

RESOLUTION NO. 2026-28

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EXETER ADOPTING GENERAL PLAN AMENDMENT NO. 2026-01, THE 6TH CYCLE HOUSING ELEMENT

WHEREAS, the City of Exeter has an adopted General Plan; and

WHEREAS, the Housing Element is a required component of the City's General Plan that is required by State law to be updated every eight years; and

WHEREAS, State Housing Element law (Government Code Sections 65580 et seq) requires that the City Council adopt a housing Element for the eight year period 2023-2031 to accommodate the City of Exeter regional housing need allocation (RHNA) of 318 lower income, 146 moderate income, and 380 above moderate income units; and

WHEREAS, the City of Exeter has prepared Housing Element 2023-2031 (6th Cycle Housing Element) in compliance with State Housing Element law and by this action the City has identified sites that, subject to the re-zoning of four properties, can accommodate housing units to meet the City's RHNA; and

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

WHEREAS, the preparation, adoption, and implementation of the Housing Element requires the City to continue its diligent efforts to include all economic segments of the community; and

WHEREAS, the 6th Cycle housing Element involved a multi-year planning and public outreach work plan and reflects input from the City Council, Planning Commission, State Housing and Community Development Department and public comments; and

WHEREAS, whereas the City's Housing Element consultant has prepared an Addendum to the General Plan Environmental Impact Report (State Clearinghouse Number 2002051062); and

WHEREAS, based on substantial evidence in the record (e.g., the nonvacant sites are currently zoned for residential uses, nonvacant sites are all used for agriculture and do not have current land conservation contracts, and there is a long history of residential development on formerly agricultural sites) the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be

discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period.; and

WHEREAS, on June 25, 2026, the Planning Commission recommended to the City Council the adoption of these amendments in Resolution 2026-04 after considering staff recommendations and public testimony concerning the proposed ordinance in a duly noticed public hearing.

WHEREAS, on July 28, 2026, the Exeter City Council, following notification in the prescribed manner, conducted a public hearing at which the City Council considered the Project, received public testimony and evidence, received a staff report and presentation on the Draft Housing Element, received a recommendation from the Planning Commission, and determined the housing Element to be consistent with State law and the Exeter General Plan.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Exeter does hereby resolve, determine, and find as follows:

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

Section 2. Based on substantial evidence in the record (e.g., the nonvacant sites are currently zoned for residential uses, nonvacant sites are all used for agriculture and do not have current land conservation contracts, and there is a long history of residential development on formerly agricultural sites) the existing uses on the non-vacant sites identified in the site inventory to accommodate the RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period.

Section 3. The Addendum to the General Plan EIR prepared for the 2023-2031 Exeter housing Element has been completed in compliance with CEQA and the CEQA Guidelines.

- a. The Addendum to the General Plan EIR was presented to the Planning Commission, which independently reviewed and considered the Addendum, and the Planning Commission has exercised its independent judgment in making its recommended findings and determinations as set forth herein to the City Council.
- b. Based on the evidence submitted and as demonstrated by the analysis and finding included in the Addendum, none of the conditions described in section 15162 of the CEQA Guidelines calling for preparation of a subsequent environmental impact report have occurred.

Section 4. the 2023-2031 Exeter Housing Element is determined to:

- a. Address all the requirements set forth in the State Planning law, including without limitation, those requirements relating to Housing Elements set forth in Government Code section 65580 et seq.
- b. Be internally consistent with the other elements of the Exeter General Plan and further the goals of the General Plan.
- c. Contain goals, policies, objectives, and programs to meet the local existing housing needs and the City's RHNA allocation for the 2023-2031 planning period.

Section 5. The proposed Housing Element Update is in the public interest and will advance the general welfare of the community. Certain state and regional funding programs consider Housing Element compliance as an eligibility or ranking criteria, and the proposed amendments will facilitate the City's ability to attract new grant funds to improve transportation, infrastructure, open space, and housing. The amendment will also advance the City's goals of producing housing types for all households and affordable housing opportunities in Exeter.

Section 6. The City Council hereby adopts the 2023-2031 Exeter Housing Element, attached hereto as Exhibit A.

PASSED AND ADOPTED by the City Council of the City of Exeter this 28th day of July, 2026 by the following vote:

AYES: ALVES, RIDDLE, JOHNSON

NOES: WILSON, LENTZ

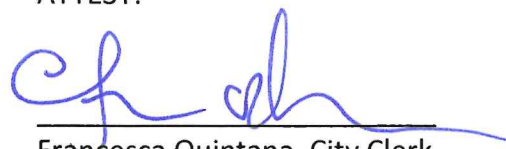
ABSTAIN: 0

ABSENT: 0



Jacob Johnson, Mayor

ATTEST:



Francesca Quintana, City Clerk



City of Exeter 2023-2031 Housing Element

Tulare County Regional Housing Element

prepared by

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July 2026 Adoption Draft

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B1 Public Participation

This section details the efforts made in Exeter to inform the public of the Housing Element update and engage the community in the development of the Housing Element. There was also community engagement conducted at a regional level, these efforts are described in Chapter 1, *Regional Introduction and Community Engagement*.

B1.1 Community Engagement

Each participating jurisdiction deployed a diverse range of public outreach methods to solicit input from stakeholders and community members including interviews, surveys, a project-specific website, community events, and public meetings. The City of Exeter collaborated with the other participating jurisdictions to compile a list of local stakeholders and organizations that provide affordable housing, market rate housing, homeless and other non-profit services, economic development services, and other community services in Exeter. These entities were included in all notifications associated with the Housing Element update, including the project website, community events, housing survey, and release of the public draft Housing Element. Detailed information on the public engagement program and copies of community engagement materials are provided in Chapter 1, *Regional Introduction and Community Engagement*.

B1.1.1 Public Noticing

In addition to the outreach conducted for the project described in Chapter 1, *Regional Introduction and Public Participation*, Exeter utilized the following notification method during the Housing Element update process to engage a diverse array of community members:

- Posts to the City's Facebook and website announcing the housing needs survey.

B1.1.2 City Council Presentation

On March 14, 2023, City staff presented at a City Council meeting that was open to the public. City staff presented an introduction to the housing element, the RHNA, state legislation, and the project timeline. No public comments were made at the meeting.

B1.1.3 Community Workshops

Exeter held an in-person workshop on May 25, 2023 to help inform the Housing Element and to introduce new Housing Element goals and requirements to the community. Information on the workshop content is available in Chapter 1, *Regional Introduction and Public Participation*

Flyers advertising the workshop were posted on the City's website. One participant attended the workshop. Key findings from the workshop are summarized as follows:

- The most important aspect when searching for housing is affordability.
- The most urgent housing issues in Exeter are the affordability of housing, availability of housing, and housing quality.
- Vacant land on the edges of the city and land that could be converted from non-housing uses are the areas where housing should be developed.

- The most beneficial programs to assist residents with housing needs are rental assistance or Housing Choice Vouchers (HCVs), special needs housing, and home rehabilitation assistance.

B1.1.4 Stakeholder Interviews

A series of virtual stakeholder interviews were hosted on March 21, March 23, and April 4, 2023 via Zoom as part of community engagement efforts for the Multi-Jurisdictional Housing Element. During the stakeholder interviews, no discussion of housing issues specific to Exeter was discussed. However, many of the issues identified on a regional level are also experienced in Exeter. Information on the interviews is available in Chapter 1, *Introduction and Public Participation*.

B1.1.5 Public Comment Survey

The City of Exeter collaborated with TCAG and the other participating jurisdictions on the release of an online survey about housing needs to help inform the Housing Element. Information on the survey and input on a regional level is available in Chapter 1, *Regional Introduction and Public Participation*.

This section summarizes information collected from survey respondents who noted that they reside in Exeter:

- Short-term rentals such as Airbnb and VRBO have replaced the availability of long-term rental units.
- Respondents selected “quality and size of housing,” “affordability,” and “close to work and/or school” as most important when looking for housing.
- Overall, most respondents selected “cost of quality housing” as the largest barrier to affording desirable housing. Respondents also identified the low supply of housing and lack of rent-restricted housing as barriers to affording housing.
- The most selected urgent housing issues are affordability of desired housing, availability of desired housing, and homelessness.
- The housing assistance programs most beneficial to Exeter residents are rental assistance or HCVs, homebuyer loan counseling services, and housing assistance for residents with special needs. Respondents also cited pathways to homeownership and programs for first-time homeowners as beneficial programs to assist with housing needs. More than 20 percent of respondents identified home rehabilitation assistance and landlord/tenant mediation services as beneficial programs.
- “Housing with three or more bedrooms” was ranked as most needed in the region followed by “housing with one to two bedrooms.”
- Approximately 30 percent of respondents were interested in developing Accessory Dwelling Units (ADUs) on their existing or future property. No respondents claimed to have an ADU on their property.
- Respondents from all jurisdictions identified a need for supportive housing programs for individuals experiencing homelessness.
- Respondents across jurisdictions expressed the need for median-income housing, “higher end” housing, and non-low-income housing to keep families in the region.

B1.1.6 Response to Community Input

During community outreach, community members identified the following overarching themes regarding housing in the region. A summary of how the Housing Element addresses each theme is below.

Need for more housing options for both renters and buyers at all income levels.

- How addressed: The City will encourage housing development and diversification of the City's housing stock to create additional housing for households of all income levels. The following programs were developed in response to the comment theme. Housing Plan Program 2 directs the City to ensure that adequate sites at appropriate densities remain available during the planning period, as required by law, including the rezoning or upzoning of identified sites to facilitate additional residential development.
- Housing Plan Program 5 directs the City to amend the Zoning Code to comply with all current provisions of housing legislation related to ADUs. The City will continue to facilitate and encourage the production of ADUs and promote ADUs for moderate- and lower-income households.
- Housing Plan Program 6 directs the City to amend the Zoning Code to facilitate the development of a variety of housing types. The City will review and revise development standards, including those related to allowed land uses in various zones, parking, density, and objective standards. The Zoning Code will be amended to remove constraints for affordable multifamily developments and restrict permitting of single family uses in RM zones. The City will also revise the Zoning Code will be amended to comply with state density bonus law, and reasonable accommodation requirements and to comply with state law and remove barriers for the development of transitional and supportive housing, emergency shelters and low barrier navigation centers, residential care facilities, employee housing for agricultural workers, and residential care facilities.
- Housing Plan Program 9 commits the City to expanding affordable housing options using tools such as density bonus provisions, potentially waiving development fees if needed, and streamlining the application process. The City will contact local non-profit and private developers to facilitate the production of affordable housing as well as pursue funding opportunities available at the local, regional, state, and federal levels. On a case-by-case basis, the City will facilitate affordable housing by public, private and non-profit groups by coordinating off-site improvements and physical infrastructure as Capital Improvement Projects. Assistance provided by the City may include traffic, street, and sewer upgrades as well as other pedestrian and mobility improvements.

Need for financial assistance for low-income families that rent, including rental assistance, rent-restricted housing, and HCVs.

How addressed: The City will coordinate with local service providers and agencies that operate assistance programs for low-income households to spread awareness of available financial resources. The following program was developed in response to the comment theme.

- Housing Plan Program 12 directs the City to facilitate housing assistance for low-income households in coordination with the Housing Authority of Tulare County (HATC). The City will spread awareness of the HATC's HCV program other available assistance programs by conducting annual workshops for landlords. The City will assist in the development of housing to meet the needs of extremely low, very low- and low-income households by continuing to work with HATC and Self Help Enterprises (SHE) and seeking funding opportunities to create more affordable or subsidized housing units.

Need for programs that expand affordable housing options, including homeownership opportunities.

How addressed: The City will coordinate with local service providers and agencies that operate assistance programs to create additional housing for households and lead to further opportunities for

homeownership for low-income households. The following programs were developed in response to the comment theme.

- Housing Plan Program 9 commits the City to expanding affordable housing options for households of all income levels using development tools such as density bonus provisions, waiving development fees and streamlining the application process.
- Housing Plan Program 12 directs the City to identify potential programs to aid moderate-income homeownership. Additionally, the City will continue to work with SHE to construct affordable infill housing and homeownership opportunities through the First Time Home Buyer Program.

Need for housing rehabilitation services, tenant protections, and preservation of long-term rental housing opportunities.

How addressed: The City will expand efforts to educate the community on fair housing rights and responsibilities and available resources for home rehabilitation services. The following programs were developed in response to the comment theme.

- Housing Plan Program 11 continues the City's coordination with organizations such as SHE that offer a variety of programs for low-income families in the region. The program also aims to fund rehabilitation efforts in the city and provide financial support for qualified owners with code violations and directs the City to advertise available rehabilitation grant programs on the City's website.
- Housing Plan Program 14 directs the City to collaborate with the Fair Housing Council of Central California (FHCCC) to distribute educational materials for fair housing rights and responsibilities, fair housing services, and housing assistance programs using flyers, social media campaigns, hosting workshops, and attending local events. The City will also work with HATC to spread awareness and resources fair housing complaints and discrimination for tenants through educational materials and workshops, publishing the complaint process on the City's website, and conducting annual trainings to City staff on referring residents for fair housing complaints.
- Housing Program 11 directs the City to monitor the impacts of short-term rentals on housing availability and affordability. Based on the findings of the report, the City will consider adopting a short-term rental ordinance to regulate short-term rentals, including a potential short-term rental fee that would fund affordable housing development.

B1.1.7 Public Review of the Draft Housing Element

Initial Draft Housing Element

The draft Housing Element was available for public review for 31 days from June 6 to July 7, 2024. The draft Housing Element was posted on the regional project website (<https://tulararegionalhousingelement.rinconconsultants.com/>). The City posted the draft Housing Element on the City's website and publicized the availability of the draft Housing Element on the City's social media platforms and through an email blast to the project stakeholder list. Physical copies of the draft Housing Element were made available at City Hall. No public comments were received on the draft Housing Element. The draft Housing Element was submitted to HCD on July 29, 2024. The City received findings from HCD on October 22, 2024.

First Revised Draft Housing Element

On December 13, 2024, prior to resubmitting the draft to HCD, the City conducted additional outreach to people and organizations that develop affordable housing and/or serve lower-income and special needs groups in the city. The City sent a questionnaire to the following organizations:

- Housing Authority of Tulare County
- Self-Help Enterprises
- Habitat for Humanity
- The Pacific Companies
- Smee Homes
- D.R. Horton
- Salt + Light Works
- Ennis Builders and Realtors
- HHSA TulareWORKs
- Kings/Tulare Area Agency on Aging
- Kings/Tulare Homeless Alliance
- Fair Housing Council of Central California
- Family Services of Tulare County
- Proteus, Inc.
- Central Valley Health Network (CVHN)
- CASA Tulare County
- Central California Environmental Justice Network
- Central Valley Air Quality Coalition
- Central Valley Regional Center
- Community Services Employment Training (CSET)
- Community Water Center - El Centro Comunitario Por El Agua
- Down Syndrome Association of Central California
- FoodLink Tulare County
- Kings/Tulare Area Agency on Aging
- Leadership Council for Justice and Accountability
- United Way of Tulare County/211
- Uplift Family Services
- Pacific West Communities
- Tulare Health and Human Services Agency
- Employment Development Department
- County of Tulare HHSA
- HUD - VASH
- Tulare County Public Defender
- Tulare County HHSA Mental Health
- Congressman David G. Valadao - 22nd District
- Tulare County Veterans Service Officer
- Tulare County Special Education Local Plan Areas (SELPA)
- LAFCo Tulare County
- Tulare County Regional Transit Agency
- Tulare County Economic Development Corporation
- Valley Community Small Business Development Center (SBDC)
- County of Tulare Economic Development
- Workforce Investment Board of Tulare County

The City also sent the questionnaire to the 25 individuals who signed up to receive updates and information on the Housing Element update via the project website. The City received feedback from Self-Help Enterprises (SHE), summarized in the points below:

- There is a long wait for households to obtain affordable housing, signifying the lack of affordable housing in the community.
- Household overcrowding is a major issue due to high rental and purchase housing and lack of available units to rent or own.
- There are homeless residents with few or no options for permanent supportive housing.
- Some landlords are reluctant to rent to households with housing choice vouchers (HCVs).

- People who work in Exeter often seek housing in other communities such as Farmersville due to lack of affordable housing and higher-wage employment in Exeter.
- Affordable rental housing opportunities are lacking in Exeter, historically due to the lack of adequate zoned sites and community opposition to affordable housing.
- Transportation options and parks are deficient in the city.
- There are a lack of housing options in the city for housing in good condition and that is affordable for most city residents.
- The City should proactively work with SHE and other affordable housing developers to locate sites, streamline permitting and entitlements, and pursue funding designed to assist in the affordable housing space. However, it is acknowledged that the lack of staff resources to proactively seek resources to build new housing is a challenge.
- The City should concentrate on locating properties that meet the HCD definition of “infill” (existing development on 75 percent of perimeter), are in “high opportunity areas” as defined by TCAC and HCD, and are in close proximity to amenities and services. Increasingly, the primary funding streams to develop affordable rental housing, including the Low Income Housing Tax Credit (LIHTC) and various programs of HCD, are providing competitive advantage to projects planned on “high or highest resource” sites.
- A significant portion of the available acreage in the adequate sites inventory should have minimum parcel sizes of 2.5 to 3 acres (and larger if onsite storm drainage is required.) Affordable housing projects generally require the development of 50 units or more to be financially feasible.
- Important funding streams for affordable housing either require or competitively favor projects where the city is a co-applicant.
- The availability of sewer, water, and dry utilities proximate to the site is helpful for the development of affordable housing.

The City responded to this input by shortening the timeline for developing the Housing Development Toolkit from December 2025 to August 2025. The Toolkit, which will be published on the City’s website, will outline a step-by-step process for residential development, including identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development (see Housing Plan Program 9 in Chapter B7, *Housing Plan*). Publishing the Toolkit will provide information to housing developers who are interested in developing affordable housing in the city and provide more certainty during initial steps. Moving up the deadline for this action will allow housing developers to access this information more quickly. Additionally, in Housing Plan Program 9 the City added an action to annually coordinate and proactively work with Self-Help Enterprises and other housing developers to locate sites and housing opportunities in infill sites in high opportunity areas, and pursue funding designed to assist in the affordable housing space. The City also added several actions in Housing Plan Program 12 to streamline and support the development of housing for lower-income and special housing needs groups, including farmworkers.

To address the input on limited transportation access in the city, Program 1 in the Housing Plan commits the City to collaborate with TCaT and/or TCAG on the 2023 Tulare County Coordinated Human Services Transportation Plan to identify ways to bridge the transit service gap for seniors, persons with disabilities and low-income persons.

The draft Housing Element was revised and made available for public review and comment from April 10 to April 17, 2025. The draft was submitted to HCD for review on April 21, 2025, and HCD's review was completed on June 16, 2025.

Second Revised Draft Housing Element

The City revised the Second Revised Draft Housing Element and made it available for public review from October 13, 2025, to October 20, 2025. The City did not receive any substantive comments on the Draft Housing Element, and it was submitted to HCD for review on October 22, 2025.

Third Revised Draft Housing Element

The City revised the Draft Housing Element and made the Third Revised Draft available for public review from April 1 to April 8, 2026. The City received no comments on the Draft Housing Element, and it was submitted to HCD for review on April 9, 2026. HCD responded and found the draft substantially compliant with all statutory requirements.

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B2 Housing Needs Assessment

This chapter provides an individual assessment of housing needs for Exeter. This section summarizes demographic, employment, and housing characteristics. The main source of the information is the pre-approved data package for jurisdictions approved by the California Department of Housing and Community Development (HCD). This data is primarily sourced from the United States (US) Census, the California Department of Finance (DoF), and American Community Survey (ACS) 2016-2020 5-year estimates. The data contained throughout this chapter may differ from the data included in Chapter B5, *Affirmatively Furthering Fair Housing*, due to the availability of data at the time of drafting. Tables and figures also include comparable data for Tulare County and the state where it is found most useful.

B2.1 Population Characteristics

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

B2.2 Population Growth

Table B2-1 analyzes population change from 2000 to 2020. Exeter experienced a population percent change of 12.7 percent from 2000 to 2010, and -0.1 percent from 2010 to 2020. Exeter's population decreased by 13 people between 2010 and 2020.

Table B2-1 Population Change (2000 - 2020)

Jurisdiction	2000	2010	2020	Percent Change 2000-2010	Percent Change 2010-2020
Exeter	9,168	10,334	10,321	12.72%	-0.1%
Tulare County	368,021	442,179	463,955	20.2%	4.9%
California	33,971,648	37,253,956	39,346,023	9.7%	5.6%

Source: U.S. Census Bureau, Census 2000, 2010; Social Explorer tables for Census 2020.

B2.3 Age Characteristics

Table B2-2 shows a breakdown of population by age group and each group's percentage of the total population. The age groups include preschool (under five years), school-age students (five to 17 years), college-age students (18 to 24 years), young adults (25 to 44 years), middle-aged adults (45 to 64 years), and seniors (65 years and over). In Exeter, the largest age group is the young adult category, representing 25.2 percent of the total population, which is similar to the county (26.9) and state (24.9). The second largest group in Exeter is school age students at 23.1 percent. The smallest population by age is preschool at 7.7 percent, which is lower than the county (11.4 percent) and the state (14.4 percent).

Table B2-2 Population by Age Group (2020)

	Under 5 years	5 to 17 years	18 to 24 years	25 to 44	45 to 64	65 years and over	
Jurisdiction	(Preschool)	(School-age Students)	(College-age Students)	(Young Adults)	(Middle-aged Adults)	(Seniors)	Total Population
Exeter	806	2,413	925	2,630	2,317	1,342	10,433
Percent	7.7%	23.1%	8.9%	25.2%	22.2%	12.9%	
Tulare County	36,942	105,835	46,977	124,822	96,553	52,826	463,955
Percent	8.0%	22.8%	10.1%	26.9%	20.8%	11.4%	
California	2,409,082	6,547,559	3,724,239	11,241,816	9,778,830	5,644,497	39,346,023
Percent	6.1%	16.6%	9.5%	28.6%	24.9%	14.4%	

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B01001.

B2.4 Race and Ethnicity

Table B2-3 shows race and ethnicity of residents in Exeter, Tulare County, and California. In Exeter, the largest racial/ethnic group identifies as (Hispanic/Latino [any race]), comprising 47.1 percent the population. This percentage is lower than countywide (65.1 percent) but higher than the state (39.1 percent). The second largest racial/ethnic group is white (not Hispanic/Latino) representing 46.5 percent of the total population in Exeter. This percentage is higher than the county (27.8 percent) and the state (36.5 percent).

Table B2-3 Population by Race

Jurisdiction	Asian American, not Hispanic	Black/African American, not Hispanic	White, not Hispanic	Other race, not Hispanic*	Hispanic/Latino (any race)	Total Population:
Exeter	320	81	4,846	270	4,916	10,433
Percent of Population	3.1%	0.8%	46.5%	2.6%	47.1%	
Tulare County	15,857	5,923	128,751	11,505	301,919	463,955
Percent of Population	3.4%	1.3%	27.8%	2.5%	65.1%	
California	5,743,983	2,142,371	14,365,145	1,713,595	15,380,929	39,346,023
Percent of Population	14.6%	5.4%	36.5%	4.4%	39.1%	

*Note: Other race includes American Indian and Alaskan Native, Native Hawaiian and Pacific Islander, Two or More Races, and Some Other Race.

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B01001.

B2.5 Economic Characteristics

Employment

Understanding employment and occupation patterns can provide insight into present housing needs. Table B2-4 shows employment by industry for Exeter. 1,034 people or 27.9 percent of the workforce in Exeter are employed in the educational services, and health care and social assistance sector, higher

than the county average of 21.6 percent and the state average of 21.2 percent. The second largest industry in Exeter is manufacturing with 9.7 percent. Agriculture, forestry, fishing, hunting, and mining employ 7.7 percent of Exeter’s workforce, lower than the county average of 15.6 percent but higher than the statewide total of 2.1 percent.

Table B2-4 Employment by Industry (2020)

	Exeter	Percent	Tulare County	Percent	California	Percent
Educational Services, And Health Care And Social Assistance	1,034	27.9%	39,809.0	21.6%	3,960,265	21.2%
Manufacturing	358	9.7%	15,074.0	8.2%	1,676,497	9.0%
Retail Trade	352	9.5%	20,382.0	11.1%	1,942,421	10.4%
Professional, Scientific, And Management, And Administrative, And Waste Management Services	333	9.0%	12,541.0	6.8%	2,581,266	13.8%
Construction	316	8.5%	10,863.0	5.9%	1,190,537	6.4%
Agriculture, Forestry, Fishing And Hunting, And Mining	285	7.7%	28,627.0	15.6%	394,290	2.1%
Public Administration	229	6.2%	10,691.0	5.8%	850,479	4.6%
Arts, Entertainment, And Recreation, And Accommodation And Food Services	224	6.0%	15,326.0	8.3%	1,894,858	10.2%
Transportation And Warehousing, And Utilities	185	5.0%	9,021.0	4.9%	1,028,818	5.5%
Finance And Insurance, And Real Estate, And Rental And Leasing	144	3.9%	5,252.0	2.9%	1,118,253	6.0%
Other Services, Except Public Administration	122	3.3%	8,228.0	4.5%	952,302	5.1%
Wholesale Trade	73	2.0%	6,000.0	3.3%	514,234	2.8%
Information	52	1.4%	2,062.0	1.1%	542,674	2.9%

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table C24050.

According to the California Bureau of Labor Statistics, the unemployment rate in Exeter as of September 2024 is 16.5 percent, which is slightly higher than the long-term average of 16.2 percent over the previous two years. Since 2020, Bureau of Labor Statistics Data indicates that unemployment rates have decreased significantly in Exeter and California. Exeter’s unemployment rate is higher than countywide (9.3 percent) and the statewide averages (5.3 percent).

Table B2-5 shows the major employers in Tulare County, the number of employees, and type of industry. The majority of large employers in Merced County are located in the City of Visalia, which is the county’s largest city and the County seat. The largest employer in Exeter is Sun Pacific, a produce wholesaler specializing in citrus, kiwi, and grapes (250-499 employees). The City does not anticipate any significant changes in employment trends and is not aware of any new large-scale employers planning on relocating to Exeter during the planning period.

Table B2-5 Major Employers in Tulare County (2024)

Employer Name	Number of Employees	Location	Industry
Adventist Health Tulare	250-499	Tulare	Hospitals
Eagle Mountain Casino	500-999	Porterville	Casinos
Kings Canyon National Park	250-499	Springville	National Parks/Preserves
Land O'Lakes Indl Cheese	250-499	Tulare	Cheese Processors (mfrs)
Latino Farm Labor Svc	500-999	Visalia	Contractors
Monrovia Nursery Co	500-999	Woodlake	Nurseries-Plants Trees & Etc-Wholesale
Porterville Developmental Ctr	500-999	Porterville	Hospitals
Prima Wawona	500-999	Cutler	Fruits & Vegetables-Growers & Shippers
Saputo Cheese USA Inc	500-999	Tulare	Cheese Processors (mfrs)
Sierra View Medical Ctr	500-999	Porterville	Hospitals
Solid Waste Collection	250-499	Tulare	Public Works Department
Sun Pacific	250-499	Exeter	Fruits & Vegetables-Growers & Shippers
Tulare City	500-999	Tulare	General Government Support
Tulare County Child Care Prgm	500-999	Visalia	Child Care Service
Tulare County Lake Patrol	250-499	Visalia	Government Offices-County
Tulare County Ofc of Edu Sicon	1,000-4,999	Visalia	Schools
Tulare County Parks & Rec Dept	250-499	Visalia	Parks
Tulare County Resource Mgmt	250-499	Visalia	Government Offices-County
Tulare Joint Union High Sch	500-999	Tulare	Schools
Tulare Local Healthcare Dist	500-999	Tulare	Health Care Management
US Cotton Classing Office	250-499	Visalia	Government Offices-Federal
Valley Labor Svc Inc	500-999	Dinuba	Services NEC
Visalia Public Works Admin	250-499	Visalia	Public Works Department
Walmart Distribution Ctr	1,000-4,999	Porterville	Distribution Centers (whls)
Yokuts Coffee House	500-999	Porterville	Full-Service Restaurant

Source: California Employment Development Department, Major Employers in Tulare County. Accessed 2024
<https://labormarketinfo.edd.ca.gov/majorer/countymajorer.asp?CountyCode=000107>

Table B2-6 shows the employment estimates, average hourly wage, and average annual wage for employment industries in the Visalia-Porterville Metropolitan Statistical Area (MSA) as of May 2023. The occupations offering the lowest wages are food preparation and serving related, healthcare support, and farming, fishing, and forestry. Occupational groups offering the highest wages include management, legal, and healthcare practitioners and technical.

The most common industry types for employed persons living in Exeter are educational services and health and social assistance; professional and management industries; retail and manufacturing industries, as shown in Table B2-4. The City's largest employer is in the agricultural services industry. While healthcare practitioners have a higher average higher annual salary (\$107,806) than the metropolitan area mean annual wage (\$57,034), healthcare support worker average salary (\$36,900) is approximately 65 percent of the mean annual wage, similar to the mean annual wage for those employed in farming, fishing, and forestry (\$36,962). Educational workers earn a mean annual wage of \$75,358 which is higher than the metropolitan area mean annual wage.

Table B2-6 Occupational Employment and Wages by Major Occupational Group, Visalia-Porterville Metropolitan Area (2023)

Major Occupational Group	Mean Hourly Wage	Mean Annual Wage
Total, all occupations	\$27.42	\$57,034
Management	\$57.62	\$119,850
Business and financial operations	\$38.37	\$79,810
Computer and mathematical	\$45.34	\$94,307
Architecture and engineering	\$44.10	\$91,728
Life, physical, and social science	\$36.30	\$75,504
Community and social service	\$29.58	\$61,526
Legal	\$55.64	\$115,731
Educational instruction and library	\$36.23	\$75,358
Arts, design, entertainment, sports, and media	\$28.97	\$60,258
Healthcare practitioners and technical	\$56.44	\$117,395
Healthcare support	\$17.99	\$37,419
Protective service	\$31.43	\$65,374
Food preparation and serving related	\$17.40	\$36,192
Building and grounds cleaning and maintenance	\$19.96	\$41,517
Personal care and service	\$19.33	\$40,206
Sales and related	\$22.12	\$46,010
Office and administrative support	\$23.98	\$49,878
Farming, fishing, and forestry	\$17.77	\$36,962
Construction and extraction	\$30.86	\$64,189
Installation, maintenance, and repair	\$28.55	\$59,384
Production	\$22.63	\$47,070
Transportation and material moving	\$21.47	\$44,658

Source: U.S. Bureau of Labor Statistics. Occupational Employment and Wages in Visalia-Porterville (May 2023)
https://www.bls.gov/regions/west/news-release/occupationalemploymentandwages_visalia.htm

A household with two income earners in the agricultural sector or food service sector may average an annual household income at or under \$74,000. In a household of four people, this household would be considered low-income according to the 2022 HUD guidelines. As discussed in Section B.2-19 Housing Affordability, a low-income household of four in Exeter can afford to pay approximately \$1,074 in monthly rent before overpaying housing costs. The median monthly rent for a three-bedroom unit in Exeter is \$1,695. Therefore, it is likely that a household with two income earners employed in food service or agriculture would need subsidized housing. According to a 2024 report by the California Housing Partnership, renters in Tulare County need to earn 1.4 times the minimum wage to afford the average asking rent, equal to an annual income of \$46,884. Medical assistants, retail salespersons, and farmworkers, which are common employee types in Exeter, typically earn a salary that does not meet that threshold.¹

¹ California Housing Partnership. 2024. Tulare County 2024 Affordable Housing Needs Report. https://chpc.net/wp-content/uploads/2024/05/Tulare_Housing_Report.pdf

A household with one person employed in the education sector would likely earn an annual household income around \$75,000, which for a household of four would be considered low-income. With two earners, the household would be considered above moderate income. Single-earner households in Exeter, even with employment in a relatively higher annual wage industry, are likely to need subsidized housing. Special housing needs households such as single-parent households and farmworkers are likely to be unable to afford appropriately sized market-rate rental units in Exeter.

Income Definitions and Income Limits

The State and Federal governments classify household income into several categories based upon the relationship to the county area median income (AMI), adjusted for household size. The U.S. Department of Housing and Urban Development (HUD) estimate of AMI is used to set income limits for eligibility in federal housing programs. The income categories include:

- Acutely low-income households, which earn up to 15 percent AMI;
- Extremely low-income households, which earn up to 30 percent AMI;
- Very low-income households, which earn between 31 and 50 percent AMI;
- Low-income households, which earn between 51 and 80 percent AMI; and
- Moderate income households, which earn between 80 and 120 percent AMI.

For all income categories, income limits are defined for various household sizes based on a four-person household as a reference point. Income limits for larger or smaller households are calculated by HUD (see Table B2-7). According to HUD, the AMI for a four-person household in Tulare County was \$80,300 in 2022.

