



Planning Commission Staff Report
Item # 1, June 18, 2026
Conditional Use Permit No. PA-2500200
Prepared by: Jessica Leal

PROJECT SUMMARY

Applicant Information

Property Owner: Nature Conservancy
Project Applicant: Eli Ferrier

Project Site Information

Project Address: 20250 N Staten Island Rd, Thornton
Project Location: North of State Route 12, 3.25-miles south of West Walnut Grove Road, Thornton with North Staten Island Rd bisecting the parcel.

Parcel Number (APN):	069-020-19	Water Supply:	Private (None)
General Plan Designation:	A/G & OS/RC	Sewage Disposal:	Private (None)
Zoning Designation:	AG-40	Storm Drainage:	Private (Natural Storm Drainage)
Project Size:	2-acres	100-Year Flood:	Yes
Parcel Size:	9,072-acres	Williamson Act:	Yes
Community:	None	Supervisorial District:	4

Environmental Review Information

CEQA Determination: Exempt pursuant to Section 15303 (Attachment D)

Project Description

A Conditional Use Permit for the establishment of a wildlife preserve within the Primary Zone of the Delta. The project includes the following:

- Construction of a 475-square foot western viewing platform
- Construction of a 2,400-square foot eastern viewing platform
- Construction of a 75-square foot shade trellis
- Construction of a parking lot with a bus turnabout and loading area
- Installation of a portable restroom

The preserve will offer an interpretive program for educational purposes on sustainable, low emission, and wildlife friendly agricultural practices, migratory and resident birds, water in the Sacramento San Joaquin Delta, and the life and legacy of Dawit Zeleke, the founder of Conservation Farms & Ranches. (Use Type: Parks and Open Space – Wildlife Preserve)

Recommendation

It is recommended that the Planning Commission:

1. Accept the Notice of Exemption (Attachment D);
2. Adopt the Findings for the Williamson Act Principles of Compatibility and Conditional Use Permit

- No. PA-2500200 (Attachment E); and
3. Approve Conditional Use Permit PA-2500200 subject to the Conditions of Approval (Attachment F).

NOTIFICATION & RESPONSES

(See Attachment B, Response Letters)

Public Hearing Notices

Legal ad for the public hearing published in the **Stockton Record**: June 5, 2026.

Number of Public Hearing notices: 395

Date of Public Hearing notice mailing: June 5, 2026.

Referrals and Responses:

- **Early Consultation Date:** October 27, 2025
- **Project Referral with Environmental Determination Date:** March 12, 2026

Agency Referrals	Response Date - Early Consultation	Response Date - Referral
County Departments		
Ag Commissioner		
Assessor		
Community Development		
Building Division		
Fire Prevention Bureau		
Public Works	01/23/2026	01/23/2026
Environmental Health	10/29/2025	03/24/2026
Sheriff Office		
Supervisor: District 4		
Mosquito Abatement		
State Agencies		
CA Native American Heritage Commission		
CA Tribal TANF Partnership		
CA Valley Miwok Tribe		
Fish & Wildlife, Division: Region 3		
CA Department of Conservation		
Federal Agencies		
F.E.M.A.	11/10/2025	03/30/2026
US Fish & Wildlife		

Agency Referrals	Response Date - Early Consultation	Response Date - Referral
Local Agencies		
Reclamation District #38		
Woodbridge Fire District		
S.J.C.O.G.	02/19/2026	
San Joaquin Farm Bureau		
Galt Joint Union High School District		
New Hope Elementary School District		
Sacramento County Planning		
Miscellaneous		
Sierra Club		
Audubon Society		
P.G.&E.	11/21/2025	04/06/2026
Sierra Club		
North Valley Yokuts Tribe		
Buena Vista Rancheria		
United Auburn Indian Community		
Delta Protection Commission		
Delta Stewardship Council		
Delta Keeper		

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ANALYSIS

Background

The site has a history of agricultural use with multiple use permits approved for gas and mineral procurement. In 2001, using grants from the California Department of Water Resources and the California Natural Resources Agency, the Nature Conservancy acquired Staten Island. Since its acquisition, Staten Island has been used for commercial agriculture, bird-watching, and educational opportunities for local schools.

In June of 2025, the Nature Conservancy submitted Conditional Use Permit No. PA-2500200 to construct an avian viewing facility, including two viewing platforms and a shade trellis, at the center of the project site. With this development, the site will also be formally established as a nature preserve. The subject property is located within the San Joaquin Delta and a designated wetlands area, however, the proposed development has been designed to limit the impact on wetlands and habitat, as well as the existing agricultural operations on site.

Williamson Act Contract

The project site is under Williamson Act Contract WA-75-C1-64. All Williamson Act contracts are rolling contracts that are renewed annually for the applicable 10 or 20-year term.

Pursuant to Development Title Section 9-702, land use approved for the parcels under contract must be compatible with the intent of preservation. Development Title Section 9-702.060 includes a list of uses that the Board of Supervisors has deemed compatible with the Williamson Act. The use type Parks and Open Space – Wildlife Preserve is not included in this list. However, for uses not specifically allowed, the Planning Commission can determine whether the intended use is comparable to or no more intensive than the approved uses, which is determined by meeting the Principles of Compatibility (Attachment D). The Principles include limiting potential impacts to the long-term productive capability or potential displacement or impairment of agricultural operations on the subject parcel or other contracted lands, as well as not resulting in the potential removal of adjacent contracted land from agricultural or open space uses. The Community Development Department reviewed the Principles of Compatibility and recommends that the proposed wildlife preserve, and avian viewing platforms are consistent with these principles as the proposed use will occupy a miniscule portion of the contracted parcel and would not interfere with any on-site or off-site agricultural operations.

San Joaquin County General Plan Goals

The project site is located in the Primary Zone of The Delta, which is “protected for agriculture, wildlife, and recreation.” San Joaquin County’s General Plan contains the following goals and provisions for land use in the Delta and for wildlife preserves:

The Delta

- Goal D-1.2 Delta Support. The County shall preserve the cultural heritage, strong agricultural/economic base, unique recreational resources, and biological diversity of the Delta, and shall support the development of public/private facilities, such as museums, recreational trails, community parks, farm stands, community centers, and water access facilities within the Delta.
- Goal D-3.1 Support Delta Tourism. The County shall support programs, such as designation of the Delta as a National Heritage Area, to encourage and enhance resource-based recreation, agritourism, and historical and cultural tourism in the Delta.
- Goal D-4.1 Preserve Delta Heritage. The County shall protect the unique character and qualities of the Delta Primary Zone by preserving the Delta’s cultural heritage and the strong agricultural base.

- Goal D-4.8 Limit Non-Agricultural Uses on Delta Islands. The County shall generally limit development in the Delta islands to water-dependent uses, recreation, and agricultural uses.
- Goal D-5.2 Delta Protection. The County shall ensure that waterway development and development on Delta islands protects the natural beauty, fisheries, wildlife, riparian vegetation, and the navigability of the waterway.
- Goal D-5.3 Agricultural Habitat Areas. The County shall encourage management of agricultural lands within the Delta which maximize seasonal and year-round wildlife habitat, through techniques such as fall and winter flooding, leaving crop residue, creation of mosaic of small grains and flooded areas, wildlife friendly farming, controlling predators, controlling poaching, controlling public access, and others.

These goals are supported by the proposed wildlife preserve which will develop only a small portion of the parcel that is not designated as wetlands, thus preserving the wetlands on the island.

Natural and Cultural Resources

- NCR-2.7 Protect Waterfowl Habitat. The County shall strive to preserve, protect, and enhance feeding areas and winter habitat for migratory waterfowl.
- NCR-2.11 Ecological Information Programs. The County shall support programs that encourage and teach respect for the environment.

As proposed the project is compatible with the General Plan goals of both preserving and enhancing available uses in the Delta, the Community Development Department supports this proposal.

Community Comments

The Community Development Department received 5 letters in support of the project and 1 letter in opposition. Letters of support focus on the site's existing importance as a sandhill crane wintering location, birdwatchers' existing use of the site, and educational opportunities relating to migratory birds, wildlife-friendly agricultural practices, and the San Joaquin Delta.

The opposition expressed concern regarding expanding public access to the area and the impact on migratory birds and other habitat. As noted previously, the proposed viewing platforms will support existing birdwatching and educational uses on site. The addition of platforms, as well as parking area and restroom facility, will lessen the impact on the existing natural environment by providing dedicated parking, restrooms, and gathering areas. The remainder of the parcel will remain in agriculture. As a result, Community Development Department staff recommends approval based on the ability to make the necessary findings (Attachment E) in the affirmative.

RECOMMENDATION

Action

It is recommended that the Planning Commission:

1. Accept the Notice of Exemption (Attachment D);
2. Adopt the Findings for the Williamson Act Principles of Compatibility and Conditional Use Permit No. PA-2500200 (Attachment E); and
3. Approve Conditional Use Permit PA-2500200 subject to the Conditions of Approval (Attachment F).

Attachments:

Attachment A – Site Plan

Attachment B – Agency Response Letters

Attachment C – Comment Letters

Attachment D – Notice of Exemption

Attachment E – Findings for Williamson Act and Conditional Use Permit

Attachment F – Conditions of Approval

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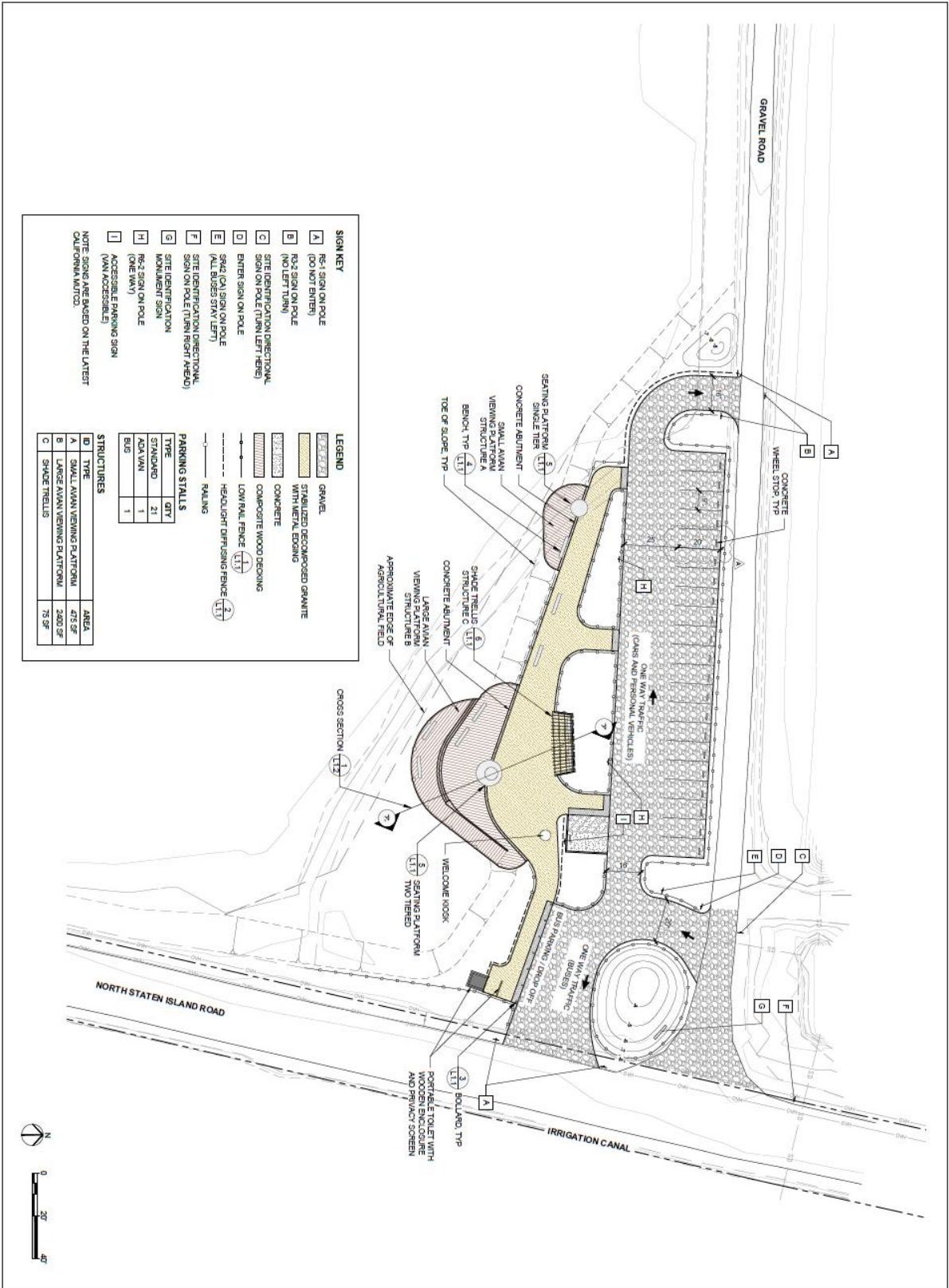
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Community Development Department

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Attachment A **Site Plan**

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 M. T. MAHRY & ASSOCIATES, Inc. 7201 CENTINELA AVE LOS GATOS, CA 95032	PREPARED FOR: THE NATURE CONSERVANCY 630 S STREET SACRAMENTO, CA 95811
	SITE PLAN DAWIT ZELEKE MEMORIAL AVIAN VIEWING PLATFORM San Joaquin County, CA
REVISIONS A 05/01/2020	PROGRESS SET NOT FOR CONSTRUCTION
CONDITIONAL USE PERMIT AS SHOWN	SHEET L1.0 05 OF 08 SHEETS



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Attachment B **Agency Response Letters**

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Department of Public Works

Fritz Buchman, Director

Alex Chetley, Deputy Director - Development

Kristi Rhea, Deputy Director - Administration

David Tolliver, Deputy Director - Operations

Najee Zarif, Deputy Director - Engineering

January 23, 2026

MEMORANDUM

TO: Community Development Department
CONTACT PERSON: Jessical Leal

FROM: Shayan Rehman, Engineering Services Manager ^{SR}
Development Services Division

SUBJECT: PA-2500200 (C); A Conditional Use Permit application for the construction of an avian viewing facility at the Staten Island Preserve. The project includes the construction of a 475-square-foot small viewing platform, a 2,400-square-foot large viewing platform, and a 75-square-foot shade trellis. The project proposes a parking lot, a bus turnaround and loading area, and a portable toilet. The property is a 9,072-acre parcel with direct access from West Walnut Grove. The parcel is under Williamson Act and is not serviced by any public agencies for sewer, storm, and water; located north of State Route 12, East of Walnut Grove Thornton Road, with North Staten Island Road going through the parcel.
(Supervisory District 4)

OWNER: Nature Conservancy

APPLICANT: Eli Ferrier

ADDRESS: 0250 N Staten Island Road, Thornton

APN: 069-020-19

INFORMATION:

The site is currently located within a Federal Emergency Management Agency Designated Flood Hazard Area designated as Zone AE. The 100-Year Flood Elevation is approximately 10 feet NAVD 1988.

