder focus groups held in October and November 2022, a collection of members from the Llaves de tu Casa Iniciativa (LTDC) met on December 13, 2022, to respond to several stakeholder interview questions. The initiative is a financial education program open to all County of Fresno residents but with a focus on increasing Latino homeownership rates. Eight initiative members represented organizations and companies including Envision Fresno (Mirna Garcia), Self Help Enterprises (Rick Gonzales, Alicia Bohigian), CORE Home Loans (Pablo Estrada), Union Bank (Reyes Ruiz), the California Association of Realtors (Sabrina Brown), and the National Association of Hispanic Realtors (Aldiva Rubalcava, Lucy Sandoval). The group collectively serves Fresno County, and members also serve other counties in the Central Valley.

The opportunities for future housing in the region that the initiative members identified included LTDC's ability to provide homeownership education virtually and in partnership with other local organizations. There has been a lack of financial literacy in the community along with challenges in using technology and language barriers.

The initiative members expressed concerns about affordability, including the location of affordable housing in undesirable areas. Upzoning single-family zoning would create more opportunities for the development of multifamily housing in more desirable locations. Some funding is only available in certain areas, which can exacerbate existing patterns of segregation and close proximity to industrial uses. They also expressed concern about investors displacing community members in order to establish short-term rentals while community members live in hotels. The State's mandate to install solar panels on new homes was also cited as an additional cost that will drive up the buyers' or renters' cost.

The gap between ownership housing affordability and program income limits was identified as a barrier to accessing housing. Moderate-income households earn too much to qualify for housing assistance, but those who qualify aren't able to afford the housing available. In addition to a lack of multifamily rental housing, there aren't many condo buildings in the region, which could present another affordable homeownership strategy. The establishment of land trusts was also identified as a potential strategy for increasing affordability, as well as donations of land from municipalities.

Self Help Enterprises has partnered with the City of Clovis on their recent accessory dwelling unit program and has partnered with Salt + Light to develop tiny homes for transitional housing.

Fresno Housing Authority

Two representatives from the Fresno Housing Authority, Doreen Eley and Michael Duarte, were interviewed on January 11, 2023. The Fresno Housing Authority currently has housing projects in every jurisdiction participating in the Multi-Jurisdictional Housing Element except for Coalinga. The City of Fresno has a separate Housing Authority.

The representatives noted that there is tremendous demand for housing in all communities in Fresno County. The last time the Section 8 waiting list opened they received more than 50,000 applications. Recently, when a 60-unit development in Clovis opened, they received more than 10,000 applications. When a project in downtown Fresno opened, they received 4,000 applications within a two-week period. Rents are high, which is challenging for residents but good for developers. The region needs more housing opportunities for people experiencing homelessness.

In rural and unincorporated communities, lack of water and sewer capacity is a major concern. The Housing Authority can't build housing in areas with no services.

For local developers, state funding and streamlining programs trigger skilled, trained, and prevailing wage requirements, which can be a barrier. Entitlement processing timelines are a barrier to development for the Housing Authority. The representatives gave the example of a recent project in San Joaquin where streamlined initiatives were used, but the project still took a year to finish the project review process. Many communities don't have much staff capacity and have part-time consultants to complete the work.

There is also a lack of capacity among agencies that provide services in rural and unincorporated areas. This is especially challenging for special needs populations that need mental health services. There is a countywide Department of Behavioral Health, but no offices in smaller cities. The representatives gave the example of a Homekey project in Huron that the Housing Authority wanted to assist with, but there were no service providers available to serve the project.

While there is a lot of interest in the community for homeownership opportunities, more funding is available for multifamily rental projects. The Housing Authority is more focused on rental projects and arriving at deeper affordability levels.

The Housing Authority is following the State's lead in providing housing in high opportunity areas. There are lots of incentives to do this to compete for tax credits and other state funding programs. The representatives mentioned that they are trying to balance this need by also working to improve the lower-resource areas where folks are already living along with disadvantaged communities like Del Ray and Lenar.

The COVID-19 pandemic brought challenges for many residents of Housing Authority projects. There were increases in domestic violence, and it was challenging for property managers to enforce rules.

Public Comments

The City offered the public opportunities to provide comment during the drafting of the Housing Element. As of January 24, 2024, no public comment was received. Any comments received will be considered and used to inform the sites analysis and assessment of fair housing issues, and goals, policies, and actions.

Noticing of Planning Commission and City Council Meetings and Community Workshops

Notice of Planning Commission and City Council Meetings were made available as part of the City's standard meeting notice process for City Council and Planning Commission meetings.

The Community Workshop was advertised to members of the public through multiple information channels. Flyers in English and Spanish were distributed through the Fresno COG email list and list of regional stakeholders and CBOs. Flyers were also posted at City Hall and the Rec Center and were sent to the Fresno Housing Authority for them to post and distribute.

Noticing of the Draft Housing Element

Per California Government Code Section 65585, the draft Housing Element was made available for public comment for 30 days, plus 10 days to consider and incorporate public input prior to submitting it to HCD. The draft was made available on the City's website starting August 29, 2023 and was noticed to residents through the same methods as the Planning Commission and City Council meetings. Additional direct noticing was sent to local housing advocate groups and other stakeholders. No public comments were received. The draft Housing Element was submitted to HCD on October 9, 2023.

Comment Letter

Self-Help Enterprises (SHE) provided a comment letter to several Fresno COG jurisdictions with numerous broadly applicable recommendations. The City of Sanger has taken these recommendations into careful consideration. SHE urges its service area members, including the City of Sanger, to prioritize high-potential sites that unlock access to opportunity and not just basic shelter. As shown in **Figure 1N-6 Local TCAC/HCD Opportunity Areas**, sites counted towards each RHNA income category are distributed across the City, with most low- and moderate-income sites in the high and moderate resource areas. SHE encourages the City to streamline approvals and create financial incentives (including fee waivers or deferrals) for 100 percent affordable housing. Per **Programs 7, 8, 10, 12, 16, 18 and 20**, the City will continue to use streamlined approvals and offer incentives (including fee waivers or deferrals) to facilitate lot consolidations and lot splits, encourage affordable housing, housing for farmworkers and ADUs. SHE encourages jurisdictions to add a program to revise their zoning ordinance to add a manufactured home on a permanent foundation to be allowed in all zones that allow single-family residences, which Sanger already

allows as such. SHE calls for a collaborative effort and the City of Sanger stands ready to partner with SHE as opportunities arise.

Summary of Public Input Incorporated into the Housing Element

Highlights of public input and the programs that address it are provided in Section 1N-3: Local Assessment of Fair Housing, in the subsections called *Programs to Address Community Workshop Comments* and *Programs to Address Consultation Comments*



A Regional Plan for Addressing Housing Needs

*Fresno County • Coalinga • Firebaugh • Fowler • Fresno City • Huron • Kerman
Kingsburg • Mendota • Orange Cove • Parlier • Reedley • San Joaquin • Sanger • Selma*