Table B2-7 HUD Income Limits by Person per Household (dollars)

Household Size:	1	2	3	4	5	6	7	8
Acutely Low-Income	\$8,450	\$9,650	\$10,850	\$12,050	\$13,000	\$14,000	\$14,950	\$15,900
Extremely Low-Income	\$16,350	\$18,700	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
Very Low-Income	\$27,300	\$31,200	\$35,100	\$38,950	\$42,100	\$45,200	\$48,300	\$51,450
Low-Income	\$43,650	\$49,850	\$56,100	\$62,300	\$6,730	\$72,300	\$77,300	\$82,250
Median-Income	\$56,200	\$64,250	\$72,250	\$80,300	\$84,730	\$93,150	\$99,550	\$106,000
Moderate-Income	\$67,450	\$77,100	\$89,700	\$96,350	\$104,050	\$111,750	\$119,450	\$127,200

Source: U.S. Department of Housing and Urban Development (HUD), 2022.

THCD uses the income categories shown in Table B2-8 to determine eligibility for state housing programs. HCD's methodology for calculating AMI is slightly different from HUD's methodology, and therefore the AMI and income limits vary.

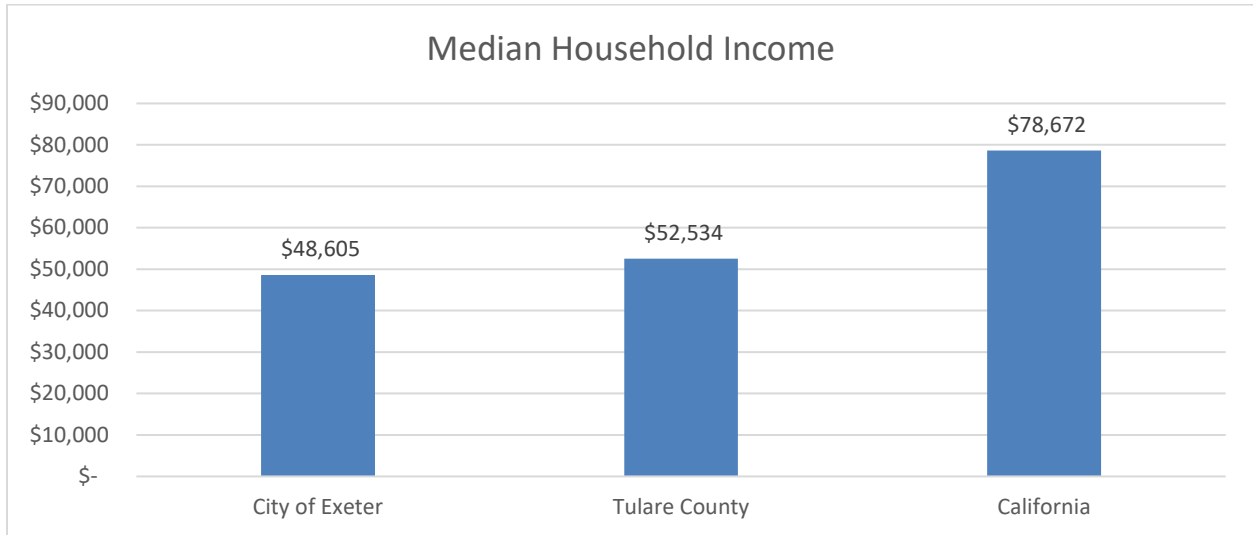
Table B2-8 State of California Income Categories

Income Category	Percent of County Area Median Income (AMI)
Extremely Low	0-30% AMI
Very Low	31%-50% AMI
Low	51%-80% AMI
Moderate	81%-120% AMI
Above Moderate	120% AMI or greater

Source: Section 50093 of the California Health and Safety Code.

Figure B2-1 shows actual median household income in Exeter as reported by the 2016- 2020 ACS. This median income is for all households, regardless of household size. The median household income in Exeter was \$48,605 in 2020, which was lower than in Tulare County (\$52,534) and significantly lower than the statewide median household income (\$78,672).

Figure B2-1 Median Household Income



Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B19013.

Table B2-9 compares the median household income by race in 2020. In Exeter, American Indian and Alaskan Native households had the highest median annual income of \$59,792. White households had the second highest median income of \$59,318. Black/African American households had the lowest median income across the state and county; however, data for this category was not available for Exeter due to the low number of Black/African American households. “Some other race, alone” had the lowest median household income recorded for Exeter.

Table B2-9 Median Household Income by Race/Ethnicity (dollars)

Jurisdiction	White, alone	Black/ African American, alone	American Indian and Alaskan Native, alone	Asian American, alone	Native Hawaiian and Other Pacific Islander, alone	Some Other Race, alone	Two or More Races, alone	Hispanic/ Latino, Any Race
Exeter	\$59,318	N/A	\$59,792	\$48,578	N/A	\$32,292	N/A	\$40,156
Tulare County	\$64,453	\$44,708	\$37,632	\$67,396	N/A	\$47,520	\$62,159	\$46,063
California	\$90,496	\$54,976	\$60,182	\$101,380	\$81,682	\$59,287	\$76,733	\$62,330

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B19013.

Overpayment and Housing Cost Burdens

Table B2-10 lists the number of households overpaying (spending more than 30 percent of income on housing) for housing in Exeter. Generally, renters are more affected by overpayment than owners. As shown, 55.6 percent of renter-occupied households are overpaying in Exeter, which is higher than the county and state averages.

Table B2-10 Overpayment by Tenure

Jurisdiction	Owner-Occupied Overpaying	Renter-Occupied Overpaying	Total Overpaying
Exeter	584	676	1,260
Percent	28.1%	55.6%	
Tulare County	23,773	28,894	52,667
Percent	30.0%	48.4%	
California	2,237,292	3,019,235	5,256,527
Percent	31.0%	51.5%	

Source: U.S. Census Bureau, ACS 06-10, 11-15, 16-20 (5-year Estimates), Table B25070

Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD provides information on cost burden based on the HUD Area Median Family Income (HAMFI). This data is included in Table B2-11 below. While the totals do not align exactly with 2020 ACS data presented above, the CHAS data identifies the level at which cost burdened households are overpaying for housing. In Exeter, 37.5 percent of households spend at least 30 percent of their income on housing (cost burden), similar to the county and state averages (37.9 and 38.8 percent, respectively). Further, 15.8 percent of households are spending more than 50 percent of their income (severe housing cost burden), which is less than in the county and state.

Table B2-11 Cost Burdened Households

Jurisdiction	Cost Burden ≤ 30%	Cost Burden >30% to ≤50%	Cost Burden >50%	Cost Burden Not Calculated	Total Occupied Units
Exeter	2,083	742	542	58	3,425
Percent	60.8%	21.7%	15.8%	1.7%	100.0%
Tulare County	84,225	27,570	24,864	1,581	138,240
Percent	60.9%	19.9%	18.0%	1.1%	100.0%
California	7,807,275	2,632,205	2,427,660	177,125	13,044,265
Percent	59.9%	20.2%	18.6%	1.4%	100.0%

Source: U.S. Department of Housing and Urban Development, CHAS 2015-19 (5-Year Estimates), Table 7.

B2.6 Household Characteristics

Table B2-12 provides information on household types. Of the 3,295 households in Exeter, 1,637 are married-couple households with or without children and 150 are cohabitating couple households with or without children. Approximately half of the households in Exeter and Tulare County are married-couple households, similar to the statewide average.

Table B2-12 Households by Type

Jurisdiction	Married-Couple Household			Cohabiting Couple Household			Total Households
	Total	Children	No Children	Total	Children	No Children	
Exeter	1,637	706	931	150	98	52	3,295
Percent	49.7%	21.4%	28.3%	4.6%	3.0%	1.6%	
Tulare County	73,140	35,234	37,906	10,809	6,596	4,213	139,044
Percent	52.6%	25.3%	27.3%	7.8%	4.7%	3.0%	
California	6,510,580	2,784,123	3,726,457	896,192	327,712	568,480	13,103,114
Percent	49.7%	21.2%	28.4%	6.8%	2.5%	4.3%	

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B11012.

B2.7 Large Households

Table B2-13 provides information on large households (households with five or more people) by tenure. As shown, 18.12 percent of households in Exeter consist of five or more people, which is less than the county average (21.3 percent) and greater than the state average (13.7 percent). In Exeter, owner-occupied 5-person households (4.6 percent) makes up the largest percentage of large households, while renter-occupied 7-or-more person households make up the smallest percentage of large households. Additionally, both Exeter and Tulare County have higher percentages of owner-occupied 6- and 7-person households than the state average of 13.7 percent.

Table B2-13 Large Households by Tenure

Jurisdiction	Total	Owner-Occupied Large Households			Renter-Occupied Large Households		
		5-Person	6-Person	7-or-More Person	5-Person	6-Person	7-or-More Person
Exeter	597	153	110	42	120	143	29
Percent	18.1%	4.6%	3.3%	1.3%	3.6%	4.3%	0.9%
Tulare County	29,599	8,116	4,101	3,237	7,507	3,896	2,742
Percent	21.3%	5.8%	3.0%	2.3%	5.4%	2.8%	2.0%
California	1,809,518	567,528	238,866	195,326	458,328	201,263	148,207
Percent	13.7%	4.3%	1.8%	1.5%	3.5%	1.5%	1.1%

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

B2.8 Overcrowding

Table B2-14 provides information on overcrowding (more than 1.0 people per room) by tenure in Exeter. There are 220 overcrowded households in the city, of which 31 are owner-occupied households and 189 are renter-occupied.

Table B2-14 Overcrowding Severity by Tenure

Jurisdiction	Owner-Occupied			Renter-Occupied		
	Total Households	1.0 to 1.5 Occupants per Room	More than 1.5 Occupants per Room	Total Households	1.0 to 1.5 Occupants per Room	More than 1.5 Occupants per Room
Exeter	2,079	23	8	1,216	189	-
Percent		1.1%	0.4%		15.5%	0.0%

Source: U.S. Census Bureau, ACS 06-10, 11-15, 16-20 (5-year Estimates), Table B25014.

B2.9 Special Needs Groups

Special needs populations include individuals with a disability, elderly, large households, single-parent households, farmworkers, and individuals experiencing homelessness. These needs can make it difficult for members of these groups to locate suitable housing. The following subsections identify and discuss these special housing needs groups.

Seniors

Table B2-15 identifies senior households by tenure in Exeter, Tulare County, and California. The percentage row identifies the percent of the specified age range within the owner-occupied or renter-occupied categories. There are far more owner-occupied senior households in Exeter (745 total), than renter-occupied senior households (151 total), which is similar to the county and state. As shown, 60.3 percent of senior owner-occupied households and 51.7 percent of senior renter-occupied households are made up of seniors between the ages of 65 and 74.

Table B2-15 Senior Households by Tenure

Jurisdiction	Owner-Occupied			Renter-Occupied		
	65 to 74	75 to 84	85 and over	65 to 74	75 to 84	85 and over
Exeter	449	231	65	78	48	25
Percent	60.3%	31.0%	8.7%	51.7%	31.8%	16.6%
Tulare County	12,787	6,686	3,009	4,613	1,643	1,238
Percent	56.9%	29.7%	13.4%	61.6%	21.9%	16.5%
California	1,350,393	688,443	301,853	484,266	234,067	139,828
Percent	57.7%	29.4%	12.9%	56.4%	27.3%	16.3%

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B25007.

Table B2-16 shows the rate of housing cost burden by elderly family type and tenure in Exeter based on data extracted through HUD's CHAS (note that the CHAS data defines senior or elderly as age 62 and over, as opposed to the American Community Survey that reports seniors as age 65 and older). Based on data in this table, of all elderly persons in lower-income categories (less than or equal to 80 percent HAMFI), approximately 28 percent of all senior-owner households and 23 percent of senior-renter households in Exeter are housing cost burdened.

Table B2-16 Housing Cost Burden by Elderly Family Type and Tenure

	Owners		Renters		Total
	Elderly Family	Elderly Non- family	Elderly Family	Elderly Non- family	
Household Income <= 30% HAMFI Extremely Low-Income					
TOTAL HOUSEHOLDS <= 30% HAMFI	10	100	-	60	170
Number w/ Cost Burden <= 30%	-	25	-	60	85
Number w/ Cost Burden > 30% to <= 50%	10	50	-	-	60
Number w/ Cost Burden > 50%	-	25	-	-	25
Percent with Cost Burden >30% HAMFI	100%	75%	0%	0%	50%
Household Income > 30% to <= 50% HAMFI Very Low-Income					
TOTAL HOUSEHOLDS > 30% to <= 50% HAMFI	85	90	-	15	190
Number w/ Cost Burden <= 30%	40	30	-	15	85
Number w/ Cost Burden > 30% to <= 50%	30	10	-	-	40
Number w/ Cost Burden > 50%	15	50	-	-	65
Percent with Cost Burden >30% HAMFI	53%	67%	0	0%	55%
Household Income > 50% to <= 80% HAMFI Low-Income					
TOTAL HOUSEHOLDS > 50% to <= 80% HAMFI	74	38	49	8	169
Number w/ Cost Burden <= 30%	45	30	20	4	99
Number w/ Cost Burden > 30% to <= 50%	25	4	25	4	58
Number w/ Cost Burden > 50%	4	4	4	-	12
Percent with Cost Burden >30% HAMFI	39%	21%	59%	50%	41%
Household Income > 80% to <= 100% HAMFI					
TOTAL HOUSEHOLDS > 80% to <= 100% HAMFI	65	30	10	-	105
Household Income > 100% HAMFI					
TOTAL HOUSEHOLDS > 100% HAMFI	245	70	-	-	315
Total Income <80% HAMFI and Cost Burden > 30%	227		33		260
Percent Income <80% HAMFI and Cost Burden > 30%	28.1%		23.2%		27.4%
GRAND TOTAL HOUSEHOLDS	479	328	59	83	949

Elderly family constitutes 2 persons with either or both age 62 and over.

HAMFI = HUD Area Median Family Income

Source: HUD Consolidated Planning / Comprehensive Housing Affordability Strategy (CHAS) database, 2015-2019 estimates, Table 7, accessed 2023. <https://www.huduser.gov/portal/datasets/cp.html>

Resources for Senior-Headed Households

As shown in Table B2-16, there are 142 total senior rental-occupied households, of which 132 are lower-income and 33 are experiencing a cost burden. Table B2-17 contains an inventory of the 40 senior income-restricted rental units in Exeter. Based on this data, there are sufficient rental units for lower-income senior renter households experiencing cost burden in the city.

Table B2-17 Inventory of Affordable Senior Housing

Housing Development	Address	Number of Units	Description
Exeter Senior Villa	655 Vine, #45, Exeter, CA 93221	40	Income-restricted rental units for seniors and disabled individuals.
Total units:		40	

Source: Housing Authority of Tulare County, <https://www.hatc.net/subsidized-housing-referral-listing.php>, Accessed June 2023.

Table B2-18 provides information for the Exeter Senior Center, which offers resources including classes, entertainment, and a gathering space for Exeter’s senior community. The Farmersville Senior Center is a senior center in the nearby community of Farmersville that offers a similar range of services and resources that is accessible to Exeter’s senior population.

Table B2-18 Tulare County CSET Senior Centers

Jurisdiction	Phone	Address
Exeter Senior Center	559-592-5960	301 South E. Street Exeter, CA
Farmersville Senior Center	559-667-2702	623 N. Avery Ave. Farmersville, CA

Source: City of Exeter, *Senior Center Directory*, <https://cityofexeter.com/directory/senior-center/>

Persons with Disabilities (including Developmental Disabilities)

Table B2-19 identifies the number of residents with one or more disabilities. In Exeter, 7.6 percent of the total population has one type of disability, while 6.5 percent report two or more disabilities. The share of population with a disability is greater in Exeter than the county and state averages. Among those with a disability, 53.8 percent have one disability, while 46.2 have two or more types of disability.

Table B2-19 Population by Number of Disabilities

Jurisdiction	Total	With One Type of Disability	With two or More types of Disability	No Disability
Exeter	10,404	787	675	8,942
Percent		7.6%	6.5%	86.0%
Tulare County	459,748	28,405	25,355	405,988
Percent		6.2%	5.5%	88.3%
California	38,838,726	2,089,065	2,057,886	34,691,775
Percent		5.4%	5.3%	89.3%

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table C18108.

Table B2-20 summarizes the population with a disability by age. In Exeter, those 65 years and older make up the largest share of disabled individuals at 45.1 percent of the total population. This is greater than the countywide average of 41.0 percent and the statewide average of 34.2 percent. The under 18 years age group accounts for the smallest percentage of those with a disability at 5.0 percent.

Table B2-20 Disability by Age for the Total Population

Jurisdiction	Total	Under 18 Years	18 to 64 Years	65 Years and Older
Exeter	10,404	161	703	598
Percent		5.0%	12.0%	45.1%
Tulare County	459,748	6,680	25,918	21,162
Percent		4.7%	9.8%	41.0%
California	38,838,726	306,806	1,944,580	1,895,565
Percent		3.4%	8.0%	34.2%

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table C18108.

Table B2-21 identifies residents with a developmental disability by age. In Exeter, there is a higher number of residents with a developmental disability under 18 years old than those 18 and older, which is consistent with both the state and county.

Table B2-21 Developmental Disability by Age

Jurisdiction	Under 18 Years	18 Years and Older	Total Population with a Developmental Disability
Exeter	100	96	196
Tulare County	3,201	3,071	6,272
California	192,384	185,353	377,737

Source: DDS Quarterly Consumer Report, December 2021.

Table B2-22 includes data summarizing the housing location of residents with developmental disabilities. 165 residents with a developmental disability in Exeter live in the home of a parent, family member, or guardian. An additional 11 residents live in intermediate care facilities and fewer than 11 residents live in independent/ supported living facility, community care facilities, and foster/family homes. Many individuals with a disability, including developmental disability, live on a small, fixed incomes, limiting their ability to pay for housing. Programs 1 and 12 in the Housing Plan commit the City to providing support for people with disabilities to access housing.

Table B2-22 Developmental Disability by Residence

Residence Type	City of Exeter	Tulare County	California
Home of Parent/Family/Guardian	165	4,652	309,381
Independent/Supported Living	<11	389	27,881
Community Care Facility	<11	526	23,728
Intermediate Care Facility	11	93	6,188
Foster/Family Home	<11	76	8,288
Other	0	27	4,792
Total	>176	>5,763	380,258

Source: California Department of Developmental Services, DDS Quarterly Consumer Report, January 2022.

Resources for Persons with Disabilities

Table B2-23 identifies 10 rental units for residents with a disability in Exeter. With 1,301 residents with a disability over 18 years old in the city (Table B2-20), the gap between residents with a disability and housing resources is considerable. Tulare County provides In-Home Supportive Services (IHSS) which pays for services that enable aged, blind, and disabled individuals to continue living safely in their own

homes and avoid or delay the need for nursing home care.² Additionally, the Porterville Developmental Center (19 miles from Exeter) provides residential services for individuals 18 years or older who have serious medical and/or behavior problems for which appropriate services are not currently available through community resources.³

Table B2-23 Inventory of Housing for People with Disabilities

Housing Development	Address	Number of Units	Description
Exeter Apartments	855 W Visalia Rd, Exeter, CA 93221	3	Affordable rental units for disabled individuals.
Exeter Senior Villa	655 Vine, #45, Exeter, CA 93221	4	Affordable rental units for seniors disabled individuals.
Jacob Square	301 Jacob, Exeter, CA 93221	3	Affordable two-bedroom handicap units.
Total Units		10	

Source: Housing Authority of Tulare County, <https://www.hatc.net/subsidized-housing-referral-listing.php>, Accessed June 2023.

Housing Plan Program 9 directs the City to support the development of affordable housing for residents with special needs, including those with a disability, by implementing permit streamlining and pursuing funding to facilitate affordable housing development.

Large Households

Table B2-13 above provides information on large households by tenure in Exeter and Tulare County, while Table B2-14 examines overcrowding severity by tenure. As shown on these tables, there are 597 large households in Exeter, 51.1 percent of large households of which are renter-occupied, and 48.9 percent are owner-occupied.

Resources for Large Households

Table B2-24 compares the number of large households to the number of large units. Units with five or more rooms provide housing options for large households and work to lessen overcrowding. As shown, there are 60 units in Exeter with five or more bedrooms but 597 large households, leaving a resource gap of more than 530 units. However, if including units with four or more bedrooms (728 units), the 597 large households can be accommodated.

Table B2-24 Housing Units for Large Households

Total Occupied Housing Units	Total Large Households	Renter Occupied Large Households	Units with 4 Bedrooms	Units with 5 or more Bedrooms	Total Units with 4 or More Bedrooms
Exeter	597	292	668	60	728

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Tables B25042, B25009.

Housing Plan Program 9 directs the City to support the development of affordable housing for residents with special needs, including large families, by implementing permit streamlining and pursuing funding to facilitate affordable housing development.

² Tulare County. 2024. In-Home Supportive Services. <https://tchhsa.org/eng/human-services/in-home-supportive-services-ihss/>

³ California Dept. of Developmental Services. 2024. <https://www.dds.ca.gov/services/state-facilities/porterville-dc/>

Female-Headed Households

Table B2-25 identifies single female-headed households with their own children under age 18. The table values do not include female-headed households with unrelated dependents. Exeter has 1,066 single female-headed households with their own children under 18, representing 32.4 percent of total households. This percentage is greater than in the county (24.3 percent) and the state (26.2 percent).

Table B2-25 Single Female-Headed Households

Jurisdiction	Total Households	Single Female-Headed Households*	Percent
Exeter	3,295	1,066	32.4%
Tulare County	139,044	33,727	24.3%
California	13,103,114	3,430,426	26.2%

Notes: Single Female-Headed Households with own children under age 18, does not include unrelated dependents.

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B11012.

Table B2-26 compares female-headed households with children by poverty status. In Exeter, 55.2 percent of female-headed households have an income below the poverty line. This percentage is significantly higher than countywide (36.3 percent) and statewide (21.5 percent).

Table B2-26 Female-Headed Family Households with No Spouse Present, by Poverty Status

	City of Exeter	Percent	Tulare County	Percent	California	Percent
Below Poverty Line	329	55.2%	8,689	36.3%	364,236	21.5%
Above Poverty Line	267	44.8%	15,222	63.7%	1,329,038	78.5%
Total	596		23,911		1,693,274	

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B17010.

Table B2-27 summarizes female-headed family households with no spouse present by poverty status and tenure for Exeter. Of the 329 female-headed family households below the poverty level, most (228 households, 69.3 percent) are renters, while 101 (30.7 percent) own their home.

Table B2-27 Female-Headed Family Households with No Spouse Present, by Poverty Status and Tenure, City of Exeter

	Total	Renter Occupied	Owner Occupied
Below Poverty Line	329	228	101
Above Poverty Line	267	81	186
Total	596	309	287

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table B17019.

Resources for Single-Parent and Female-Headed Households

Female-headed households that are lower-income can access affordable housing opportunities in Exeter and the Housing Choice Voucher (HCV) program through the County. Tulare County CSET operates family resource centers located in Tulare and Earlimart that provide families with access to services ranging from nutrition and health education to housing and utility assistance to employment training. Each Resource Center has established partnerships and referral processes with local agencies, food pantries, and the faith-based community to be able to provide assistance quickly and smoothly.

Core services of the Tulare County Family Resource Network include family advocacy, parenting education, ongoing intensive family support services, resources, and referrals to partner agencies, family health and wellness, home visitation and child development services.

Table B2-28 provides information on resources for single parents located throughout Tulare County and are available to all Exeter residents.

Table B2-28 Single-Parent Resources

Organization	Phone	Address
Tulare County Resource Center	559.684.1987	304 E. Tulare Ave., Tulare, CA 93274
Earlimart Family Resource Center	661.849.2960	176 N. Front St., Earlimart, CA 93219
CalWORKs Child Care Program	559.624.8100	1845 North Dinuba Boulevard, Visalia, CA 93291

Source: Tulare County CSET, <https://www.cset.org/> accessed June 2023.
Tulare County Family Resource Center Network, <http://www.tcfrcn.org/> accessed June 2023.
California Department of Social Services, CalWORKs Child Care Program, <https://www.cdss.ca.gov/calworks-child-care> accessed June 2023.

Extremely Low-Income Residents

Table B2-29 identifies extremely low-income households by tenure in Exeter. Renter-occupied households make up a larger percentage of total extremely low-income households (64.8 percent) than owner-occupied households (35.2 percent). There are 610 extremely low-income households in Exeter, comprising 18.5 percent of the total households in the city.

Table B2-29 Extremely Low-Income Households by Tenure

Jurisdiction	Income <=30% HAMFI		Total
	Owner-Occupied	Renter-Occupied	
Exeter	215	395	610
Percent	6.5%	12.0%	18.5% of total households

Source: US Housing and Urban Development, CHAS 2015-19 (5-Year Estimates), Table 7.

Table B2-30 summarizes cost burdens among extremely low-income households. As shown, 190 of 210 extremely low-income owner-occupied households (90.5 percent) and 305 of 395 extremely low-income renter-occupied households (77.2 percent) are experiencing a housing cost burden.

Table B2-30 Extremely Low-Income Households Overpaying by Tenure

Jurisdiction	Owner-Occupied			Renter-Occupied			Total ELI Households
	Cost Burden <30%	Cost Burden 30% - 50%	Cost Burden >50%	Cost Burden <30%	Cost Burden 30% - 50%	Cost Burden >50%	
Exeter	25	95	95	90	25	280	610
Percent	4.1%	15.6%	15.6%	14.8%	4.1%	45.9%	100.0%

Source: US Housing and Urban Development, CHAS 2015-19 (5-Year Estimates), Table 7.

Analyzing the overlap between special needs groups and extremely low-income households can provide a deeper understanding of each population. The CHAS dataset used to analyze extremely low-income households above, also provides data on senior households, householders with a disability and large households. Table B2-31 compares the number of extremely low-income households among the total

population, seniors, and residents with a disability. As shown, among 610 extremely low-income households, there are 170 senior households, 385 households where the householder has at least one disability, and 95 large households.

Table B2-31 Extremely Low-Income Households

	Total	Senior Households	Householders with a Disability	Large Households
Exeter	610	170	385	95
Percent	100.0%	27.9%	63.1%	15.6%

Source: US Housing and Urban Development, CHAS 2015-15 (5-Year Estimates), Tables 6 and 7.

The CHAS dataset does not include data for female headed households with children; however, as shown in Table B2-27 there are 329 female-headed family households with incomes below the poverty line.

Resources for Extremely Low-Income Households

Table B2-32 includes an inventory of affordable housing in Exeter. As shown, there are 168 affordable units in the city. These units serve households making less than 80 percent of the AMI. Based on the identified need (305 extremely low-income households experiencing housing cost burden) there is a need for 137 additional units affordable to extremely low-income households in the city.

Table B2-32 Inventory of Public Assisted Complexes, Exeter

Name	Address	City	Zip	Affordable Units
Jacob's Square	301 Jacobs Place	Exeter	93221	18
Belmont Family Apartments	1110 West Palm Ave	Exeter	93221	24
Exeter Elderly	501 N. B Street	Exeter	93221	24
Exeter Senior Villa	655 Vine Street	Exeter	93221	44
Exeter Apartments	855 West Visalia Road	Exeter	93221	58

Source: California Housing Partnership, 2023.

The Housing Authority of Tulare County (HATC) provides assistance to lower and moderate-income families in need of housing through the HCV program throughout the county. HATC currently administers approximately 700 public housing units, 3,100 HCV units, and 860 units of local, non-traditional housing.⁴ According to HATC, 53 households use HCVs in Exeter. Taking into account the 53 HCVs in the city and the number of affordable units (168), there is a housing resource gap for 84 extremely low-income households in the city.

To address the needs of extremely low-income households the City will implement Housing Plan Program 12 to facilitate housing assistance for low-income households in coordination with HATC, spread awareness of the HCV program and other available assistance programs. The City will also use HCD's HOME Investment Partnerships Program (HOME) and Community Development Block Grant (CDBG) funds, to create more affordable or subsidized housing units.

⁴ U.S. Department of Housing and Urban Development, Housing Authority of Tulare County, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/tulare accessed June 2023.

Farmworkers

Farmworkers and day laborers are an essential component of California's agriculture industry. Farmers and farmworkers are the cornerstone of the larger food sector, which includes the industries that provide farmers with fertilizer and equipment; farms to produce crops and livestock; and industries that process, transport, and distribute food to consumers. Farmworker households are often compromised of extended family members or single male workers. Farmworkers make up the majority of the agricultural labor sector and include individuals whose primary income is earned through either seasonal or permanent agricultural labor.

Migrant farmworkers as a group consist of individuals who travel not only across county lines but also from one major geographic region of California to another to find work. Travel for work prevents them from returning to their primary residence every evening. Many migrant farmworkers are single males, most of whom are married and migrate alone to support their families who live at home base. However, there are many migrant families who have more than one employed member.

When workloads increase during harvest periods, the labor force is supplemented by seasonal labor, often supplied by a labor contractor. Non-migrant seasonal farmworkers consist of individuals who work only during a harvest season, and are able to return to their primary residence every evening. This group, which includes cannery workers, is fairly significant, and includes more than half of all farmworkers in the state. Permanent farmworkers comprise the smallest group of individuals employed in agriculture. Permanent farmworkers are employed year-round, usually by one employer in the agricultural industry. This group generally lives in rural areas in permanent housing provided by the grower. Providing migratory or seasonal farmworkers with affordable shelter has long presented a problem. Traditionally, growers offered some level of shelter to workers, yet the availability of grower-offered housing has dramatically decreased over the last twenty years. While housing for farmworkers is most convenient when located on or adjacent to farms, housing affordable at very low-income levels tends to be more feasible in cities. Housing in cities, with services located nearby, may also be more suitable for seasonal farmworkers whose families live with them. Increasingly, farmworkers are living in cities on a year-round basis, especially in existing single family rental units in older neighborhoods that offer relatively low-cost housing and its central location in relation to farmland.

According to a study conducted by the University of California, Merced, farmworker households frequently experience high poverty rates, severe overcrowding, and poor housing conditions, with a majority renting and living in substandard environments due to their typically lower incomes and face a disproportionate need for more affordable housing. These housing issues, combined with the demanding and poorly compensated nature of farmwork, often lead to negative health outcomes and exacerbate respiratory and infectious diseases.⁵

In Tulare County, the average wage for people employed as farmworkers in 2024 is \$17.42 per hour, or \$36,228 annually.⁶ As discussed in Section B2.5, this salary is considered low-income and insufficient to afford the average asking market rent in Tulare County without incurring a housing cost burden.

The U.S. Department of Agriculture (USDA) provides countywide farmworker population data generated through the Census of Agriculture. The most recent Census of Agriculture data (2017) identified 23,233 farmworkers in the county.

⁵ Farmworker Health in California. UC Merced. August 2022.

https://clc.ucmerced.edu/sites/clc.ucmerced.edu/files/page/documents/fwhs_report_2.2.2383.pdf?_gl=1*1rg0e9w*_ga*MTU3Njc2MDMzNS4xNzA4OTk2Nzg*_ga_TSE2LSBDQZ*MTcwODk5Njc4MC4xLjAuMTcwODk5Njc4MC42MC4wLjA.

⁶ California Housing Partnership. 2024. Tulare County 2024 Affordable Housing Needs Report. https://chpc.net/wp-content/uploads/2024/05/Tulare_Housing_Report.pdf

It can be difficult to obtain an accurate count of farmworkers in Exeter due to the seasonal nature of agricultural labor. Additionally, many workers are migrant farmworkers who may travel across county lines or from a different geographic location entirely. Farmworkers often face access barriers to housing and assistance programs due to language differences. Table B2-33 provides ACS data for the total farmworker population in Exeter and Tulare County in 2020. Exeter had 285 farm workers in 2020, representing one percent of the total farmworker population across the county.

Table B2-33 Farmworker Population

Jurisdiction	Farmworkers
Exeter	285
Percent	1.0%
Total Tulare County	28,627

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table C24050.

The USDA Census of Agriculture reported the presence of 1,800 farms with a total of 20,531 workers in Tulare County in 2017 (Table B2-38). The majority of the farmworkers were seasonal, working fewer than 150 days per year.