Walnut Grove Road has an existing right-of-way width of 80-variable feet and a planned right-of-way width of 84-110 feet.

Staten Island Road has an existing right-of-way width of 40-60 feet and a planned right-of-way width of 50-60 feet.

PA-2500200 (C)

RECOMMENDATIONS:

- 1) An encroachment permit shall be required for all work within road right-of-way. (Note: Driveway encroachment permits are for flatwork only – all vertical features, including but not limited to fences, walls, private light standards, rocks, landscaping and cobbles are not allowed in the right-of-way.) (Development Title Sections 9-607.020 and 9-607.040)
- 2) The driveway approach shall be improved in accordance with the requirements of San Joaquin County Improvement Standards Drawing No. 17 prior to issuance of the occupancy permit. (Development Title Section 9-607.040)
- 3) The Traffic Impact Mitigation Fee shall be required for this application. The fee is due and payable at the time of building permit application. The fee will be based on the current schedule at the time of payment. The fee shall be automatically adjusted July 1 of each year by the Engineering Construction Cost Index as published by the Engineering News Record. (Resolutions R-00-433)
- 4) The Regional Transportation Impact Fee shall be required for this application. The fee is due and payable at the time of building permit application. The fee will be based on the current schedule at the time of payment. (Resolution R-06-38)
- 5) The developer shall provide drainage facilities in accordance with the San Joaquin County Development Standards. Retention basins shall be fenced with six (6) foot high chain link fence or equal when the maximum design depth is 18 inches or more. Required retention basin capacity shall be calculated and submitted along with a drainage plan for review and approval, prior to release of building permit. (Development Title Section 9-606)
- 6) A copy of the Final Site Plan shall be submitted prior to release of building permit.
- 7) This project is subject to the NPDES Region-Wide Permit requirements and shall comply with the following conditions. Prior to release of the building permit, plans and calculations shall be submitted and approved by the Public Works Department – Water Resources Division (209-468-9360):
 - a) Treatment: A registered professional engineer shall design the site to treat the 85th percentile storm as defined in the County's 2023 Storm Water Quality Control Criteria Plan (SWQCCP).
 - b) Hydromodification: A registered professional engineer shall design the site to comply with the volume reduction requirement outlined in the County's 2023 SWQCCP
 - c) Trash: A registered professional engineer shall design the site to comply with the trash control requirement outlined in the County's 2023 SWQCCP.
- 8) Prior to release of the building permit, the owner shall enter into an agreement with San Joaquin County for post-construction maintenance of stormwater quality facilities.
- 9) Prior to release of the building permit the applicant shall submit a Storm Water Quality Control Plan (SWQCP) to Public Works that complies with all requirements of the 2023 SWQCCP

PA-2500200 (C)

- 10) Prior to release of the building permit the applicant shall submit the Storm Water Pollution Prevention Plan (SWPPP) to Public Works. A copy of the approved SWPPP and all required records, updates, test results and inspection reports shall be maintained on the construction site and be available for review upon request.
- 11) Applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and comply with the State "General Permit for Storm Water Discharges Associated with Construction Activity". The Waste Discharge Identification Number (WDID), issued by SWRCB, shall be submitted to Public Works prior to release of the building permit. Contact the SWRCB at 1-866-563-3107 for further information.
- 12) Prior to release of the building permit all new construction and the substantial improvement of any structure or tanks in the area of special flood hazard shall be elevated or floodproofed in accordance with San Joaquin County Ordinance Code Section 9-703.130. Plans and calculations shall be submitted and approved by the Public Works Department – Water Resources Division (209-468-9596).

SR:GM:GG



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Environmental Health Department

Jasjit Kang, REHS, Director

Muniappa Naidu, REHS, Assistant Director

PROGRAM COORDINATORS

Jeff Carruesco, REHS, RDI

Willy Ng, REHS


Steven Shih, REHS

Elena Manzo, REHS

Natalia Subbotnikova, REHS

March 24, 2026

To: San Joaquin County Community Development Department
Attention: Jessica Leal

From: Aaron Gooderham (209) 616-3062 
Senior Registered Environmental Health Specialist

RE: **PA-2500200 (C), Referral, SU-2500898**
20250 N. Staten Island Road, Thornton

The following requirements have been identified as pertinent to this project. Other requirements may also apply. These requirements cannot be modified.

- 1) Any geotechnical drilling shall be conducted under permit and inspection by The Environmental Health Department (San Joaquin County Development Title, Section 9-601.010(b) and 9-601.020(i)).



S J C O G , I n c .

555 East Weber Avenue • Stockton, CA 95202 • (209) 235-0574 • Email: boyd@sjcog.org

San Joaquin County Multi-Species Habitat Conservation & Open Space Plan (SJMSCP)

SJMSCP RESPONSE TO LOCAL JURISDICTION (RTLJ) ADVISORY AGENCY NOTICE TO SJCOG, Inc.

To: Jessica Leal, San Joaquin County, Community Development Department
From: Laurel Boyd, SJCOG, Inc. Phone: (209) 235-0574 Email: boyd@sjcog.org
Date: February 19, 2026
Local Jurisdiction Project Title: PA-2500200 (C)
Assessor Parcel Number(s): 069-020-19
Local Jurisdiction Project Number: PA-2500200 (C)
Total Acres to be converted from Open Space Use: Unknown
Habitat Types to be Disturbed: Agricultural Habitat Land
Species Impact Findings: Findings to be determined by SJMSCP biologist.

Dear Ms. Leal:

SJCOG, Inc. has reviewed the application referral for PA-2500200 (C). This project consists of a Conditional Use Permit application for the construction of an avian viewing facility at the Staten Island Preserve. The project includes the construction of a 475-square-foot small viewing platform, a 2,400 square foot large viewing platform, and a 75 square foot shade trellis. The project proposes a parking lot, a bus turnaround and loading area, and a portable toilet. The property is a 9,072-acre parcel with direct access from West Walnut Grove. The project site is a 9,072-acre parcel to the North of State Route 12, east of Walnut Grove, Thornton Road, with North Staten Island Road going through the parcel (APN/Address: 069-020-19 / 20250 N. Staten Island Road, Thornton).

San Joaquin County is a signatory to San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). Participation in the SJMSCP satisfies requirements of both the state and federal endangered species acts, and ensures that the impacts are mitigated below a level of significance in compliance with the California Environmental Quality Act (CEQA). The LOCAL JURISDICTION retains responsibility for ensuring that the appropriate Incidental Take Minimization Measure are properly implemented and monitored and that appropriate fees are paid in compliance with the SJMSCP. Although participation in the SJMSCP is voluntary, Local Jurisdiction/Lead Agencies should be aware that if project applicants choose against participating in the SJMSCP, they will be required to provide alternative mitigation in an amount and kind equal to that provided in the SJMSCP.

This project is subject to the SJMSCP and is located within the unmapped land use area. Per requirements of the SJMSCP, unmapped projects are subject to case-by-case review. This can be a 90 day process and it is recommended that the project applicant contact SJMSCP staff as early as possible. It is also recommended that the project applicant obtain an information package. <http://www.sjcog.org>

If this project is approved by the Habitat Technical Advisory Committee and the SJCOG Inc. Board, the following process must occur to participate in the SJMSCP:

- Schedule a SJMSCP Biologist to perform a pre-construction survey **prior to any ground disturbance**
- SJMSCP Incidental take Minimization Measures and mitigation requirement:
 1. Incidental Take Minimization Measures (ITMMs) will be issued to the project and must be signed by the project applicant prior to any ground disturbance but no later than six (6) months from receipt of the ITMMs. If ITMMs are not signed within six months, the applicant must reapply for SJMSCP Coverage. Upon receipt of signed ITMMs from project applicant, SJCOG, Inc. staff will sign the ITMMs. This is the effective date of the ITMMs.
 2. Under no circumstance shall ground disturbance occur without compliance and satisfaction of the ITMMs.
 3. Upon issuance of fully executed ITMMs and prior to any ground disturbance, the project applicant must:
 - a. Post a bond for payment of the applicable SJMSCP fee covering the entirety of the project acreage being covered (the bond should be valid for no longer than a 6 month period); or
 - b. Pay the appropriate SJMSCP fee for the entirety of the project acreage being covered; or
 - c. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
 - d. Purchase approved mitigation bank credits.
 4. Within 6 months from the effective date of the ITMMs or issuance of a building permit, whichever occurs first, the project applicant must:

- a. Pay the appropriate SJMSCP for the entirety of the project acreage being covered; or
- b. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
- c. Purchase approved mitigation bank credits.

Failure to satisfy the obligations of the mitigation fee shall subject the bond to be called.

- Receive your Certificate of Payment and release the required permit

It should be noted that if this project has any potential impacts to waters of the United States [pursuant to Section 404 Clean Water Act], it would require the project to seek voluntary coverage through the unmapped process under the SJMSCP which could take up to 90 days. It may be prudent to obtain a preliminary wetlands map from a qualified consultant. If waters of the United States are confirmed on the project site, the Corps and the Regional Water Quality Control Board (RWQCB) would have regulatory authority over those mapped areas [pursuant to Section 404 and 401 of the Clean Water Act respectively] and permits would be required from each of these resource agencies prior to grading the project site.

If you have any questions, please call (209) 235-0574.



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San Joaquin County Multi-Species Habitat Conservation & Open Space Plan

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SJMSCP HOLD

TO: Local Jurisdiction: Community Development Department, Planning Department, Building Department, Engineering Department, Survey Department, Transportation Department, Other:

FROM: Laurel Boyd, SJCOG, Inc.

**DO NOT AUTHORIZE SITE DISTURBANCE
DO NOT ISSUE A BUILDING PERMIT
DO NOT ISSUE _____ FOR THIS PROJECT**

The landowner/developer for this site has requested coverage pursuant to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). In accordance with that agreement, the Applicant has agreed to:

- 1) SJMSCP Incidental Take Minimization Measures and mitigation requirement:
 1. Incidental Take Minimization Measures (ITMMs) will be issued to the project and must be signed by the project applicant prior to any ground disturbance but no later than six (6) months from receipt of the ITMMs. If ITMMs are not signed within six months, the applicant must reapply for SJMSCP Coverage. Upon receipt of signed ITMMs from project applicant, SJCOG, Inc. staff will sign the ITMMs. This is the effective date of the ITMMs.
 2. Under no circumstance shall ground disturbance occur without compliance and satisfaction of the ITMMs.
 3. Upon issuance of fully executed ITMMs and prior to any ground disturbance, the project applicant must:
 - a. Post a bond for payment of the applicable SJMSCP fee covering the entirety of the project acreage being covered (the bond should be valid for no longer than a 6 month period); or
 - b. Pay the appropriate SJMSCP fee for the entirety of the project acreage being covered; or
 - c. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
 - d. Purchase approved mitigation bank credits.
 4. Within 6 months from the effective date of the ITMMs or issuance of a building permit, whichever occurs first, the project applicant must:
 - a. Pay the appropriate SJMSCP for the entirety of the project acreage being covered; or
 - b. Dedicate land in-lieu of fees, either as conservation easements or fee title; or
 - c. Purchase approved mitigation bank credits.

Failure to satisfy the obligations of the mitigation fee shall subject the bond to be called.

Project Title: PA-2500200 (C)

Landowner: Nature Conservancy

Applicant: Eli Ferrier

Assessor Parcel #s: 069-020-19

T _____, R _____, Section(s): _____

Local Jurisdiction Contact: Jessica Leal

The LOCAL JURISDICTION retains responsibility for ensuring that the appropriate Incidental Take Minimization Measures are properly implemented and monitored and that appropriate fees are paid in compliance with the SJMSCP.



Pacific Gas and Electric Company
PGEPlanReview@pge.com
Land Management
300 Lakeside Drive
Oakland, CA 94612

April 6, 2026

Re: Gas and Electric Transmission and Distribution

Dear Jessica Leal,

Thank you for providing PG&E the opportunity to review your proposed plans for PA-2500200 (C). Our review indicates the proposed work and/or improvements do not appear to directly interfere with any of PG&E's existing facilities or land rights.

Please note, this is our preliminary review and PG&E may provide additional comments in the future as the project progresses or if additional information is provided. If there are subsequent modifications made to the design, we ask that the plans be resubmitted for review to the email address listed below.

If PG&E gas and/or electric service are needed, please submit an application through PG&E's Your Project Portal: [Sign In \(yourprojects-pge.com\)](https://yourprojects-pge.com).

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of two (2) working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding this response, please contact me at (877) 259-8314 or pgeplanreview@pge.com

Sincerely,

PG&E Plan Review Team
Land Management

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



March 30, 2026

Jessica Leal, Project Planner
San Joaquin Community Development Department
1810 E. Hazelton Avenue
Stockton, California 95205

Dear Ms. Leal:

This is in response to your request for comments regarding Application Referral Application Number PA 2500200 (C), (APN/Address: 069-020-19/20250 N. Staten Island Road, Thornton) (Supervisory District 4).

Please review the current effective Flood Insurance Rate Maps (FIRMs) for County of San Joaquin (Community Number 060299), Maps revised October 20, 2016. To locate FIRMs online, visit the Map Service Center (MSC) at <https://msc.fema.gov>. Please note that San Joaquin County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

www.fema.gov

Jessica Leal, Project Planner
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- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The San Joaquin County floodplain manager can be reached by calling V. Venki Narasimhalu, Senior Water Resources Engineer, at (209) 953-7611.

If you have any questions or concerns, please do not hesitate to contact Gabriel Riggle at gabriel.riggle@fema.dhs.gov of the Mitigation staff.