Table B2-34 Farmworkers in Tulare County by Days Worked (2022)

Farm Type	Number of Farms	Number of Workers
150 Days or More (Year-Round)		
Small Farms (fewer than 10 workers per farm)	941	2,628
Large Farms (10 or more workers per farm)	395	9,812
Subtotal	1,336	12,440
Fewer than 150 Days (Seasonal)		
Small Farms (fewer than 10 workers per farm)	810	2,216
Large Farms (10 or more workers per farm)	195	5,875
Subtotal	1,005	8,091
Total	2,341	20,531

Source: USDA. 2022 Census of Agriculture - County Data.
https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_2_County_Level/California/st06_2_007_007.pdf

Resources for Farmworkers

To meet the need of farm workers in Exeter, HATC operates 191 housing units at the Linnel Farm Labor Center, situated on Walnut Avenue and Road 156, approximately five miles east of Exeter in nearby Visalia.⁷ La Puente apartments is located on North Bridge Street in Visalia approximately 12 miles from Exeter and provides an additional 15 units for farmworkers. HATC also operates 175 units for farmworkers at the Woodville Farm Labor Center, approximately 18 miles south of Exeter near the unincorporated community of Woodville. HATC requires low-income farm worker families to pay 30 percent of their adjusted gross income towards rent. Additional rent is paid by the USDA Rural Development program. As reported in Table B2-33, there were 285 farmworkers living in Exeter in 2020. Based on existing affordable housing units, HCV programs, and nearby farmworker housing, there are

⁷ U.S. Department of Housing and Urban Development, Housing Authority of Tulare County,
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/tulare. Accessed June 2023.

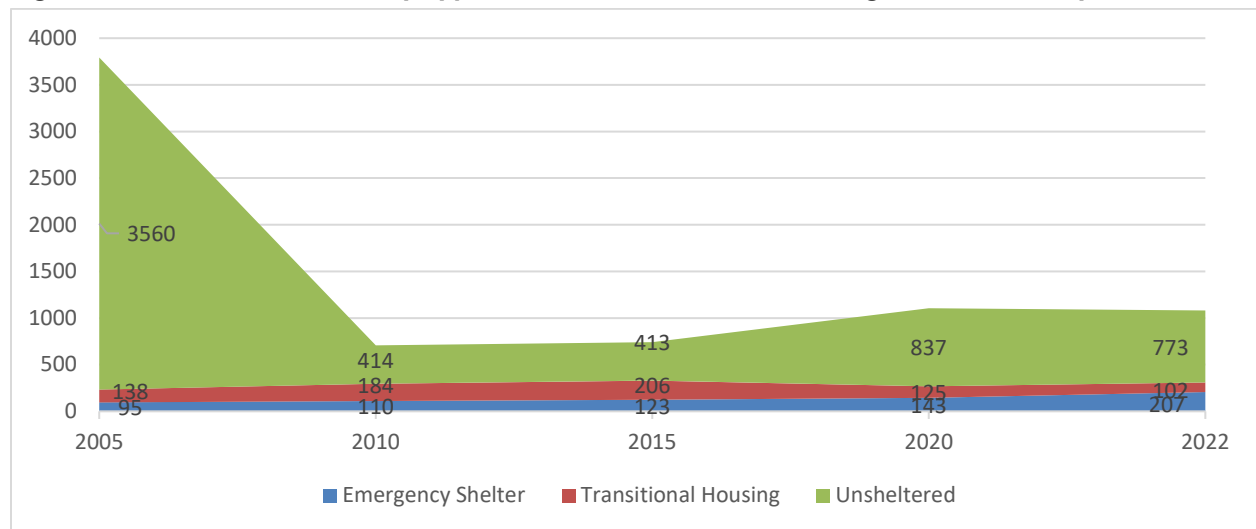
sufficient units affordable to farmworkers households identified in Exeter. However, providing migratory or seasonal farmworkers with affordable shelter has long presented a challenge. Despite the housing opportunities listed above, there remains a significant gap in resources for farmworkers. The nearby farmworker housing might also be utilized by farmworkers from other areas of the county, making it difficult to determine whether the numbers of units would be sufficient for the farmworker population, specifically in Exeter. Consequently, there is still a need for additional housing resources for farmworkers in the city.

To address the needs of farmworkers, the City will implement Housing Plan Program 6 and Program 9 to support affordable housing development and remove constraints to development of housing types that may fit the needs of farmworkers, such as employee housing.

Persons Experiencing Homelessness

Figure B2-2 shows total households experiencing homelessness by living situation between 2005 to 2022. As shown, 2005 had the highest reported number of households (3,793) within the Continuum of Care (CoC), the majority of which were unsheltered. Data for 2022 indicates that 1,082 households were experiencing homelessness, including 773 that were reported as unsheltered.

Figure B2-2 Homelessness by Type Over Time, Households, Kings/Tulare County CoC



Source: U.S. HUD, CoC Homeless Populations and Subpopulations Reports (2005, 2010, 2015, 2020, 2022).

CoC data identifies persons experiencing homelessness by type and race across the regions CoC for the year 2020. Among those counted, 92 percent identified as white, nine percent as Black/African American, and seven percent as American Indian or Alaska Native. In regard to ethnicity, 45 percent identify as Hispanic/Latino (of any race).

The Kings Tulare Homeless Alliance conducted a point-in-time count in 2023. Data from the point-in-time count is reported for Porterville, Visalia, Tulare, and the balance of the county. Among those counted, there were a total of 1,053 people experiencing homelessness. Approximately 97 percent of this population lives in either Porterville, Tulare, or Visalia, while the remaining three percent (236 residents) live throughout all other jurisdictions including Exeter. Table B2-35 identifies those counted in 2022.

Table B2-35 Homelessness by Type (2023)

Jurisdiction	Emergency Shelter	Transitional Housing	Unsheltered	Total
Balance of County, including Exeter	5	0	31	36
Porterville	56	16	227	299
Tulare	21	36	227	284
Visalia	83	57	294	434

Kings/Tulare Homeless Alliance, 2023 Point in Time Report, July 7, 2023.

Resources for Persons Experiencing Homelessness

There are no emergency shelters in Exeter; however, there are two shelters in nearby Visalia about 11 miles from Exeter. Visalia Rescue Mission with locations on NE First Avenue and N Burke Avenue provides 50 beds to men 18 years and older and an additional 40 beds to women and children. Emergency shelters are currently (2023) allowed by conditional use permit in the RM, PO, and CC districts. Although the number of unsheltered persons in the city may be relatively small (36 or fewer persons), the lack of resources for persons experiencing homelessness in the city constitutes a hardship for this group.

The City will implement Housing Plan Program 1 to encourage and coordinate development of emergency shelters and low barrier navigation centers. The City will also implement Housing Plan Program 6 to support the development of shelter housing and supportive services for people experiencing homelessness.

B2.10 Housing Stock Characteristics

A community's housing stock is defined as the collection of all housing units located within the jurisdiction. The characteristics of the housing stock, including growth, type, age, condition, tenure, vacancy rates, housing costs, and affordability are important in determining the housing needs for the community. The following sections detail the housing stock characteristics of Exeter to identify how well the current housing stock meets the needs of current and future residents.

B2.11 Housing Growth

Table B2-36 summarizes the growth of the housing stock in Exeter by providing the total number of units constructed each decade from 1980 to 2020. The largest growth rate occurred between 2000 and 2010 with a 25.7 percent change during this 10-year period. Between 1980 and 2010, the housing stock grew by at least 10 percent each decade. Between 2010 and 2020, however, production slowed significantly. During this time, the number of housing units in the city grew by just 0.6 percent.

Table B2-36 Total Housing Units Over Time (1980 to 2020)

Jurisdiction	1980	1990	2000	2010	2020
Exeter	2,060	2,651	3,168	3,600	3,620
Percent Change		+28.7%	+19.5%	+13.6%	+0.6%

Source: U.S. Census Bureau, Census 1980(STF1:T65), 1990(STF1:H1), 2000(SF1:H1); ACS 16-20 (5-year Estimates), Table B25001.

B2.12 Housing Type and Tenure

Table B2-37 identifies the total housing units by type in Exeter, Tulare County, and California. In Exeter, single-family detached homes comprise much of the housing stock, with 79.8 percent of total units. This percentage is greater than the county average (75 percent) and the statewide average (57.7 percent). The second most common housing type is 3- or 4-unit complexes, providing 4.7 percent of the total units in the city.

Table B2-37 Total Housing Units by Type

Jurisdiction	Total	1 unit, Detached	1 unit, Attached	2 unit	3 or 4 unit	5 to 9 unit	10 to 19 unit	20 to 49 unit	50 unit or more	Mobile Home	Boat, RV, Van, etc.
Exeter	3,620	2,887	156	88	170	109	30	44	35	101	-
Percent		79.8%	4.3%	2.4%	4.7%	3.0%	0.8%	1.2%	1.0%	2.8%	0.0%
Tulare County	150,079	112,528	4,416	3,704	7,936	4,077	2,262	2,362	3,535	9,096	163
Percent		75.0%	2.9%	2.5%	5.3%	2.7%	1.5%	1.6%	2.4%	6.1%	0.1%
California	14,210,945	8,206,621	1,009,488	339,846	773,994	840,296	721,132	705,450	1,083,247	515,666	15,205
Percent		57.7%	7.1%	2.4%	5.4%	5.9%	5.1%	5.0%	7.6%	3.6%	0.1%

Source: U.S. Census Bureau, ACS16-20 (5-year Estimates), Table C24050.

Table B2-38 indicates housing units by tenure. In Exeter, 63.1 percent of units are owner-occupied compared to 36.9 renter occupied. This percentage is higher than the county (57.1 percent) and the statewide average (55.3 percent).

Table B2-38 Housing Units by Tenure

Jurisdiction	Total	Owner-Occupied	Renter-Occupied
Exeter	3,295	2,079	1,216
Percent		63.1%	36.9%
Tulare County	139,044	79,353	59,691
Percent		57.1%	42.9%
California	13,103,114	7,241,318	5,861,796
Percent		55.3%	44.7%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25042.

B2.13 Vacancy Rate

Table B2-39 provides data on vacancy status by type for all vacant units. Exeter has a vacancy rate of 9.9 percent, higher than the county's vacancy rate of 7.9 percent. Of the total vacant units in Exeter, "other vacant units" make up the largest percentage of total vacant units. These units make up 56.6 percent of the total vacant units in the city, greater than both the county (42.6 percent) and state (28.2 percent). Exeter has no vacant units for seasonal, recreational, or occasional use, far less than the county (27.2 percent) and state (34.1 percent).

Table B2-39 Vacancy Status by Type for Total Vacant Units

Jurisdiction	Total	For Rent	Rented, Not Occupied	For Sale Only	Sold, Not Occupied	For Seasonal, Recreational, or Occasional Use	For Migrant Workers	Other Vacant
Exeter	325	-	101	12	28	-	-	184
Percent		0.0%	31.1%	3.7%	8.6%	0.0%	0.0%	56.6%
Tulare County	11,035	1,542	449	901	398	3,004	39	4,702
Percent		14.0%	4.1%	8.2%	3.6%	27.2%	0.4%	42.6%
California	1,107,831	227,993	54,898	77,702	53,437	378,023	3,326	312,452
Percent		20.6%	5.0%	7.0%	4.8%	34.1%	0.3%	28.2%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25004.

B2.14 Housing Unit Size

Table B2-40 provides housing unit size data for Exeter, Tulare County, and California. In Exeter, three-bedroom units (44.3 percent) are the most common housing type, followed by two-bedroom (28.3 percent) and four-bedroom units (20.3 percent). This percentage is similar to the statewide and countywide housing unit size trend; however, there is notably larger share of three-bedroom units in Exeter and Tulare County when compared to the state.

Table B2-40 Housing Unit Size

Jurisdiction	Total	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 or more Bedroom
Exeter	3,295	-	177	931	1,459	668	60
Percent		0.0%	5.4%	28.3%	44.3%	20.3%	1.8%
Tulare County	139,044	2,322	7,462	33,867	67,094	25,533	2,766
Percent		1.7%	5.4%	24.4%	48.3%	18.4%	2.0%
California	13,103,114	547,466	1,686,731	3,527,970	4,418,085	2,336,619	586,243
Percent		4.2%	12.8%	26.9%	33.7%	17.8%	4.4%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25042.

B2.15 Age and Condition of Housing Stock

Table B2-41 provides data on the total occupied housing units by year built. Exeter saw the most growth between 2000 and 2009. During this period, 696 units were constructed, representing 21.1 percent of the current housing stock. In contrast, the largest percentage of units were constructed in the 1970s, comprising 20.3 percent in Tulare County and 17.5 percent in California. Notably, nearly half (49 percent) of the housing stock in Exeter was built prior to 1980 and is more than 40 years old.

Table B2-41 Total Occupied Housing Units by Year Built

Jurisdiction	Total	2014 or later	2010 to 2013	2000 to 2009	1990 to 1999	1980 to 1989	1970 to 1979	1960 to 1969	1950 to 1959	1940 to 1949	1939 or earlier
Exeter	3,295	27	-	696	472	489	426	286	288	144	467
Percent		0.8%	0.0%	21.1%	14.3%	14.8%	12.9%	8.7%	8.7%	4.4%	14.2%
Tulare County	139,044	5,070	4,655	22,770	20,677	20,078	25,486	13,063	12,537	7,205	7,503
Percent		5.0%	7.2%	13.9%	13.9%	8.5%	20.3%	7.4%	10.1%	7.4%	6.4%
California	13,103,114	294,667	234,646	1,432,955	1,448,367	1,967,306	2,290,081	1,740,922	1,767,353	763,029	1,163,788
Percent		2.2%	1.8%	11.0%	11.1%	15.1%	17.5%	13.3%	13.5%	5.8%	8.9%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25036.

Table B2-42 provides information on substandard housing units. In Exeter, there are 20 units lacking kitchen facilities (0.6 percent of total units) and no observed units lacking plumbing facilities. Exeter substandard housing units comprise a lower percent of total units (0.6 percent) compared to Tulare County (1.0 percent) and California (1.6 percent).

With the exception of a fire-damaged residence at 146 S. G Street in need of rehabilitation, the City is not aware of any units in critical need of repair. Self Help Enterprises, which administers rehabilitation of units in the city, indicated that 19 applicants are on a waiting list for the owner-occupied rehabilitation program. Areas of the city with higher numbers of housing units in need of repair are located between G Street and Orange Street in Central Exeter, and Firebaugh Street and Vine Street in West Exeter. The City’s Planning Department, in consultation with Self-Help Enterprises and the Tulare County Building Department, estimates that 354 units (9.6 percent of total units) are in need of minor repair and 188 units (5.1 percent of total units) are in need of major repair.

The City will implement Housing Plan Program 11 to support housing assistance providers that offer housing rehabilitation assistance for owner-occupied households by applying for funding opportunities and expanding awareness of available rehabilitation programs.

Table B2-42 Substandard Housing Units

Jurisdiction	Total	Lacking Plumbing Facilities	Lacking Kitchen Facilities
Exeter	3,295	-	20
Percent		0.0%	0.6%
Tulare County	139,044	481	971
Percent		0.4%	0.7%
California	13,103,114	54,342	151,660
Percent		0.4%	1.2%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25049.

B2.16 Housing Costs

Median Home Sale Price

Table B2-43 provides information on the median housing value in Exeter and comparable jurisdictions from 1980 to 2020. As shown, prices rose steadily from 1980 to 2000, before experiencing a large increase in value from 2000 to 2010, especially compared to other cities in the county. Median home values increased by 105.2 percent during this period. Increases in value have slowed since 2010, with growth between 2010 and 2020 at 6.0 percent. Each jurisdiction listed in the table experienced a similar pattern of growth in home values, including an extreme spike in value between 2000 and 2010. Porterville is the only jurisdiction that saw a decrease in value during any decade (0.6 percent decreases between 2010 and 2020). According to Zillow analytics, the typical value for single-family homes in Exeter (within the 65th to 95th percentile range) as of October 2024 (latest available data) is \$374,990.⁸ No information was available for multifamily units.

⁸ Zillow.com. 2024. Housing Data. <https://www.zillow.com/research/data/>

Table B2-43 Median Housing Value Over Time (1980 to 2020)

Jurisdiction	1980	1990	2000	2010	2020
Exeter	\$44,300	\$67,900	\$94,800	\$211,400	\$224,000
Percent		53.3%	39.6%	123.0%	6.0%
Dinuba	46,400	67,200	95,700	196,400	210,100
Percent		44.8%	42.4%	105.2%	7.0%
Farmersville	36,000	49,100	77,600	151,300	173,800
Percent		36.4%	58.0%	95.0%	14.9%
Lindsay	38,600	56,300	78,000	162,100	189,700
Percent		45.9%	38.5%	107.8%	17.0%
Porterville	52,300	70,800	92,200	183,200	182,100
Percent		35.4%	30.2%	98.7%	-0.6%

Note: Data are not inflation-adjusted to current 2022 dollars.

Source: U.S. Census Bureau, Census 1980(ORG STF1), 1990(STF3), 2000(SF3); ACS 06-10, 16-20 (5-year Estimates), Table B25077.

Housing Rents

According to the 2016-2020 ACS, the median gross rent in Exeter was \$967 per month (Table B2-44). This was slightly lower than the median for the county (\$974) and significantly lower than the state average (\$1,586).

Table B2-44 Median Gross Rent, Exeter, 2020

	City of Exeter	Tulare County	City % of County	California	City % of State
Median Gross Rent	\$967	\$974	99.3%	\$1,586	61.0%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25064.

Table B2-45 below provides data on median gross rent from 1980 to 2020. Median gross rent has grown from \$215 per month in 1980 to \$967 in 2020. Between 2000 and 2010, rents in the city grew by 48.3 percent. From 2010 to 2020 rents grew at a slower rate of 24.9 percent.

Table B2-45 Median Gross Rent Over Time, Exeter, 2020

	1980	1990	2000	2010	2020
Median Gross Rent	\$215	\$371	\$522	\$774	\$967
Percent Change		72.6%	40.7%	48.3%	24.9%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25064.

Table B2-46 provides an overview of median rent for rental housing by number of bedrooms. The median rent data provided by Zumper shows the estimated rent for 2022 and 2023 in Exeter.

Table B2-46 Median Rent by Number of Bedrooms

Jurisdiction	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Exeter	N/A	\$695	\$950	\$1,695	\$1,495
Tulare County	\$660	\$850	\$1,425	\$1,800	\$1,995
California	\$1,643	\$1,964	\$1,996	\$2,349	\$2,785

Source: Zumper.com, Rental data 2022 and 2023, accessed June 2023.

B2.17 Distribution of Owner-Occupied Units

Table B2-47 compares data on the number of owner-occupied housing units by race and ethnicity in Exeter, Tulare County, and California. In Exeter, most owner-occupied units are occupied by residents that identify as white (82.2 percent). This percentage is higher than in Tulare County (73.6 percent) and California (66.7 percent).

Considering ethnicity, 24.3 percent of owner-occupied units are occupied by Hispanic/ Latino residents of any race, compared to 47.1 percent of the share of population. This means that Hispanic/Latino residents are underrepresented in housing ownership in Exeter. The percentage of owner-occupied units with Hispanic/Latino residents is lower than in Tulare County (48.8 percent) but similar to the statewide average (24.0 percent).

Table B2-47 Owner Occupied Units by Race

Jurisdiction	White	Black/African American	American Indian and Alaska Native	Asian American	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races	Hispanic/ Latino of any Race
Exeter	1,708	-	38	24	-	246	63	506
Percent	82.2%	-	1.8%	1.2%	-	11.8%	3.0%	24.3%
Tulare County	58,375	710	784	2,682	45	10,916	5,841	38,702
Percent	73.6%	0.9%	1.0%	3.4%	0.1%	13.8%	7.4%	48.8%
California	4,831,347	286,043	48,100	1,111,582	18,182	576,852	369,212	1,741,159
Percent	66.7%	4.0%	0.7%	15.4%	0.3%	8.0%	5.1%	24.0%

Source: U.S. Census Bureau, ACS 16-20 (5-year Estimates), Table B25003.

B2.18 Housing Affordability

Table B2-48 shows the maximum amount that a household can pay for housing each month without incurring a cost burden (overpayment) for Exeter. A summary of each income category's ability to pay for housing is provided below the table.

Table B2-48 Housing Affordability Matrix – Exeter (2022)

	Annual Income Limits	Affordable Monthly Housing Costs	Rental Utility Allowance (2020)	Taxes, Insurance, Homeowners Association Fees	Affordable Rent	Affordable Home Price
Extremely Low Income (0-30% AMI)						
1-Person (Studio)	\$14,582	\$365	\$181	\$128	\$184	\$64,549
2-Person (1 BR)	\$16,408	\$410	\$202	\$144	\$208	\$72,000
3-Person (2 BR)	\$18,225	\$456	\$227	\$159	\$229	\$79,427
4-Person (3 BR)	\$20,052	\$501	\$263	\$175	\$238	\$86,877
5-Person (4 BR)	\$25,847	\$646	\$298	\$226	\$348	\$108,862
Very Low Income (30-50% AMI)						
1-Person	\$24,303	\$608	\$181	\$213	\$427	\$107,582
2-Person	\$27,347	\$684	\$202	\$239	\$482	\$120,000
3-Person	\$30,376	\$759	\$227	\$266	\$532	\$132,378
4-Person	\$33,420	\$836	\$263	\$292	\$573	\$144,795
5-Person	\$35,898	\$897	\$298	\$314	\$599	\$151,198
Low Income (50-80% AMI)						
1-Person	\$38,884	\$972	\$181	\$340	\$791	\$172,132
2-Person	\$43,755	\$1,094	\$202	\$383	\$892	\$191,999
3-Person	\$48,601	\$1,215	\$227	\$425	\$988	\$211,805
4-Person	\$53,473	\$1,337	\$263	\$468	\$1,074	\$231,672
5-Person	\$57,437	\$1,436	\$298	\$503	\$1,138	\$241,917
Median Income (80-100% AMI)						
1-Person	\$48,605	\$1,215	\$181	\$425	\$1,034	\$215,164
2-Person	\$54,694	\$1,367	\$202	\$479	\$1,165	\$239,999
3-Person	\$60,751	\$1,519	\$227	\$532	\$1,292	\$264,757
4-Person	\$66,841	\$1,671	\$263	\$585	\$1,408	\$289,589
5-Person	\$71,796	\$1,795	\$298	\$628	\$1,497	\$302,396
Moderate Income (100-120% AMI)						
1-Person	\$58,326	\$1,458	\$181	\$510	\$1,277	\$258,197
2-Person	\$65,633	\$1,641	\$202	\$574	\$1,439	\$287,999
3-Person	\$72,901	\$1,823	\$227	\$638	\$1,596	\$317,708
4-Person	\$80,209	\$2,005	\$263	\$702	\$1,742	\$347,507
5-Person	\$86,155	\$2,154	\$298	\$754	\$1,856	\$362,875

Assumptions:

1. Income limits are the 2021 HCD limits for Tulare County.
2. Affordable housing costs are 30 percent of gross household income.
3. Utility costs are based on Tulare County Housing Authority Utility Allowance Schedule for 2022.
4. Taxes, insurance, private mortgage insurance, and homeowners' association dues are calculated at 35 percent of monthly affordable cost.
5. Affordable home price assumes a 30-year fixed mortgage with a 7 percent interest rate and 10 percent down payment.
6. Taxes and insurance costs apply to owners only.

Sources: 2022 HCD Income Limits, Tulare County Housing Authority Utility Allowance Schedule, 2022.

Extremely Low-income Households

Extremely low-income households earn 30 percent or less of the county AMI. According to HCD estimates, extremely low-income households in Exeter have an annual income of \$14,582 or below for a one-person household and \$25,847 or below for a five-person household. Extremely low-income households cannot afford market-rate rental or ownership housing in Exeter. After deductions for utilities, an extremely low-income household can afford to pay approximately \$184 to \$348 in monthly rent. Given the cost of housing in Exeter, extremely low-income households could not afford to purchase a home, as the affordable home price for extremely low-income households ranges from \$64,548 to \$108,862 depending on household size.

Very Low-income Households

Very low-income households earn between 31 and 50 percent of the county AMI – up to \$24,303 for a one-person household and up to \$35,898 for a five-person household in 2022. A very low-income household can generally afford homes offered at prices between \$107,582 and \$151,198, adjusting for household size. After deductions for utilities, a very low-income household can afford to pay approximately \$427 to \$599 in monthly rent, depending on household size. Given the cost of housing in Exeter, very low-income households could not afford to purchase a home or rent an adequately sized unit.

Low-income Households

Low-income households earn between 51 and 80 percent of the county AMI – up to \$38,884 for a one-person household and up to \$57,437 for a five-person household in 2022. A low-income household can generally afford homes offered at prices between \$172,132 and \$241,917, adjusting for household size. After deductions for utilities, a low-income household can afford to pay approximately \$791 to \$1,138 in monthly rent, depending on household size. Finding appropriately sized market-rate rental housing in Exeter can be challenging to households in this income group.

Median-Income Households

Median-income households earn between 80 and 100 percent of the county's AMI – up to \$48,605 for a one-person household and up to \$71,796 for a five-person household in 2022. The affordable home price for a moderate-income household ranges from \$215,164 to \$302,396. After deductions for utilities, a one-person median-income household could afford to pay up to \$1,034 in rent per month and a five-person low-income household could afford to pay as much as \$1,497. Finding appropriately sized market-rate rental housing in Exeter can be challenging to households in this income group.

Moderate-Income Households

Moderate-income households earn between 100 and 120 percent of the county's AMI – up to \$58,326 for a one-person household and up to \$86,155 for a five-person household in 2022. The maximum affordable home price for a moderate-income household is \$259,197 for a one-person household and \$362,875 for a five-person family. Moderate-income households in Exeter could afford to purchase the median priced home; however, finding an affordable adequately sized home could present a challenge for households earning incomes at the lower end of the moderate-income category. The maximum affordable rent payment for moderate-income households is between \$1,277 and \$1,856 per month. Appropriately sized market-rate rental housing in Exeter is generally affordable to households in this income group.

Workforce Housing

Federal guidelines define workforce housing as housing that is affordable to households earning incomes within the range of 60 to 120 percent of the AMI (in Tulare County, that range is \$50,580 to \$101,160). A broader definition of workforce housing is housing that is affordable to people who work in the county. A four-person household with an annual income of \$84,300 could afford monthly rent of \$1,845 for a three-bedroom housing unit and a home purchase price of \$304,998 without being burdened by housing costs. As noted in Table B2-44, the average monthly rental price for a three-bedroom unit is \$1,720, just below the affordable rent for the AMI for the county.

As noted in Table B2-4, the salary for the largest number of workers located in Tulare County (educational services, healthcare and social assistance) receives an annual median income of approximately \$52,534. At this median income level, a household of two would be considered low-income; if there were two children or dependents, then that household would be considered a low-income household.

Cost Burden

Table B2-49 and Table B2-50 identify cost-burdened households by tenure overtime in Exeter. There has been a decrease in the number of owner-occupied cost-burdened households from 671 households in 2010 to 431 in 2020. Cost-burdened renter-occupied households show different results, indicating noticeable increases during the same time period, from 475 in 2010 to 520 in 2020.

Table B2-49 Cost Burdened Owner-Occupied Households Over Time

Jurisdiction	1980	1990	2000	2010	2020
Exeter	76	210	322	671	431
Percent Change		176.3%	53.3%	108.4%	-35.8%

Note: Data are not inflation-adjusted to current 2023 dollars.

Source: U.S. Census Bureau, Census 1980 (ORG STF1), 1990 (STF3), 2000 (SF3); ACS 06-10, 16-20 (5-year Estimates), Table B25077.

Table B2-50 Cost Burdened Renter-Occupied Households Over Time

Jurisdiction	1980	1990	2000	2010	2020
Exeter	255	313	328	475	520
Percent Change		22.8%	4.8%	44.8%	9.5%

Note: Data are not inflation-adjusted to current 2022 dollars.

Source: U.S. Census Bureau, Census 1980(ORG STF1), 1990(STF3), 2000(SF3); ACS 06-10, 16-20 (5-year Estimates), Table B25077.

CHAS data provided by HUD provides information on cost burden by income category based on the HAMFI. This data is included in Table B2-51 below. While the totals do not align exactly with 2020 ACS data presented above, the CHAS data gives insight into which income categories are currently experiencing costs burdens in the city. As shown, households with income less than 50 percent of HAMFI experience a high rate of cost burden, including 495 of 610 extremely low-income households and 425 of 590 very low-income households.

Table B2-51 Cost Burden by Income and Tenure

Row Labels	Owner occupied	Renter occupied	Grand Total
Household income is <= to 30% of HAMFI (extremely low income)	215	395	610
Housing cost burden is <= to 30%	25	90	115
Housing cost burden > 30% but <= to 50%	95	25	120
Housing cost burden is > 50%	95	280	375
Income is greater than 30% but <= to 50% of HAMFI (very low income)	260	330	590
Housing cost burden is <= to 30%	105	60	165
Housing cost burden is > 30% but <= to 50%	60	210	270
Housing cost burden is > 50%	95	60	155
Income is > 50% but <= to 80% of HAMFI (low income)	457	232	689
Housing cost burden is <= to 30%	320	149	469
Housing cost burden is > 30% but <= to 50%	129	79	208
Housing cost burden is > 50%	8	4	12
Income is > 80% <= to 100% of HAMFI (median income)	240	39	279
Housing cost burden is <= to 30%	175	29	204
Housing cost burden is > 30% but <= to 50%	65	10	75
Housing cost burden is > 50%	0	0	0
Income is greater than 100% of HAMFI (moderate income)	1,039	160	1,199
Housing cost burden is <= to 30%	970	160	1,130
Housing cost burden is > 30% but <= to 50%	69	0	69
Housing cost burden is > 50%	0	0	0
Grand Total	2,211	1,156	3,367

US Housing and Urban Development, CHAS 2015-19 (5-Year Estimates), Table 7.

B2.19 Assisted Housing Units

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

At-Risk Housing Units

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

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

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

Table B2-52 shows assisted units in Exeter by estimated affordability end date. As shown, there are 168 assisted units in the city, 68 are listed with an estimated affordability end year that has passed; however, they remain on the list of active affordable units. Since these units meet the definition of high risk of conversion to market-rate units, a fiscal analysis for replacement or preservation of these units is provided below. However, according to City staff, these units are not considered to be at risk of conversion during the planning period.

Costs of Replacement Versus Preservation

To understand the significance of the loss of these 68 at-risk units from the supply of affordable housing, it is critical to identify the cost of construction of new regulated housing to replace these at-risk units if they are converted to market-rate units, as well as to compare this cost to the potential costs to preserve these units. The cost to develop new housing depends upon a variety of factors, including density, size of the units (i.e., square footage and number of bedrooms), location, land costs, and type of construction, as discussed in Chapter B3, *Housing Constraints*. The typical cost of construction for below market-rate housing in Tulare County in 2022 was \$337,540 per unit. Based on this per unit cost, the total cost to replace the 68 high-risk affordable units with new construction would be approximately \$23 million.

Another option to preserve the units at risk is to transfer the units to nonprofit ownership. Transferring ownership of an at-risk project to a non-profit housing provider is one of the least costly ways to ensure that the at-risk units remain affordable for the long term. By transferring property ownership to a non-profit organization, low-income restrictions can be secured, and the project would become potentially eligible for a greater range of governmental subsidies. Under AB 1521, there are prescribed steps for owners of deed restricted properties to take prior to the expiration of those affordability requirements. This law requires that the owner consider an offer to purchase the deed-restricted units.

Nonprofit organizations are usually committed to maintaining the long-term affordability of low-income housing and may be eligible for a variety of affordable housing programs. A list of qualified entities is provided in Chapter 2, *Regional Housing Needs Assessment*. The feasibility of this option depends largely on the willingness of property owners to sell. Transferring ownership would also involve the projects in their entirety, not just the at-risk units. A cursory survey of older apartment buildings sold in Exeter and similar nearby cities conducted in November 2024 indicates a price range of \$63,545 to \$230,835 per unit, with an average sales price of \$131,229 per unit.⁹ At this sales price, the replacement cost for the 68 at-risk units would be approximately \$8.9 million.

The cost of preserving these units is much less than the cost of new construction. As shown in Table B2-48, the amount a lower-income household of four can afford to pay for housing annually without a housing cost burden is \$1,074 per month. The median market rent for a three-bedroom unit in the city is \$1,695 monthly. Based on the difference between the affordable rent and current market rate, the cost of preserving such a unit is approximately \$621 per month, or \$7,452 per year. Using this total, the cost of preserving the 68 units at Exeter Elderly and Exeter Senior Villa would be approximately \$506,736 per year. However, the City does not have a program to provide such subsidies.

⁹ Homes.com. 2024. <https://www.homes.com/tulare-county-ca/multi-family-homes-for-sale/>

The City will Implement Housing Plan Program 10 to preserve deed restricted affordable housing developments that may become at risk of converting to market-rate during the planning period. Although the units are not currently considered to be at risk of conversion, the City will monitor all regulated affordable units and maintain annual contact with property owners regarding the status of these units. Should a Notice of Intent to opt out of low-income use be filed, the City will ensure that tenants are properly notified of their rights under California law.

Funding Sources for Assisted Housing

There are a variety of funding sources for affordable housing, preservation, and rehabilitation from federal, state, and local sources. The HCD and HUD administer grants which can assist developers, local governments, and non-profits in constructing housing units.