Sincerely,

XING LIU Digitally signed by XING LIU
Date: 2026.04.08 09:31:49
-07'00'

Xing Liu, Branch Chief
Floodplain Management and Insurance Branch

cc:

V. Venki Narasimhalu, Senior Water Resources Engineer, San Joaquin County
Alex Acosta, State of California, Department of Water Resources, North Central Region
Office

Anntonette Duncan, DWR NFIP Coordinator, State of California, Sacramento Headquarters
Office

Gabriel Riggle, Emergency Management Specialist, DHS/FEMA Region IX

Jeffrey Smyly, Regional Environmental Officer, DHS/FEMA Region IX

www.fema.gov



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Community Development Department

Planning · Building · Code Enforcement · Fire Prevention

Attachment C **Comment Letters**

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1901 Harrison Street
Suite 1450
Oakland, CA 94612
415.644.4600
ca.audubon.org

Re: The Nature Conservancy's (TNC) *Staten Island Avian Viewing Platform* (Project) application for San Joaquin County Planning Permit.

Dear San Joaquin County Development Committee,

We, Audubon California, strongly supports TNC's application to San Joaquin County for the conditional use permit for the Avian Viewing Platform on Staten Island. The Project sits on the Staten Island Preserve, a 9,200-acre working agricultural farm in the heart of the Sacramento-San Joaquin River Delta owned by TNC. TNC acquired the property in 2001, with a vision to create a place for wildlife-friendly agriculture while protecting the land's critical role as a wintering destination for sandhill cranes and other migratory birds traveling on the Pacific Flyway.

Staten Island plays a vital role in the conservation of sandhill cranes, supporting a significant portion of the Delta and Central Valley's wintering population. Each year, this remarkable gathering draws countless birders who come to witness the sight of thousands of cranes descending onto the Island to roost during peak season. The significant number of visitors coming to Staten underscores the island's importance as both a habitat and a viewing destination. However, because Staten Island functions as an active agricultural operation, the increase in visitors—often arriving during dawn and/or dusk—has raised important safety concerns regarding site access. Addressing these challenges is essential to ensure both the protection of visitors and the continued success of Staten Island's conservation and farming activities.

TNC's Project to build an Avian Viewing Platform and visitor amenities on Staten Island Preserve will allow for safer public access. The platform will be used to accommodate bird watching by up to 80 individuals simultaneously during the wet winter season at the Staten Island Preserve. The Project includes a gravel parking lot, portable toilet, and interpretive signage. It will accommodate buses and provide a safe place for buses to turn around. Previously, cars and buses often performed tricky turnarounds on the narrow road. The Project is also prioritizing accessibility, inclusiveness, and compliance with applicable accessibility laws & standards, including but not limited to the Americans with Disabilities Act (ADA) and California Civil Code section 54 et seq.

The Project will be a public access benefit for not only the birding community who has been visiting Staten Island for years but for schools in the local region and the community at large to learn about the Pacific Flyway, migratory birds, wildlife-friendly agriculture, and the importance of the Delta.

Audubon has a long history of working throughout California in partnership with private landowners, public agencies, businesses, communities, and other NGOs to protect, restore, and enhance lands to benefit people and birds. Our Working Lands program is a leader in applying science to inform land management decisions that can then provide multiple benefits to wildlife and people. We do this for people now and into the future to appreciate and enjoy nature. This project to build an avian viewing platform supports public access to enjoy what we work so hard to enhance and protect. Audubon California strongly supports the project and request that you do so as well.

Sincerely Yours,

A handwritten signature in blue ink that reads "Xeronimo Castañeda". The signature is written in a cursive style with a large initial 'X'.

Xeronimo Castañeda
Working Lands Program Director, Audubon California



Point Blue Conservation Science (formerly PRBO)
3820 Cypress Drive Suite 11
Petaluma, CA 94954
707.781.2555 pointblue.org

Conservation Science for a healthy planet.

13 March 2026

Re: The Nature Conservancy's (TNC) *Staten Island Avian Viewing Platform* (Project) application for San Joaquin County Planning Permit.

Dear San Joaquin County Development Committee,

Point Blue Conservation Science strongly supports TNC's application to San Joaquin County for the conditional use permit for the Avian Viewing Platform on Staten Island. The Project sits on the Staten Island Preserve, a 9,2000-acre working agricultural farm in the heart of the Sacramento-San Joaquin River Delta owned by TNC. TNC acquired the property in 2001, with a vision to create a place for wildlife-friendly agriculture while protecting the land's critical role as a wintering destination for sandhill cranes and other migratory birds traveling on the Pacific Flyway.

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Conservation Science for a healthy planet.

Access at Staten Island has been critical to Point Blue for multiple reasons, including advancing conservation science and educating supporters and public audiences. It enables rich, immersive experiences and helps everyone appreciate the nexus of conservation and agriculture as well as the wonder of migration!

For all these reasons, we support the project and request that you do so as well.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Hickey", written in a cursive style.

Catherine Hickey
Acting, Chief of Staff, Point Blue Conservation Science
chickey@pointblue.org



CENTRAL VALLEY JOINT VENTURE

Conserving Bird Habitat in California's Central Valley

2800 Cottage Way, W1916
Sacramento, CA 95825
(279)202-4098
www.cvjv.org

March 20, 2026

Subject: The Nature Conservancy's (TNC) Staten Island Avian Viewing Platform (Project) application for San Joaquin County Planning Permit.

Dear San Joaquin County Development Committee,

The Central Valley Joint Venture (CVJV) strongly support(s) TNC's application to San Joaquin County for the conditional use permit for the Avian Viewing Platform on Staten Island. The Project sits on the Staten Island Preserve, a 9,2000-acre working agricultural farm in the heart of the Sacramento-San Joaquin River Delta owned by TNC. TNC acquired the property in 2001, with a vision to create a place for wildlife-friendly agriculture while protecting the land's critical role as a wintering destination for sandhill cranes and other migratory birds traveling on the Pacific Flyway.

The CVJV is a partnership of 20 public and private entities comprised of government agencies, science and conservation organizations, and one regulated utility provider. Our mission is to work collaboratively to protect, restore, and enhance habitats for birds, in accordance with conservation actions identified in the 2020 CVJV Implementation Plan (Plan). This Plan provides a cohesive vision for bird conservation in the Central Valley within the context of the entire Pacific Flyway and sets quantitative habitat objectives based on best available science to ensure sustainable populations of migrant and resident birds in California's Central Valley. In addition to habitat objectives, the Plan sets goals and priorities to address human dimensions including outdoor recreation, sustainable agriculture and multiple benefit projects that conserve bird populations and help meet the needs of people.

Staten Island plays a vital role in the conservation of sandhill cranes, supporting a significant portion of the Delta and Central Valley's wintering population. Each year, this remarkable gathering draws countless birders who come to witness the sight of thousands of cranes descending onto the Island to roost during peak season. In addition to cranes, Staten island also supports thousands of wintering and migrating waterfowl and shorebirds. The significant number of visitors coming to

Staten underscores the island’s importance as both a bird habitat and a viewing destination. However, because Staten Island functions as an active agricultural operation, the increase in visitors—often arriving during dawn and/or dusk—has raised important safety concerns regarding site access. Addressing these challenges is essential to ensure both the protection of visitors and the continued success of Staten Island's conservation and farming activities.

TNC’s Project to build an Avian Viewing Platform and visitor amenities on the Staten Island Preserve will allow for safer public access. The platform will be used to accommodate bird watching by up to 80 individuals simultaneously during the wet winter season at the Staten Island Preserve. The Project includes a gravel parking lot, portable toilet, and interpretive signage. It will accommodate buses and provide a safe place for buses to turn around. Previously, cars and buses often performed tricky turnarounds on the narrow road. The Project is also prioritizing accessibility and compliance with applicable accessibility laws & standards, including but not limited to the Americans with Disabilities Act (ADA) and California Civil Code section 54 et seq.

The Project will be a public access benefit for not only the birding community who has been visiting Staten Island for years but for schools in the local region and the community at large to learn about the Pacific Flyway, migratory birds, wildlife-friendly agriculture, and the importance of the Delta.

The project directly supports the CVJV’s goals of providing public access to wildlife dependent recreation, maintaining wildlife friendly agriculture and informing the public on the importance of Central Valley agriculture to the conservation of migratory birds in the Pacific Flyway. For all these reasons, we support the project and TNC’s application to San Joaquin County for a conditional use permit.

Sincerely,

**JAMES
COGSWELL**

Digitally signed
by JAMES
COGSWELL
Date: 2026.03.20
14:22:30 -07'00'

James Cogswell
CVJV Coordinator

cc: Central Valley Joint Venture Board



Galt Joint Union Elementary School District

1018 C Street, Suite 210, Galt, CA 95632
209-744 4545 | www.galt.k12.ca.us

March 23, 2026

Re: The Nature Conservancy's (TNC) *Staten Island Avian Viewing Platform* (Project) application for San Joaquin County Planning Permit.

Dear San Joaquin County Development Committee,

The Galt Joint Union Elementary School District strongly supports TNC's application to San Joaquin County for the conditional use permit for the Avian Viewing Platform on Staten Island. The Project sits on the Staten Island Preserve, a 9,2000-acre working agricultural farm in the heart of the Sacramento-San Joaquin River Delta owned by TNC. TNC acquired the property in 2001, with a vision to create a place for wildlife-friendly agriculture while protecting the land's critical role as a wintering destination for sandhill cranes and other migratory birds traveling on the Pacific Flyway.

Staten Island plays a vital role in the conservation of sandhill cranes, supporting a significant portion of the Delta and Central Valley's wintering population. Each year, this remarkable gathering draws countless birders who come to witness the sight of thousands of cranes descending onto the Island to roost during peak season. The significant number of visitors coming to Staten Island underscores the island's importance as both a habitat and a viewing destination. However, because Staten Island functions as an active agricultural operation, the increase in visitors—often arriving during dawn and/or dusk—has raised important safety concerns regarding site access. Addressing these challenges is essential to protecting visitors and ensuring the continued success of Staten Island's conservation and farming activities.

TNC's Project to build an Avian Viewing Platform and visitor amenities on Staten Island Preserve will allow for safer public access. The platform will be used to accommodate bird watching by up to 80 individuals simultaneously during the wet winter season at the Staten Island Preserve. The Project includes a gravel parking lot, portable toilet, and interpretive signage. It will accommodate buses and provide a safe place for buses to turn around. Previously, cars and buses often performed tricky turnarounds on the narrow road. The Project is also prioritizing accessibility, inclusiveness, and compliance with applicable accessibility laws & standards, including but not limited to the Americans with Disabilities Act (ADA) and California Civil Code section 54 et seq.

The Project will be a public access benefit for not only the birding community who have been visiting Staten Island for years but for schools in the local region and the community at large to learn about the Pacific Flyway, migratory birds, wildlife-friendly agriculture, and the importance of the Delta.

The Viewing Platform would greatly enhance experiences for students and all visitors.

For all these reasons, the District supports the project and request that you do so as well.

Sincerely Yours,

Lois Yount, Superintendent

MISSION STATEMENT

The school district's mission is to promote growth and achievement through innovative educational programs that integrate personal strengths, social-emotional and academic learning for all children.

Superintendent: Lois Yount | Chief Business Official: Alejandra Garibay
Curriculum Director: Stephanie Simonich | Educational Services Director: Kuljeet Nijjar

Board of Trustees: Katherine Harper, Annette Kunze, Casey Raboy, Wesley Cagle, Matthew Ward

KELSEY NAVARRE
Sacramento, California
Knavarr4@gmail.com

March 23, 2026

Re: The Nature Conservancy's (TNC) *Staten Island Avian Viewing Platform* (Project) application for San Joaquin County Planning Permit.

Dear San Joaquin County Development Committee,

I, Kelsey Navarre, strongly support TNC's application to San Joaquin County for the conditional use permit for the Avian Viewing Platform on Staten Island. The Project sits on the Staten Island Preserve, a 9,200-acre working agricultural farm in the heart of the Sacramento-San Joaquin River Delta owned by TNC. TNC acquired the property in 2001, with a vision to create a place for wildlife-friendly agriculture while protecting the land's critical role as a wintering destination for sandhill cranes and other migratory birds traveling on the Pacific Flyway.

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TNC's Project to build an Avian Viewing Platform and visitor amenities on Staten Island Preserve will allow for safer public access. The platform will be used to accommodate bird watching by up to 80 individuals simultaneously during the wet winter season at the Staten Island Preserve. The Project includes a gravel parking lot, portable toilet, and interpretive signage. It will accommodate buses and provide a safe place for buses to turn around. Previously, cars and buses often performed tricky turnarounds on the narrow road. The Project is also prioritizing accessibility, inclusiveness, and compliance with applicable accessibility laws & standards, including but not limited to the Americans with Disabilities Act (ADA) and California Civil Code section 54 et seq.

The Project will be a public access benefit for not only the birding community who has been visiting Staten Island for years but for schools in the local region and the

community at large to learn about the Pacific Flyway, migratory birds, wildlife-friendly agriculture, and the importance of the Delta.

Several years ago, I worked as an avian monitoring technician on Staten Island and had the opportunity to witness firsthand the spectacle of wintering sandhill cranes and other waterbirds that rely on the Island. While conducting bird surveys, I became familiar with the safety concerns created when visitors stop along the narrow levee road, which is also frequently used by heavy farm equipment. I still visit Staten Island regularly and continue to see these same challenges as interest in the cranes and birdwatching grows. I believe that building the Avian Viewing Platform will meaningfully address these issues by providing a safe, designated area for people to enjoy the birds. The addition of interpretive signage and visitor facilities will also make the experience more comfortable, educational, and accessible. Ultimately, I believe this project will foster deeper community engagement in conservation and strengthen visitors' connection with the land.