Permanent Local Housing Allocation (State)

The 2017-18 Regular Session of the California State Legislature passed one bill (of many other housing-related legislation) sought to generate, and distribute directly to cities, funds for new affordable housing production. The Building Homes and Jobs Act (Senate Bill 2, Atkins 2017) established a permanent source of funding for affordable housing through a \$75 fee on real estate document filings. In fiscal year 2023, the City received an entitlement from the resulting program “Permanent Local Housing Allocation” in the amount of \$164,970 from filing fees during calendar year 2022.

Affordable Housing and Sustainable Communities Program (State)

The statewide Greenhouse Gas Reduction Fund’s Affordable Housing and Sustainable Communities program is a competitive funding program that encourages collaboration between affordable housing developers, jurisdictions, and transit agencies to fund affordable housing development and transportation infrastructure and amenities. City planning staff will continue to work with their colleagues in various departments to best position affordable housing and sustainable infrastructure planning to align with this program. Additionally, staff will continue seeking partnerships with area technical assistance programs, affordable housing developers, and area transit agencies to collaborate in an application for funding when a viable and competitive housing and transportation development is ready to move forward.

State Low Income Housing Tax Credits (State)

The federal government through the Internal Revenue Service enacted the Low-Income Housing Tax Credit Program (LIHTC) in 1986. This program has been the largest producer of affordable multifamily rental housing since its inception. Each state has a financing agency that administers the LIHTC Program, and in California that is the Tax Credit Allocation Committee (TCAC). Institutional investors or syndicates are incentivized to invest in long term affordable rental housing projects to receive tax credits. Nonprofit and private developers are eligible to apply for State LIHTC for acquisition, new construction and/or rehabilitation of affordable rental housing.

Table B2-52 Inventory of Public Assisted Complexes – Exeter

Name	Address	City	Zip	Affordable Units	Total Units	Active Program(s)	Estimated Affordability End Year/Date	Risk Level
Jacob's Square	301 Jacobs Place	Exeter	93221	18	45	LIHTC; HCD	2049	Low
Belmont Family Apartments	1110 West Palm Ave	Exeter	93221	24	25	LIHTC	2069	Low
Exeter Elderly	501 N. B Street	Exeter	93221	24	24	USDA	10/13/2007	High
Exeter Senior Villa	655 Vine Street	Exeter	93221	44	44	USDA	7/14/2008	High
Exeter Apartments	855 West Visalia Road	Exeter	93221	58	58	USDA	6/30/2038	Low

Source: California Housing Partnership, 2023.

HOME (State)

This program was created under Title II of the Cranston-Gonzales National Affordable Housing Act enacted on November 28, 1990. For Exeter, HOME funds are made available on an annual, competitive basis through HCD's HOME Investment Partnerships Program. Approximately \$245,776.18 is available to develop and support affordable multifamily rental housing, owner-occupied housing rehabilitation, and home ownership affordability. Exeter uses HOME funds primarily for first-time homebuyers (down payment assistance), owner-occupied rehabilitation, and rental-rehabilitation.

CDBG Funding (Locally controlled federal funds)

The City is considered a non-entitlement city, as it has a population of under 50,000, a criterion defined by HUD for agencies seeking assistance with CDBG funds. The City received approximately \$298,094.19 from the State administered HUD funds in 2022. Exeter utilizes CDBG funds for rental and owner housing rehabilitation activities and infrastructure improvements. Proceeds from those activities are deposited into a revolving loan fund established from low interest loans for rehabilitation and could be a resource for preservation activities.

Homebuyer Assistance Program (Local)

It can be difficult for very low-, low-, and moderate-income first-time homebuyers to acquire sufficient savings and income to pay for a down payment, closing costs, monthly mortgage, and tax and insurance payments. To address this problem, Exeter administers the First Time Homebuyer Loan Program, a special low-interest, deferred-payment loan program designed to provide "silent" second mortgages of up to \$40,000, funded by CDBG. Applicants must demonstrate financial need and pre-approval for a first mortgage; the second mortgage will be financed as a three percent-interest, 30-year deferred loan payment.

Housing Rehabilitation Program (Local)

Exeter contracts with Self-Help Enterprises to administer its housing rehabilitation program funded by the CDBG Fund. Priority is afforded to lower-income households based on health and safety needs, followed by energy conservation needs, extension of the unit's useful life, and complying with the Uniform Building Code.

B3 Housing Constraints Analysis

Constraints to the development of adequate and affordable housing include market, governmental, infrastructure, and environmental factors. These constraints may result in housing that is not affordable to low- and moderate-income households and may render residential construction economically infeasible for developers. Constraints to housing production significantly impact households with low and moderate incomes and special needs.

According to Government Code Section 65583, local governments are required to analyze governmental and non-governmental constraints to the production, maintenance, and improvement of housing for persons of all income levels and those with special needs and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing as part of the housing element update. Where constraints to housing production are related to the City's regulations or land use controls, the City must identify appropriate programs to mitigate these constraints, particularly ones that impact the production of affordable housing or housing for special needs populations.

The following chapter outlines non-governmental, governmental, environmental and infrastructure constraints and was used in the development of specific policies and actions included in the Housing Plan to remove barriers to housing and to incentivize housing production, specifically targeting housing production at all income levels and housing for persons with special needs.

B3.1 Summary of Local Housing Constraints

- The costs of developing housing, including land costs and construction costs, are rising rapidly. There is a lack of federal, state, and local funding and the funding that is available is increasingly competitive. The time and effort needed to identify, compete for, and layer affordable housing funds is a major constraint to development of affordable housing.
- Loan denial rates in Tulare County were higher for Hispanic/Latino applicants (18 percent) compared to non-Hispanic/Latino applicants (15.5 percent). Although discrimination in mortgage lending is prohibited by the federal Fair Housing Act, other factors may contribute to a potential homebuyer's ability to secure safe financing, such as credit history, savings, and education regarding the home-buying process. The higher denial rate in for Hispanic/Latino applicants indicates a financial constraint to purchasing a home which in tandem with the relatively low inventory of homes affordable for lower income residents puts higher pressure on the rental markets.
- Although Exeter's development regulations allow for a variety of densities throughout the city, development standards, such as parking requirements, are not sufficiently flexible. In addition, zoning code provisions allowing single-family residences by-right in multifamily zones potentially constraints the development of a variety of housing types.
- Use permit regulations residential care facilities in certain zoning districts could pose a constraint to housing for individuals with special needs and use permit regulations and parking requirements for emergency shelters in certain zoning districts could pose a constraint on housing access for unsheltered individuals.

B3.2 Non-Governmental Constraints

The availability of housing is affected by a complex set of interrelated market factors including but limited to cost of land, cost of construction, and availability of financing. These factors contribute to determining a new home's sale price or the rents required to make a project feasible. Non-governmental constraints include factors outside of direct governmental control that directly impact housing prices. The cost of construction and the availability of financing contribute to the cost of housing and can hinder the production of affordable housing. The following analysis accounts for these non-governmental constraints.

B3.2.1 Land Costs

The cost of land can impede the production of affordable housing. Land costs are influenced by many variables, including land scarcity and developable density (both of which are indirectly controlled through governmental land use regulations), location, site constraints, and the availability of public utilities.

Table B3-1 provides the average price per acre for land listed for sale throughout Exeter in June 2023. The average price per acre is significantly higher for smaller lots, some of which are in non-agricultural zones. The average price per acre for all plots is \$222,479. The price per acre is less for larger lots, which average \$20,934. All large properties are in agricultural zones.

Table B3-1 Listed Land Prices – Exeter

Lot Size	Average Price per Acre (Listed)
Less than 10 acres	\$424,024.99
10 or more acres	\$20,934.35
Average \$/acre	\$222,479.67

Source: Zillow, Inc., 2023.

Table B3-2 provides the average price per acre for land sold in 2022 in Exeter. The average price per acre for all land sales across Exeter is \$140,933, significantly lower than the average list price. The average price per acre was significantly higher for smaller lots, most of which are in non-agricultural zones. The average sales price per acre for larger lots was \$40,050, which is lower than the total average per acre price for all sales, but much higher than the average price per acre for currently listed properties. Most of these larger properties are in agricultural zones.

Table B3-2 Sold Land Prices – Exeter

Lot Size	Average Price per Acre (Listed)
Less than 10 acres	\$241,817.32
10 or more acres	\$40,050.38
Average \$/acre	\$140,933.85

Source: Zillow, Inc., 2023.

Conclusion

Land costs in Exeter are consistent with neighboring cities and are not considered a constraint to development.

Recommended Action

None required.

B3.2.2 Construction Costs

Construction costs can be broken down into two primary categories: materials and labor. A major component of the cost of housing is the cost of building materials, including wood and wood-based products, cement, asphalt, roofing materials, and pipe. The availability and demand for such materials affect prices for these goods.

Another major cost component of new housing is labor. The cost of labor in Tulare County is comparatively low because the area's cost of living is relatively low compared to other areas in California. However, labor for government subsidized housing work is additionally costly for the Central Valley, as wages are rooted in the required State Labor Standards based on higher northern and southern California prevailing wages.

Table B3-3 shows the estimated cost of constructing a basic 2,000 square foot single-family home in Tulare County to be around \$337,540. The estimate includes direct and indirect (e.g., insurance, permits, utilities, plans) construction costs, including material, labor, and equipment costs, but does not include the price of land or development impact fees.

Table B3-3 Estimated Construction Cost

Item	Cost
Material	\$204,226
Labor	\$126,001
Equipment	\$7,313
Total	\$337,540

Source: Promatcher.com, 2023.

There is little that municipalities can do to mitigate the impacts of high construction costs except by avoiding local amendments to uniform building codes that unnecessarily increase construction costs without significantly adding to health, safety, or construction quality. Because construction costs are similar across jurisdictions in Tulare County, the cost of construction is not considered a major constraint to housing production.

Conclusion

The cost of housing construction is not considered a major constraint based on cost alone, however it is important to note that there is a significant need for more housing. Higher purchase price homes are preferred by developers as they are more profitable, which can lead to a lack of affordable houses being constructed.

Recommended Action

Although construction costs are not influenced by the actions of any local government, the City will implement Housing Plan Program 9 to partner with local, state, and federal agencies that provide funding to assist in the production of affordable housing in order to offset construction costs.

B3.2.3 Availability of Financing

Mortgage interest rates have a considerable influence over housing affordability. Higher interest rates increase a homebuyer's monthly payment and decrease the range of housing that a household can afford. Lower interest rates result in a lower cost and lower monthly payments for the homebuyer.

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

Where financing is available, construction capital seems to be directed at those with large, established, and well-capitalized sponsors. Given recent trends of increasing interest rates, the availability of financing is likely to be more of a constraint on new housing construction during this Housing Element planning period than it has been in the recent past.

B3.2.3.1 Market-Rate Development Financing

As discussed in Land Costs and Construction Costs, above, market-rate development is generally financed by investors, and the cost to build a project must be recovered by revenue from sales or rents, which drives up the ultimate rent or sales prices of new housing as the component costs increase. A market in which housing supply is limited and demand is high can support higher housing prices, but lower-income segments of the community are priced out. Therefore, it is difficult for the private sector, for-profit developers, and market-rate housing to meet the housing needs of all community members.

B3.2.3.2 Affordable Housing Financing

A description of available funding sources for affordable development is provided in Chapter B2, *Housing Needs Assessment*.

B3.2.3.3 First Time Homebuyer Program

It can be difficult for very low-, low-, and moderate-income first-time homebuyers to acquire sufficient savings and income to pay for a downpayment, closing costs, monthly mortgage, and tax and insurance payments. To address this problem, Exeter administers the First Time Homebuyer Program (FTHB), a special low-interest, deferred-payment loan program designed to provide up to 49 percent of the financing amount.

Applicants must demonstrate financial need and pre-approval for a first mortgage; the second mortgage will be financed as a three percent-interest, 30-year deferred loan payment. The City does not currently have grant funds to implement the first-time homebuyer program but is pursuing options to regain funding for the program. Potential funding to support this program includes the HOME Investment Partnerships Program (HOME), California Housing Finance Agency (CalHFA), Community Development Block Grant (CDBG), and HCD's Cal Home Program funds.

B3.2.3.4 Mortgage and Rehabilitation Financing

The availability of financing affects the ability of residents to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The primary purpose of reviewing the lending activity is to determine whether home financing is available to City

residents. The data presented in this section includes the disposition of loan applications submitted to financial institutions for home mortgages, home improvement, and refinance loans.

Lending activity data provides information regarding home financing availability for City residents. The most recent data set available for the County of Tulare from 2022 shows that 18,154 households applied for a home financing loan which includes loans for home purchase, home improvement, and refinancing. As discussed in Chapter 3, *Regional Housing Constraints Analysis*, of the total applications received for home purchase 54 percent of the loans originated while 5.9 percent were denied.

Conventional loans are made by the private sector (banks, mortgage companies, etc.) and are not guaranteed or insured by the U.S. government. Conversely, government-backed loans, such as those issued by the Federal Housing Administration, Department of Veterans Affairs, and the Rural Housing Services/Farm Service Agency, are completely or partially insured by the U.S. government. Within the county, 12,849 of the applications received were for conventional loans and 5,305 were for government backed loans. As discussed in Chapter 3, *Regional Housing Constraints Analysis*, 49 percent of the conventional loans were originated, and 18 percent of the applications were denied. Additionally, 43 percent of the government backed loans originated and 10 percent of the applications were denied.

County data shows that the white racial group had the highest number of loan applications with 5,463 applications. Per racial group, white applicants also had the highest percentage of loans originated out of applications received with 56 percent. In terms of ethnicity, Hispanic/Latino applicants comprised 38 percent of the total number of loan applications while non-Hispanic or Latino residents comprised 29 percent. However, of the loan applications made by Hispanic/Latino applicants, only 53 percent of loans originated compared to 56 percent for non-Hispanic/Latino applicants. Hispanic/Latino applicants also had a higher loan denial rate (18 percent) compared to non-Hispanic/Latino applicants (15.5 percent). Institutionally low wages are likely a contributing factor to higher denial rates among Hispanic/Latino applicants, as many Hispanic/Latino residents work in agriculture, which is one of the lowest paying employment sectors in the state.

The City of Exeter's Housing Rehabilitation Program, administered by Self-Help Enterprises and funded by the CDBG Fund, distributes loans to low-income owner- and tenant-occupied households to achieve cost-effective repairs. Priority is accorded to health and safety needs, followed by energy conservation needs, extension of the unit's useful life, and converting to the Uniform Building Code.

B3.2.3.5 Construction Financing Timing

The timing between project approval and requests for building permits affects project viability. Project delays may result from developers' inability to secure financing for construction. In Exeter, the average time between project approval and request for building permit is typically one to nine months but varies by type of project. Some projects take years to pull building permits and secure financing. Single-family homes usually experience the least delay (one to three months). Multifamily housing construction tends to be more complex and usually requires more time between entitlement and building permit issuance (ten to twelve).

Conclusion

Although discrimination in mortgage lending is prohibited by the federal Fair Housing Act, other factors may contribute to a potential homebuyer's ability to secure safe financing, such as credit history, savings, and education regarding the home-buying process. Federal Financial Institutions Examination Council (FFIEC) HMDA data does not provide insight into these other factors. Therefore, it is important that the City supports housing opportunities for all residents.

Recommended Action

The City shall implement goals and policies to support homeownership opportunities and home-buying education, particularly for racial and ethnic groups underrepresented in the homebuying market. The City will implement Housing Plan Program 12 to assist in the development of housing for lower-income households and to pursue funding options to regain funding for the First Time Homebuyer Program.

B3.2.4 Requests for Lower Development Densities

Exeter does not receive a high volume of development proposals, but it is not uncommon for residential projects to not achieve maximum allowable density due to market demand for lower-density projects, for the following reasons:

- Homebuilders usually have a set of building plans that fit a certain lot size and are reluctant to produce a new set of plans due to the cost. Recently, homebuilders have prepared plans for 5,000 square foot lots, which would permit the homebuilder to achieve the zoning district's maximum allowable density.
- If the subdivision's circulation system does not follow a grid pattern, a certain percentage of lots are "elbow" and "cul-de-sac" lots which are significantly larger than the permitted minimum lot size, thus constraining the total number of units developed.
- Developers have sought large front, rear and even side yards for custom lots due to market preferences.

The development of projects at lower than maximum allowed densities is often driven by market preferences for the inclusion of certain project features and is not necessarily due to any singular code requirement. However, these market preferences can limit the ability for the City to meet the RHNA. During the 5th housing cycle, Exeter started to increase achieved densities by processing single-family subdivisions with a planned development overlay district, which allows smaller lots and deviations from lot standards (i.e. front yard setbacks, location of porches, and rear yard setbacks).

For development that will count toward the current (6th Cycle) Housing Element, the two projects listed as pipeline projects in Chapter 4, *Housing Resources and Site Inventory Analysis* (Morgan and Smee Homes / Yokohl Landing) propose 44 and 36 units, respectively, meeting the minimum density allowed for each site. The Morgan project is approved in the RM-1.5 zone with a maximum allowable density of 29 dwelling units per acre and a built density of 34 dwelling units per acre based on an approved density bonus. The Smee Homes project is approved in the R-1-6 zone with a maximum allowable density of 7.26 dwelling units per acre and built density of 3.65 dwelling units per acre. These projects reach an average percentage of maximum allowable density of 84 percent. These built densities are generally consistent with assumptions in the Site Inventory (*Chapter B4, Housing Resources and Site Inventory Analysis*, Section B4.4.2) at 75 percent of maximum allowable densities.

Through Program 2, the City will monitor its progress toward its RHNA obligations and ensure development continues to occur at densities sufficient to meet the assumptions in the Site Inventory and its RHNA obligations.

B3.3 Governmental Constraints

Although local governments have little influence on market factors such as interest rates, local policies and regulations can impact where, how much, and what type of residential development is built. Land use controls, site improvement requirements, fees and exactions, and permit processing procedures,

among other policies and regulations, may constrain the maintenance, development, and improvement of housing.

B3.3.1 Land Use Controls

Land use controls provided in the general plan and the zoning code influence housing production in several ways. The permitted and conditionally permitted uses in each district guide new development and provide both developers and the public with an understanding of how vacant land will develop in the future. This includes the density of development that will occur within a particular zone, the compatibility of planned uses in each area, and the range and type of buildings and uses that will be located throughout Exeter.

B3.3.1.1 General Plan

The City of Exeter's General Plan was adopted in March 2003 and was intended to serve the community until 2020 but has yet to be updated.

The Exeter General Plan contains the following residential land use designations:

- Very Low Density Residential: maximum of 2 units per acre, or six persons per acre.
- Low Density: maximum of 5 units per acre, or 14 persons per acre.
- Medium Density: maximum of 15 units per acre, or 42 persons per acre.
- High Density: maximum of 29 units per acre, or 84 persons per acre.

Conclusion

The General Plan includes four residential land use designations with a density range from zero to 29 dwelling units per acre. The maximum density of six persons per acre for Very Low Density Residential is a constraint to housing as it does not allow for more than one unit per acre with a household of six or fewer residents, which is an impediment to the development of large residential care facilities and affordable housing.

Recommended Action

Remove the requirement of a maximum of six persons per acre for the Very Low Density Residential land use designation. The City will implement Housing Plan Program 7 to remove the requirement of a maximum of six persons per acre for the Very Low Density Residential areas.

B3.3.1.2 Zoning Code

The City regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance, as well as specific plan development codes. A zoning district is assigned to every parcel in the city, and the Zoning Ordinance identifies compatible uses. In general, the City's zoning regulations are designed to balance the goal of providing a mix of residential and commercial land use types while protecting the health and safety of residents and preserving the character of existing neighborhoods. Additionally, development standards such as setbacks, height limits, lot coverage, open space requirements, and parking are identified for each zoning district. Some zoning districts may allow similar uses but have different development standards. Development standards may be considered a constraint to the development of housing units if they are too restrictive or reduce the development potential on a parcel.

The City's Zoning Code allows residential uses in the following districts:

- **Agriculture (A):** The purpose of the A district is to preserve lands for long-term agricultural uses within the city limits of Exeter. The application of this zone will protect lands utilized for raising crops, livestock, and horticultural specialties from urban encroachment. The A district allows for single family dwellings as a permitted use. The minimum site area is 20 acres.
- **Urban Reserve (UR):** The purpose of the UR district is to preserve undeveloped land, including agricultural lands within the city limits of Exeter as open space until such time as the conversion to an urban use is determined to be appropriate and feasible. The UR district allows for single family dwellings as a permitted use. The minimum site area is 20 acres.
- **Rural Agriculture (RA):** The purpose of the RA district is to provide residential living areas which combine certain advantages of both urban and rural locations at very low residential densities. The RA district allows for single family dwellings as a permitted use. The minimum site area is 20,000 square feet.
- **Single Family Residential (R-1):** The purpose of the R-1 district is to provide living areas within Exeter where development is consistent with the Exeter General Plan and is limited to low density concentrations of single family dwellings and where regulations are designed to promote the following: (1) encourage a suitable environment for family life, (2) provide space for community facilities, including parks, schools, churches, and other facilities that will complement the residential environment, (3) a circulation system that is pedestrian-friendly, is properly connected to the community at-large and adjacent residential developments, and provides for alternative forms of transportation, (4) an attractive and unique neighborhood design that ranges from streetscape to the residential dwellings themselves, and (5) the conservation of valuable resources ranging from water to energy. Table B3-4 provides the minimum site area requirements for each R-1 district.
- **Multifamily Residential (RM):** the purpose of the RM districts is to provide living areas within Exeter where development is consistent with the Exeter General Plan and is limited to medium and high density concentrations of multifamily dwellings, and where regulations are designed to promote the following: (1) encourage a suitable environment for family life, recognizing that significant part of the multifamily population is adult, including senior citizens; (2) provide space for community facilities, including parks, schools, churches, and other facilities that will complement the residential environment; (3) an attractive and unique project that encompasses well-designed buildings with ample landscape and off-street parking; and (4) the conservation of valuable resources ranging from water to energy. The RM district allows for single family dwellings, duplexes, triplexes, ADUs, and multifamily apartments as permitted uses. The minimum site area is 3,000 square feet per unit for the RM-3 district and 1,500 square feet per unit for the RM-1.5 district.
- **Professional Office (PO):** The purpose of the PO district is to provide areas in Exeter where professional offices can be constructed outside of commercial districts; to provide opportunities for older residential dwellings to be converted to an office use; and to protect offices from noise, disturbances, traffic hazards and other objectionable influences which would adversely affect professional practices from being exercised. The PO district allows for single family and multifamily residential as permitted uses. The minimum site area is 3,000 square feet per unit.
- **Mixed Use (MU):** the purpose of the MU district is to implement the goals and policies of the Exeter General Plan, Land Use Element; the Exeter Downtown Specific Plan and the Southwest Exeter Specific Plan. The MU district is intended to allow for a combination of residential, office and commercial uses. The district does not permit service commercial or industrial uses given that these land use categories can create noise, odor, vibration, visual and traffic impacts that would adversely

impact adjoining uses in the mixed-use project. The MU district allows for all residential dwellings as conditional uses in accordance with the R-1, RM, CN, and PO districts.

- **Neighborhood Commercial (CN):** The purpose of the Neighborhood Commercial district is to provide for the development of small scale, low intensity commercial uses that serve the daily needs of residential neighborhoods that are in close proximity to the shopping center. The design of neighborhood commercial centers shall be of a scale and design that is compatible with the surrounding residential neighborhoods. In addition, the design of the centers should provide for pedestrian access from surrounding neighborhoods. Single family dwellings are allowed by conditional use if the person or persons owning or operating the commercial use on the same site. The single-family dwellings in the CN district are subject to the use, site area, coverage, and yard requirements of the R-3 district.
- **Central Commercial (CC):** The purpose of the CC district is to serve as the central district of Exeter. This district permits the accommodation and enhancement of several existing dominant functions within the central business district including shopping, retailing goods, office uses, financial, government, retail, and entertainment. Apartments over or behind permitted uses consistent with the standards of the RM-1.5 district are permitted.
- **Planned Development Overlay (PD):** The purpose of the PD zone is to promote development designs that respond to significant planning-related issues facing Valley cities, including urbanization of agricultural land, air quality, housing affordability, traffic, aesthetics, and neighborhood deterioration. This new approach to development design has been popularized by the term “smart growth”. The following development standards together with applicable standards specified in the single-family residential base zone shall apply to all land and structures within this planned development overlay district. Single family residential development requires a minimum site area of one acre and the density for this district shall not exceed the density permitted by the base zone district. The minimum site area for multifamily residential districts is one-half acre and the density for this district shall not exceed the density permitted by the base zone district.

Conclusion

The City’s Zoning Code provides for a range of densities and is consistent with the General Plan land use designations.

Recommended Action

None required.

B3.3.2 Residential Development Standards

Table B3-4 shows the development standards for residential zones. The minimum parcel area for residential zones ranges from 1,500 square feet to 20 acres. Front setback ranges from 15 to 25 feet for all residential districts and 15 to 35 feet for all non-residential districts. Side setback ranges from 5 to 12 feet for residential districts, and 5 to 10 feet for nonresidential. Rear setback ranges from 10 to 25 feet for all residential and nonresidential districts. The maximum height standard is 35 feet for all districts (except the CC district, where the maximum height is 45 feet), and 15 feet for accessory units. There is no limit to the number of stories; development is governed only by the applicable height standard. Maximum site coverage ranges from 40 to 65 percent of the lot area. Maximum density ranges from two units per acre in the agricultural districts to 29.04 units per acre in the RM-1.5 and CC districts.

Table B3-4 Residential Development Standards

Zoning District	Minimum Parcel Area	Minimum Setback (in feet)			Maximum Height (feet)	Maximum Height (Accessory Structure)	Maximum Site Coverage (percent of lot)	Maximum Density (du/acre)
		Front (feet)	Side (feet)	Rear (feet)				
A	20 acres	35	10	25	35	–	–	2
UR	20 acres	35	10	25	35	–	–	2
RA	20,000 sq. ft.	30	10	25	35	–	–	2
R-1-5	5,000 sq. ft.	15	5	15	35	15	40	8.71
R-1-6	6,000 sq. ft.	20	5	20	35	15	40	7.26
R-1-7.5	7,500 sq. ft.	20	5	20	35	15	40	5.81
R-1-10	10,000 sq. ft.	25	5 and 12	25	35	15	40	4.36
RM-3	3,000 sq. ft.	20	5	20	35	15	50	14.52
RM-1.5	1,500 sq. ft.	15	5	10	35	15	65	29.04
PO	6,000 sq. ft.	15	5	10	35	15	60	7.26
CN	6,000 sq. ft.	15	10	10	35	15	–	7.26
CC	1,500 sq. ft.	15	5	10	45	15	65	29.04

Source: Exeter Zoning Code, Updated July 2018.

The City has recently received requests for concessions related to development standards, such as setbacks and parking requirements, to adapt to site-specific constraints. These requests are currently accommodated through minor deviations, variances, and density bonuses.

Conclusion

The City's requirements for minimum parcel area, setbacks, heights, site coverage, and density do not pose a constraint to residential development as the City accommodates requests in the form of minor deviations, variances, and density bonuses. The height requirement of 35 feet in the AN, RA, and RM zones does not constrain the development of three-story buildings. In addition, to ensure that the height requirement is not a constraint for higher density multifamily development, the City will amend the RM-3, RM-1.5, and CC districts to increase the permissible height requirement to 40 feet.

Recommended Action

Housing Plan Program 6 directs the City to amend the maximum allowable height requirement for the RM-3, RM-1.5, and CC zoning districts from 35 feet to 40 feet.

B3.3.2.1 Parking

According to the Turner Center for Housing Innovation at UC Berkeley, parking can cost \$25,000 to \$75,000 per space to construct. However, given the age of data and the increased cost of land and construction costs discussed above, the costs per parking space are likely much higher.¹ Parking provided in underground or structured parking facilities, or if required to be covered or enclosed, can significantly increase the cost of housing and could affect the feasibility of various housing projects in the city. In addition, requirements for parking space locations and maximum distances from dwelling units may also increase the cost of housing and affect the feasibility of housing projects. Requiring less

¹ Turner Center for Housing Innovation at UC Berkeley, 2016. Available at: <http://turnercenter2.berkeley.edu/proforma/>

parking not only reduces the project budget but can allow for more space to build additional housing units.

Table B3-5 provides the residential parking requirements in Exeter.

Table B3-5 Residential Parking Requirements

Residential Use		Required Parking Spaces
Single family units		2 per unit
Condominium units	One bedroom	1 per unit
	Two or more bedrooms	2 per unit
Multifamily units		1.5 per unit
Senior residential units		1 per unit
Spaces for single family units require a garage or carport.		
Half of multifamily parking spaces must be covered.		
Source: Exeter Zoning Code, Updated July 2018.		

Conclusion

The residential parking requirements may pose a constraint to residential development of studio or one-bedroom multifamily units due to the requirement of more than one parking space per unit, which can be cost prohibitive to the development of such units.

Recommended Action

Revise the Zoning Code to amend the parking requirements related to studios and one bedroom multifamily units to decrease the number of spaces required per unit. The City will implement Housing Plan Program 6 to amend the Zoning Code to amend the parking requirements related to studios and one-bedroom multifamily units to require no more than one space per unit.

B3.3.2.2 Open Space and Park Requirements

The Zoning Code does not include open space or park requirements beyond the setback and maximum site coverage requirements identified in Table B3-4 above.

Conclusion

Open space and park requirements are not a constraint to the development of housing.

Recommended Action

None required.

B3.3.2.3 Density Bonus

Chapter 17.58 of the Exeter Municipal Code establishes the City's density bonus policy. The City provides a density bonus and other incentives or concessions to applicants for residential projects who agree to provide affordable or senior housing pursuant to the provisions of Government Code Sections 65915 through 65918 or successor statute. Density bonus requirements are triggered when a residential development sets aside at least 10 percent of the total units as affordable to low-income households; or

at least five percent of the total units as affordable to very low-income households; or at least 10 percent of the total units as affordable for moderate income households.

Development concessions or incentives that may be provided by the City of Exeter include a reduction in site development standards; a modification of Zoning Code requirements (including a reduction in setbacks, square footage requirements, or parking spaces; or architectural design requirements which exceed the minimum building standards); approval of mixed use zoning in conjunction with the housing project if commercial, office, industrial, or other land uses will reduce the cost of the housing development, and if such nonresidential uses are compatible with the project; or other regulatory incentives or concessions proposed by the developer or the City of Exeter which result in identifiable cost reductions. The base density of a property for which a density bonus is being requested shall be determined by the property's zoning. A housing development may qualify for a minimum increase or density bonus of 35 percent over the maximum number of permitted residential units of the property's zoning.

A project that receives a density bonus and concession or incentive must retain affordability of the units for at least 30 years.

Application and Approval Process

An application for a density bonus shall be made to the Planning Department on a form prescribed by the Department. A fee set by resolution of the City Council shall accompany the application.

The Planning Department shall prepare a report on the density bonus application. The Department shall provide a recommendation based on the following density bonus requirements.

- A. The housing development qualifies for a density bonus based on the requirements outlined in Government Code Sections 65915 to 65918.
- B. The applicant has provided to the City the legal instrument that will insure that "target households" will remain affordable for at least 30 years.
- C. The application has selected a developer incentive or concession.

Following the Planning Commission's review of the Planning Department's report on the applicant's request for a density bonus, the Commission shall act on the density bonus application based on the regulations contained in Government Code Sections 65915 to 65918. The Commission can approve, approve with conditions, or deny the density bonus. Denial of a density bonus application shall require findings consistent with those in Government Code Sections 65915 to 65918.

Assembly Bill 1287 Additional Density Bonus for Very Low- to Moderate-income Units

California Assembly Bill 1287, signed into law on June 21, 2023, requires that a city, county, or city and county grant an additional density bonus. Additional density bonuses are to be administered when housing development conforms to specified requirements and provides 24 percent of the total units to lower income households, conforms to specified requirements and provides 15 percent of the total units to very low households, or conforms to specified requirements and provides 44 percent of the total units to moderate-income units.

The Density Bonus Law prohibits a local government from conditioning the submission, review, or approval of an application pursuant to the Density Bonus Law on the preparation of an additional report or study that is not otherwise required by state law, but provides that this provision does not prohibit a

local government from requiring an applicant to provide reasonable documentation to establish eligibility for a requested density bonus, incentives or concessions, waivers or reductions of development standards, and parking ratios, as specified.

Conclusion

Chapter 17.58: *Density Bonus* was last updated in 2017. The Zoning Code will be updated to include provisions related to density bonuses, incentives, and concessions as required by state law.

Recommended Action

Amend the Density Bonus Ordinance for compliance with state law. Housing Plan Program 6 requires the City to revise Zoning Code Chapter 17.58: *Density Bonus* to include provisions relative to density bonuses, incentives, and concessions as required by state law.