For all these reasons, I support the project and request that you do so as well.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Kelsey Navarre". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kelsey Navarre

Leal, Jessica [CDD]

From: Crystal Olinger <olinger2207@gmail.com>
Sent: Wednesday, April 8, 2026 10:12 PM
To: Leal, Jessica [CDD]
Subject: Public hearing on PA-2500200 (C)

You don't often get email from olinger2207@gmail.com. [Learn why this is important](#)

Hello Community Development Department,
My husband Dennis Conde and I oppose this project. The very name is an oxymoron of its proposal. This should be left as an undeveloped conservation for the natural inhabitants of the Delta. Disturbing their peace is another intrusion of some of the protected migratory birds and other wildlife. To make a viewing area for the public will just invite more transients to pollute the area and furthermore defecate on nature's beauty. Thank you for your attention to this matter!
Sincerely
Crystal And Dennis Conde

CALIFORNIA VALLEY MIWOK TRIBE



May 26, 2026

San Joaquin County
Community Development Department
Attn: Planning Commissioners
1810 E. Hazel Ave
Stockton, California 95205-6298
Email: pcrecords@sjgov.org

Re: Project: Conditional Use Permit No. PA-2500200 of Nature Conservancy (C/O Eli Ferrier) for the construction of an avian viewing facility at the Staten Island Preserve, Thornton, San Joaquin County, California

Dear Planning Commissioners,

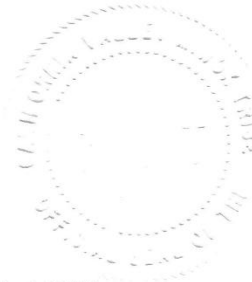
It is the understanding of the California Valley Miwok Tribe that project is located on the west side of North Staten Island Road, 3.25 miles south of West Walnut Grove Road, Thornton. The Project includes the construction of a 475 square-foot viewing platform, a 2,400 square-foot viewing platform, and a 75 square-foot shade trellis. The project proposes a parking lot, a bus turnaround, and a bus loading area.

It is further understood by the Tribe that the parcel is not serviced by any public agencies for water, wastewater, or stormwater drainage, however, a portable toilet will be available for visitors.

The California Valley Miwok Tribe has no comments or concerns regarding the proposed CUP # PA-2500200 of Nature Conservancy (C/O Eli Ferrier) for construction of an avian viewing facility at the Staten Island Preserve, Thornton, San Joaquin County, California.

Respectfully,

Silvia Burley,
Chairperson
California Valley Miwok Tribe



California Valley Miwok Tribe 14807 Avenida Central, La Grange, California 95329
Official Website: <https://californiavalleymiwok.us> Office Ph: 209-931-4567 Email: office@cvmt.net

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Attachment D **Notice of Exemption**

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Community Development Department

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Jennifer Jolley, Director

Eric Merlo, Assistant Director

Tim Burns, Code Enforcement Chief

Corinne King, Deputy Director of Planning

Jeff Niemeyer, Deputy Director of Building Inspection

NOTICE OF EXEMPTION

TO: Office of Planning & Research
P. O. Box 3044, Room 212
Sacramento, CA 95812-3044

FROM: San Joaquin County
Community Development Department
1810 East Hazelton Avenue
Stockton, CA 95205

County Clerk, County of San Joaquin

Project Title: Conditional Use Permit No. PA-2500200

Project Location - Specific: The project site is a 9,072-acre parcel to the North of State Route 12, East of Walnut Grove Thornton Road, with North Staten Island Road going through. (APN/Address: 069-020-19 / 20250 N. Staten Island Rd., Thornton) (Supervisorial District: 4)

Project Location – City: Thornton

Project Location – County: San Joaquin County

Project Description: Conditional Use Permit application for the construction of an avian viewing facility at the Staten Island Preserve. The project includes the construction of a 475-square-foot small viewing platform, a 2,400-square-foot large viewing platform, and a 75-square-foot shade trellis. The project proposes a parking lot, a bus turnaround and loading area, and a portable toilet. The property is a 9,072-acre parcel with direct access from West Walnut Grove. The parcel is under Williamson Act and is not serviced by any public agencies for sewer, storm, and water.

The Property is zoned AG-40 (General Agriculture, 40-acre minimum) and the General Plan designation is A/G (General Agriculture).

Project Proponent(s): Nature Conservancy / Eli Ferrier

Name of Public Agency Approving Project: San Joaquin County Planning Commission

Name of Person or Agency Carrying Out Project: Jessica Leal, Associate Planner
San Joaquin County Community Development Department

Exemption Status:
Categorical Exemption. (Section 15303)

Exemption Reason:
Processed under the provisions of the California Code of Regulations Section 15303, which are exempt from CEQA. This project is exempt from the California Environmental Quality Act (CEQA) per CEQA Guidelines Section 15303. Class 3 Categorical Exemptions includes a list of classes of projects that have been determined not to have a significant effect on the environment and that are, therefore, exempt from the provisions of CEQA. Section 15303 lists Class 3 projects, which include "construction and location of limited numbers of new, small facilities or structures: installation of small new equipment and facilities in small structure." The proposed avian viewing facility is a small facility with no expected significant effect on the environment and, therefore, the project is not subject to CEQA.

Lead Agency Contact Person:
Jessica Leal Phone: (209) 468-3140 Fax: (209) 468-3163 Email: jleal@sigov.org

Signature: _____ Date: _____

Name: Sean Cardenas Title: Deputy County Clerk

Signed by Lead Agency

Date Received for filing at OPR: _____

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

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Attachment E

Findings for Williamson Act and Conditional Use Permit

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FINDINGS

PA-2500200

NATURE CONSERVANCY/ ELI FERRIER

Williamson Act Principles of Compatibility Findings

Pursuant to Development Title Section 9-702.060, in order to approve the Conditional Use Permit application for developments on parcels under a Williamson Act contract, the Planning Commission is required to make the following findings in the affirmative:

1. The use will not significantly compromise the long-term productive agricultural capability of the property, or of other contracted land.
 - **The proposed avian viewing platform and associated parking area and bus turn around will not significantly compromise the long-term productive agricultural capability of the property. The proposed site is already an equipment staging area for the farm at the intersection between a dirt farm road and the main gravel road down the center of the island. Crops are not grown where the platform and parking will be. The improvements that we propose will result in an improved turn around for large vehicles and equipment in the proposed bus turnaround. During the peak of the farming season, migratory birds and birding visitors are historically not present, so the site retains its utility as a staging area. As a result, the proposed use will not significantly compromise the long-term agricultural capability of the property and other contracted land.**
2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the parcel or on other contracted lands.
 - **The proposed project will not significantly displace or impair current or reasonably foreseeable agricultural operations on the parcel. Instead, the proposed amenity will enhance the farming operation by adding a portable restroom facility to an area of the farm where there is not one currently. The avian viewing platform will provide a place of shade and respite for agriculture workers to rest and recuperate while on their breaks from field work. The focused use of the platform by farm visitors will enhance the farming operations' safety and exposure to the public by creating a space where the public can congregate away from the heavily trafficked farm roads, reducing the likelihood of negative interactions between the public and farm equipment. Currently, there is no such space and the public consistently parks in the right-of-way on the gravel Staten Island Road, creating a hazard to themselves and to farm workers and equipment who must actively avoid them on the narrow roadway. As a result, the proposed use and project area is not anticipated to displace or impair agricultural operations.**
3. The use will not result in significant removal of contracted land from agricultural or open-space use.
 - **The proposed Avian Viewing Platform will not result in significant removal of contracted land from agricultural or open-space use. The proposed site impacts less than a half an acre of arable land on a 9000-acre farm. The site is not currently in cultivation as it is utilized for equipment staging. The actual impact to arable land is much less than the site footprint because area includes roadway shoulders and staging areas and is not currently in cultivation. We do anticipate a small open buffer of 20 feet by 150 feet in the field bordering the platform's viewing edge. This project edge will remain open-space and see seeding which will provide a buffer for the birds of the flyway. Therefore, the use will not result in a significant removal of contracted land from agricultural or open-space area.**
4. Conditions are included in the contract that mitigate or avoid those on-site and off-site impacts that would otherwise render the proposal inconsistent with the Williamson Act principles of compatibility.

- **This finding can be made because the proposed wildlife preserve will have no long-term negative impacts on the property or nearby properties. The parcel is a large open agricultural space, in which the proposed structures for the project will take up a miniscule portion of it. As such, the project was determined to be exempt from the California Environmental Quality Act under a Class 3 Categorical Exemption because the project proposes a small structure and is not anticipated to result in any potentially significant impacts. Additionally, the project will not convert any land from agricultural or open space use, either on site or off-site, and will allow for the continuous of agricultural activities. Furthermore, at any point in time, the proposed avian viewing platforms can be removed, and the area can be once more be used for other agricultural purposes. Therefore, the proposed project is consistent with the Williamson Act principles of compatibility.**
5. The productive capability of the land has been considered as well as the extent to which the proposed use(s) may displace or impair agricultural operations.
- **This finding can be made because the proposed use will not change, displace, or impair existing agricultural operations on the property. By providing a dedicated space for bird viewing, the project intends to reduce conflicts between bird viewers and agricultural operations by relocating this use form the shoulders of the roadways abutting operations to the project area. Additionally, the project requires minor adjustments to the agricultural field itself and will not have a substantial impact on agricultural operations. Therefore, the wildlife preserve is not expected to displace or impair agricultural operations.**
6. The proposed use(s) are consistent with the intent of the Williamson Act to preserve agricultural and open-space land.
- **This finding can be made as the proposed avian viewing platform preserves agricultural space while providing a dedicated space for public access to this open-space land that is used by sandhill cranes and other migratory birds during the winter. Additionally, the project area takes up roughly 2-acres of a 9,072-acre parcel and is located at least 0.75-miles from the nearest neighboring parcel. As a recommended Condition of Approval, any potential impacts to species or habitat in the area due to the project will be mitigated through the San Joaquin County Multi-Species Habitat Conservation and Open Space plan. As a result, the proposed project will aid in preserving and promoting agricultural and open-space land.**

Conditional Use Permit Findings

Pursuant to Development Title Section 9-804.050, in order to approve the Conditional Use Permit application, the Planning Commission is required to make the following findings in the affirmative:

1. The proposed use is consistent with the goals, policies, standards, and maps of the General Plan, any applicable Master Plan, Special Purpose Plan, Specific Plan, and Planned development zone; and any other applicable plan adopted by the County.
- **This finding can be made because the proposed use, Park and Open Space – Wildlife Preserve, may be conditionally permitted in the AG-40 (General Agriculture, 40-acre minimum) zone with an approved Conditional Use Permit. The project site has a General Plan designation of A/G (General Agriculture), and the AG-40 zone is an implementing zone for this designation. Additionally, the project is compatible with the Williamson Act Principles of Compatibility, and therefore, compatible with the Williamson Act. Furthermore, the project site is in the Primary Zone of the Delta, which is protected for agricultural, wildlife, and recreation, and which the General Plan contains goals and provisions for land use. The proposed wildlife preserve is compatible with the General Plan goals of both preserving and enhancing available uses in the Delta. Therefore, the proposed project is consistent with the goals, policies, standards, and maps of the General Plan, and there are no Master Plans, Specific Plans, and/or Special Purpose Plans in the project vicinity.**

2. Adequate utilities, roadway improvements, sanitation, water supply, drainage, and other necessary facilities have been provided, and the proposed improvements are properly related to existing and proposed roadways.
 - **This finding can be made because there are no new utility or roadway improvements required. The proposed avian viewing platforms are an unmanned facility and will not impact existing public utilities. This project will not require the use of public water or a septic system, and all storm water will be retained on site. The proposed project will be accessed from North Staten Island Road, a County maintained roadway.**
3. The site is physically suitable for the type of development and for the intensity of development.
 - **This finding can be made because the 9,702-acre parcel is of adequate size to accommodate the proposed use and the Site Plan shows that all setbacks, and other requirements of the Development Title can be met. Additionally, as the site is already used for bird viewing by the public, the proposed project allows a designated area for the viewers that will minimize conflicts with agricultural operations.**
4. The location, size, design, and operating characteristics of the proposed use will be compatible with and will not adversely affect the livability or appropriate development of abutting properties and the surrounding neighborhood.
 - **This finding can be made because the proposed project encompasses a small area and only requires periodic maintenance after construction, limiting the amount of traffic that would need to access the site, and is not expected to increase the number of people visiting the parcel. The viewing platforms will not adversely affect the livability or appropriate development of abutting properties and the surrounding neighborhood as the project site is in the interior of large parcel.**
5. The proposed use will not create any nuisances arising from the emission of odor, dust, gas, noise, vibration, smoke, heat, or glare at a level exceeding ambient conditions.
 - **This finding can be made because the proposed use is an unmanned avian viewing platform facility that, once built, will have no activities that will create any nuisances. Therefore, it is not anticipated to create any odor, dust, gas, noise, vibration, smoke, heat, or glare at a level exceeding ambient conditions.**
6. The site of the proposed use is adequately served by highways, streets, water, sewer, storm drainage, and other public facilities and services.
 - **This finding can be made because the proposed project will be accessed from North Staten Island Road, a County maintained roadway, that runs through the center of the parcel. Additionally, the proposed use does not require water or sewer services or other public facilities.**
7. The proposed use complies with all applicable provisions of this title.
 - **This finding can be made because the proposed use type Parks and Open Space – Wildlife Preserve may be conditionally permitted in the AG-40 (General Agriculture, 40-acre minimum) zone subject to a Conditional Use Permit and the proposed use meets the Williamson Act Principles of Compatibility. Furthermore, the use meets all standards pursuant to Development Title Sections 9-702 and will be consistent with the Development Title if the project is approved with the proposed Conditions of Approval provided by the reviewing departments and agencies.**

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Attachment F **Conditions of Approval**

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CONDITIONS OF APPROVAL

PA-2500200

NATURE CONSERVANCY/ ELI FERRIER

Conditional Use Permit No. PA-2500200 was approved by the Planning Commission on June 18, 2026. The effective date of approval is June 28, 2026. This approval will expire on June 28, 2029, which is thirty-six (36) months from the effective date of approval, unless (1) all Conditions of Approval have been complied with, (2) all necessary building permits have been issued and remain in force, and (3) all necessary permits from other agencies have been issued and remain in force.

Unless otherwise specified, all Conditions of Approval and ordinance requirements shall be fulfilled prior to the establishment of the use and the issuance of any building permits. Those Conditions followed by a Section Number have been identified as ordinance requirements pertinent to this application. Ordinance requirements cannot be modified, and other ordinance requirements may apply.

1. COMMUNITY DEVELOPMENT DEPARTMENT (Contact: Community Development Department, [209] 468-3121)
 - a. **BUILDING PERMIT:** Submit an "APPLICATION-COMMERCIAL BUILDING PERMIT". The Site Plan required as a part of the building permit must be prepared by a registered civil engineer or licensed architect. This Plan must show drainage, driveway access details including gates, on-site parking, landscaping, signs, existing and proposed utility services, and grading (refer to the "SITE PLAN CHECK LIST" for details). Foundation and soils investigation shall be conducted in conformance with Chapter 18 of the California Building Code at the time of permit application. A fee is required for the Site Plan review. (Development Title Section 9-802.020)
 - b. **APPROVED USE:** This approval is for the establishment of a wildlife preserve within the Primary Zone of the Delta. The project includes the following:
 - Construction of a 475-square foot western viewing platform
 - Construction of a 2,400-square foot eastern viewing platform
 - Construction of a 75-square foot shade trellis
 - Construction of a parking lot with a bus turnabout and loading area
 - Installation of a portable restroom(Use Type: Parks and Open Space – Wildlife Preserve)
 - c. **CAPITAL FACILITY FEE:** This project may be subject to the Capital Facility Fee. If the Capital Facility Fee is applicable, the County shall collect the fees before the issuance of any building permits. (Development Title Section 9-610.070)
 - d. **PARKING:** Off-street parking shall be provided and comply with the following:
 1. All permanent parking lots, including internal circulation and loading areas, shall be surfaced and permanently maintained with gravel. (Development Title Section 9-406.110)
 2. Each vehicle parking stall shall be an unobstructed rectangle, minimum 9 feet wide and 20 feet long. (Development Title Section 9-406.060)
 - e. **ACCESS AND CIRCULATION:** The following requirements apply and shall be shown on the Site Plan:
 1. Access driveways shall have a width of no less than 25 feet. (Development Title Section 9-406.060[n])

- f. **LIGHTING:** Lighting shall be provided and comply with the following:
 - 1. All lighting shall be designed to confine direct rays to the premises. No spillover beyond the property lines shall be permitted, except onto public roads, provided, however, that such light shall not cause a hazard to motorists. (Development Title Section 9-406.060[m][3])
- g. **SIGNS:** Sign details shall be consistent with Chapter 9-408 of the Development Title and be included on the Site Plan. All portions of any sign shall be set back a minimum of 5 feet from existing and future right-of-way lines and shall not block pedestrian or vehicle rights-of-way or obstruct drivers' visibility. (Development Title Section 9-408)

2. DEPARTMENT OF PUBLIC WORKS (Contact: [209] 468-3000)

- a. An encroachment permit shall be required for all work within road right-of-way. (Note: Driveway encroachment permits are for flatwork only – all vertical features, including but not limited to fences, walls, private light standards, rocks, landscaping and cobbles are not allowed in the right-of-way.) (Development Title Sections 9-607.020 and 9-607.040)
- b. The driveway approach shall be improved in accordance with the requirements of San Joaquin County Improvement Standards Drawing No. 17 prior to issuance of the occupancy permit. (Development Title Section 9-607.040)
- c. The Traffic Impact Mitigation Fee shall be required for this application. The fee is due and payable at the time of building permit application. The fee will be based on the current schedule at the time of payment. The fee shall be automatically adjusted July 1 of each year by the Engineering Construction Cost Index as published by the Engineering News Record. (Resolutions R-00-433)
- d. The Regional Transportation Impact Fee shall be required for this application. The fee is due and payable at the time of building permit application. The fee will be based on the current schedule at the time of payment. (Resolution R-06-38)
- e. The developer shall provide drainage facilities in accordance with the San Joaquin County Development Standards. Retention basins shall be fenced with six (6) foot high chain link fence or equal when the maximum design depth is 18 inches or more. Required retention basin capacity shall be calculated and submitted along with a drainage plan for review and approval, prior to release of building permit. (Development Title Section 9-606)
- f. A copy of the Final Site Plan shall be submitted prior to release of building permit.
- g. This project is subject to the NPDES Region-Wide Permit requirements and shall comply with the following conditions. Prior to release of the building permit, plans and calculations shall be submitted and approved by the Public Works Department – Water Resources Division (209-468-9360):
 - 1. Treatment: A registered professional engineer shall design the site to treat the 85th percentile storm as defined in the County's 2023 Storm Water Quality Control Criteria Plan (SWQCCP).
 - 2. Hydromodification: A registered professional engineer shall design the site to comply with the volume reduction requirement outlined in the County's 2023 SWQCCP
 - 3. Trash: A registered professional engineer shall design the site to comply with the trash control requirement outlined in the County's 2023 SWQCCP.
- h. Prior to release of the building permit, the owner shall enter into an agreement with San Joaquin County for post-construction maintenance of stormwater quality facilities.
- i. Prior to release of the building permit the applicant shall submit a Storm Water Quality Control Plan (SWQCP) to Public Works that complies with all requirements of the 2023 SWQCCP

- j. Prior to release of the building permit the applicant shall submit the Storm Water Pollution Prevention Plan (SWPPP) to Public Works. A copy of the approved SWPPP and all required records, updates, test results and inspection reports shall be maintained on the construction site and be available for review upon request.
 - k. Applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and comply with the State "General Permit for Storm Water Discharges Associated with Construction Activity". The Waste Discharge Identification Number (WDID), issued by SWRCB, shall be submitted to Public Works prior to release of the building permit. Contact the SWRCB at 1-866-563-3107 for further information.
 - l. Prior to release of the building permit all new construction and the substantial improvement of any structure or tanks in the area of special flood hazard shall be elevated or floodproofed in accordance with San Joaquin County Ordinance Code Section 9-703.130. Plans and calculations shall be submitted and approved by the Public Works Department – Water Resources Division (209-468-9596).
3. ENVIRONMENTAL HEALTH DEPARTMENT (Contact: [209] 468-3420)
- a. Any geotechnical drilling shall be conducted under permit and inspection by The Environmental Health Department (San Joaquin County Development Title, Section 9-601.010(b) and 9-601.020(i)).
4. SAN JOAQUIN COUNCIL OF GOVERNMENT (Contact: [209] 235-0600)
- a. This project is subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP). The applicant must provide a Certificate of Payment prior to issuance of any grading or building permits.



**Planning Commission Staff Report
Item # 2, June 18, 2026
General Plan Amendment No. PA-2600209
Revised Adopted San Joaquin County 2023-2031 Housing Element
Prepared by: Megan Aguirre**

PROJECT SUMMARY

Applicant Information

Project Applicant: San Joaquin County Community Development Department

Project Site Information

Project Location: Countywide

Supervisorial District: All

Environmental Review Information

CEQA Determination: Notice of Exemption pursuant to Sections 15061(c)(3) (Attachment A, Environmental Review)

Project Description

This project is a General Plan Text Amendment to revise the adopted Housing Element for the 2023-2031 housing cycle (6th cycle). Proposed revisions address the incorporation of the City of Mountain House and the related reallocation of a portion of the County's Regional Housing Needs Allocation (RHNA) to the city.

Recommendation

1. Forward to the Board of Supervisors with a recommendation to adopt the Findings for General Plan Text Amendment (Attachment C, Findings), and
2. Forward to the Board of Supervisors with a recommendation to approve General Plan Text Amendment No. PA-2600209 for revisions to the adopted 2023-2031 Housing Element (Attachment B).

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NOTIFICATION & RESPONSES

Public Hearing Notices

Legal ad for the public hearing published in the Stockton Record: June 5, 2025

Number of Public Hearing notices: 52

Date of Public Hearing notice mailing: June 5, 2025.

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ANALYSIS

Background

All cities and counties in California are required to adopt a comprehensive, long-term General Plan comprised of nine mandated elements for the physical development of each jurisdiction. The Housing Element is one of these elements and is required to address the existing and projected housing needs of all economic segments of the community pursuant to State Housing Element law¹. In 2025, the Board of Supervisors approved the San Joaquin County's current Housing Element for the 2023-2031 housing cycle (6th cycle), which was followed by certification by the California Department of Housing and Community Development (HCD).

City of Mountain House Incorporation

On July 1, 2024, the City of Mountain House was incorporated into a city and was no longer an Urban Community in unincorporated San Joaquin County. Although the incorporation occurred after the beginning of the 6th cycle, it occurred after the Housing Element update was underway and due to be completed. As such, the HCD staff directed the County to complete the Housing Element update for the 6th cycle and then submit a subsequent amendment to address the city's incorporation and reallocation of housing units.

Regional Housing Needs Assessment

An integral part of the Housing Element update process is an assignment of housing needs to each city and county in the state, based on an evaluation of recent housing production and estimated housing needs (including housing based on affordability levels). This process, known as the RHNA, is managed by the San Joaquin Council of Governments (SJCOG) at the local level, and SJCOG assigns an overall housing production target for each local jurisdiction. In 2022, the San Joaquin Council of Governments adopted the 6th Cycle Regional Housing Needs Plan (RHNP) for 2023-2031, which allocated 16.7% of the 52,719 housing units allocated to San Joaquin County as a whole to the unincorporated County for a total of 8,808 housing units. Now that the City of Mountain House has incorporated, State law² allows the County and City to negotiate a revised RHNA to allot some of the County's current numbers to the City. As such, the County began coordination efforts with both SJCOG and the City of Mountain House upon completion of the process for the adopted Housing Element.

On November 12, 2025, the County submitted a letter to the City of Mountain House requesting transfer of 5,114 units based on a review of the methodology used in the RHNP for the current RHNA, and a review of the Comprehensive Fiscal Analysis prepared for the City of Mountain House prior to incorporation. On January 13, 2026, the City of Mountain House submitted a letter to the County accepting the transfer. Once SJCOG received the City's letter, they began coordination efforts with HCD on finalizing the transfer. During this time, HCD identified a rounding error in the updated methodology resulting in a recommendation to transfer one less unit to the City of Mountain House for a total transfer of 5,113 housing units. On May 27, 2026, SJCOG submitted a letter to HCD to formally transfer the units and notified the County that the revised adopted Housing Element must be completed by July 12, 2026, to address the transfer. (See Attachment D, RHNA Transfer Letters and Correspondence.)

Table 1 from SJCOG's letter is attached below. Details about the County's original and revised RHNA, as well as the City of Mountain House's new RHNA, are outlined in blue on the table.

¹ Government Code Section 65580 et seq.

² Government Code Section 65584.07

Amended Allocation Plan

Table 1: Factor Adjusted RHNA Housing Unit Determination

Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low Income Units	Lower Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate Income Units	Higher-Income (Moderate & Above-Moderate-Income)
Escalon	367	90	56	146	66	155	221
Lathrop	8,402	2,386	1,498	3,884	1,342	3,176	4,518
Lodi	3,909	941	591	1,532	706	1,671	2,377
Manteca	8,306	2,246	1,409	3,655	1,381	3,270	4,651
Ripon	1,424	347	218	565	255	604	859
Stockton	12,673	2,465	1,548	4,013	2,572	6,088	8,660
Tracy	8,820	2,004	1,870	4,872	1,175	2,782	3,957
Mountain House	5,113	1,309	821	2,130	886	2,097	2,983
Revised Unincorporated County Areas	3,695	515	324	839	848	2,008	2,856
Previous Unincorporated County Area*	8,808	1,824	1,145	2,969	1,734	4,105	5,839
Total San Joaquin County	52,719	13,293	8,344	21,637	9,231	21,851	31,082

* Note: The row "Previous Unincorporated County Area" is not part of Total, but is divided between Mountain House and Revised Unincorporated County Area.

General Plan Text Amendment

In order to address the incorporation of the City of Mountain House and RHNA transfer, the Community Development Department (CDD) is proposing several changes to the adopted Housing Element. This amendment is required by State law^{3 3} to be completed within 180 days of the effective date of the transfer of housing units. The revised adopted Housing Element for the County analyzes the County's ability to meet the new RHNA obligations, provides an analysis of housing constraints and opportunities, and identifies any changes to potential sites for development of new housing. As identified in the draft Housing Element update, the County has a surplus capacity of 1,278 potential housing sites.

Housing Development Challenges

Although the County's new RHNA is approximately 42% of the original allocation and it is estimated that the County will have surplus capacity of potential housing sites, development of available sites is contingent on outside parties to develop those properties and limited by physical constraints, such as lack of infrastructure or capacity for public services (i.e. water, sewer, and storm drainage) or lack of market demand. Additionally, the many potential lower income sites were previously identified in what is now the City of Mountain House. Most housing currently developed in unincorporated San Joaquin County continues to be single-family residences, Accessory Dwelling Units, and farm employee housing. As such,

^{3 3} Government Code Section 65584.07

the County must not only meet the new RHNA but also ensure that units can be provided across the various affordability levels.

Public Input

Prior to submitting the revised document to HCD for review, a public notice was sent out, and the document was posted on the County's website. The only comment received was a point of clarification from the SJCOG regarding a rounding error in the reallocation numbers that was corrected.

Agency Review

State of California Housing and Community Development

Pursuant to State law⁴, the County is required to submit the revised adopted Housing Element to the State of California's Housing and Community Development (HCD) for a specified review process that includes an initial 60-day review period, as well as subsequent 60-day review periods if there are revisions. The revised adopted Housing Element was submitted to HCD on April 22, 2026, for the initial (60-day) review period and the County's consultant has been in contact with HCD to ensure that all questions are promptly address. It is anticipated that HCD will provide confirmation that no further revisions are needed in advance of the Board of Supervisors meeting, which has tentatively been scheduled for June 30, 2026. However, if HCD does not provide confirmation prior to this date, the item will need to be continued to a future date for final adoption by the Board of Supervisors. Typically, County staff would wait to bring the item forward, but has fast tracked this item in an attempt to meet the State deadline of July 12, 2026, for final adoption.

Notice of Exemption

California Environmental Quality Act (CEQA) Guidelines Section 15061 (b)(3) states that a project is exempt from CEQA if the activity is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. CDD has determined that the proposed General Plan Text Amendment for revisions to the adopted Housing Element is exempt because the project involves policies, programs, and actions to meet the County's RHNA allocation that would not have the potential to cause a significant physical effect on the environment.

⁴ Government Code Section 65585.

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RECOMMENDATION

It is recommended that the Planning Commission:

1. Forward to the Board of Supervisors with a recommendation to adopt the Findings for General Plan Text Amendment (Attachment C, Findings), and
2. Forward to the Board of Supervisors with a recommendation to approve General Plan Text Amendment No. PA-2600209 for revisions to the adopted 2023-2031 Housing Element (Attachment B).