B3.3.2.4 On-/Off-Site Improvement Standards

On/off-site improvement standards establish infrastructure or site requirements to support new residential development such as streets, sidewalks, water and sewer, drainage, curbs and gutters, street signs, park dedications, utility easements and landscaping. These improvements are necessary to ensure that new housing meets Exeter's development goals, however, the cost of these requirements can represent a significant share of the cost of producing new housing in Exeter. As stated in HUD's study of Subdivision Requirements as a Regulatory Barrier, such requirements can reasonably be considered regulatory barriers to affordable housing if Exeter determines that the requirements are greater (and hence, more costly) than those necessary to achieve health and safety requirements in the community.²

Exeter requires housing developers to install a wide range of infrastructure improvements, including streets; curb, gutter, and sidewalks; water and sewer connections; landscaping; and storm drainage lines and basins. All these improvements are required by local ordinance to insure public health, safety and welfare in addition to quality-of-life measures. For example, by requiring the housing developer to install sidewalks, school-aged children and adults living in the development can safely walk to school and other destinations.

The other improvements mentioned above such as streets and sewer and water connections are typical requirements that all cities in California generally require. The cost of these improvements is built into the cost of the housing or rental unit.

Improvement Standards

Public improvement standards and approximate values are listed below.

- Local Street – 60-foot right-of-way, including 36 feet of pavement with two travel lanes and two parking lanes. 2 inches A.C. over 6 inches compacted aggregate. Value: range between \$4.00 to \$6.00/sf.
- Curb and Gutter – 30 inches from asphalt pavement to back of curb, 7 ½ inches concrete over compacted native soil. Value: \$25 to \$35 per linear foot, dependent upon method of construction.
- Sidewalk – 48 inches from back of curb, 4 inches concrete over compacted native soil. Value: range between \$7.00 to \$10.00/sf.

² U.S. HUD. 2007. Study of Subdivision Requirements as a Regulatory Barrier.
https://www.huduser.gov/portal/publications/commdev/subdiv_report.html

- Sewer Lateral – 4-inch PVC (dependent upon depth) with minimum slope of ¼-inch per foot. Value: range between \$3,000 to \$4,000/ea.
- 1-inch Water Service – 1 inch CTS copper pipe, meter boxes, bronze saddles, straps, and bolts. Value: range between \$4,000 to \$5,000/ea.

Based on a review of recent projects, typical off-site costs for a single-family development in Exeter total \$23,725 per unit, approximately 7.3 percent of total development costs of \$325,000. Comparatively, the costs for development in Tulare County range from \$2,500 to \$30,000 per unit for development in an existing service district.³ For multifamily development, off-site improvements total an estimated \$16,065 per unit, approximately 6.3 percent of total development costs of \$255,000 per unit. Costs for off-site improvements in Exeter are typical of the region. Given that Exeter has some of the lowest home prices and residential rental rates in the San Joaquin Valley, on/off-site improvements required of Exeter's housing projects do not have a significant adverse impact on the cost of housing.

Conclusion

On/off-site improvement standards for Exeter are typical of small cities and comparable to surrounding jurisdictions. These improvement costs, however necessary, can have a significant, cumulative impact on development; however, the City does not consider the requirements to be greater than those necessary to achieve health and safety requirements.

Recommended Action

None required. While the City's on-site and off-site improvement standards are not considered a considerable constraint to development, the City will implement Housing Plan Program 9 to further facilitate the development of affordable housing by allowing required improvements to be negotiated.

B3.3.2.5 Provision of a Variety of Housing Types

Housing Element law specifies that jurisdictions must identify adequate sites that are zoned to encourage the development of a variety of housing types available to all economic segments of the population. Persons and households of different ages, types, incomes, and lifestyles have a variety of housing needs and preferences that evolve over time and in response to changing life circumstances. This includes single-family homes, multifamily housing, accessory dwelling units, mobile homes, agricultural employee housing, homeless shelters, and transitional housing, among others. Table B3-6 summarizes the housing types permitted and conditionally permitted in Exeter.

³ County of Tulare. 2023. Tulare County Housing Element. <https://tularecounty.ca.gov/rma/planning-building/tulare-county-housing-element/tulare-county-housing-element-2023-2031-update/>

Table B3-6 Residential Use Matrix

Residential Use	A	UR	RA	R-1	RM	PO	CN	CC	MU
Single family dwelling	P	P	P	P	P	P	CUP*	NP	CUP
ADU	P	P	P	P	P	P	NP	NP	CUP
Guest houses	NP	NP	P	P	NP	NP	NP	NP	CUP
Manufactured homes	P	P	P	P	P	P	CUP*	NP	CUP
Duplex unit	NP	NP	NP	CUP	SPR	SPR	NP	NP	CUP
3 to 4 dwelling units	NP	NP	NP	NP	SPR	SPR	NP	P**	CUP
5 or more dwelling units	NP	NP	NP	NP	SPR	SPR	NP	P**	CUP
Mobile home park	NP	NP	NP	CUP	CUP	CUP	NP	NP	CUP
Transitional and Supportive Housing (six or fewer)	NP	NP	NP	P	P	NP	NP	P	CUP
Transitional and Supportive Housing (seven or more)	NP	NP	NP	NP	NP	NP	NP	NP	CUP
Rest homes	NP	NP	NP	CUP	CUP	CUP	NP	NP	CUP
Boarding homes	NP	NP	NP	NP	CUP	CUP	NP	NP	CUP
Rooming homes	NP	NP	NP	NP	CUP	CUP	NP	NP	CUP
Nursing homes	NP	NP	NP	NP	CUP	CUP	NP	NP	CUP
Labor camps	NP	NP	NP	NP	CUP	CUP	NP	NP	CUP
Sanitariums	NP	NP	NP	NP	CUP	CUP	NP	NP	CUP
Hotels/motels	NP	NP	NP	NP	NP	NP	NP	P	CUP
Emergency shelter	NP	NP	NP	NP	CUP	NP	NP	CUP	CUP
Group home/Residential Care Facility (six or fewer)	NP	NP	NP	P*	P*	P***	NP	NP	CUP
Group home/Residential Care Facility (seven or more)	NP	NP	NP	NP	NP	NP	NP	NP	NP

P = permitted; SPR = Site Plan Review; CUP= Conditional Use Permit; NP = Not Permitted

*Limited to the exclusive use of the person or persons owning or operating the commercial use on the same site

**Apartments permitted over or behind permitted uses consistent with the standards of the RM-1.5 district.

***Licensed group care homes only Source: Exeter Zoning Code, 2017.

Manufactured Housing

Manufactured housing is permitted by right in the A, UR, RA, R-1, RM, and PO, districts and can also be used as second units, same as traditionally built single-family homes. All residential districts permit the construction of manufactured homes, provided that they are placed on permanent foundations. Manufactured housing development requires a CUP in the CN district.

Conclusion

There are no undue constraints on manufactured housing.

Recommended Action

None required.

Accessory Dwelling Units

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

In 2022, two laws were passed that affect ADU law. SB 897 increases the existing height limit for attached and detached ADUs that meet certain conditions. AB 2221 clarifies existing ADU law to close procedural and permitting loopholes for approving ADUs, including the requirement for approving or denying applications within 60 days of application submittal and providing a full set of comments and remedies to applicants with denied applications. Additionally, AB 2221 adds front setbacks to the list of local development standards that local governments cannot impose if they would preclude construction of an attached or detached ADU of at least 800 square feet, that is at least 16 feet in height and that has at least 4-foot side and rear yard setbacks. This new legislation is in effect as of January 1, 2023.

Exeter processes applications for second units consistent with Government Code Section 65852.2. The Government Code has established guidelines for residents who wish to construct a second unit on their property. In accordance with state law, these applications are reviewed and approved at the staff level. They are not required to secure discretionary approval from the City. Criteria for second units include:

- No more than one additional dwelling unit is allowed on any one legal lot or parcel.
- The second unit may be attached to detached.
- The total floor area of the second unit cannot exceed 1,200 square feet.
- Second units must conform to setback requirements of the zoning district.
- Occupancy of the second unit shall be an immediate family member of the primary residence.
- The second dwelling unit shall incorporate the same or similar architectural features as the primary residence.
- One on-site parking spot (uncovered) is required per unit.

Although the City approves applications consistent with Government Code Section 65852.2, the Zoning Code has not been amended for consistency with recent changes to state law, which among other changes, allows up to two ADUs on a single parcel, reduces and provides exemptions to parking requirements, and requires ADUs to be allowed in mixed use and multifamily zones. ADUs are subject to an administrative plan check.

Conclusion

The City of Exeter's ADU Ordinance is not in compliance with current state legislation.⁴ Additionally, the second unit criteria that requires the occupant of the second unit to be an immediate family member is a constraint to available rental housing.

Recommended Action

Revise the Zoning Code to comply with state law by removing criteria that requires the occupant of the second unit to be an immediate family member. This change will be implemented through Housing Plan Program 5, which directs the City to amend the Zoning Code to be in compliance with state ADU law, and implements strategies to expedite the ADU permitting process, promote development in targeted geographic areas, and to encourage affordability of ADUs.

Multifamily

Duplexes, 3- to 4-unit residential, and five- or more unit residential developments require a Site Plan Review in the RM and PO districts. Duplexes are also allowed with a CUP in the R-1 district. Multifamily uses consistent with the RM-1.5 district are permitted in conjunction with an allowed use in CC districts. The MU district permits residential uses consistent with the R-1, RM-3, or RM-1.5 districts by CUP. Multifamily uses in accordance with the RM-3 district are allowed uses in the PO district. The Zoning Code also requires all multifamily projects that contain 16 or more units to provide an on-site manager, which poses a constraint development.

Conclusion

The requirement for multifamily developments of 16 or more units to provide an onsite manager is a constraint to development as it adds additional costs. Additionally, allowing single-family residences by-right in multifamily zones potentially constrains the development of multifamily housing.

Recommended Action

Revise the Zoning Code to remove the requirement of an on-site manager for multifamily developments of 16 or more units and to prohibit single-family uses in RM districts. These changes will be implemented through Housing Plan Program 6, which directs the City to amend the Zoning Code.

Community Care Facilities

Community Care Facilities are defined by the City as any facility, place or building operated to provide non-medical care to children and adults, including children and adults with physical or mental disabilities. A residential facility is a family home, group care facility, or similar assisted living arrangement providing 24-hour non-medical services. Exeter allows licensed group care homes with six

⁴ State laws governing ADUs since 2017: Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019), Assembly Bill 3182 (2020), Assembly Bill 345 (2021), Assembly Bill 2221 (2022), Senate Bill 897 (2022), Assembly Bill 345 (2022).

or fewer persons in the R-1 and R-M zones. Exeter's zoning ordinance does not specifically permit residential care facilities or group homes for more than six persons in the R-1 and R-M zones, although it allows "public and private charitable institutions, hospitals, convalescent homes, sanitariums, or rest homes for mental, drug or alcoholic cases" with a CUP without specifying the number of persons permitted. The RM zone also allows "rest homes and nursing homes" with a CUP. The City permits "single and multi-family uses in accordance with the RM-3 district" in the PO zone, which implies that licensed group care homes with six or fewer persons are permitted in that zone. The PO zone, which permits single-family development without a CUP, allows "public and private charitable institutions, hospitals and sanitariums, rest homes or nursing homes, or group homes for the mentally handicapped, or drug or alcohol addicted" with a CUP but does not specify the number of persons permitted. All development permitted by-right or with a CUP in the R-1, RM-3, RM-1.5, CN, PO, or CC zones is permitted in the MU zone with a CUP.

A project permitted with a CUP is required to be processed through the City's Site Plan Review process, which includes a hearing before the Planning Commission. Typically, the City does not impose special design conditions on these types of projects. For projects requiring a CUP in established residential neighborhoods, planning staff require the design of the dwelling to be consistent with the local neighborhood, although the City will require additional parking beyond the standards for a similar type of dwelling in the same zone if determined to be necessary. Additionally, residential facilities are not allowed to be located within 0.25-mile of a similar facility. If structural improvements are required for an existing residential facility, a building permit would be required. If a new structure is proposed for use as a residential facility, design review would be required like any other new residential structure. The City's design review process has not been used to deny or substantially modify a housing project for persons with disabilities to the point where it is no longer feasible. All residential projects in the city require the same level of design review.

Conclusion

The requirements for review and public hearings, licensing, specificity of use or care, additional parking, and proximity are constraints for the development of community care facilities/residential facilities for six or fewer and more than six persons.

Recommended Action

Revise the Zoning Ordinance to allow residential facilities of six and fewer and seven or more residents in all zones that permit residential uses, approved with objectivity and certainty, and subject only to the requirements of residential uses of similar type and form, regardless of licensing status or type of care. This will be implemented by Housing Plan Program 6, which directs the City to revise the Zoning Code to address these changes.

Emergency Shelters

The City of Exeter permits emergency shelters with a CUP in the RM and CC districts. This requirement is not in accordance with Senate Bill 2 (Government Code Section 65583), which requires every jurisdiction to identify at least one zone where emergency shelters are allowed as a permitted use without a CUP or other discretionary permit. Additionally, the City requires one parking stall for every four beds in the shelter. This requirement is not compliant with AB 2339 which requires cities to only require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. The City does not have other development standards or requirements for emergency shelters.

In 2019, AB 101 was passed requiring that a Low Barrier Navigation Center development be a use by right in mixed uses zones and nonresidential zones permitting multifamily uses if it meets specified requirements. A Low Barrier Navigation Center is a low barrier, temporary, service-enriched shelter that helps homeless individuals and families obtain permanent housing. The City will need to amend its Zoning Code to explicitly allow the development of Low-Barrier Navigation Centers, by-right, in mixed-use zones and nonresidential zones permitting multifamily uses.

AB 2339 was passed in 2022 and went into effect January 1, 2023. AB 2339 requires that jurisdictions identify zoning designations where emergency shelters are allowed. The identified sites must meet at least one of the following:

- Vacant and zoned for residential use;
- Vacant and zoned for nonresidential use and located near amenities and services for homeless individuals;
- Nonvacant and is suitable for use as a shelter in the current planning period.

Identified sites must have a minimum area of 200 square feet per person to show that it may accommodate the number of people experiencing homelessness and the zoning designations identified to allow emergency shelters as a permitted use without a discretionary permit must allow residential uses. Additionally, AB 2339 requires that emergency shelters can only be subject to parking requirements such that the jurisdiction can require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.

The Kings/Tulare County Point-in-time count estimated that 1,053 people experienced homelessness in Tulare County in 2023, including 299 in Porterville, 284 in Tulare, and 434 in Visalia and 36 in the remainder of the county areas including Exeter. In Exeter, 7,200 square feet or 0.17 acres of land are required to shelter the estimated 36 individuals from the 2023 PIT, using 200 square feet per person, pursuant to AB 2339.

Exeter permits emergency shelters through a CUP in the R-M zone and CC zone. Both zones permit residential development by-right. There are nine parcels in the R-M zone that permit emergency shelters through a CUP and are within 0.5-mile of a public transit stop. Currently, there are a variety of uses occupying six of these available parcels that include commercial developments, condominiums, and pastures. However, there are three sites that are vacant. To meet the requirements of AB 2339, the City would need at least 7,200 square feet of land. Table B3-7 shows that if the City allows emergency shelters permitted by-right in the R-M zoning district, there would be sufficient capacity on the vacant sites and would not be considered a constraint.

Table B3-7 Capacity Analysis

APN	Acreage	Realistic Capacity (beds)	Vacant or Non-vacant
135072016	0.17	36	Vacant
135092008	0.31	68	Vacant
138122018	0.11	24	Vacant
Total Capacity	1.18	128	–

Source: City of Exeter and Tulare County 2023

APNs 135072016 is located on S Orange Avenue and is within walking distance of a bus stop at W Firebaugh Ave and I Street (Route 9 of Visalia Transit), and a 20-minute bus ride to Exeter Food Closet, Sequoia Youth Services, and other service organizations. APN 135092008 is located at W Firebaugh Ave and I street, also close to the bus stop. APN 138122018 is located at N Orange Street and Vine Street, an 18-minute walk to the W Firebaugh Avenue bus stop, a 16-minute walk to Exeter Food Closet, a 25-minute walk to Sequoia Youth Services, and a 10-minute walk to grocery stores and other commercial services. These parcels are as close or closer to transit and services than most parcels in the city.

Conclusion

Permit requirements for emergency shelters are not in accordance with state law, which states that jurisdictions must permit low barrier navigation centers in all mixed-use and non-residential zones where multifamily housing is permitted. Exeter only permits emergency shelters in the R-M and CC zones with approval of a CUP and requires more parking than directed by state law.

Recommended Action

Revise the Zoning Code to allow emergency shelters by-right in at the R-M zoning district. Revise the Zoning Code to be consistent with AB 2339, expanding the definition of emergency shelters to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care as well as ensuring emergency shelters are only subject to objective development standards that apply to residential to commercial development within the same zone. Additionally, revise parking requirements for emergency shelters to comply with AB 2339.

In addition, the City should revise the Zoning Code to allow low barrier navigation centers by right in the PO and CC zones, in compliance with AB 101. The City will implement Housing Plan Program 1 to encourage and coordinate development of emergency shelters and low-barrier navigation centers. The City will also implement Housing Plan Program 6 to revise the Zoning Code to allow emergency shelters by-right in at the R-M zoning district and expand the definition of emergency shelters to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care as well as ensuring emergency shelters are only subject to objective development standards that apply to residential to commercial development within the same zone, and revise parking standards for emergency shelters in order to comply with AB 2339. The City will also permit low-barrier navigation centers in all mixed-use and nonresidential zones where multifamily housing is permitted.

Transitional and Supportive Housing

“Transitional housing” is defined as buildings configured as rental housing operating under program requirements that require the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months from the beginning of the assistance. Transitional housing units are residential uses subject only to those requirements and restrictions that apply to other residential uses of the same type in the same zone.

“Supportive housing” is defined as housing with no limit on length of stay that is occupied by the target population and that is linked to on-site or off-site services that assist the supportive housing resident in retaining permanent housing, health services, and employment, as needed. Supportive housing units are residential uses subject only to those requirements and restrictions that apply to other residential uses of the same type in the same zone. AB 2162, which went into effect on January 1, 2019, requires that cities allow supportive housing with up to 50 units by-right in multifamily and mixed-use zones and

precludes cities from imposing parking requirements on supportive housing developments located within 0.5-mile of a public transit stop.

Transitional and supportive housing is allowed by right in the R-1 and RM districts. Government Code Section 65583 requires that supportive housing be considered a residential use and subject to only those restrictions that apply to other residential dwellings of the same type in the same zone.

Conclusion

Transitional and supportive housing are permitted as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. In addition, the City does not permit supportive housing by-right in all zones where multifamily and mixed uses are permitted. These requirements for transitional and supportive housing do not comply with state requirements. As the City's Zoning Code is not consistent with the requirements of AB 2126, this is considered a constraint to housing for individuals in need of supportive housing options.

Recommended Action

Amend the Zoning Ordinance to comply with SB 745 to ensure that transitional and supportive housing is permitted as a residential use and is similarly permitted and only subject to the same standards of the same type in the same zone.

Revise the Zoning Code to comply with AB 2162, whereby certain supportive housing meeting specific criteria are to be permitted by right in all zones where multifamily housing is also permitted (including nonresidential zones). For such supportive housing locating within half-mile from transit, no minimum parking can be required. The City will implement Housing Plan Program and 6 to amend the Zoning Code as appropriate.

Farmworker Housing/Employee Housing

The Employee Housing Act (Health & Safety Code Section 17021.6) requires that any employee housing consisting of no more than 36 beds in a group quarter or 12 units or spaces designed for use by a single family or household shall be deemed an agricultural land use for the purposes of this section. For the purpose of all local ordinances, employee housing shall not be deemed a use that implies that the employee housing is an activity that differs in any other way from an agricultural use. No conditional use permit, zoning variance, or other zoning clearance shall be required of employee housing that is not required of any other agricultural activity in the same zone. The permitted occupancy in employee housing in a zone allowing agricultural uses shall include agricultural employees who do not work on the property where the employee housing is located.

In Exeter, labor camp housing is primarily occupied by farmworkers and is allowed with a CUP in the RM and PO districts. Farmworkers and other employee housing are allowed in the form of boarding homes and rooming homes are permitted in agricultural zones, both of which are allowed with a CUP in the RM and PO districts.

There are no zoning districts that allow farmworker or employee housing by right, which is not in accordance with the Employee Housing Act.

Conclusion

The City's Zoning Code does not comply with state law regarding agricultural employee housing. Farmworker and employee housing is not permitted in any of the City's agricultural zones. Employee housing requires a CUP in the RM and PO zones.

Recommended Action

Revise the Zoning Code to ensure compliance with the Employee Housing Act (Health & Safety Code Section 17021.6). The City will implement Housing Plan Program 6 to amend the Zoning Code to allow employee housing of up to 36 beds or 12 single-family units as a permitted use in all agricultural zones.

Single Room Occupancy Units (SROs)

Exeter allows SROs with a CUP in all residential districts.

Conclusion

Exeter's Zoning Code allows the development of SROs with a CUP. Requiring a CUP may be considered a constraint to development.

Recommended Action

The City will implement Housing Plan Program 6 to amend the Zoning Code to establish SRO as a permitted use in zones where multifamily and mixed-use residential developments are permitted.

B3.3.3 Housing for Persons with Disabilities

California Government Code Section 65583 requires local jurisdictions to analyze potential and actual government constraints on the maintenance, improvement, and development of housing for people with disabilities. This is to ensure that persons with either physical or mental disabilities are provided reasonable accommodation for access to and the enjoyment of all facilities, including housing. Government Code Section 65583(c)(3) also requires housing elements to provide a program to "...address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing for persons with disabilities."

This section analyzes if the zoning policies and permitting procedures in Exeter impose any constraints to persons with disabilities accessing appropriate and adequate housing in the city.

B3.3.3.1 Definition of Family

Local jurisdictions may restrict access to housing for households that do not meet the jurisdiction's definition for "family." A restrictive definition of "family" that limits the number of individuals living together may illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated. The City of Exeter's definition of family is as follows:

An individual or two or more persons related by blood, marriage, or adoption or a group of not more than five persons, not including servants, who need not be related by blood, marriage, or adoption, living as a single housekeeping unit.

Conclusion

The City of Exeter's definition of "family" is overly restrictive.

Recommended Action

The City will implement Housing Plan Program 6 to revise the Zoning Code definition of "family" to mean all persons, related and unrelated, who occupy a single housing unit.

B3.3.3.2 Reasonable Accommodation Procedures

The federal Fair Housing Act and the California Fair Employment and Housing Act require that cities and counties provide reasonable accommodation where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. Cities and counties must also consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be “reasonable” based on fair housing laws and the case law interpreting the statutes.

Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. These accommodations require that local jurisdictions make modifications or exceptions in their zoning laws and other land-use regulations when accommodations are necessary to afford individuals with disabilities an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that a paved path of travel can be provided to residents with mobility impairments.

Reasonable accommodation enables developers and providers of housing for people with disabilities a means of requesting from the local government flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing.

Section 17.62 of the Municipal Code establishes a procedure for making requests for reasonable accommodation in land use, zoning and building regulations, policies, practices, and procedures of the jurisdiction to comply fully with the intent and purpose of fair housing laws. A request for reasonable accommodation may be made by an individual with a disability, his or her representative, or a developer or provider of housing for individuals with disabilities, when the application of a land use, zoning, or building regulation, policy, practice, or procedure acts as a barrier to fair housing opportunities. Any eligible person as defined in Section 17.62.02 may request reasonable accommodation in land use, zoning and building regulations, policies, practices, and procedures.

Action by the Planning Director

Reasonable accommodation applications are processed as an administrative matter. The Planning Director can approve, approve with conditions, or deny the application based on the findings listed below. Following a decision by the Planning Director, an administrative agreement is prepared, consistent with Section 17.63: *Administrative Agreement*, that outlines the findings and conditions of the decision. The decision is made within 30 days of receiving the application. The written decision of the Planning Director is final unless appealed to the Planning Commission consistent with the requirements contained in Section 17.06: *Appeals*.

The Planning Director shall render a decision based on the following findings.

- A. The Exeter Housing Element contains policies and action programs that remove governmental constraints to housing for individuals with disabilities, including local land use and zoning constraints.
- B. The Attorney General of the State of California has recommended that cities and counties implement fair housing reasonable accommodation procedures for making land use and zoning determinations concerning individuals with disabilities.
- C. A fair housing reasonable accommodation will ensure Exeter’s compliance with federal and state fair housing laws and provide greater opportunities for the development of critically needed housing for individuals with disabilities.

- D. Whether the housing, which is the subject of the request for reasonable accommodation, will be used by an individual with disabilities protected under fair housing laws.
- E. Whether the requested accommodation is necessary to make housing available to an individual with disabilities protected under the fair share housing laws.
- F. Whether the requested accommodation would impose an undue financial or administrative burden on the City of Exeter.
- G. Whether the requested accommodation would require a fundamental alteration in the nature of the jurisdiction's land use and zoning or building codes.

Conclusion

Exeter provides a 30-day administrative process for requesting and approving reasonable accommodation. While information on requirements and procedure of reasonable accommodation requests is described in the Zoning Ordinance, this information is not readily accessible to the general public.

Recommended Action

None required. While there is not an identified constraint in regard to reasonable accommodation, Housing Plan Program 12 directs the City to provide a link to its Reasonable Accommodations policy on the Housing page of the City's website and include contact information for City Staff that oversee the application process.

B3.3.3.3 Building Codes and Enforcement

The City of Exeter adopted the California Building Code, 1997 Edition, which regulates the access and adaptability of buildings to accommodate persons with disabilities. California Building Standards Code and Federal Americans with Disabilities Act (ADA) is assessed and enforced by the Building Division as part of the plan check and building permit issuance process. The City's Code Enforcement, which is under the Prevention Division, enforces the local laws of the Municipal Code and investigates violations related to housing, zoning, weed abatement and all codes specifically designed to address blight and nuisances. Most of the code enforcement violations are resolved through an administrative process; others may be resolved through civil or criminal processes. The City enforces Title 24 of the California Code of Regulations, which regulates the access and adaptability of buildings to accommodate persons with disabilities. Compliance with provisions including the California Building Standards Code, is reviewed, and enforced by the Building Division as a part of the building permit submittal.

Exeter implements a local amendment to the California Building Code, which requires all new construction and/or substantial improvement (including prefabricated and mobile homes) to have a minimum floor elevation of at least 18 inches above the top of the nearest street curb, or, above the crown of the nearest street if no street curb is nearby. The requirement may be met, in the alternative, by providing adequate floor waterproofing, to the satisfaction of the building official, for all portions of the building which do not meet the minimum floor elevation. Exeter implemented this amendment to prevent damage from potential flooding. The requirement results in an approximately 25 percent increase in costs for foundation construction, but this increase in cost is minimal compared to the total cost to develop housing and is not considered by the City to be a constraint to development.

Exeter permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of uses in any part of the city. The Land Use Element of the General Plan does not restrict the siting of special needs housing.

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

Conclusion

No unique restrictions are in place that would constrain the development of housing for persons with disabilities.

Recommended Action

The City will continue to review and amend the Building Code to ensure that it is up to date with the California Building Code and all applicable state laws. The City will implement Housing Plan Program 6, which directs the City to revise the Building Code and adopt the most recent (2022) California Building Code.

B3.3.4 Planning and Development Fees

The City charges various fees and assessments to cover the cost of processing permits and providing certain services and utilities. Table B3-8 describes residential development planning fees for both single- and multifamily development.

The City of Exeter has lower fees than Farmersville and Lindsay, cities in Tulare County with similar sized populations. For example, a CUP application is \$626 in Exeter, \$1,780 in Farmersville, and \$2,425 in Lindsay. A Site Plan Review is \$967 in Exeter, \$2,210 in Farmersville, and \$2,906 in Lindsay.

Table B3-8 Residential Development Planning Fees

Fee Title	Amount
Tentative Subdivision Map Review	\$1,593
Final Subdivision Map Review	\$4,324
Site Plan Review	\$967
Site Plan Review with zone change	\$1,110
General Plan Amendment	\$996
General Plan Amendment - Complex	\$2,134
Zoning Code Amendment	\$285
Appeal	\$740
Zone Variance	\$1,110
Conditional Use Permit	\$626
Lot Line Adjustment	\$97
Minor Deviation	\$797
Tentative Parcel Map	\$2,105
Final Parcel Map	\$1,536
Annexation Application to City	\$1,110
LAFCO Fee	Actual
Development Agreement	\$1,821

Fee Title	Amount
Engineering Plan Check and Inspection	4% of site value
ADU Plan Check	\$85
Engineering Special Services	\$180 per hr.
Planning Special Services	\$85 per hr.
Source: City of Exeter, Master Fee Schedule, 2022-2023.	

Table B3-9 shows development impact and permit fees for single-family and multifamily prototype developments. Development impact and engineering/building permit fees constitute a larger percentage of the cost of a housing unit than the planning permit fees discussed above. Development impact fees cover public improvements such as water, sanitary sewer, storm drainage, parks, schools, traffic, and engineering/building plan review and field inspection.

Table B3-9 Residential Development Fees

Number of Units	Cost Per Unit	
	Multifamily	Single Family
Building permit and plan check	\$1,000	\$2,001
Park fee	\$506	\$597
Landscaped medians	\$282	\$395
Signals	\$225	\$315
Railroad crossings	—	\$164
Bike paths	\$23	\$33.00
Public facilities	\$366	\$1,098
Water capital fee	—	\$5,176
Water connection fee	\$5,176	\$330
Sewer connection fee	\$729	\$729
Storm Drainage	\$84	\$84
School impact fee (\$3.20 per sq. ft.)	\$2,104	\$4,800
Total	\$10,495.25	\$16,482
Source: Exeter Zoning Code, Updated July 2018.		

According to a 2019 National Impact Fees Survey of 37 jurisdictions in California, the average impact fees are \$37,471 per single family unit and \$21,703 per multifamily unit⁵. Exeter's fees for a single-family unit and multifamily are less than the survey average.

Development fees in Exeter are similar to other similarly sized cities in the same county. Fees for a single-family unit are around \$16,482 in Exeter but range from \$12,009 to \$19,269 in the cities of Lindsay, Farmersville, and Woodlake. Similarly, fees for a multifamily unit are approximately \$10,495 per multifamily unit in Exeter and range from \$11,478 to \$16,400 per unit other cities. Table B3-10 shows a comparison of development fees in other Tulare County jurisdictions.

⁵ National Impact Fee Survey, 2019. Available at <http://www.impactfees.com/publications%20pdf/2019survey.pdf>

Table B3-10 Residential Development Fee Comparison

Jurisdiction	Total Cost Per Unit	
	Multifamily	Single Family
Dinuba	\$32,796 to \$33,962	\$37,059 to \$38,888
Exeter	\$10,495.25	\$16,482
Farmersville	\$16,400.00	\$19,269
Lindsay	\$40,342.88	\$12,009
Porterville	\$12,000 to \$14,500	\$17,000 to \$20,000
Tulare	\$17,781	\$18,677
Woodlake	\$11,478	\$14,607

Conclusion

Planning and development fees are not considered a constraint to development.

Recommended Action

None required.

B3.3.5 Permit Types

The City of Exeter provides the full range of services relating to the development of property within its city boundaries and Sphere of Influence. Subdivision maps, parcel maps, conditional use permits, and building plans are all processed by the City.

B3.3.5.1 Site Plan Review

All projects except those specifically exempted (i.e. single-family dwellings) go through Site Plan Review. For Site Plan Review, the site plan may only be denied if the project does not comply with city codes, standards, policies, or California Environmental Quality Act (CEQA) requirements. At a minimum, the Site Plan Review Committee includes the Planning Director, Head Building Official, City Engineer, Exeter Public Works Director, Fire Marshall, and other persons who may possess expertise in fields that would benefit the site plan review process. The Site Plan Review Committee reviews the application and approves or denies a project within 15 days and provides recommendation to the Planning Commission. The report may be forwarded to the Planning Commission if the following findings are made:

- That the location of the proposed use is in accordance with the purpose and objectives of this Ordinance and the purposes of the district in which the subject site is located.
- That the location of the proposed use and the conditions under which it would be operated or maintained will not be detrimental to the public interest, health, safety, convenience or welfare, or be materially injurious to properties or improvements in the vicinity.
- That the proposed use will not have a significant impact on the environment.
- That the proposed use will comply with applicable provisions contained in this Ordinance.
- That the proposed use is consistent with the Exeter General Plan.
- That the site for the proposed use is adequate in size, shape and location to accommodate the use for which it is proposed.

The Planning Commission makes approval or denial decisions for these projects based on the findings listed above, although this decision is not subject to a public hearing. The decision can be appealed to the City Council.