Attachments:

Attachment A – Environmental Review

Attachment B – Draft Ordinance (Revised Adopted 2023 – 2031 Housing Element [6th Cycle])

Attachment C – Findings

Attachment D – RHNA Transfer Letters

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— COUNTY —
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Attachment A

Environmental Review

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Notice of Exemption

Appendix E

To: Office of Planning and Research
 P.O. Box 3044, Room 113
 Sacramento, CA 95812-3044
 County Clerk
 County of: _____

From: (Public Agency): _____

 (Address)

Project Title: _____

Project _____ Applicant: _____

_____ Project Location -

Specific:

Project Location - City: _____ Project Location - County: _____

Description of Nature, Purpose and Beneficiaries of Project:

Name of Public Agency Approving Project: _____

Name of Person or Agency Carrying Out Project: _____

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: _____
- Statutory Exemptions. State code number: _____

Reasons why project is exempt:

Lead Agency
 Contact Person: _____ Area Code/Telephone/Extension: _____

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: _____ Date: _____ Title: _____

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code. Date Received for filing at OPR: _____
 Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

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Attachment B **Draft Ordinance**

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The revised adopted Housing Element can be found here:

[https://www.sjgov.org/docs/default-source/community-development/planning/other/2023-2031-housing-element-hcd-submittal-draft/san-joaquin-county-2023-2031-housing-element-\(adopted-april-2026\).pdf?sfvrsn=15ee4ad1_5](https://www.sjgov.org/docs/default-source/community-development/planning/other/2023-2031-housing-element-hcd-submittal-draft/san-joaquin-county-2023-2031-housing-element-(adopted-april-2026).pdf?sfvrsn=15ee4ad1_5)

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Attachment C **Findings**

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Findings

Basis for General Plan Text Amendment (PA-2600209)

1. The proposed amendment is consistent with the General Plan and any applicable Master Plan.
 - This proposed revisions to the adopted Housing Element for the 6th cycle include updating references to the City of Mountain house to clarify that it is no longer an Urban Community in the unincorporated County and identifying how the County will accommodate the revised Regional Housing Needs Allocation (RHNA) after transferring units to the City of Mountain House. The Housing Element is a State-mandated policy document that is a component of the General Plan, and with inclusion of the revisions will continue to be consistent with the remainder of the General Plan, and any applicable Master Plan.
2. The proposed amendment is necessary for public health, safety, and general welfare or will be of benefit to the public.
 - The overall purpose of the proposed project is to analyze current and projected housing needs; identify locations where housing can be built; and set goals, policies, and programs to meet the community's housing needs. As a result, this General Plan Text Amendment to revise the document to accommodate the incorporation of the City of Mountain House will benefit the public. The City of Mountain House is also working on its first Housing Element to address the RHNA transfer agreed upon with the County.
3. The proposed amendment has been reviewed in compliance with the requirements of the California Environmental Quality Act.
 - California Environmental Quality Act (CEQA) Guidelines Section 15061 (b)(3) states that a project is exempt from CEQA if the activity is covered by the general rule that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. The proposed General Plan Text Amendment to revise the 2023-2031 Housing Element (6th cycle) is exempt because the project involves policies, programs, and actions to meet the County's updated RHNA allocation and the incorporation of the City of Mountain House. The proposed revisions would not have the potential to cause a significant physical effect on the environment.

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Attachment D **RHNA Transfer Letters** **& Correspondence**

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Community Development Department

Planning · Building · Code Enforcement · Fire Prevention

Jennifer Jolley, Director

Eric Merlo, Assistant Director

Tim Burns, Code Enforcement Chief

Corinne King, Deputy Director of Planning

Jeff Niemeyer, Deputy Director of Building Inspection

November 12, 2025

City of Mountain House
 Attn: Steve Pinkerton, City Manager
 251 E Main Street
 Mountain House, CA 95391

RE: Regional Housing Needs Allocation (RHNA) Transfer Request

Dear Mr. Pinkerton,

In 2022, the San Joaquin Council of Governments adopted the 6th Cycle Regional Housing Needs Plan (RHNP)¹ for 2023-2031, which allocated housing units by income categories to all incorporated cities and the unincorporated areas of San Joaquin County. Of the 52,719 housing units allocated to San Joaquin County as a whole, 16.7% of the units (8,808 units) were assigned to unincorporated San Joaquin County as part of this Regional Housing Needs Allocation (RHNA) process. Pursuant to corrected Table 2 on page 9 of the RHNP, the County's RHNA is distributed by income level as indicated below:

Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low Income Units	Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate Income Units	Income (Moderate & Above-Moderate-Income)
Escalon	367	90	56	146	66	155	221
Lathrop	8,402	2,386	1,498	3,884	1,342	3,176	4,518
Lodi	3,909	941	591	1,533	706	1,671	2,377
Manteca	8,306	2,246	1,409	3,654	1,381	3,270	4,651
Ripon	1,424	347	218	565	255	604	859
Stockton	12,673	2,465	1,548	4,014	2,572	6,088	8,660
Tracy	8,830	2,994	1,879	4,873	1,175	2,782	3,957
Unincorporated County Areas	8,808	1,824	1,145	2,969	1,734	4,105	5,839
Total San Joaquin County	52,719	13,293	8,344	21,637	9,231	21,851	31,082

¹ Mandated by California Government Code Section 65584.

On July 1, 2024, the community of Mountain House incorporated, thus triggering the process for reallocation of RHNA housing units within unincorporated San Joaquin County to the City of Mountain House². Once the RHNA reallocation is agreed to by both the county and the city, this agreement must be submitted to SJCOG and the revised RHNA included in an adopted or amended Housing Element for each jurisdiction.³

Although this reallocation process is intended to occur within 90 days of incorporation, San Joaquin County was in the midst of a Housing Element update when the incorporation occurred, and was advised by the California Department of Housing and Community Development (HCD) to first adopt the updated Housing Element and then finalize the transfer of housing units and amend the Housing Element to reflect the change in RHNA. On August 22, 2025, HCD sent a letter certifying that San Joaquin County's adopted Housing Element is in substantial compliance with State Housing Element Law⁴.

County staff has met with SJCOG and city staff to discuss the RHNA reallocation. Additionally, County staff has reviewed the Comprehensive Fiscal Analysis of the Proposed Incorporation of the City of Mountain House dated September 5, 2023, which indicates that growth in Mountain House is forecasted to include 5,755 new housing units by 2034. Although this is a few years past the planning period for the RHNP, which covers 2023-2031, it is not unreasonable to assume that the City of Mountain House is capable of attaining the proposed RHNA goal within the RHNP planning period.

Based on the various meetings attended by County staff, a review of the methodology used in the RHNP for the current RHNA, and a review of the Comprehensive Fiscal Analysis, the county is requesting that the City of Mountain House accept 5,114 of the 8,808 units originally allocated to unincorporated San Joaquin County for the 2023-2031 planning period. San Joaquin County requests that the City of Mountain House accept the transfer as the city's RHNA allocation or provide an alternative number to be discussed along with the supporting methodology.

Sincerely,



Jennifer Jolley, Director
Community Development Department
San Joaquin County

² Pursuant to Government Code Section 65584.07.

³ Cities must complete this within 30 months of incorporation and the county within 180 days of the transfer.

⁴ Pursuant to Government Code Section 65580 et seq.



251 E Main Street, Mountain House, CA

January 13, 2026

Jennifer Jolley
Director
Community Development Department
1810 East Hazelton Avenue
Stockton, CA 95205

Subject: Acceptance of Proposed RHNA Transfer Request for the City of Mountain House

Dear Ms. Jolley,

This letter serves as the City of Mountain House's formal acceptance of the County's proposed RHNA allocation for the 6th Housing Element Cycle (2023-2031). We have received your RHNA transfer request letter, dated November 12, 2025, and agree with your proposed allocation.

City staff brought the RHNA transfer request to the Mountain House City Council for consideration and approval. On December 10, 2025, the City Council approved the proposed RHNA transfer as a City Council Consent Item.

As outlined in your letter, the total RHNA allocation for Mountain House is 5,114, based on the methodology used in the 2022 Adopted RHNA Plan prepared by the San Joaquin Council of Governments (SICOG). We understand that SICOG's memo, dated November 13, 2025, suggests the following RHNA allocation for each income category:

- *Very Low Income: 1,308*
- *Low Income: 821*
- *Moderate Income: 887*
- *Above Moderate: 2,098*

As you know, the City is beginning to undergo the process of preparing Mountain House's first Housing Element. We will use the RHNA allocation you proposed in the preparation of the Housing Element.

To Provide Responsive Service to Our Growing Community That Exceeds Expectations at a Fair Value

 (209) 831-2300

 (209) 831-5610

 MountainHouseCA.gov

Page 2

Acceptance of Proposed RHNA Transfer Request for the City of Mountain House

Page 2 of 2

Please feel free to contact me directly at (209) 831-5656 or via email at spinkerton@sjgov.org if you have questions. Thank you again for your collaboration in achieving this crucial step in Mountain House's Housing Element preparation process.

Sincerely,

DocuSigned by:


Steven J. Pinkerton

Steven J. Pinkerton

City Manager

City of Mountain House

To Provide Responsive Service to Our Growing Community That Exceeds Expectations at a Fair Value

 (209) 831-2300

 (209) 831-5610

 MountainHouseCA.gov



Community Development Department

Planning · Building · Code Enforcement · Fire Prevention

Jennifer Jolley, Director

Eric Merlo, Assistant Director

Tim Burns, Code Enforcement Chief

Corinne King, Deputy Director of Planning

Jeff Niemeyer, Deputy Director of Building Inspection

November 12, 2025

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 Attn: Steve Pinkerton, City Manager
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 Mountain House, CA 95391

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¹ Mandated by California Government Code Section 65584.

On July 1, 2024, the community of Mountain House incorporated, thus triggering the process for reallocation of RHNA housing units within unincorporated San Joaquin County to the City of Mountain House². Once the RHNA reallocation is agreed to by both the county and the city, this agreement must be submitted to SJCOG and the revised RHNA included in an adopted or amended Housing Element for each jurisdiction.³

Although this reallocation process is intended to occur within 90 days of incorporation, San Joaquin County was in the midst of a Housing Element update when the incorporation occurred, and was advised by the California Department of Housing and Community Development (HCD) to first adopt the updated Housing Element and then finalize the transfer of housing units and amend the Housing Element to reflect the change in RHNA. On August 22, 2025, HCD sent a letter certifying that San Joaquin County's adopted Housing Element is in substantial compliance with State Housing Element Law⁴.

County staff has met with SJCOG and city staff to discuss the RHNA reallocation. Additionally, County staff has reviewed the Comprehensive Fiscal Analysis of the Proposed Incorporation of the City of Mountain House dated September 5, 2023, which indicates that growth in Mountain House is forecasted to include 5,755 new housing units by 2034. Although this is a few years past the planning period for the RHNP, which covers 2023-2031, it is not unreasonable to assume that the City of Mountain House is capable of attaining the proposed RHNA goal within the RHNP planning period.

Based on the various meetings attended by County staff, a review of the methodology used in the RHNP for the current RHNA, and a review of the Comprehensive Fiscal Analysis, the county is requesting that the City of Mountain House accept 5,114 of the 8,808 units originally allocated to unincorporated San Joaquin County for the 2023-2031 planning period. San Joaquin County requests that the City of Mountain House accept the transfer as the city's RHNA allocation or provide an alternative number to be discussed along with the supporting methodology.

Sincerely,



Jennifer Jolley, Director
Community Development Department
San Joaquin County

² Pursuant to Government Code Section 65584.07.

³ Cities must complete this within 30 months of incorporation and the county within 180 days of the transfer.

⁴ Pursuant to Government Code Section 65580 et seq.



MEMORANDUM

To: SJCOG Member Agencies

From: SJCOG

Date: 11.13.2025

RE: Mountain House RHND Amendment to Adopted 6th Cycle Regional Housing Needs Plan (2023-2031)

The incorporation of Mountain House from the unincorporated portion of San Joaquin County necessitates the development of a housing element that aligns with its Regional Housing Needs Determination (RHND). Other jurisdictions within San Joaquin County received their Factor-Adjusted Regional Housing Needs Allocation (RHNA) determinations as part of the 6th Cycle Housing Needs Allocation, developed by the San Joaquin Council of Governments (SJCOG) and described in the Regional Housing Needs Plan (RHNP) adopted on September 22, 2022.¹

To ensure compliance with RHNA objectives and avoid altering the Regional Housing Needs Determination (RHND) of other jurisdictions, adjustments to include Mountain House were constrained to the allocations for the unincorporated county area as adopted in the RHNP on September 22, 2022. These prior allocations for the unincorporated county area previously encompassed Mountain House.

Table 1: Factor Adjusted RHNA Housing Unit Determination

Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low Income Units	Lower Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate Income Units	Higher-Income (Moderate & Above-Moderate-Income)
Escalon	367	90	56	146	66	155	221
Lathrop	8,402	2,386	1,498	3,884	1,342	3,176	4,518
Lodi	3,909	941	591	1,533	706	1,671	2,377
Manteca	8,306	2,246	1,409	3,654	1,381	3,270	4,651
Ripon	1,424	347	218	565	255	604	859
Stockton	12,673	2,465	1,548	4,014	2,572	6,088	8,660
Tracy	8,830	2,994	1,879	4,873	1,175	2,782	3,957
Mountain House	5,114	1,308	821	2,129	887	2,098	2,985
Unincorporated County Areas	3,695	515	324	839	848	2,008	2,856
Total San Joaquin County	52,719	13,293	8,344	21,637	9,231	21,851	31,082

¹ For details see: <https://www.sjocog.org/113/Regional-Housing-Needs-Allocation>



This memorandum outlines the process used to estimate Mountain House’s specific allocation. The resulting overall allocations of lower-income and higher-income housing units for each jurisdiction remain unchanged, but Mountain House is now included as a separate jurisdiction, with a proportional reduction in the allocations assigned to the unincorporated county area. The results from this effort are presented in Table 1, which reports the factor-adjusted RHNA housing unit determination for jurisdictions across San Joaquin County, including Mountain House in a structure paralleling that from Table 2 on page 9 in the RHNP adopted on September 22, 2022.