B3.3.5.2 Subdivision Map Review

All Tentative Subdivision Maps are reviewed by the Subdivision Review Committee prior to the submission of the map to the Planning Commission. The Subdivision Review Committee review the completeness and accuracy of the tentative map and the suitability of the land for purposes of subdivision, conformity of the overall design of the subdivision to the General Plan and other city plans, the provisions for and adequacy of street improvements and utilities, and provisions for public areas and services. The Subdivision Review Committee may deem it advisable to recommend additional improvements, easements, dedications, etc., to be included, in which case the subdivider is informed of the nature of the recommendations following the Committee meeting. Within 50 days after the tentative map has been filed with the City Planner or at such later date as may be required to concurrently process the appurtenant environmental impact review documents required by CEQA, the Planning Commission shall conduct a public hearing on the Tentative Parcel Map. The City Council may overrule or modify any ruling or determination of the Planning Commission in regard to a Tentative Map and may make conditional exceptions if special circumstances pertaining to the property involved justify a variance.

B3.3.5.3 Parcel Map

All Tentative Parcel Maps are reviewed by the Subdivision Review Committee prior to the submission of the map to the Planning Commission. The Subdivision Review Committee review the completeness and accuracy of the tentative map and the suitability of the land for purposes of subdivision, conformity of the overall design of the subdivision to the General Plan and other city plans, the provisions for and adequacy of street improvements and utilities, and provisions for public areas and services. The Subdivision Review Committee may deem it advisable to recommend additional improvements, easements, dedications, etc., to be included, in which case the subdivider is informed of the nature of the recommendations following the Committee meeting. Within 30 days after the tentative map has been filed with the City Planner or at such later date as may be required to concurrently process the appurtenant environmental impact review documents required by CEQA, the Planning Commission shall conduct a public hearing on the Tentative Parcel Map. If the applicant is dissatisfied with the decision of the Planning Commission, an appeal in writing to the City Council for a hearing can occur within 15 days after the decision of the Commission.

B3.3.5.4 Conditional Use Permits

Projects that require a CUP include senior housing/nursing homes, boardinghouses and rest homes, all residential uses in the Mixed-Use zone, and single-family dwellings in the CN zone. The CUP review process consists of an analysis to verify consistency of the project with the City's zoning ordinance and general plan, and requirements of CEQA. A CUP requires a public hearing and approval by the City's Planning Commission. The Planning Commission may impose reasonable conditions upon a project, subject to appeal to the City Council.

To be able to approve the CUP, the Planning Commission must be able to make the following findings:

1. That there are circumstances or conditions applicable to the land, structure or use which makes the granting of a use permit necessary for the preservation and enjoyment of a substantial property right.
2. That the proposed location of the conditional use and the conditions under which it would be operated or maintained will not be detrimental to the public health, safety or welfare, or materially injurious to, or inharmonious with, properties or improvements in the vicinity.
3. That the proposed location of the conditional use is in accordance with the objectives of the zoning ordinance and the purposes of the district in which the site is located.
4. That the proposed use will comply with each of the applicable provisions of this ordinance. A use permit may be revocable, may be granted for a limited time period, or may be granted subject to such conditions as the Planning Commission may prescribe.

Requirements related to neighborhood character (“inharmonious with properties or improvements in the vicinity”) are subjective.

B3.3.5.5 Variances

An applicant must request a variance when seeking an exception to specific requirements of the Zoning Ordinance, Parking Regulations, and Sign Regulations, if those requirements would result in a hardship due to the physical conditions of a property. The Planning Director or the Planning Commission acts on variance requests. Administrative action on a variance request takes place two to four weeks after the application is deemed complete; additional time is necessary if Planning Commission review is required.

B3.3.5.6 General Plan Amendment and Zone Change

Projects that are not consistent with the General Plan or Zoning Ordinance may require approval of a General Plan Amendment or a Zone Change. Approval of these types of proposals is discretionary, subject to CEQA, and requires public hearings before the Planning Commission and City Council.

Conclusion

The requirement for Planning Commission approval for typical multifamily residential development through the Site Plan Review process is a constraint. Additionally, the requirement for discretionary permits that projects must be related to neighborhood character (“inharmonious with properties or improvements in the vicinity”) is subjective.

Recommended Action

The City will implement Housing Plan Program 6 to revise the procedure for Site Plan Review approval for residential development to be limited to the Site Plan Review Committee instead of the Planning Commission. Additionally, the Program directs the City to revise findings for discretionary permits to be objective by removing the requirement for discretionary permits that projects must be related to neighborhood character (“inharmonious with properties or improvements in the vicinity”).

B3.3.6 Permit Procedures and Processing Times

Processing and permit procedures can pose a considerable constraint for the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements and costly conditions of

approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer.

The Exeter Zoning Code stipulates the residential types permitted, permitted with a Site Plan Review permit, conditionally permitted, or prohibited in each residential zone district. Table B3-11 provides the typical processing time and approval body for various entitlement applications. It should be noted that each project does not necessarily have to complete each step in the process (i.e., small scale projects consistent with general plan and zoning designations do not generally require environmental impact reports (EIRs).

Also, certain review and approval procedures may run concurrently. For example, a ministerial review for a single-family home would be processed concurrently with the plot plan review. Since most EIRs are prepared in response to a General Plan Amendment request they are often processed simultaneously. Exeter also encourages the joint processing of related applications for a single project. As an example, a rezone petition may be reviewed in conjunction with the required site plan, a tentative tract map, and any necessary variances. As shown, minor modifications and single-family units have the shortest estimated processing times (one-two weeks) while Environmental Impact Report has the longest (4-6 months).

The average number of days from entitlement to building permit is 173.32 days, based on a review of projects from the past 18 months.

Table B3-11 Timelines for Permit Procedures

Type of Approval or Permit	Typical Processing Time	Approval Body
Site Plan Review/Design Plan Review	6 - 8 weeks	Planning Commission
Minor Modifications	1 - 2 weeks	City Staff
Minor Amendment	6 - 8 weeks	Planning Commission (PC)
Major Amendment	8 - 10 weeks	PC
Conditional Use Permit	6 - 8 weeks	PC
Variance	6 - 8 weeks	PC
Zone Change	4 - 5 months	PC and City Council (CC)
General Plan Amendment	4 - 5 months	PC and CC
Architectural/Design Review - Minor	2 - 4 weeks	City Staff Dev. Review Comm.
Architectural/Design Review - Major	4 - 8 weeks	City Staff Dev. Review Comm.
Tentative Subdivision Map	6 - 10 weeks	PC, CC if easements
Final Subdivision Map	6 - 8 weeks	CC
Tentative Parcel Map	6 - 8 weeks	PC, CC if easements
Final Parcel Map	6 - 8 weeks	CC
Negative Declaration	2 months	PC and CC
Environmental Impact Report	4 - 6 months	PC and CC
Single Family Unit/Bldg. Permit Review	2 - 4 weeks	Building Official

Source: Exeter Zoning Code

Table B3-12 shows the typical processing procedures by project type for Exeter. As shown, single-family units have the shortest estimated processing times (two to three months) while subdivisions have the

longest (six to eight months). Exeter’s permit process times are consistent with typical permit processing times for cities in Tulare County.

Table B3-12 Typical Processing Procedures by Project Type

	One Single-Family Unit	Subdivision	Multifamily Units	Planned Unit Development
	Single Family Permit Review	Site Plan Review	Site Plan Review	Site Plan Review
		Tentative Map		Conditional Use Permit
	Environmental Assessment	Environmental Assessment	Environmental Assessment	Environmental Assessment
		Final Map		
		Final Map		
Estimated Processing Time	1 week	3 - 4 months	2 - 3 months	3 - 5 months
Source: Exeter Zoning Code				

B3.3.6.1 Building Permits

Building permit review timelines for all projects are as follows depending on complexity and scope of work:

- First review: one to 20 working days
- Second review: one to 15 working days
- Third review: one to 15 working days
- Fourth review: one to 10 working days
- Fifth review: one to 10 working days

Conclusion

The permit procedure and processing times for multifamily developments are not a constraint. Other cities in the county have similar or longer permit processing times for multifamily developments. The processing time in Porterville is 4-6 months and two months in Farmersville.

Recommended Action

None required.

B3.3.6.2 State Streamlining (SB 35)

Under the 5th Cycle Housing Element reporting period (2015-2023), the City of Exeter has made insufficient progress toward its lower-income RHNA and is subject to SB 35 streamlining provisions for projects that include at least 50 percent affordability. SB 35 requires that eligible projects be reviewed for compliance and consistency with the City’s objective standards and are not subject to discretionary processes, such as CEQA environmental review and public hearings. Eligible projects with 150 units or fewer must be approved within 90 days and projects with more than 150 units must be approved within 180 days. In addition, AB 1397 requires that 5th cycle opportunity sites re-used in the 6th cycle and identified to accommodate lower income units (very low-income and low-income) be subject to by-right approval if projects include 20 percent affordable units for lower income households on-site. The City of

Exeter has not adopted procedures for processing SB 35 applications, nor have they created a checklist for SB 35 applications. Since 2018, no projects have been approved through SB 35 ministerial approval.

In addition, AB 1397 requires that 5th cycle opportunity sites re-used in the 6th cycle and identified to accommodate lower-income units (very low-income and low-income) be subject to by-right approval if projects include at least 20 percent affordable units for lower-income households on-site.

Conclusion

The lack of permit procedures and resources for SB 35 applicants is a constraint to development.

Recommended Action

Amend the Zoning Code to provide a clear permitting process for SB 35 eligible projects and create an SB 35 application checklist. The City will amend the Zoning Code with Housing Plan Program 6 to provide a clear permitting process for SB 35 eligible projects and create an SB 35 application checklist. The City will implement Housing Plan Program 3 to comply with AB 1397.

B3.3.6.3 Permit Streamlining Act

The Permit Streamlining Act sets forth various time limits within which state and local government agencies must either approve or disapprove permits and provides that these time limits may be extended once by agreement between the parties. The City currently meets the timelines below and complies with the Permit Streamlining Act including streamlining determinate with 30-day CEQA determination:

- 30 days to deem application complete/incomplete
- 30-day period restarts with each resubmittal on an incomplete application.
- 30 days to make environmental determination after an application is deemed complete
- 60 days after the environmental determination, including a finding that the project is exempt from CEQA, the City must take action to approve or disapprove the project. Applicants can agree to an additional 90 days to take action.

Conclusion

The City complies with the Permit Streamlining Act.

Recommended Action

None required.

B3.3.7 Short-Term Housing Rentals

Exeter does not have a short-term housing rental program that regulates short-term vacation rentals in the city. As of July 2023, there were 65 active VRBO and Airbnb rentals in the city. There were 55 listings that rented the entire house and 10 listings that rented a private room within a housing unit. Short-term rentals can be found throughout the city. Public input at the community workshop noted that short-term rentals in the city may constrain long-term rental opportunities.

Conclusion

There are no regulations related to short-term rental housing in the city. Short-term rentals may contribute to a reduction in the supply of available long-term rental housing.

Recommended Action

As directed by Housing Plan Program 11, the City will monitor the impacts of short-term rentals on housing availability and affordability. Based on the findings of the report, consider adopting a short-term rental ordinance to regulate short-term rentals, including a potential short-term rental fee that would fund affordable housing development.

B3.3.8 Code Enforcement

The provisions set forth in the "Uniform Code for the Abatement of Dangerous Buildings, 1997 Edition," published by the International Conference of Building Officials, are adopted as the code for the abatement of dangerous buildings in the city. The City has the power to inspect and declare unsafe any structure or piece of equipment, be it existing or under construction, that does not meet specific Municipal Code standards. These include, but are not limited to, structures with insufficient modes of egress; structures that are unsafe or that have been made structurally unsound due to fire, earthquake, or other natural disaster; buildings that are deemed a public nuisance; and buildings that have been constructed or maintained in violation of local or state law. Once a building has been declared unsafe, the building official may issue notice that the structure be repaired, vacated, or demolished within a reasonable amount of time and with the appropriate permits.

The enforcement of building codes in the city is centered on the inspection of new construction and remodels or renovations requiring building permits. However, for existing structures, City staff prioritizes code enforcement complaints according to the severity of the violation on the community and individuals. Situations that appear to pose a serious risk to health and safety are given top priority; others are pursued in the order in which they are received, as resources are available. In most cases for non-emergency complaints, a warning letter or courtesy notice is sent to the alleged violator to verify the status of the potential complaint and to obtain compliance. Further enforcement procedures include:

- Warnings and courtesy notices typically allow 10 business days, sometimes 30 depending on the type of action/needs for correction,
- Appeals and hearings can be requested by the notices/fined party and are arranged and held by the City Administrator.
- If compliance is not obtained then administrative citations are issued with amounts starting at \$100.00, then increasing to \$200.00, then \$500.00,
- If, after fines have been issued, compliance has still not been obtained, the City will pursue an action to abate a nuisance at cost to the property owner through the means of an abatement warrant, lien, special assessment, or other means.

Conclusion

The City of Exeter utilizes the 1997 Uniform Building Code.

Recommended Action

Revise the Building Code and adopt the most recent (2022) California Building Code. Housing Plan Program 6 directs the City to revise the Building Code and adopt the most recent California Building Code. Additionally, the City will implement Housing Plan Program 11 to advertise available rehabilitation grant programs on the City's website and ensure that Code Enforcement has the information when addressing enforcement cases.

B3.3.9 Transparency in the Development Process

To increase transparency in the development process, the City's website publishes resources that help developers and homeowners navigate the residential development and home improvement processes. Specifically, the Planning Division webpage (<https://cityofexeter.com/departments/administration/planningbuilding>) provides a zoning map, information on the permit center and staff contacts, the public hearing calendar, planning and building permit resources. The zoning code and zoning map, plan review procedures, fee schedule and forms and handouts, among other documents are available online.

Conclusion

The City provides general information and handouts regarding the development process on the City website. Additional information such as previous annual financial reports should be provided on the City website to facilitate and further assist residents and developers.

Recommended Action

The City of Exeter will evaluate its compliance with the new transparency requirements per Government Code Section 65940.1(a)(1) make changes as necessary. The City will implement Housing Plan Program 8 to increase transparency in the development process by evaluating its compliance with Government Code Section 65940.1(a)(1).

B3.3.10 Cumulative Impact of Development Standards

The Housing Element must analyze the cumulative effect of development standards on the development of housing and/or achieving densities after considering how all standards and/or ordinances relate to each other. In Exeter, overly restrictive density requirements; parking requirements; multifamily requirements; permit requirements for community care facilities, emergency shelters and supportive housing, farmworker housing, employee housing; and lack of streamlining procedures and objective design standards may constrain development of multifamily or special needs housing.

B3.4 Environmental Constraints

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

B3.4.1 Wildfire

Exeter is not designated by the California Department of Forestry and Fire Prevention (CALFIRE) as a fire hazard severity zone. According to the CALFIRE, Fire and Resource Assessment Program, the City is a Local Responsibility Area (where fire protection and response is a local responsibility). State Responsibility Areas generally include foothill areas located east of the Friant-Kern Canal and the Sierra Nevada.

Wildfire hazards in the city include vacant lands that have dry vegetation and/or agricultural debris storage (e.g., limbs, trimmings, etc.). These hazards are more common on non-irrigated lands, during drought years, and in dry seasons. The City manages vegetation in areas within and adjacent to public rights-of-way and critical facilities to reduce the risk of wildfire and property damage. The City has a nuisance abatement regulation for private property that prohibits the accumulation of wastepaper, hay, grass, weeds, litter, or any other combustible vegetation or debris that endangers a property or is liable to become a fire hazard. Fire and code enforcement personnel perform citywide property reviews and send letters of abatement to violators. Wildfire is not a constraint to the development of housing in the city.

B3.4.2 Floodplains

There is no land within a 100-year floodplain in Exeter. However, to ensure that shallow flood flows do not potentially impact existing or future residential development, new residential development is required to construct ground floors 18 inches above adjacent curb elevations. This requirement increases the cost of residential development because of the increased fill requirement but is standard and not considered a constraint to development.

B3.4.3 Seismic Zones

While Exeter is in proximity to major California fault lines, there is no specific threat or hazard from seismic ground shaking to residential development within Tulare County, and all new construction will comply with current local and state building codes. Due to the minimal historical hazard of earthquakes in the city and the use of the most current building codes and construction techniques, seismic faults do not pose a constraint to residential development.

B3.4.4 Soil Contamination

Agricultural uses may contaminate sites due to the use of pesticides and other chemicals. Soil contamination may be a concern if a Phase One Environmental Site Assessment determines there is a potential for soil contamination and contamination is substantiated by a Phase Two study. The City ensures that the necessary steps are taken to clean up residual hazardous wastes on any contaminated sites proposed for redevelopment or reuse. Soil evaluations are required as needed to ensure that risks are assessed, and appropriate remediation is provided. Developing housing on these sites can involve costs to remediate contaminated soil or groundwater. The remediation cost would typically be on the developer to address the clean-up and potential site contamination is not considered a constraint.

Conclusion

Environmental conditions in Exeter are not considered a constraint to development.

Recommended Action

None required.

B4 Housing Resources and Site Inventory Analysis

This section documents the methodology and results of the Site Inventory analysis conducted to demonstrate Exeter’s ability to meet the 6th cycle Regional Housing Needs Allocation (RHNA). Infrastructure, services, and financial and administrative resources that are available for the development, rehabilitation, and preservation of housing in the Exeter are also discussed in this chapter. Background information on regional development trends and analysis are included in Chapter 4, *Regional Housing Resources*.

The Site Inventory was developed through the analysis of development trends, the identification of vacant land, and community input. Community engagement events included an online, interactive community survey, where residents identified areas for potential future residential development in southern Exeter, and a community workshop held in Exeter on May 25, 2023.

B4.1 Regional Housing Needs Allocation (RHNA)

This Housing Element covers the planning period of December 2023 through December 2031 (also referred to as the 6th housing cycle). The Tulare County Association of Governments (TCAG), as the Metropolitan Planning Agency for the Tulare County region, is responsible for preparing the RHNA for the region based on recent growth trends, income distribution, and capacity for future growth. This methodology must align with state objectives, including but not limited to:

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

Exeter must identify adequate land with appropriate zoning and development standards to accommodate its RHNA or assigned share of the region’s housing need. Exeter’s RHNA is 844 units, which is distributed among five income categories, as shown in Table B4-1.

Table B4-1 Exeter 2023-2031 RHNA

Income Category (Percent of Tulare County Area Median Income [AMI])	Number of Units	Percent of Total Units
Extremely Low (< 30% of AMI)*	105	12.4%
Very Low (30 to 50% of AMI)	92	10.9%
Low (51 to 80% of AMI)	121	14.3%
Moderate (81% to 120% of AMI)	146	17.3%
Above Moderate (> 120% of AMI)	380	45.0%
Total	844	100%

* The RHNA does not project the need for extremely low-income units, but pursuant to State law (AB 2634), the City must project its extremely low-income housing needs based on Census income distribution or assume 50 percent of the very low-income units required by the RHNA as extremely low-income units. The City’s very low-income requirement is 197 units. The number of extremely low-income units that the City must plan for shown here was projected using Census data. According to the Comprehensive Housing Affordability Strategy (CHAS), data developed by HUD, 36.3 percent of households in the city earned less than 50 percent of the AMI. Among these households, 53.4 percent earned incomes below 30 percent (extremely low-income). Therefore, the City’s RHNA allocation of 197 very low-income units was distributed as 105 extremely low-income (53.4 percent of the 197 very low-income units required by the RHNA) and 92 very low-income units. However, for purposes of identifying adequate sites for the RHNA allocation, state law does not mandate the separate accounting for the extremely low-income category.

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

B4.2 Meeting the RHNA

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

Once the City demonstrates in the Housing Element that it has the development capacity to accommodate the RHNA, it has two implementation-related obligations during the planning period:

1. Maintain a “no net loss” policy of its residential development capacity over the housing element planning period, meaning that sites listed in the adopted Housing Element land inventory may not be down-zoned to a lower-density residential zone or rezoned to a nonresidential zone, unless the City up-zones or rezones alternative sites prior to the density reduction or rezone on the inventoried site.
2. Continue to allocate funding resources to and facilitate the development of affordable housing.

B4.2.1 RHNA Credits

The City may use units in approved and/or permitted residential developments which will be completed within the planning period, and anticipated ADU production, as credit towards fulfillment of its RHNA. The City issued only two ADU permits during the prior planning period, and while there are actions in Chapter B7, *Housing Plan*, to facilitate the building of ADUs in the 6th Cycle Housing Element, no ADUs are counted as credits in the 6th Cycle Housing Element. Planned and approved projects are discussed below.

Planned and Approved Projects

Residential developments approved and permitted, but not yet built (also called “pipeline projects”) can be credited towards the City’s RHNA provided it can be demonstrated that the units can be built by the end of the 6th cycle planning period. Similarly, units that have not yet received a building permit as of June 30, 2023, can also be credited towards the RHNA. Affordability (the income category in which the units are counted) is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. Pipeline projects that can count toward the City’s 6th cycle RHNA are listed in Table B4-2. All pipeline projects are affordable to above moderate-income households.

Figure B4-1 shows the locations of pipeline projects. For the purposes of analysis in this Housing Element, the city is divided into six neighborhoods:

- | | |
|--------------------|--------------------|
| ▪ Downtown Exeter | ▪ South Exeter |
| ▪ Northeast Exeter | ▪ Southeast Exeter |
| ▪ Northwest Exeter | ▪ Southwest Exeter |

These projects are located in Downtown and Northeast Exeter. Pipeline projects consist of single-family and multifamily projects. The City currently averages three to four weeks between the approval of a project and the submittal of a building permit application, depending on the length of time it takes for a developer to submit an application. Once a permit is issued, the duration from permit issuance to construction varies significantly based on the size of the project. For individual residences, construction is generally completed within approximately eight months of building permit issuance. However, larger

subdivisions can take longer to complete due to their size and complexity. Rarely do individual residential permits expire once construction begins.

Considering the City's past trends of project approvals and the current status of these projects, all units are expected to receive Certificates of Occupancy by 2027, well before the end of 2023-2031 planning period.

Table B4-2 Pipeline Projects

Map ID	Project Name	Assessor's Parcel Number (APN) ¹	Very Low-Income Units	Low-Income Units	Moderate-Income Units	Above Moderate-Income Units	Total Units	Status
1	Morgan	135-161-008	0	0	0	44	44	Entitlement approved. Remaining steps: Construction and final inspections. Anticipated completion date: 2028.
2	Smee Homes (Yokohl Landing)	138-200-001	0	0	0	36	36	Final map approved and construction in progress. Remaining steps: Construction and final inspections. Anticipated completion date 2026.
Total			0	0	0	80	80	

¹An assessor's parcel number is a series of digits used to identify property. Each parcel is assigned an APN that corresponds to a location on a page in a book of maps maintained by the County Assessor's Office.

B4.2.2 Summary of RHNA Credits

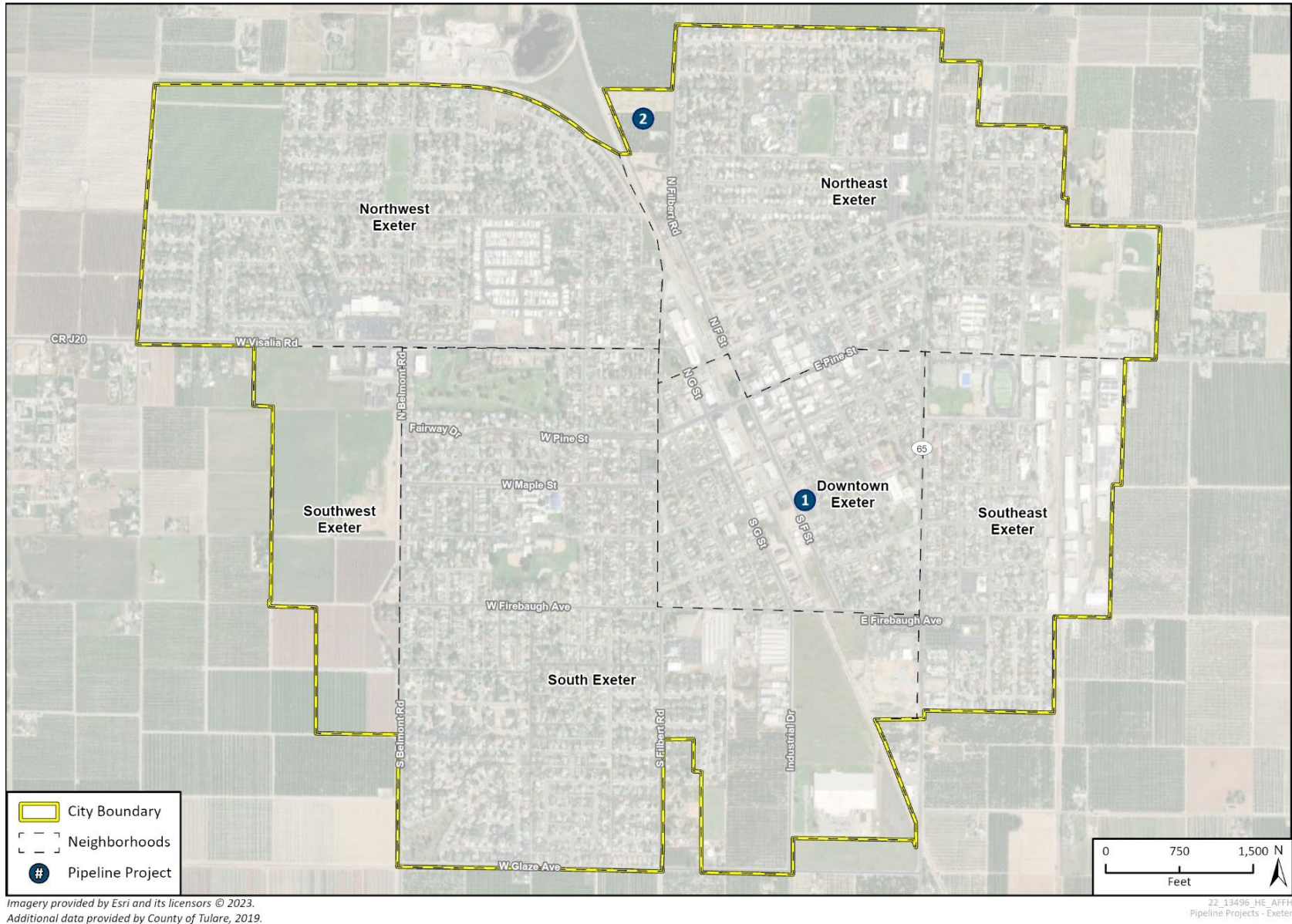
The City can satisfy nine percent of its RHNA requirement with planned and approved units. Since only two ADU permits were recorded during the previous planning period, ADUs are not assumed to contribute to the RHNA. To encourage the production of ADUs, the City will implement Housing Plan Program 5 by expediting ADU application reviews and implementing promotional strategies and educational events to increase the number of affordable ADUs.

To achieve the remaining RHNA, the City must demonstrate the availability of sites with appropriate zoning and development standards that allow and encourage the development of 764 units. This unit count is broken down by household income level. As shown in Table B4-3, Exeter has a remaining RHNA of 197 units affordable to very low-income households, 121 units affordable to low-income households, 142 units affordable to moderate-income households, and 304 units affordable to above moderate-income households.

Table B4-3 Remaining Share of RHNA

Affordability Category	RHNA Allocation	Units Pending or Approved or under Construction	Estimated ADUs	Remaining RHNA
Very Low	197	0	0	197
Low	121	0	0	121
Moderate	146	0	0	146
Above Moderate	380	80	0	300
Total	844	80	0	764

Figure B4-1 Pipeline Projects



B4.3 Site Inventory Analysis

B4.3.1 Nonvacant Sites Analysis

The Housing Element must analyze the extent to which existing uses may impede additional residential development on nonvacant inventory sites. The City's Site Inventory accommodates approximately 59 percent of its lower-income RHNA, 22 percent of its moderate-income RHNA, and 16 percent of its above moderate-income RHNA on vacant sites. The remaining 41 percent of lower-income RHNA, 78 percent of moderate-income RHNA, and 84 percent of above moderate-income RHNA are proposed on sites currently being used for agriculture.

Nonvacant sites included in the Site Inventory have comparable predevelopment characteristics to developed residential projects in the region. As discussed in Chapter 4, *Regional Housing Resources*, residential development in Tulare County has occurred primarily on vacant sites and sites used for agriculture. Each nonvacant inventory site in Exeter is located in a residential zone and would not require rezoning to allow for housing development. Market conditions, site characteristics, and regional trends indicate a high likelihood of redevelopment of nonvacant sites.

Market Conditions

Demand for residential development of agricultural land in the San Joaquin Valley is high, and driven by the critical need for more housing, necessity for less water-intensive land use, and the declining property values of agricultural lands due to constrained water resources. The Sustainable Groundwater Management Act (SGMA) has significantly impacted agricultural land use throughout California. Groundwater sustainability plans now require landowners in groundwater sustainability basins to reduce their groundwater use, which could result in the fallowing of between 500,000 and 900,000 acres of cropland in the San Joaquin Valley. Residential development is a much less water intensive use than cropland.¹ Counties throughout the San Joaquin Valley have noticed decreasing property values for agricultural lands in response to limited water supply.² Between 2016 and 2018, 74,641 acres of farmland and grazing lands were converted to other uses in California, including 37,583 acres of land that were urbanized.³ Approximately 44,942 acres were urbanized between 2014 and 2016.⁴

In Tulare County, 4,300 acres of land were urbanized between 2010 and 2020.⁵ California Department of Conservation data from 1984 to 2022 shows land classified as farmland around Exeter has been converted to urban uses.⁶ Trends illustrating local conversion of farmland to urban uses are further supported by recent development throughout Exeter and the region, where properties previously used for agricultural purposes were redeveloped with housing, as detailed in *Redevelopment Trends on Agriculture Sites*, below.

¹ Hanak, Ellen, et al. 2023. Managing Water and Farmland Transitions in the San Joaquin Valley. Public Policy Institute of California. <https://www.ppic.org/publication/managing-water-and-farmland-transitions-in-the-san-joaquin-valley/>

² Willis, Natalie. 2024. SGMA Breakdown of the 2024 Trends in Agricultural Land and Lease Values. <https://www.valleyagvoice.com/asfmra-conference-unveils-insights-into-agricultural-land-values/>

³ California Department of Conservation. 2023. California Farmland Conversion Report 2016-2018. https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2016-2018/FCR/FCR_1618_Report.pdf

⁴ California Department of Conservation. California Farmland Conversion Report 2014-2016. https://www.conservation.ca.gov/dlrp/fmmp/Pages/2012-2014_Farmland_Conversion_Report.aspx

⁵ California Department of Conservation. Tulare County Important Farmland Data Availability, Historic Land Use Conversion. 2020. <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Tulare.aspx>

⁶ California Department of Conservation. 2022. California Important Farmland: 1984-2022. <https://maps.conservation.ca.gov/dlrp/ciftimeseries/>

Site Characteristics

In considering sites, the City identified agricultural land with residential zoning to facilitate the development of a variety of housing types. The nonvacant sites are currently zoned R-1-6, R-1-7.5, R-1-10, and RM-1.5.

All nonvacant sites are currently used for agricultural production. Based on development and economic trends, the City anticipates that existing agricultural uses will cease during the planning period, freeing the sites for residential development. This is consistent with the redevelopment trends and all pipeline projects with existing agricultural uses outlined below in *Redevelopment Trends on Agriculture Sites*. In considering future residential development, the City determined that the nonvacant sites currently used for agricultural purposes could facilitate the development of a variety of housing types given redevelopment potential and the high probability of turnover.

Redevelopment Trends on Agriculture Sites

The San Joaquin Valley region has primarily experienced redevelopment of previously vacant sites and on parcels that have required the conversion of agricultural uses to residential development. Examples of recent projects in the region that converted operational agricultural uses to residential uses are listed on Table B4-4. Seven sites in the Exeter Site Inventory are currently utilized for active agricultural operations. Sites 13, 16, 29, and 34 are active orchards and Sites 30, 32, 33 are planted with row crops. These sites are not under a Williamson Act Contract and there are no conditions that would impede residential development. These existing uses (orchards and row crops) can be easily ceased, and it is easy to clear the land and repurpose it for development. Unlike agricultural processing or dairy uses, orchards and row crops do not typically require extensive infrastructure or investment. These sites are located in a prime location for residential development and are adjacent to existing residential subdivisions and community resources.

These sites range in size from 4.0 to 25.0 acres, with an average size of 10.4 acres. The sites exhibit predevelopment characteristics that are consistent with regional trends observed on redeveloped sites. The largest site is similar in size to Hillside Estates in Woodlake and Sundance Village in Livingston. The average size of these seven sites is similar in size to Village at Shannon Parkway Apartments in Visalia and Stocking Street in Dos Palos. Given the redevelopment trends on sites in agricultural production, the City does not anticipate existing operational agricultural uses to impede residential development on the seven identified sites included in the Site Inventory.

Table B4-4 Redevelopment Trends on Sites with Operational Agriculture

Jurisdiction	Project Name	Parcel Size (acres)	Total Units	Achieved Density (du/ac)
Tulare County				
Woodlake	Hillside Estates	28.5	75	2.2
Visalia	Village at Shannon Parkway Apartments	9.24	216	23.38
Merced County				
Dos Palos	Stocking Street	9.83	44	4.48
Livingston	Manzanita	51.33	213	4.15
Livingston	Sundance Village	21.63	97	4.48
Los Banos	The Villas	58.95	231	3.92
Los Banos	Westbrook	37.81	162	4.28

B4.4 Capacity of Housing Opportunity Sites

B4.4.1 Development Trends

As discussed in detail in Chapter 4.4, *Development Trends*, the development characteristics in the region indicate that most of the recently developed residential projects, or projects that are planned to be developed, are on vacant land or land zoned for agricultural use. Approximately one-third of the development trend projects include housing affordable to very low- and low-income households. The densities of these projects range from 2.63 to 60.00 dwelling units per acre due to the various zoning requirements per jurisdiction and use of state density bonus. The average density of projects is approximately 16 dwelling units per acre, with 99 percent density achieved. Projects located in low density residential zones averaged 92 percent density achieved, projects located in medium density residential zones averaged 96 percent density achieved, and projects high density residential zones achieved 105 percent of allowable density.

Of the projects discussed in Chapter 4.4, *Development Trends*, two recently approved residential developments are in Exeter: Orange Avenue, which is a multifamily development with two market-rate duplexes, and Belmont Family Apartments, which has 25 units of two-, three-, and four-bedroom apartments. These projects achieved a density of approximately 14.5 units per acre with an average achieved density of 66 percent of the maximum density allowed by the zoning district, as shown in Table B4-5. The planned projects listed in Table B4-2 will achieve an average density of 17.65 units per acre and an average density achievement of 81 percent of allowable density. The combined average density achieved in planned projects and recently developed projects is 73 percent.

Table B4-5 Exeter Development Trends

Project Name	Total Units	Acreage	Density	Zoning District	Zoning District Density (du/ac)	Number of Units Allowed	Percent Density Achieved
Orange Avenue (completed)	4	0.49	8.16	RM-3	14.52	7	57%
Belmont Family Apartments (completed)	25	2.29	10.91	RM-3	14.52	33	75%
Morgan (pipeline)	44	1.38	31.88	RM-1.5	29.04	40	110%
Smee Homes (pipeline)	36	9.85	3.65	R-1-6	7.26	71	51%
Exeter Average			13.65				73%
Regional Average			16.18				99%

B4.4.2 Realistic Development Capacity

Factors such as site-specific conditions and development standards such as open space or parking requirements may limit the development capacity of a given site. To account for this, the City assumes that the development capacity on each site will be less than the full development capacity allowed by the parcel's zoning or land use designation. To determine a realistic development capacity on the sites in the inventory, the City reviewed the typical densities of recently developed projects and projects in the development pipeline in Exeter and in the region as a whole. The projects shown in Table B4-5 achieved a density of 73 percent of the maximum density allowed on the site based on the site's zoning and development standards. Morgan and Belmont Apartments, both multifamily projects, achieved densities of 75 and 110 percent of maximum allowable densities. It is reasonable to assume that future multifamily projects in Exeter will continue to achieve densities of at least 75 percent of the maximum

allowed by the zoning district requirements. In Exeter, residential projects that typically did not achieve maximum allowable density were single-family developments that were lower density due to market demand. The City will implement Housing Plan Program 9 to encourage the use of density bonuses to allow projects to achieve greater than 100 percent of allowable density.

As discussed in Chapter 4, *Regional Housing Resources*, the average percentage of maximum density achieved by projects collectively in the region is 99 percent. Taking regional trends into account, it is likely that the sites in the Exeter Site Inventory can realistically achieve a capacity of 75 percent of the maximum capacity allowed under the applicable zoning or general plan designation. The City will implement Housing Plan Program 2 to ensure that an inventory of adequate sites with appropriate densities remain available throughout the planning period to accommodate the RHNA, and to annually meet with property owners and interested developers to pursue housing development in the city. Additionally, the City will implement Housing Plan Programs 2, 6, and 9 to encourage and expedite new housing production in the city.

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

- Single-Family Residential (R-1-10): This district allows for single-family residential uses with one unit per 10,000 square feet of lot area, equal to a maximum residential density of 4.36 dwelling units per acre.
- Single-Family Residential (R-1-7.5): This district allows for single-family residential uses with one unit per 7,500 square feet of lot area, equal to a maximum residential density of 5.36 dwelling units per acre.
- Single-Family Residential (R-1-6): This district allows for single-family residential uses with one unit per 6,000 square feet of lot area, equal to a maximum residential density of 7.14 dwelling units per acre.
- Multifamily Residential (RM-3): This district allows for a variety of housing types including single-family dwellings, duplexes, triplexes accessory structures, and multifamily apartments. This district allows for multifamily residential uses with one unit per 3,000 square feet of lot area, equal to a maximum residential density of 14.52 dwelling units per acre.
- Multifamily Residential (RM-1.5): This district allows for a variety of housing types including single-family dwellings, duplexes, triplexes accessory structures, and multifamily apartments. This district allows for multifamily residential uses with one unit per 1,500 square feet of lot area, equal to a maximum residential density of 29.04 dwelling units per acre.

Table B4-6 details the realistic capacity of available sites by zoning district.

Table B4-6 Realistic Capacity of Sites by Zoning District

Zoning District	Total Acreage	Maximum Density	Realistic Density	Lower-Income Units	Moderate Income-Units	Above Moderate-Income Units	Total Units
R-1-10	12.66	4.35	3.26	0	0	41	41
R-1-7.5	12.17	5.88	4.41	0	0	52	52
R-1-6	30.33	7.14	5.36	0	0	160	160
RM-3	18.32	14.52	10.89	0	139	57	196
RM-1.5	19.27	29.04	21.78	368	28	20	416
Total	92.75			368	167	330	865

B4.4.3 Lower-Income Development

Six sites in the Site Inventory are identified for the development of lower-income units. Four of these sites are currently vacant and two are currently used for agricultural operations. All sites are currently zoned for RM-1.5 or will be rezoned to RM-1.5, which allows a maximum of 29.04 units per acre. This is the same zoning district as the proposed Morgan apartment complex that is currently in the development pipeline. Several projects in the region and the broader San Joaquin Valley have been successfully developed with lower-income units, including sites previously used for agricultural operations. In Woodlake, the Mulberry Estates and Antelope Creek Estates projects that are in the development pipeline have existing agricultural uses and are proposed for lower-income housing development. In Tulare County, recent projects with deed-restricted units were developed on sites previously used for agricultural operations. The Ben Maddox-K property developed 292 deed-restricted (affordable) units on 10.8 acres (27 units per acre), and the Lovers-Caldwell property developed 342 lower-income units on 11.4 acres (30 units per acre). These projects were developed with densities similar to the maximum allowed density in Exeter's RM-1.5 zone.

Additionally, the two agricultural sites, W Visalia Rd. and W Chestnut St. & S Belmont Rd., are proximate to established residential neighborhoods with a mix of housing types, including multifamily housing.

B4.4.4 Rezone Sites Analysis

To accommodate a shortfall of capacity, the City is obligated to rezone land suitable to facilitate the development of the listed rezone sites. Housing Plan Program 2 requires the rezone of selected sites and establishment of appropriate development standards to ensure maximum allowable densities at the respective zones can be achieved. The City anticipates adoption of the rezonings concurrent with the Housing Element. Rezoned sites are assumed to accommodate 391 housing units.

The Sites Inventory includes six sites that will be rezoned to facilitate additional residential development. The sites will be rezoned to medium and high density residential with a maximum density of at least 14.5 and 29 dwelling units per acre, respectively. These sites encompass 26.61 acres and can accommodate a total of 189 lower-income units, 134 moderate-income units, and 68 above moderate-income units. Three sites are in South Exeter, two are in Southwest Exeter, and one is in Northwest Exeter, as seen in Figure B4-2. Table B4-7 summarizes the acreage and unit assumptions for sites proposed for rezoning.

Table B4-7 Realistic Capacity of Rezoned Sites

Map ID	Current Zoning District	Proposed Zoning District	APN	Acres	Maximum Density	Realistic Density	Lower Income Capacity	Moderate Income Capacity	Above Moderate-Income Capacity	Total Capacity
16	R-1-6	RM-3	133060008	5.00	14.52	10.89	0	27	27	54
25	R-1-6	RM-1.5	133072042	5.00	29.04	21.78	99	4	5	108
26	R-1-6	RM-1.5	135190063	1.70	29.04	21.78	34	1	2	37
27	ML	RM-1.5	135190039	1.46	29.04	21.78	28	1	2	31
28	ML	RM-1.5	135190037	1.45	29.04	21.78	28	1	2	31
34	R-1-10	RM-3	133080047	12.00	14.52	10.89	0	100	30	130
Total				26.61			189	134	68	391

B4.4.5 Sites Used in Previous Planning Periods

In accordance with Government Code Section 65583, vacant parcels from both the 4th and 5th RHNA cycles, and non-vacant parcels from the 5th RHNA cycle, may be reused in this Housing Element to accommodate lower-income housing, provided they are rezoned to allow projects that have at least 20 percent of the units set aside as affordable for lower-income households to be allowed by right (i.e., can be approved administratively without requiring Planning Commission or City Council approval). Two sites identified in the Site Inventory, sites with Map ID 13 and 16, were previously included in the 4th or 5th cycle, but are not assumed to accommodate lower-income development.

B4.5 Site Inventory Summary

A description of development capacity by neighborhood is provided below. Sites are listed in Table B4-8 and shown geographically in Figure B4-2. During the outreach process, residents identified southern Exeter as areas with the most potential or need for housing development. The Site Inventory places 69 percent of units in the Site Inventory in South and Southwest Exeter. The table of sites includes the following items in the column heading order from left to right:

- Map Identification number (a unique reference number assigned by the City to reference the parcel on each map)
- Address or nearest cross street
- APN (Government Code § 65583.2(b)(1))
- Size in acres (Government Code § 65583.2(b)(2))
- General Plan land use designation (Government Code § 65583.2(b)(2))
- Zoning designation (Government Code § 65583.2(b)(2))
- Description of existing uses (Government Code § 65583.2(b)(3))
- Minimum allowable density by zone
- Maximum allowable density by zone
- Inventoried income level (units appropriate for lower-, moderate-, above moderate-income households) (Government Code § 65583.2(c))
- Total number of units realistically assumed on the site
- Opportunity category as designated by the California Tax Credit Allocation Committee (TCAC)⁷

B4.5.1 Downtown Exeter

Downtown Exeter is bounded by Palm Street, North F Street, East Pine Street, and Rocky Hill Drive to the north, State Route 65 to the east, Avenue 276 and West Firebaugh Avenue to the south, and Filbert Avenue to the west. Downtown Exeter contains a diverse range of uses including industrial uses along the San Joaquin Valley Railroad, commercial uses, and single- and multifamily residential uses. Downtown Exeter is in a CAL FIRE designated Urban Unzoned Fire Hazard⁸ and in an area of minimal

⁷ Resource levels designated by TCAC/HCD denote access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. TCAC has a composite opportunity score for each census tract. Source: <https://www.treasurer.ca.gov/ctcac/opportunity/2023/methodology.pdf>

⁸ The Urban Unzoned Fire Hazard is defined as an urban area that does not have a severity assigned because it does not have the same degree of risk for wildfire than other zones fire hazard areas. <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/>

flood hazard⁹. This neighborhood can accommodate one site with an assumed capacity of three moderate-income units. This site is currently vacant and in an area of the city that has a TCAC designation of moderate resource.

B4.5.2 Northeast Exeter

Northeast Exeter is bounded by city boundaries to the north and east, North Filbert Road and the San Joaquin Valley Railway to the west, and Rocky Hill Drive, East Pine Street, North F Street, and Palm Street to the south. The neighborhood is developed predominantly with single-family residential and commercial uses. Northeast Exeter is in a CAL FIRE designated Urban Unzoned and Non-Wildland/Non-Urban Fire Hazard area and in an area of minimal flood hazard. This neighborhood can accommodate 10 sites with an assumed capacity of five moderate-income units and nine above moderate-income units. All sites identified in this area are currently vacant. All sites are in an area of the city that has a TCAC designation of high resource.

B4.5.3 Northwest Exeter

Northwest Exeter is bounded by city boundaries to the north and west, West Visalia Road to the south, and North Filbert Road and the San Joaquin Valley Railway to the east. The neighborhood primarily consists of single-family residential and commercial uses, but also contains vacant and agricultural land. Northwest Exeter is in a CAL FIRE designated Urban Unzoned and Non-Wildland/Non-Urban Fire Hazard and in an area of minimal flood hazard. This neighborhood can accommodate four sites with an assumed capacity of 33 moderate-income units and 161 above moderate-income units. Three of the sites in this area are currently vacant, and one site is zoned for single-family residential but currently used as agricultural land. All sites are in an area of the city that has a TCAC designation of high resource.

B4.5.4 South Exeter

South Exeter is bounded by city boundaries to the south, Visalia Road, Filbert Avenue, and Firebaugh Avenue to the north, State Route 65 to the east, and South Belmont Road to the west. The neighborhood consists of mostly single-family residential uses with some industrial uses in its southeastern area. South Exeter is in a CAL FIRE designated Urban Unzoned Fire Hazard and in an area of minimal flood hazard. This neighborhood can accommodate nine sites with an assumed capacity of 90 lower-income units, 15 moderate-income units, and 12 above moderate-income units. All sites identified in this area are currently vacant. All sites are in an area of the city that has a TCAC designation of moderate resource.

⁹ The City has the Flood Hazard designation of "X". Zone X is the area determined to be outside the 500-year flood and protected by levee from 100- year flood.

Table B4-8 Exeter Site Inventory

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity	TCAC Opportunity Category
Downtown Exeter													
1	448-490 S G St.	135092008	0.31	Medium	RM-3	Vacant	0	14.52	0	3	0	3	Moderate Resource
Total									0	3	0	3	
Northeast Exeter													
2	Cambridge St. & Atwood Ave.	138220047	0.27	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
3	Old Line Ct. & Cambridge St.	138220033	0.27	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
4	Old Line Ct. & Cambridge St.	138220015	0.28	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
5	Atwood Ave. & Cambridge St.	138220059	0.29	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
6	Atwood Ave. & Cambridge St.	138220058	0.26	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
7	Atwood Ave. & Cambridge St.	138220054	0.26	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
8	Sequoia Ct. & N F St.	138150076	0.24	Low	R-1-6	Vacant	0	7.14	0	0	1	1	High Resource
9	Sequoia Ct. & N F St.	138150077	0.26	Low	R-1-6	Vacant	0	7.14	0	0	1	1	High Resource
10	Sequoia Ct. & N F St.	138150084	0.23	Low	R-1-6	Vacant	0	7.14	0	0	1	1	High Resource
11	N E St.	138042012	0.23	High	RM-1.5	Vacant	0	29.04	0	5	0	5	High Resource
Total									0	5	9	14	
Northwest Exeter													
12	N Quince Ave.	138190064	0.29	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	High Resource
13	E Elberta Rd. & Vine St.	133060008	25.00	Low	R-1-6	Agriculture	0	7.14	0	0	133	133	High Resource
14	N Quince Ave. & W Willow St.	138122018	0.11	Medium	RM-3	Vacant	0	14.52	0	1	0	1	High Resource
15	314 N Albert Ave.	138130024	0.53	Medium	RM-3	Vacant	0	14.52	0	5	0	5	High Resource
16	E Elberta Rd. & Vine St.	133060008	5.00	Medium*	RM-3*	Agriculture		14.52	0	27	27	54	High Resource
Total									0	33	161	140	

City of Exeter
Housing Resources and Site Inventory Analysis

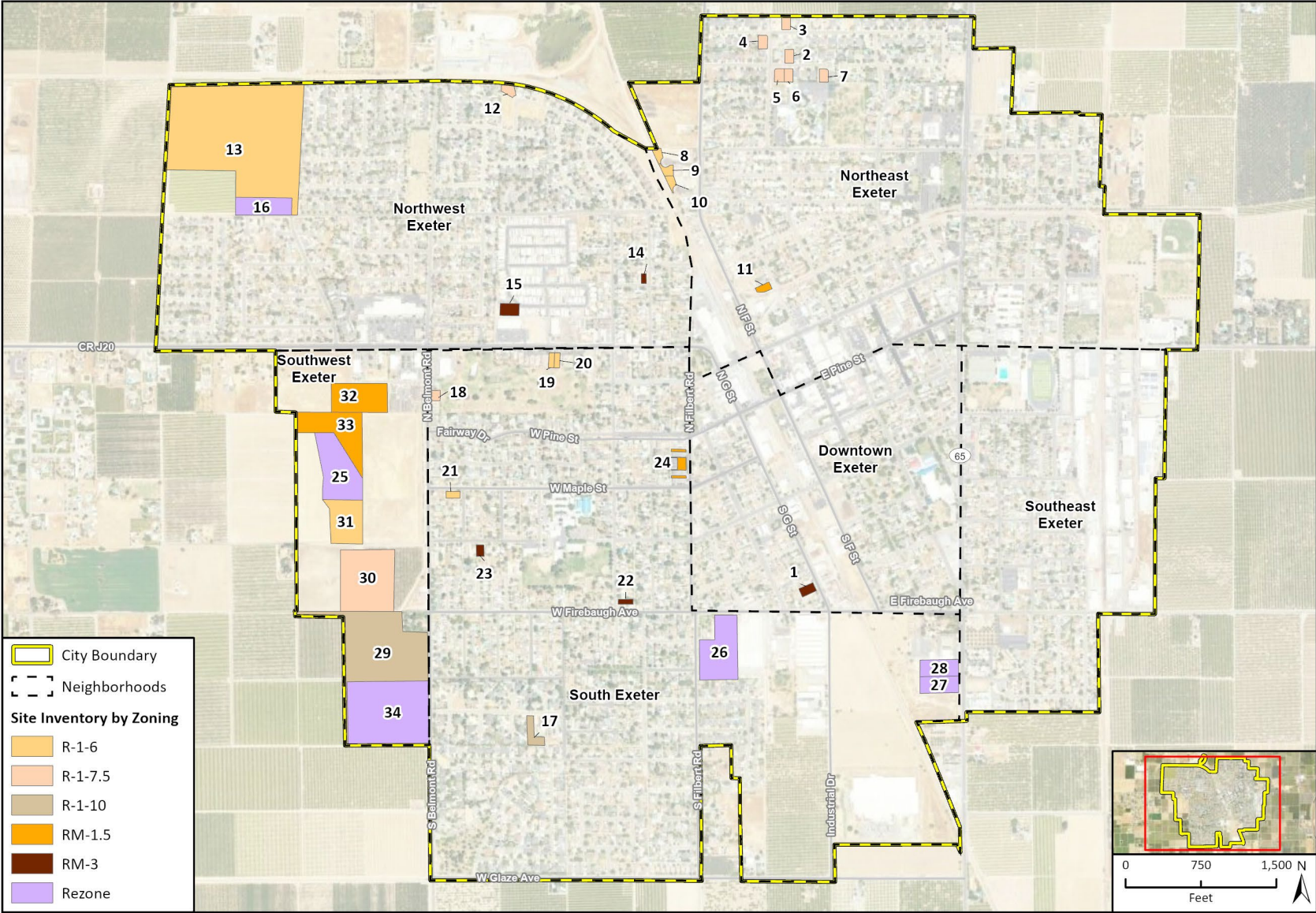
Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity	TCAC Opportunity Category
South Exeter													
17	Dove Ct. & Olivewood Dr.	135300051	0.66	Very Low	R-1-10	Vacant	0	4.35	0	0	2	2	Moderate Resource
18	N Belmont Rd.	135030025	0.25	Low	R-1-7.5	Vacant	0	5.88	0	0	1	1	Moderate Resource
19	582 Little Lane Dr.	135030035	0.19	Low	R-1-6	Vacant	0	7.14	0	0	1	1	Moderate Resource
20	570 Little Lane Dr.	135030036	0.19	Low	R-1-6	Vacant	0	7.14	0	0	1	1	Moderate Resource
21	W Maple St. & S Francis Ave.	135026014	0.22	Low	R-1-6	Vacant	0	7.14	0	0	1	1	Moderate Resource
22	397 S Orange Ave.	135072016	0.17	Medium	RM-3	Vacant	0	14.52	0	1	0	1	Moderate Resource
23	866-870 W Chestnut St.	135010041	0.20	Medium	RM-3	Vacant	0	14.52	0	2	0	2	Moderate Resource
24	S Filbert Rd.	135054035	0.43	High	RM-1.5	Vacant	0	29.04	0	9	0	9	Moderate Resource
26	S Filbert Ave & W Firebaugh Ave.	135190063	1.70	High*	RM-1.5*	Vacant	20	29.04	34	1	2	37	Moderate Resource
27	S Kaweah Ave.	135190039	1.46	High*	RM-1.5*	Vacant	20	29.04	28	1	2	31	Moderate Resource
28	S Kaweah Ave.	135190037	1.45	High*	RM-1.5*	Vacant	20	29.04	28	1	2	31	Moderate Resource
Total									90	15	12	117	
Southwest Exeter													
25	W Chestnut St. & S Belmont Rd.	133072042	5.00	High*	RM-1.5*	Vacant	20	29.04	99	4	5	108	Moderate Resource
29	S Belmont Rd.	133080053	12.00	Very Low	R-1-10	Agriculture	0	4.35	0	0	39	39	Moderate Resource
30	W Chestnut St & S Belmont Rd.	133072015	10.00	Low	R-1-7.5	Agriculture	0	5.88	0	0	44	44	Moderate Resource
31	W Chestnut St. & S Belmont Rd.	133072042	4.00	Low	R-1-6	Vacant	0	7.14	0	0	21	21	Moderate Resource

Tulare County Association of Governments
Tulare County Regional Housing Element

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity	TCAC Opportunity Category
32	W Visalia Rd.	133280021	4.00	High	RM-1.5	Agriculture	0	29.04	80	3	4	87	High Resource
33	W Chestnut St. & S Belmont Rd.	133072042	5.00	High	RM-1.5	Agriculture	0	29.04	99	4	5	108	Moderate Resource
34	S Belmont Rd. & Powell Ave.	133080053	12.00	Medium*	RM-3*	Agriculture	0	14.52	0	100	30	130	Moderate Resource
Total									278	111	148	537	
Exeter Total									368	167	330	865	

*Rezone sites to accommodate a RHNA shortfall list the proposed land use and zoning designations

Figure B4-2 Exeter Site Inventory



Imagery provided by Esri and its licensors © 2026.

22_13496_HE_AFFH
Site Inventory - Exeter

B4.5.5 Southwest Exeter

Southwest Exeter is bounded by city boundaries to the south and west, West Visalia Road to the north, and South Belmont Road to the east. The neighborhood consists of commercial uses in its northeastern corner, vacant land, and agricultural land. Southwest Exeter is in a CAL FIRE designated Urban Unzoned and Non-Wildland/Non-Urban Fire Hazard and in an area of minimal flood hazard. This neighborhood can accommodate five sites with an assumed capacity of 278 lower-income units, 111 moderate-income units, and 148 above moderate-income units. One site identified in this area is currently vacant, all others are located on land used for agriculture. All sites are in an area of the city that has TCAC designations of high resource and moderate resource.

B4.6 Adequacy of Residential Site Inventory in Meeting RHNA

The Site Inventory identifies sites to accommodate the development of 368 lower-income units, 167 moderate-income units, and 330 above moderate-income units on 34 sites. No sites less than 0.5-acre in size are used to accommodate lower-income housing.

Of the identified sites, 28 are vacant while the remainder are located on land currently used for agriculture. None of the sites currently used for agriculture are subject to Williamson Act contracts. The Site Inventory includes 28 sites which are currently zoned for residential and would not require rezoning to allow for housing development. Six sites will be rezoned to allow higher density residential development. Regional trends indicate the high likelihood of redevelopment of sites with agricultural uses to residential development.

The Site Inventory includes a surplus of 50 lower-income units, giving the City a 16 percent buffer for this income category. The summary of the residential Site Inventory, including rezone sites and planned and approved units, is presented in Table B4-9.

Table B4-9 Adequacy of Residential Site Inventory

	Lower Income	Moderate Income	Above Moderate Income	Total
RHNA Allocation	318	146	380	844
Planned and Approved Units	0	0	80	80
ADUs Anticipated	0	0	0	0
Remaining RHNA	318	146	300	764
Downtown Exeter	0	3	0	3
Northeast Exeter	0	5	9	14
Northwest Exeter	0	6	134	140
South Exeter	0	12	6	18
Southwest Exeter	179	7	113	299
Rezone Sites	189	134	68	391
Total Units on Sites	368	167	330	865
Total Unit Surplus	50	21	30	101
Percent Buffer over RHNA	16%	14%	10%	13%

B4.7 Availability of Infrastructure and Services

The City's Public Works Department ensures the continued maintenance and improvement of the City's infrastructure. This includes all public utilities: domestic water, refuse/recycling collection (contracted with Mid Valley Disposal), wastewater treatment, sanitary sewer services, and street and signal maintenance. As such, the City will ensure adequate capacity of all infrastructure and utilities to accommodate the housing included in the Site Inventory. All sites identified in the inventory have existing and available infrastructure. Within one week of adoption, the City will provide a copy of the adopted 2023-2031 Housing Element to the City's Public Works Department, pursuant to Government Code Section 65589.7.

B4.7.1 Wastewater System

The City's Wastewater Division operates and maintains the sanitary sewer system, which consists of collector lines and nine lift stations. The City's wastewater treatment plant receives and treats 980,000 gallons of sewage per day from residential and commercial waste.¹⁰ The City's wastewater system has sufficient capacity to serve new residential development necessary to serve the proposed development to accommodate the City's RHNA.

B4.7.2 Potable Water System

The City's Water Division operates and maintains the City's water system, which consists of eight wells, chlorination treatment facilities at each of the active wells, two inactive wells, one elevated storage tank with a capacity of 100,000 gallons, and a loop distribution system. In 2004, the City replaced most of its cast iron pipe water mains with C-900 polyvinyl chloride (PVC) pipes. The system can produce and deliver approximately 6.6 million gallons of water per day. Based on estimates from the Environmental Protection Agency (EPA), this is enough water to serve approximately 20,000 households per day, based on the average household use of 300 gallons per day¹¹. Therefore, the City's potable water system has sufficient capacity to serve new residential development necessary to fulfill the City's RHNA.

B4.7.3 Storm Water and Drainage

The storm drainage system consists of one City-owned permanent discharge basin (commonly referred to as the Brickyard), one City-owned detention basin at the City's Corporation Yard, one City-owned park-pond basin at Park Place, separate primary points of discharge into the Consolidated Peoples Ditch along Belmont Avenue, an underground pipe network, and three lift stations. The majority of the storm drain infrastructure in the downtown area was constructed prior to the 1940s, while numerous additions and repairs have been made to other parts of the city over the last 70 years¹². The City's stormwater system has sufficient capacity to serve new residential development necessary to fulfill the City's RHNA.

¹⁰ Exeter General Plan Environmental Impact Report, 2000.

¹¹ City of Exeter Water System Master Plan, 2019.

¹² City of Exeter Storm Drain Master Plan, 2023.

B4.7.4 Dry Utilities

Dry utilities are defined as electricity, natural gas, cable, and telephone services. Southern California Edison is the main supplier of electricity, The Gas Company is the natural gas service provider, and Frontier provides telecom services. No capacity, installation, or connectivity issues for the proposed housing sites are anticipated during the planning period.

B4.8 Environmental Considerations

As noted in Chapter B3, *Housing Constraints*, environmental constraints to housing development in the region include risk of wildfire, earthquakes, landslides and erosion, and flooding. The sites identified in the Site Inventory are all located outside of identified hazardous areas.

The Tulare County Multi-Jurisdictional Local Hazard Mitigation Plan identifies climate change, drought, extreme heat, and flooding as the hazards most likely to affect Exeter. There are no known environmental constraints related to shape, access, contamination, property conditions, easements, conservation easements, overlays and airport or military compatibility that could impact housing development on identified sites in the planning period. Each project will undergo a site-specific environmental clearance process to ensure that it is built safely and in conformance with the appropriate and applicable building codes.

B4.9 Opportunities for Energy Conservation

Exeter, through its land use and housing elements, has implemented programs and approved projects that have provided an adequate supply of housing to ensure affordable housing and employment opportunities for a full range of income groups. Program 13 is included in this Housing Element to further encourage infill development, resulting in lower average vehicle miles traveled by Exeter residents by reducing car trips to work or for errands, and providing for housing development that is more energy efficient.

Additionally, Exeter's Zoning Ordinance specifies the following opportunities for energy conservation¹³:

- To the greatest extent possible, the multifamily buildings should run east and west to take advantage of passive solar design opportunities.
- All ground-mounted heating/cooling units shall be located on the east side of a building that fronts onto an east/west roadway, and on the north side of a building that fronts onto a north/south roadway.
- The landscaping plan for the multifamily complex should plant deciduous trees on the south and west sides of the residential complex.

¹³ Exeter Zoning Ordinance. Chapter 17.16.11.

B5 Affirmatively Furthering Fair Housing Analysis

B5.1 Introduction

This section of the Housing Element analyzes issues relating to fair housing for the City of Exeter. This analysis is based on the directives from State Assembly Bill (AB) 686. Background information on AB 686, countywide fair housing services, data sources, and analysis of the regional Affirmatively Furthering Fair Housing (AFFH) issues are included in Chapter 5, *Regional Affirmatively Furthering Fair Housing Analysis*.

B5.2 Methodology

This local AFFH analysis evaluates fair housing issues on the following topics:

- Fair Housing Enforcement and Outreach Capacity
- Integration and Segregation Patterns and Trends
- Racially and Ethnically Concentrated Areas of Poverty
- Disparities in Access to Opportunity
- Disproportionate Housing Needs
- Local Area Knowledge and Stakeholder and Community Input
- Other Relevant Factors
- Analysis of Housing Site Inventory using AFFH indicators

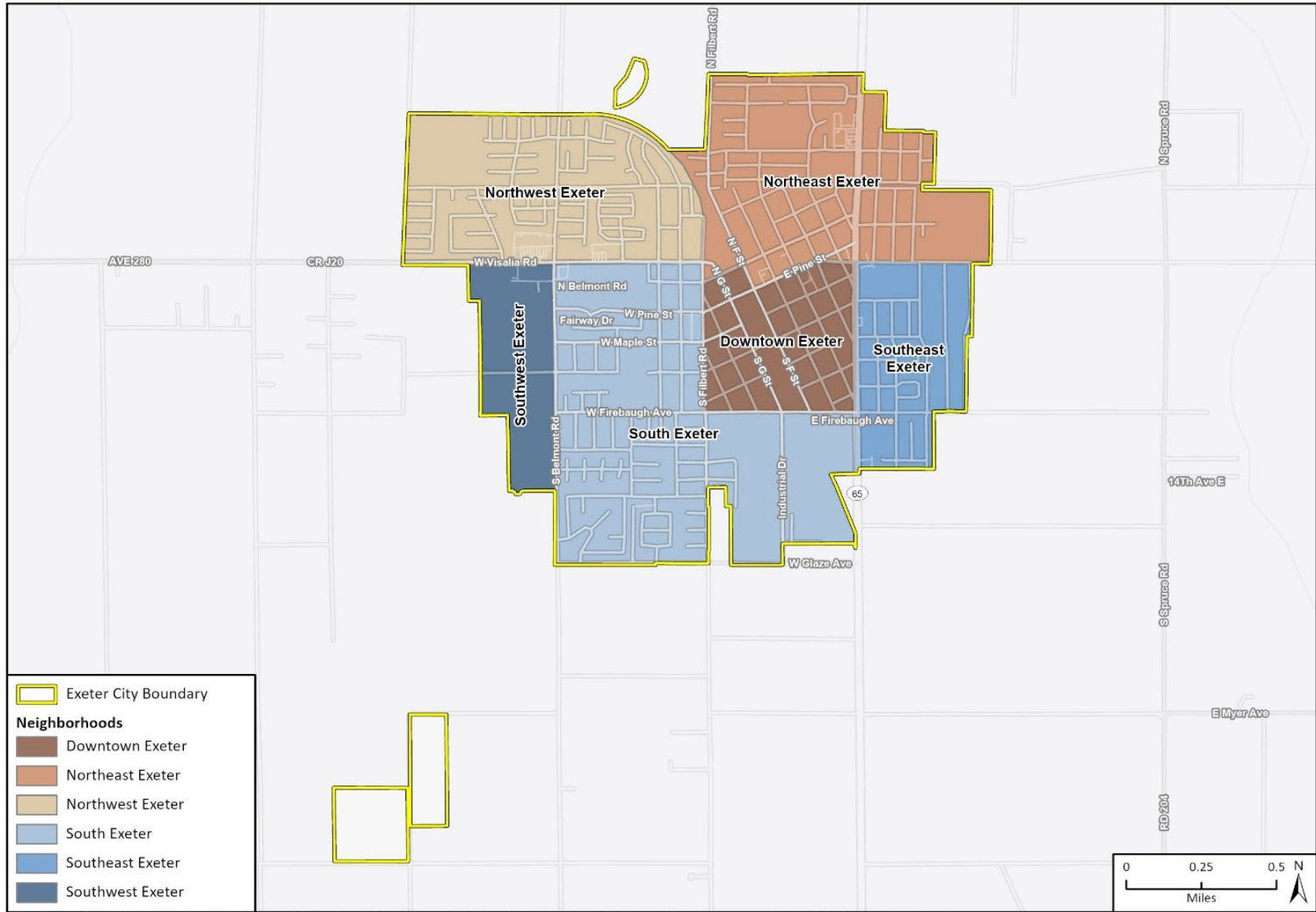
This analysis identifies patterns and trends at the local level. Where appropriate, the analysis refers to the regional AFFH analysis provided in Chapter 5, *Regional Affirmatively Furthering Fair Housing Analysis*, which analyzes patterns and trends of the county and Tulare County/Kings County/Fresno County tri-county area.