The remainder of this memorandum provides a detailed explanation of the process used to establish Mountain House's Housing Unit Determination. This process follows the same methodology as the RHNP adopted on September 22, 2022, resulting in similar narrative language. However, additional notes have been included throughout to highlight adjustments made to distinguish Mountain House as a separate jurisdiction from the unincorporated county areas.

A. Base RHNA Calculation

The first step in the RHNA Methodology is to determine each jurisdiction’s total RHNA allocation before it is divided by income categories. The RHNA Methodology determines each jurisdiction’s total base RHNA number by multiplying the total RHND from HCD by the proportion of household growth attributed to the jurisdiction in the forecast for the RTP/SCS between 2023 and 2031.

Table 2: RTP/SCS Forecast Households in 2031 by Jurisdiction

Jurisdiction	A	B	C
	Household Growth (2023-2031)	Share of Growth	Base RHNA Allocation
Escalon	160	0.7%	367
Lathrop	3,654	15.9%	8,402
Lodi	1,700	7.4%	3,909
Manteca	3,612	15.8%	8,306
Ripon	619	2.7%	1,423
Stockton	5,512	24.0%	12,673
Tracy	3,841	16.7%	8,830
Mountain House	2,224	9.7%	5,114
Unincorporated	1,607	7.0%	3,695
Total San Joaquin County	22,930	100%	52,719

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

Table 2: RTP/SCS Forecast Households in 2031 by Jurisdiction reports the results of this process for San Joaquin County. In Column A each jurisdiction’s household growth during San Joaquin County’s 6th RHNA Cycle (2023-2031) is reported based on the RTP/SCS forecast.² The associated jurisdictional shares (Column B) are then multiplied by the County’s total housing unit need, 52,719, to get the base total RHNA determination for the jurisdictions in Column C. **[This table includes the addition of**

² This report uses the San County RTP/SCS Forecast dated 9/10/2021 for these estimates. It is available here: <https://www.sjocog.org/DocumentCenter/View/6007/Demographic-and-Employment-Forecast-2020>



Mountain House’s forecast 2023-2031 growth from the RTP/SCS forecast and its removal from the Unincorporated areas]

Table 3: Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination

Jurisdiction	A	B	C	D
	Total Base RHNA	Lower IIII (%)	Lower RHNA	Higher RHNA
Escalon	367	41.04%	151	217
Lathrop	8,402	41.04%	3,448	4,954
Lodi	3,909	41.04%	1,604	2,305
Manteca	8,306	41.04%	3,409	4,897
Ripon	1,423	41.04%	584	839
Stockton	12,673	41.04%	5,201	7,472
Tracy	8,830	41.04%	3,624	5,206
Mountain House	5,114	41.04%	2,099	3,015
Unincorporated	3,695	41.04%	1,516	2,178
San Joaquin County	52,719	41.04%	21,637	31,082

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

The second step determines jurisdictional allocations by income category according to those specified in the RHND. *Table 3: Initial RHNA Allocation by Jurisdiction and Calibration to Final HCD RHNA Determination* details the process for San Joaquin County. The jurisdictions’ Base RHNA Allocation from the previous table is carried forward (*Column A*) and those values are multiplied by the share of lower-income housing units in the Final RHNA determination (*Column B*) to get each jurisdiction’s base lower-income RHNA determination (*Column C*). The number of higher-income housing units (*Column D*) is then estimated by subtracting the Lower-Income allocation (*Column C*) from the Total Base RHNA (*Column A*). **[This table includes the addition of Mountain House to the list of jurisdictions]**

Table 4: RHNA Determination by Jurisdiction Aligned to Broad Income Category Totals

Jurisdiction	Lower-Income (0-80%)	Higher-Income (80+%)	Base RHNA Allocation
Escalon	151	217	367
Lathrop	3,448	4,954	8,402
Lodi	1,604	2,305	3,909
Manteca	3,409	4,897	8,306
Ripon	584	839	1,423
Stockton	5,201	7,472	12,673
Tracy	3,624	5,206	8,830
Mountain House	2,099	3,015	5,114
Unincorporated	1,516	2,178	3,695
San Joaquin County	21,637	31,082	52,719

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.



Table 4: RHNA Determination by Jurisdiction Aligned to Broad Income Category Totals presents a summary of the jurisdictional allocations aligned to the RHND by broad income level. **[This table includes the addition of Mountain House and its removal from the Unincorporated areas in the list of determinations by jurisdiction]**

Using the RTP/SCS forecast as the basis for total RHNA calculations ensures consistency between these two planning efforts. Since the RTP/SCS forecast is built from local plans, it incorporates a variety of regulatory, market, and performance factors. The RTP/SCS growth forecast has also been thoroughly vetted by local planning staff and represents a County-wide agreement on growth and its path to attaining climate and quality of life goals.

B. Lower-Income Housing Units Adjustment Factors

The framework for the RHNA Methodology is oriented around furthering each of the statutory RHNA objectives. In *Table 5: RHNA Objectives and Allocation Adjustment Factors*, the five RHNA objectives are listed by row and the adjustment factors used to further those objectives are listed by column. As described above, the first two objectives are furthered through the total RHNA calculation relying on the development pattern in the RTP/SCS (step one). Those objectives are also intrinsically addressed through the assignment of housing units at different income categories to each jurisdiction of the county (step two). The three other objectives are not inherently furthered by the RTP/SCS. Therefore, additional adjustment factors are needed. This section describes those factors.

Table 5: RHNA Objectives and Allocation Adjustment Factors

<i>RHNA Objectives (rows)/ RHNA Adjustment Factors (columns)</i>	Baseline RTP/SCS Forecast	Affirmatively Furthering Fair Housing Factor	Income Parity Factor	Jobs-Housing Fit Factor
Increasing the housing supply and mix of housing types, tenure, and affordability	Furthers	Supports	Supports	Supports
Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, and encouraging efficient development patterns	Furthers	Supports		Supports
Promoting an improved intraregional relationship between jobs and housing	Supports			Furthers
Balancing disproportionate household income distributions		Supports	Furthers	
Affirmatively furthering fair housing		Furthers	Supports	



B1. Adjustment Factor One: Jobs-Housing Fit Factor

This factor addresses the objective to improve the intraregional relationship between jobs and housing, including explicit consideration of the balance between the number of low-wage jobs and the number of units affordable to low-wage jobs in the jurisdictions. While the RTP/SCS addresses the overall jobs-housing balance, it does not separate the lower-income work-housing balance issue. Therefore, this factor considers the existing ratio of low-wage workers to units affordable to low-wage workers. Jurisdictions with a higher-than-average ratio receive an upward adjustment of lower-income RHNA units and those with a lower-than-average ratio receive a downward adjustment of lower-income RHNA units.

Table 6: Jobs-Housing Fit Factor Jurisdictional Variance reports the jobs-housing fit adjustment factors by jurisdiction for San Joaquin County. It uses the number of jobs by jurisdiction that pay \$3,333 per month or less as the measure of low-wage jobs.³ Given that HCD considers households who spend more than 30% of their income on housing to be cost-burdened, data on units for rent at less than \$1,000 a month (30% of \$3,333 income) are used to estimate the number of affordable housing units by jurisdiction.⁴ **[This table includes the addition of Mountain House to the list of jurisdictions with data from the same sources as those of the other jurisdictions as well as its removal from the Unincorporated areas.]**

Table 6: Jobs-Housing Fit Factor Jurisdictional Variance

Jurisdiction	Affordable Housing Units	Low-Wage Jobs	Jobs-Housing Fit Ratio	Adjustment from County Ratio [3.01]
Escalon	233	1,154	5.0	64.6%
Lathrop	246	4,366	17.7	489.8%
Lodi	5,696	14,095	2.5	-17.8%
Manteca	3,135	11,521	3.7	22.1%
Ripon	529	2,443	4.6	53.5%
Stockton	28,532	60,982	2.1	-29.0%
Tracy	1,736	23,578	13.6	351.3%
Mountain House	21	482	23.0	662.8%
Unincorporated	8,089	26,472	3.3	8.8%

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

³ In this report, 2018 jobs by jurisdiction data are used from the U.S. Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) program.

⁴ In this report, Contract Rent reported by jurisdiction in the U.S. Census Bureau's American Community Survey (ACS) Table# B25056, 2019 5-Year Estimates is used to estimate affordable housing units.



The percentage difference between the overall county ratio of 3.01 and the jurisdictions’ ratios is then used to proportionally adjust the jurisdictions’ allocated affordable housing units. Through this process jurisdictions with higher ratios of low-wage workers to affordable housing units are encouraged to zone for more affordable housing.

B1. Adjustment Factor Two: Regional Income Parity Factor

This factor addresses the objective to balance disproportionate household income distributions. Using the existing share of lower-income households, jurisdictions with a lower-than-average share receive an upward adjustment of lower-income RHNA units and those with a higher-than-average share receive a downward adjustment of lower-income RHNA units.

Table 7: Regional Income Parity Factor Jurisdictional Variance

Jurisdiction	Lower-Income Households	Total Households	Lower-Income Share	Adjustment from County Share [39.1%]
Escalon	880	2,600	33.8%	5.2%
Lathrop	1,540	5,485	28.1%	11.0%
Lodi	9,145	22,530	40.6%	-1.5%
Manteca	7,845	23,495	33.4%	5.7%
Ripon	1,190	5,085	23.4%	15.7%
Stockton	43,805	93,745	46.7%	-7.7%
Tracy	5,950	25,470	23.4%	15.7%
Mountain House	515	4,190	12.29%	26.78%
Unincorporated	16,585	41,210	40.25%	-1.17%

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

Table 7: Regional Income Parity Factor Jurisdictional Variance reports the regional income parity adjustment factors by jurisdiction for San Joaquin County. It uses the number of households with an income 80% or less than the area median income divided by the total number of households in the area to estimate the lower income share.⁵ The percentage difference between the overall county share of 39.1% lower income households and the jurisdictions’ shares are then used to proportionally adjust the jurisdictions’ allocated affordable housing units. By allocating more affordable housing unit zoning to jurisdictions with lower shares of lower-income households and vice versa, over time this factor intends to move jurisdictions towards a similar proportion of lower-income households across the County. **[This table includes the addition of Mountain House to**

⁵ In this report, 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data produced by the U.S. Department of Housing and Urban Development (HUD) is used to estimate the number of area households by income level.



the list of jurisdictions with data from the same sources as those of the other jurisdictions as well as its removal from the Unincorporated areas.]

B2 Adjustment Factor Three: Affirmatively Furthering Fair Housing Factor

This factor addresses the objective to take meaningful actions to address disparities in housing needs and in access to opportunity, such as employment, higher performing schools, health care, and transportation. Using the share of existing homes in higher opportunity areas, this factor seeks to open high opportunity jurisdictions to all economic segments of the community by giving jurisdictions with a higher-than-average share of high opportunity housing units an upward adjustment of lower income RHNA units and those with a lower-than-average share a downward adjustment of lower income RHNA units.

Table 8: Affirmatively Furthering Fair Housing Factor Jurisdictional Variance

Jurisdiction	Housing Units in High/Highest Resource Areas	Total Housing Units	Higher Opportunity Share	Adjustment from County Share [44.6%]
Escalon	0	2,694	0.0%	-44.6%
Lathrop	695	5,883	11.8%	-32.8%
Lodi	20,639	24,383	84.6%	40.0%
Manteca	20,083	26,152	76.8%	32.2%
Ripon	0	5,645	0.0%	-44.6%
Stockton	41,473	102,795	40.3%	-4.3%
Tracy	21,465	26,695	80.4%	35.8%
Mountain House	4,190	4,190	100.00%	55.39%
Unincorporated	0	41,210	0.00%	-44.61%

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

Table 8: Affirmatively Furthering Fair Housing Factor Jurisdictional Variance reports the AFFH adjustment factors by jurisdiction for San Joaquin County. It uses the number of housing units a jurisdiction has that are in higher opportunity areas divided by total number of housing units in that jurisdiction to estimate the share of higher opportunity areas.⁶ **[This table includes the addition of Mountain House to the list of jurisdictions with data from the same sources as those of the other jurisdictions as well as its removal from the Unincorporated areas.]** The percentage difference between the overall county share of 44.6% higher opportunity units and the jurisdictions' shares are then used to proportionally adjust the jurisdictions' allocated affordable housing units. Through this process jurisdictions with larger shares of higher opportunity housing units are asked to zone for more affordable housing. In doing so, this factor intends to open high opportunity jurisdictions to all economic segments.

⁶ In this report the census tracts identified as high and highest resource in the 2021 Statewide Summary Table of the TCAC/HCD Opportunity Area Maps are used to identify the higher opportunity areas by jurisdiction. The associated housing units in those census tracts are then estimated from the U.S. Census Bureau's American Community Survey Table# DP04, 2019 5-Year data.



B3 Application of the Adjustment Factors

The third step applies the three adjustment factors to each jurisdiction’s lower-income units according to their respective factor weights and then uses the sum of those factors to increase or decrease the jurisdictions’ total lower-income units. Some jurisdictions have exceptionally high factor rates in comparison to the county. For instance, the job-housing fit factor reported in *Table 6: Jobs-Housing Fit Factor Jurisdictional Variance* for the City of Tracy has a ratio of 13.6 low-wage jobs per affordable housing unit. That value is 351% higher than county-wide, implying that the City of Tracy’s Job-Housing Fit allocation should be increased by 351% unless some maximum factor adjustment limits are imposed. Without limits on the adjustment factors, outliers like the City of Tracy’s Job-Housing Fit ratio create an increase in the overall number of lower-income housing unit allocations.

Given the impact from exceptional, or outlier, values on a particular jurisdiction as well as the distortionary county-wide impact on allocations across income categories, the Methodology has incorporated a Maximum Factor Adjustment Value (MFAV) that sets an upper and lower limit on divergence across the adjustment factors. In determining the MFAV, the distortions of the unbound divergence must be weighed against similar distortions introduced by excessively restrictive values. Therefore, this methodology uses an MFAV of 100% which limits any factor adjustment to a doubling of the jurisdiction’s increase or decrease in lower income housing unit allocation.

Table 9: Jurisdictions’ Lower-Income Factor Adjustment Allocations

Jurisdiction	A Lower-Income RHNA	B J-H Fit Factor Weight = 33%	C J-H Fit Factor % Adj	D J-H Fit Factor	E Income Parity Weight = 33%	F Income Parity Factor % Adj	G Income Parity Factor	H AFFH Factor Weight = 33%	I AFFH Factor % Adj	J AFFH Factor	K Factor Adj Lower-Income
Escalon	151	50	65%	83	50	5%	53	50	-45%	28	163
Lathrop	3,448	1,149	100%	2,299	1,149	11%	1,276	1,149	-33%	772	4,347
Lodi	1,604	535	-18%	440	535	-2%	527	535	40%	749	1,715
Manteca	3,409	1,136	22%	1,388	1,136	6%	1,201	1,136	32%	1,502	4,090
Ripon	584	195	53%	299	195	16%	225	195	-45%	108	632
Stockton	5,201	1,734	-29%	1,231	1,734	-8%	1,601	1,734	-4%	1,660	4,492
Tracy	3,624	1,208	100%	2,416	1,208	16%	1,398	1,208	36%	1,640	5,455
Mountain House	2,099	700	100%	1,398	700	27%	886	700	55%	1,086	3,370
Unincorporated	1,516	505	9%	549	505	-1%	499	505	-45%	280	1,328
County Total	21,637	7,212		10,103	7,212		7,666	7,212		7,825	25,594

*Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided
 = MFAV of 100% applied

Table 9: Jurisdictions’ Lower-Income Factor Adjustment Allocations details the factor adjustment process for San Joaquin County. First, each factor’s weight is multiplied by the lower-income housing unit allocation (*Column A*). Doing this results in unadjusted factor weighted lower-income housing units for each factor (*Columns B, E, and H*). Next, each factor adjustment is applied. The percentage adjustment from the first factor, the Jobs-Housing Fit Factor, from *Table 6: Jobs-Housing Fit Factor*



Jurisdictional Variance is reported in *Column C*. The value in *Column C* is multiplied by the unadjusted factor weighted shares from *Column B* and then added to *Column B* to get the factor adjusted jobs-housing fit unit allocation in *Column D*. The Income Parity Factor is second, its adjustment values from *Table 7: Regional Income Parity Factor Jurisdictional Variance* are reported in *Column F* and multiplied by the unadjusted factor weighted shares from *Column E* and then added to *Column E* to get the factor adjusted income parity unit allocation in *Column G*. Similarly, the adjustment values for the Affirmatively Furthering Fair Housing (AFFH) Factor from *Table 8: Affirmatively Furthering Fair Housing Factor Jurisdictional Variance* are reported in *Column I* and multiplied by the unadjusted factor weighted shares from *Column H* and then added to *Column H* to get the factor adjusted AFFH unit allocation in *Column J*. The sum of *Column D, G, and J* then form a factor adjusted lower-income housing unit allocation by jurisdiction in *Column K*. It should be noted that since the MFAV is 100%, three values in *Table 9: Jurisdictions’ Lower-Income Factor Adjustment Allocations* are affected, the Jobs-Housing Fit adjustment factors for the City of Tracy, the City of Lathrop, and the City of Mountain House. **[This table includes the addition of Mountain House and its removal from the Unincorporated areas in the list of factor adjustments by jurisdiction]**

C. Factor Adjusted RHNA Determination

The fourth, and final, step re-aligns the jurisdictional factor adjusted housing unit allocations to those specified in the RIIND. If San Joaquin County is to maintain the county-wide RIIND across each of the income categories, it is necessary to correct the factor adjusted housing units by income category. Therefore, the percentage differences in the totals across the income levels are applied to each of the jurisdictional factor adjusted housing unit allocations to align the sum of the jurisdictional allocations to the Final Determination values.

Table 10: Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination

	A	B	C	D	E
Jurisdiction	Factor Adj. Lower-Income RHNA	Lower-Income RHNA % Adjustment	Calibrated Factor Adjusted Lower-Income RHNA	Base Total RHNA Allocation	Calibrated Factor Adjusted Higher Income RHNA
Escalon	163	-10.7%	146	367	221
Lathrop	4,347	-10.7%	3,884	8,402	4,518
Lodi	1,715	-10.7%	1,533	3,909	2,377
Manteca	4,090	-10.7%	3,654	8,306	4,651
Ripon	632	-10.7%	565	1,423	859
Stockton	4,492	-10.7%	4,014	12,673	8,660
Tracy	5,455	-10.7%	4,873	8,830	3,957
Mountain House	3,370	-36.8%	2,129	5,114	2,985
Unincorporated	1,328	-36.8%	839	3,695	2,856
San Joaquin County	25,594	-15.46%	21,637	52,719	31,082

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.



Table 10: Factor Adjusted Allocations Calibrated to Final HCD RHNA Determination details this adjustment process. In *Column A*, the jurisdictions' factor-adjusted lower-income housing unit allocations from *Column K* of *Table 9: Jurisdictions' Lower-Income Factor Adjustment Allocations* are carried forward. Since the sum of lower-income RHNA housing units in *Column A*, 24,218, is higher than the 21,637 in the RHND for lower-income housing units, it is necessary to adjust downward the allocations in *Column A*. Therefore, the percentage difference of -10.7% at the County level (*Column B*) is applied to each jurisdiction's factor adjusted lower-income housing unit allocation (*Column A*) to get the factor adjusted lower-income housing unit allocation by jurisdiction calibrated to the RHND for San Joaquin County in *Column C*. Given these adjustments, it is necessary to make complementary adjustments to the jurisdiction's higher-income housing unit allocations. Those adjustments are made by subtracting the calibrated factor-adjusted lower-income housing units (*Column C*) from the base total RHNA allocation (*Column D*), which results in calibrated factor adjusted higher income housing units in *Column E*.

However, in order to keep the calibration process constrained to the control total established by the Unincorporated portion of the County in the RHNP adopted on September 22, 2022, it is necessary to separately calibrate the Factor Adjusted Lower-Income RHNA values from Mountain House and the Unincorporated area less Mountain House. Given that the two areas previously formed a Calibrated Factor Adjusted Lower-Income RHNA of 2,969 for the Unincorporated areas this value must form a control value if the addition of Mountain House is not to affect the housing unit determination of other jurisdictions in the county.⁷ The 3,370 Factor Adjusted Lower-Income units assigned to Mountain House in *Column K* of *Table 9* and the 1,328 Factor Adjusted Lower-Income units assigned to the Unincorporated areas without the inclusion of Mountain House must therefore be proportionally reduced to total 2,969. Since the uncalibrated Factor Adjusted Lower-Income units for Mountain House and Unincorporated areas without the inclusion of Mountain House total 4,698, this means that the two jurisdictions must be adjusted by down by 36.8% $(2,969 - 4,698 / 4,698)$. As indicated in *Table 10* this adjustment is applied similarly to that of the other jurisdictions to effect Calibrated Factor Adjusted Lower-Income RHNA in *Column C* and then that value is subtracted from their Base Total RHNA Allocation in *Column D* to derive their Calibrated Factor Adjusted Higher Income RHNA in *Column E*. ***[As discuss in the preceding paragraph Table 10, Table 11, and Table 12 include the addition of Mountain House as well as its removal from the Unincorporated areas along with a series of associated adjustments to accommodate these additions.]***

⁷ This control value of 2,969 may be verified in the Unincorporated area value from Table 15 on page 35 of RHNP adopted on September 22, 2022.



Table 11: Factor Adjusted RHNA Housing Unit Determination

	Factor Adjusted Lower- Income (0-80%)	Factor Adjusted Higher- Income (80+%)	Base RHNA Allocation
Escalon	146	221	367
Lathrop	3,884	4,518	8,402
Lodi	1,533	2,377	3,909
Manteca	3,654	4,651	8,306
Ripon	565	859	1,423
Stockton	4,014	8,660	12,673
Tracy	4,873	3,957	8,830
Mountain House	2,129	2,985	5,114
Unincorporated	839	2,856	3,695
San Joaquin County	21,637	31,082	52,719
<i>Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.</i>			



Table 11: Factor Adjusted RHNA Housing Unit Determination reorganizes the data in Table 10 to summarize the Factor Adjusted RHNA Housing Unit Determination by income level. Differences between the existing share of households by income and shares of factor adjusted RHNA unit allocations are reported in Table 12: Comparison of Housing Unit Structure from Factor Adjustments. It highlights the influence the RHNA Methodology has in promoting transformative housing opportunities in San Joaquin County.

Table 12: Comparison of Housing Unit Structure from Factor Adjustments

Jurisdiction	Lower-Income (0-80%)			Higher-Income (80+%)		
	Existing	Factor Adjusted	Difference	Existing	Factor Adjusted	Difference
Escalon	34%	40%	6%	66%	60%	-6%
Lathrop	28%	46%	18%	72%	54%	-18%
Lodi	41%	39%	-1%	59%	61%	1%
Manteca	33%	44%	11%	67%	56%	-11%
Ripon	23%	40%	16%	77%	60%	-16%
Stockton	47%	32%	-15%	53%	68%	15%
Tracy	23%	55%	32%	77%	45%	-32%
Mountain House	12%	42%	29%	88%	58%	-29%
Unincorporated	40%	23%	-4%	60%	77%	18%
San Joaquin County	39%	41%		61%	59%	

Note: Due to rounding, numbers presented in this table may not add up precisely to the totals provided.

Acronyms

ACS	American Community Survey
AFFH	Affirmatively Furthering Fair Housing
CBPR	Center for Business and Policy Research
HCD	California Department of Housing and Community Development
LEHD	Longitudinal Employer-Household Dynamics
MFAV	Maximum Factor Adjustment Value
RHNA	Regional Housing Needs Allocation
RHND	Regional Housing Needs Determination
RHNP	Regional Housing Needs Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SJCOC	San Joaquin Council of Governments





SAN JOAQUIN COUNCIL OF GOVERNMENTS

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May 27, 2026

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AND
THE COUNTY OF SAN
JOAQUIN

Regional Housing Needs Allocation Team
Housing Policy Development Division
California Department of Housing and Community Development
Via email: RegionalHousingNeeds@hcd.ca.gov

RE: Notice of Formal Transfer of Regional Housing Needs Allocation from County of San Joaquin to City of Mountain House

To the RHNA Team:

The San Joaquin Council of Governments (SJCOCG), in its role as the Council of Governments responsible for administering the Regional Housing Needs Allocation (RHNA) for San Joaquin County, is issuing this letter to formally document the RHNA transfer associated with the incorporation of the City of Mountain House.

Amended Allocation Plan

Table 1: Factor Adjusted RHNA Housing Unit Determination

Jurisdiction	Total RHNA Allocation	Very-Low Income Units	Low Income Units	Lower Income (Very-Low & Low-Income)	Moderate Income Units	Above-Moderate Income Units	Higher-Income (Moderate & Above-Moderate-Income)
Escalon	367	90	56	146	66	155	221
Lathrop	8,402	2,386	1,498	3,884	1,342	3,176	4,518
Lodi	3,909	941	591	1,532	706	1,671	2,377
Manteca	8,306	2,246	1,409	3,655	1,381	3,270	4,651
Ripon	1,424	347	218	565	255	604	859
Stockton	12,673	2,465	1,548	4,013	2,572	6,088	8,660
Tracy	8,830	2,994	1,879	4,873	1,175	2,782	3,957
Mountain House	5,113	1,309	821	2,130	886	2,097	2,983
Revised Unincorporated County Areas	3,695	515	324	839	848	2,008	2,856
Previous Unincorporated County Area*	8,808	1,824	1,145	2,969	1,734	4,105	5,839
Total San Joaquin County	52,719	13,293	8,344	21,637	9,231	21,851	31,082

* Note: The row "Previous Unincorporated County Area" is not part of Total, but is divided between Mountain House and Revised Unincorporated County Area.

Key Dates Relevant to the Transfer

Cycle 6 RHNA Plan 2023 – 2031 Adoption	September 22, 2022
Incorporation of the City of Mountain House	July 1, 2024
Deadline to Submit Transfer Agreement or Request (90 days after incorporation)	September 29, 2024
Actual Agreed Date of Transfer	January 13, 2026
COG Finalization Window (180 days after receipt of written request)	July 12, 2026
City of Mountain House Housing Element Due Date (30 months after incorporation)	January 1, 2027
County of San Joaquin Housing Element Amendment Deadline (180 days after agreed date of transfer)	July 12, 2026

Although this reallocation process is intended to occur within 90 days of incorporation, San Joaquin County was in the midst of a Housing Element update when the incorporation occurred, and was advised by the California Department of Housing and Community Development (HCD) to first adopt the updated Housing Element and then finalize the transfer of housing units and amend the Housing Element to reflect the change in RHNA. On August 22, 2025, HCD sent a letter certifying that San Joaquin County’s adopted Housing Element is in substantial compliance with State Housing Element Law.

The RHNA methodology distributes housing need based on projected household growth, employment patterns, access to opportunity, equity considerations, and alignment with regional planning objectives. The methodology ensures that each jurisdiction receives an allocation that supports fair housing goals, sustainable development, and regional housing production needs.

Pursuant to state law, both the County of San Joaquin and the City of Mountain House have provided their consent to the RHNA transfer associated with the incorporation. This transfer reflects the portion of the County’s adopted RHNA allocation corresponding to the geographic area now within the boundaries of the newly incorporated city.


This RHNA adjustment is made in accordance with Government Code Section 65584.07, which governs RHNA modifications resulting from jurisdictional boundary changes, including incorporations. The statute authorizes the Council of Governments to reassign a portion of an existing RHNA allocation when a new jurisdiction is formed, provided that the affected jurisdictions agree to the transfer and the adjustment is documented in writing.

This letter serves as formal record of the RHNA transfer between the County of San Joaquin and the City of Mountain House for the 2023-2031 RHNA cycle. SJCOG will maintain this documentation as part of the official RHNA record and is providing it to HCD for your files and any necessary review.

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If additional information or supporting documentation is needed, please contact Christine Corrales, Manager of Planning at 209-235-0128 or corrales@sicog.org.

Sincerely,

DocuSigned by:

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Diane Nguyen, AICP
Executive Director

Enclosures

CC:

Jennifer Jolly, Community Development Director, County of San Joaquin
Steven Pinkerton, City Manager, City of Mountain House