For the purposes of this analysis, the city is divided into six neighborhoods: Downtown Exeter, Northeast Exeter, Northwest Exeter, South Exeter, Southeast Exeter, and Southwest Exeter (Figure B5-1). These neighborhoods were based on the City's planning documents, including the General Plan, as well as local knowledge from City staff. Most of the geographic analysis of fair housing issues in Exeter is based on the California Department of Housing and Community Development (HCD) AFFH Data Viewer described in Chapter 5, *Regional Affirmatively Furthering Fair Housing Analysis*. The AFFH Data Viewer relies on information provided by the U.S. Census and other data sources at the census tract and block group level. The data contained throughout this chapter may differ from the data included in Chapter B2, *Housing Needs Assessment*, due to the availability of data at the time the documents were written.

City staff were interviewed on August 14, 2025, to collect additional local knowledge and other relevant factors related to fair housing issues in Exeter. Staff provided qualitative and quantitative information, including relevant projects and plans, related to all applicable topics outlined above.

There are two census tracts that include the city. Census Tract 15.01 includes the northern half of the city, and Census Tract 15.02 includes the southern half. Additionally, the City contains two noncontiguous parcels to the north and southwest within its jurisdiction. However, these areas are not included in this analysis as they do not contain residential uses.

Figure B5-1 Exeter Neighborhoods



Fresno County Dept. PWP, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

HE_AFFH
AFFH - Exeter Basemap 8.5 x 11

B5.3 Summary of AFFH Analysis Findings

The largest percentage of any one ethnicity in the city is Hispanic/Latino. However, the percentage of non-white population is lower than that of Tulare County. The median income of the city is slightly higher than the county, although the City has high rates of poverty and a high percentage of Low and Moderate Income (LMI) residents. The City contains areas designated by the California Tax Credit Allocation Committee (TCAC) as moderate and high resource areas with characteristics that have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. However, there is an identified lack of access to transit, a high pollution burden, and high vulnerability of displacement for residents. A large percentage of residents in Exeter, particularly renters, are experiencing housing cost burden (defined as spending more than 30 percent of household income on housing costs). Southwest, South, Downtown, and Southeast Exeter have a higher concentration of non-white residents and residents living below the poverty line than Northeast and Northwest Exeter. Downtown Exeter has the highest LMI population in the city, the lowest median income, and the highest concentration of non-white residents. In contrast, Northwest and Northeast Exeter have a predominantly white population, lower percentage of residents living below the poverty line, and better environmental outcomes.

Below is a summary of AFFH analysis findings by neighborhood in Exeter.

Northeast Exeter	Northwest Exeter	Downtown Exeter
• Lower percentage of residents living below the poverty line • Lower pollution burden • Predominant white majority (sizable gap) • More positive economic outcomes • High percentage of married couple households • High resource areas	• Lower percentage of residents living below the poverty line • Lower pollution burden • Predominant white majority (sizable gap) • More positive economic outcomes, further from jobs • High percentage of married couple households • High resource areas	• Higher percentage of residents living below the poverty line • Higher pollution burden • Predominant Hispanic/Latino population (slim gap) • Highest concentration of LMI residents, lowest median income • Disadvantaged community • Less positive economic outcomes • Lowest household median income • High percentage of renters experiencing overpayment • Moderate resource areas

South Exeter	Southeast Exeter	Southwest Exeter
•Higher percentage of residents living below the poverty line •Higher pollution burden •Predominant Hispanic/Latino population (slim gap) •Lowest percentage of LMI residents •Disadvantaged community •Less positive economic outcomes, further from jobs •High percentage of renters experiencing overpayment •Moderate Resource Areas	•Higher percentage of residents living below the poverty line •Higher pollution burden •Predominant Hispanic/Latino population (slim gap) •Disadvantaged community •Less positive economic outcomes, closest to jobs •High percentage of renters experiencing overpayment •Low, moderate and high resource areas	•Higher percentage of residents living below the poverty line •Higher pollution burden •Predominant Hispanic/Latino population (slim gap) •Lowest percentage of LMI residents •Disadvantaged community •Less positive economic outcomes, further from jobs •Highest median income •High percentage of renters experiencing overpayment •Low, moderate and high resource areas

B5.4 Data Sources

To conduct this analysis, the City utilized data from a variety of sources discussed in Chapter 5, *Regional Affirmatively Furthering Fair Housing Analysis*. The Community Development Block Grant (CDBG) Consolidated Plan and Analysis of Impediments (AI) were used to identify issues that impede fair housing choice. Additionally, the analysis includes a discussion of historic land use and segregation patterns and input from sources of local knowledge, including advocates for people with special needs, housing development and advocacy organizations, housing and social services providers, and low-income residents. Correspondence with City staff about key AFFH topics occurred in December 2024 and again in August 2025. Self-Help Enterprises was also consulted on fair housing issues in Exeter.

B5.5 Fair Housing Resources

Enforcement and Outreach Capacity

The City of Exeter works with the Housing Authority of Tulare County (HATC) to provide fair housing information and resources to residents and housing providers. HATC provides a local Fair Housing Information Program which includes distribution of educational materials to property owners, apartment managers, and tenants, and responding to complaints of discrimination (i.e., in-taking, investigation of complaints, and resolution) by referring the affected party to the appropriate agencies.

Compliance with Existing State and Federal Fair Housing Laws

The fair housing assessment should include a description of state and local fair housing laws and how the City complies with those laws. These laws include the following:

- **Fair Housing Act; Title VI of the Civil Rights Act of 1964.** The City complies by ensuring its actions related to housing are not discriminatory through City protocols, decision-making procedures, and adhering to non-discrimination requirements of federal funding programs.
- **Rehabilitation Act of 1973.** See Fair Housing Act; also, the City complies through its accessibility protocols, administered and enforced by the City's Human Resources Department.
- **American Disabilities Act.** The City complies with the ADA through building permit review and issuance and as described in this Housing Element.

- **California Fair Employment and Housing Act (FEHA) Regulations.** The City complies with FEHA and its regulations through established City protocols decision making, legal counsel, and advisement.
- **Government Code Section 65008.** The City Zoning Code is written to ensure that the City's actions regarding the development of housing for very low, low, moderate, and middle income persons and households or emergency shelters for the homeless, are not discriminatory. Programs have been included in this Housing Element to remove constraints and facilitate housing for all households, including protected classes (e.g., programs regarding residential care facilities, emergency shelters, etc.).
- **Government Code Section 8899.50.** Chapter B5, *Affirmatively Furthering Fair Housing Analysis*, of this Housing Element documents compliance with Affirmatively Furthering Fair Housing requirements.
- **Government Code Section 11135 et seq.** The City complies with anti-discrimination requirements through the City's Human Resources programs and the City's procurement protocols.
- **Density Bonus Law (Gov. Code, Section 65915.).** The City will update its density bonus ordinance to comply with the new provisions as part of the updates to the Zoning Ordinance (Housing Plan Programs 6 and 9).
- **Housing Accountability Act (Gov. Code, Section 65589.5.).** The City has documented compliance with the Housing Accountability Act as described in Chapter B3, *Housing Constraints Analysis*.
- **No-Net-Loss Law (Gov. Code, Section 65863).** The City has documented compliance with sufficient capacity for RHNA and will ensure compliance with no-net loss via required annual reporting to HCD.
- **Least Cost Zoning Law (Gov. Code, Section 65913.1).** Housing Plan Program 2 ensures that sufficient land is zoned with appropriate standards to accommodate the City's RHNA.
- **Excessive subdivision standards (Gov. Code, Section 65913.2.).** The City's subdivision standards are typical or not excessive and in compliance with the Government Code.
- **Limits on growth controls (Gov. Code, Section 65302.8.).** The City complies as The City does not maintain any restrictions on the number or timing of housing development. The City's General Plan does establish the Urban Development Boundary; however, the boundary extends beyond the city limits and Sphere of Influence and does not limit housing development within the city.
- **Housing Element Law (Gov. Code, Section 65583, esp. subds. (c)(5), (c)(10)).** This Housing Element documents compliance with state Housing Element Law.

The City of Exeter ensures compliance with these laws through the City's daily operations, with any complaints referred to the City Attorney and/or the City Manager for investigation and action, as appropriate. The City has not been a part of any lawsuits, enforcement actions, or settlements related to fair housing or civil rights. Further analysis of the City's compliance with fair housing laws is also provided in Chapter B3, *Housing Constraints Analysis*.

B5.6 Ability to Address Complaints

The City refers fair housing complaints to the Fair Housing Council of Central California (FHCCC), the State Department of Fair Employment and Housing (DFEH), and HATC. The DFEH maintains a record of housing discrimination complaints filed in local jurisdictions. HATC refers fair housing issues and complaints to the U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing and Equal Opportunity (FHEO). Based on data provided by HUD, two FHEO inquiries were reported in Exeter between 2013 and 2021. These inquiries are not considered official cases and the basis of these inquiries was not provided.

The City does not have sufficient staffing and financial resources to adequately address fair housing concerns. The City will collaborate with regional agencies, fair housing providers, organizations, and other jurisdictions within the county to address housing needs, including fair housing outreach and services, as specified in Housing Plan Programs 11 and 14.

B5.7 Segregation and Integration Patterns and Trends

Race and Ethnicity

Exeter has a lower percentage of non-white residents compared to the county and the Tulare County/Fresno County/Kings County tri-county area. Hispanic/Latino residents comprise the largest racial/ethnic group in Exeter (47 percent), less than Tulare County (66 percent). Downtown Exeter is the most racially and ethnically diverse area in the city, as shown in Figure B5-1, with at least 61 percent of non-white residents, followed by Southeast Exeter, where between 41 and 60 percent of residents are non-white. The remainder of the city has a non-white population between 21 and 40 percent.

Exeter has a smaller share of Hispanic/Latino residents than Tulare County and the tri-county area. The percentage of residents in each area that identify as Hispanic/Latino:

- Exeter: 47%
- Tulare County: 66%

Over the past decade, racial/ethnic diversity increased in Exeter (Table B5-1). The percentage of white residents decreased by seven percent, and Hispanic/Latino residents of any race increased by two percent. The proportion of residents who reported as “other or multiple races” decreased slightly. The percentage of Asian American and Native American/Native Alaskan residents increased from zero to six and one percent of the population, respectively. The percentage of Black/African American residents decreased by approximately one percent and are the least populous racial group. Asian American residents make up the third largest racial/ethnic group, after the Hispanic/Latino and White populations. While the Asian population makes up a relatively small share of the population citywide, the largest proportion of the Asian population (64.1 percent or 173 people) is Filipino. As discussed in Section B5.10, *Local Area Knowledge*, in the early part of the 20th century, Filipino workers were brought in to work the grape and fig harvests, replacing American workers for lesser wages. Currently, seven percent of Exeter’s population works in the agriculture, forestry, fishing and hunting, and mining industries.

Table B5-1 Population by Racial Group (City of Exeter)

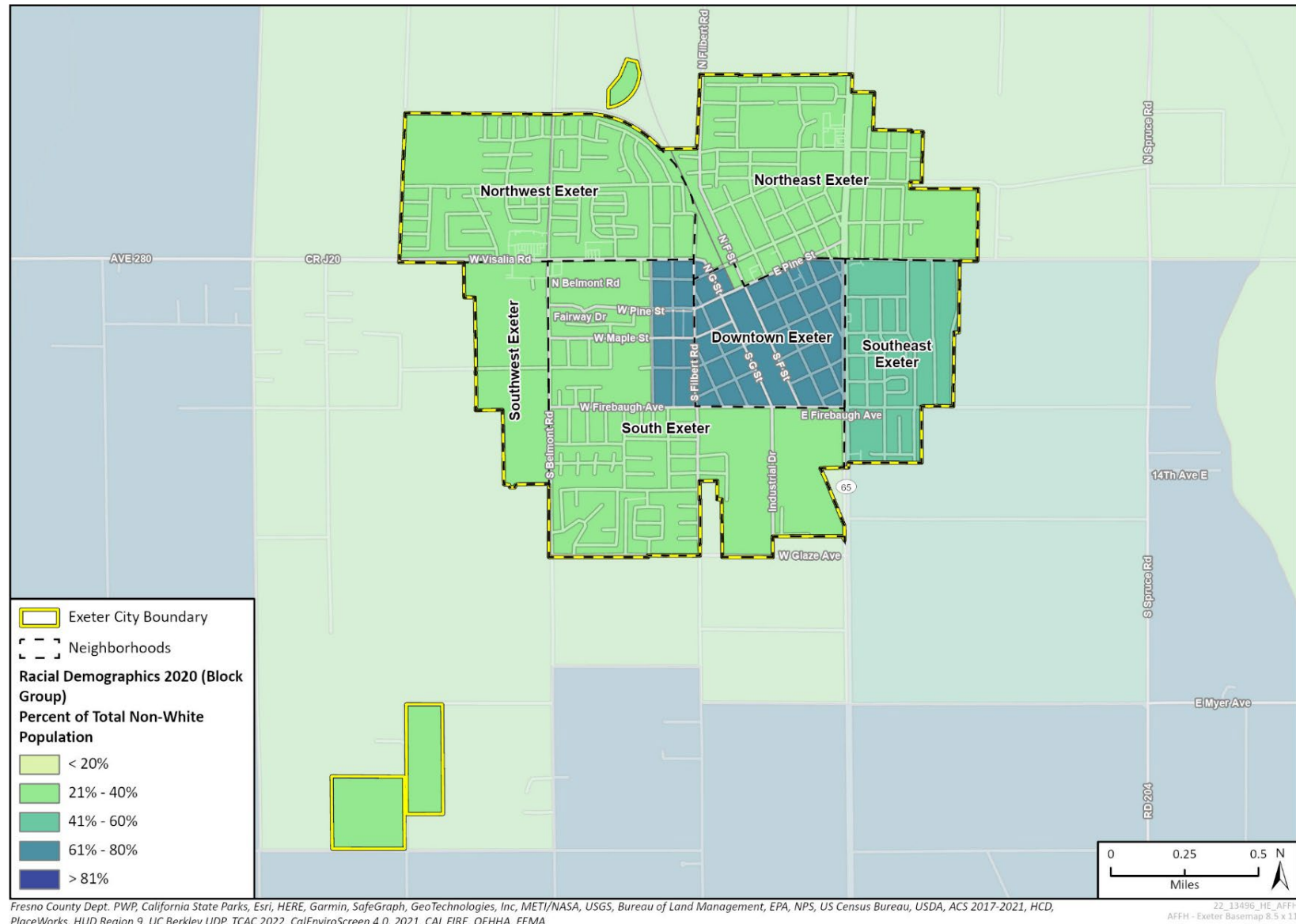
Race	Percent of Population	
	2011	2021
Hispanic/Latino (of any race)	45.8%	47.3%
Not Hispanic/Latino		
White	50.9%	43.7%
Other or Multiple Races	1.7%	1.5%
Asian American	0.0%	6.1%
Black/African American	1.2%	0.3%
Native American/Native Alaskan	0.0%	1.1%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2007-2011, 2017-2021), Table DP05.

The AFFH Data Viewer identifies the degree to which areas have a predominant racial/ethnic majority. Northwest Exeter and Northeast Exeter have a predominantly white population. The southern part of the city south of Visalia Road, Pine Street, and Rocky Hill Drive (in the neighborhoods of Southwest Exeter, South Exeter, Downtown Exeter, and Southeast Exeter) has a predominant Hispanic/Latino population, as shown in Figure B5-2.

According to Othering and Belonging Institute (OBI) racial segregation/integration data, the entire city has a low-medium level of segregation (neither highly segregated nor integrated), as shown in Figure B5-3.

Figure B5-2 Percent of Total Non-White Population (City of Exeter)



Source: AFFH Viewer, 2023.

Figure B5-3 Predominant Population (City of Exeter)

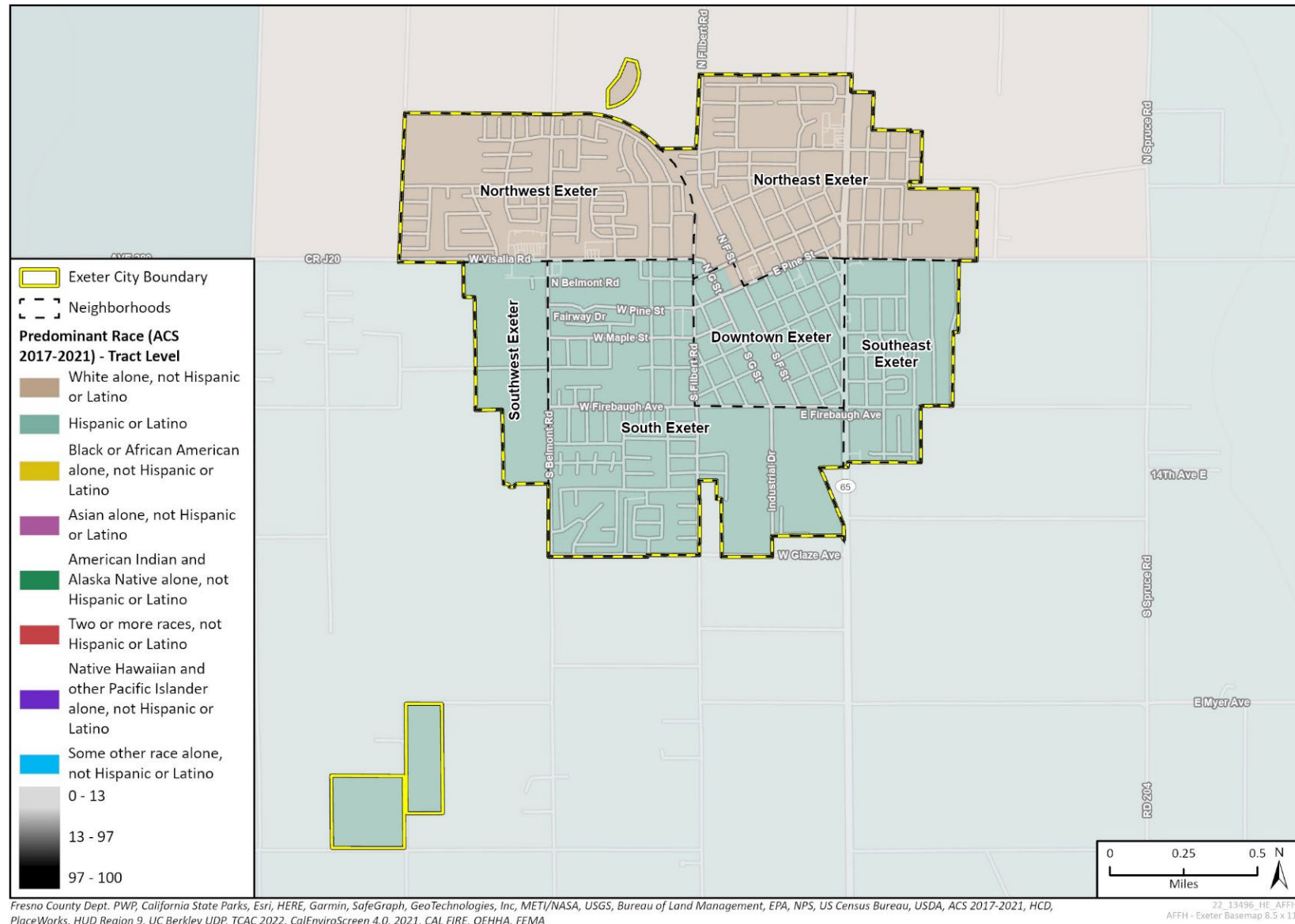
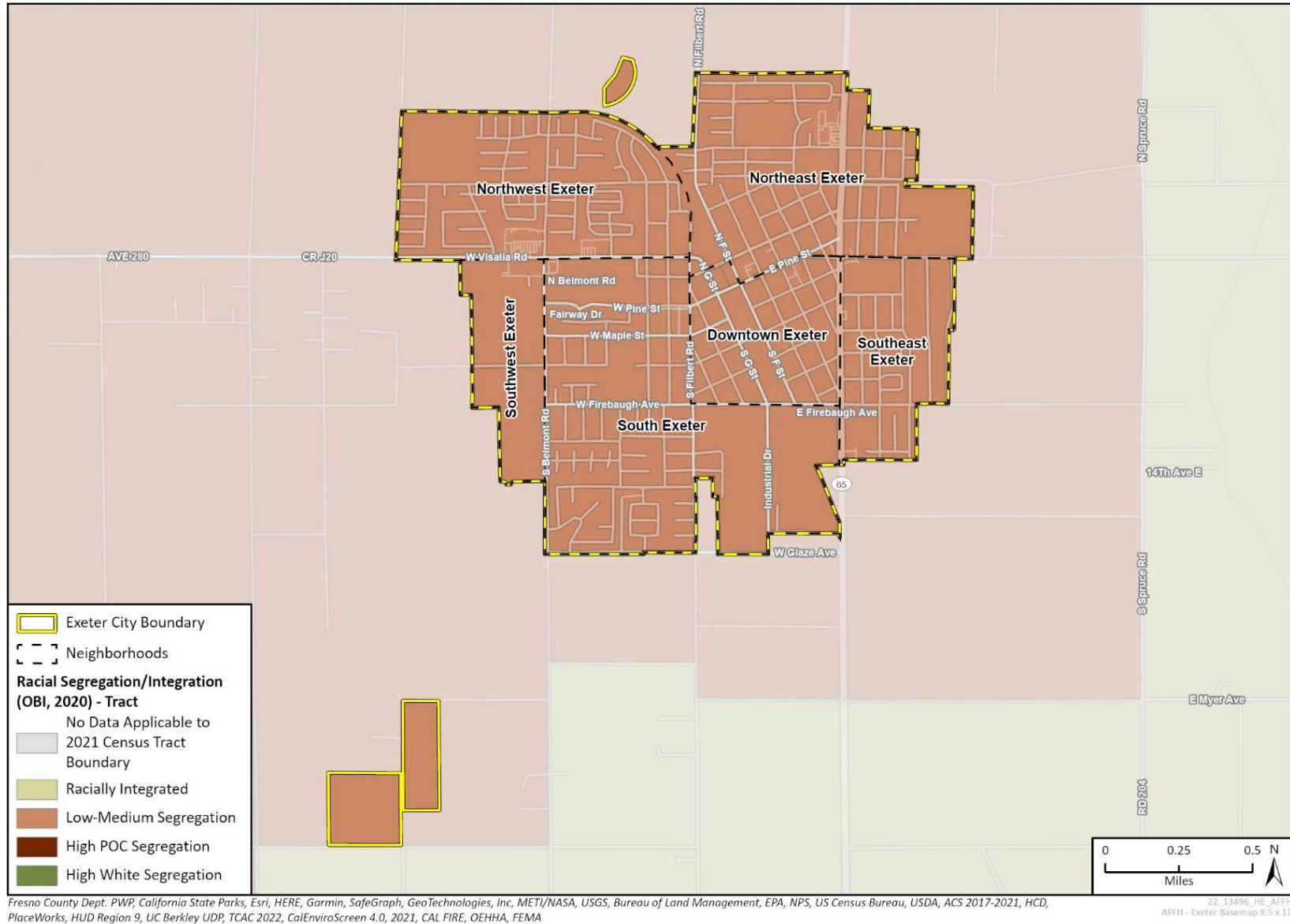


Figure B5-4 Racial Segregation and Integration (City of Exeter)

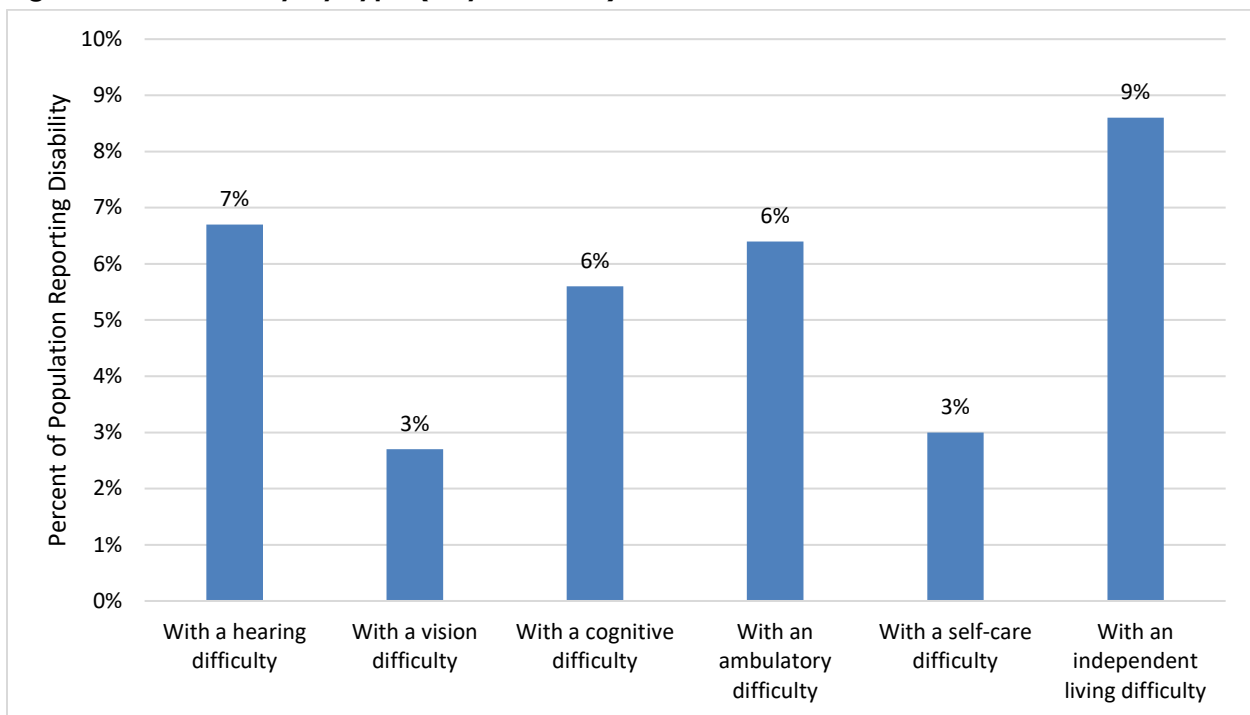


Source: AFFH Viewer, 2023.

Persons with Disabilities

As referenced in Chapter B2, *Housing Needs Assessment*, approximately 14 percent of the population in Exeter (1,559 residents) reported living with one or more disabilities. This is more than the percent of residents living with a disability in Tulare County (12 percent) and the tri-county area (12 percent). The most common disability in the city is independent living disability, followed by hearing difficulty, and ambulatory difficulty, defined as having serious difficulty walking or climbing stairs (Figure B5-5). Disabilities are most prevalent among senior residents. Approximately 45 percent of residents aged 65 and over in the city have at least one disability. According to 2017-2021 ACS data for Exeter, American Indian and Alaska Native and non-Hispanic/Latino white residents reported the highest rates of disability by racial/ethnic group, at 46 percent and 23 percent, respectively.

Figure B5-5 Disability by Type (City of Exeter)



Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed.

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2017-2021), Table S1810.

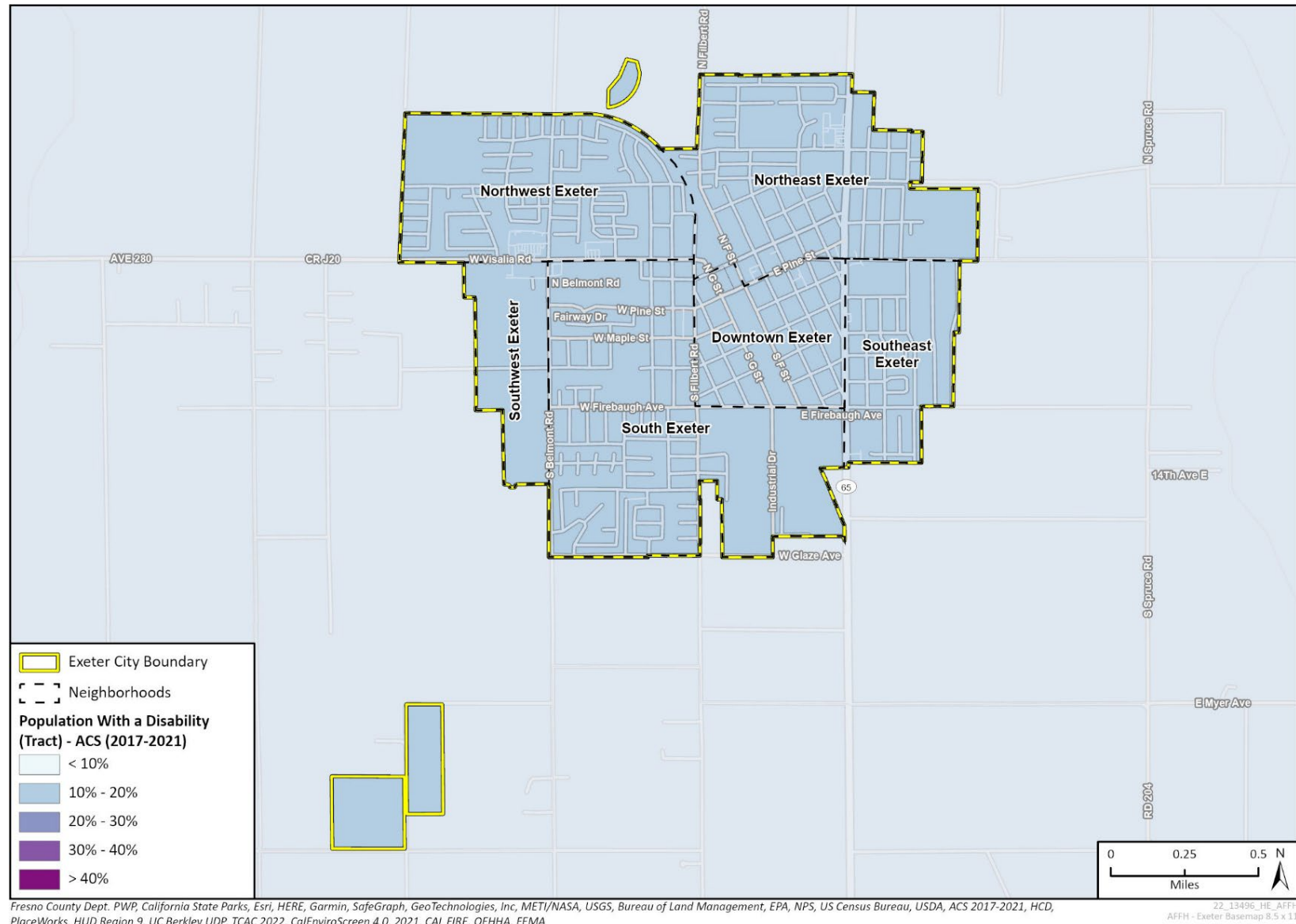
The percentage of the population with a disability is evenly distributed throughout the entire city, with 10 to 20 percent of the population having a disability in all census tracts (Figure B5-6).

Adult residential facilities and residential elderly care facilities are shown in Figure B5-7. There are three adult residential facilities located in Northeast Exeter and one residential elderly care facility in the central portion of the City. One adult residential facility is also located in the unincorporated county to the west of Exeter. Given the size and population of Exeter, these facilities are generally considered sufficient to serve Exeter residents but additional facilities, particularly in the southern and northwest neighborhoods, may benefit the community. However, location and type of facility is dependent on land availability and service provider interest.

According to an interview with city staff, there is a concentration of group homes and elderly care facilities in the Downtown area. This area is considered more walkable and has better access to transportation opportunities compared to other Exeter neighborhoods. Staff indicated that there may be a need for more elderly care facilities on the east and west sides of town. However, Exeter encompasses only two square miles. Therefore, most services and resources are accessible to residents citywide.

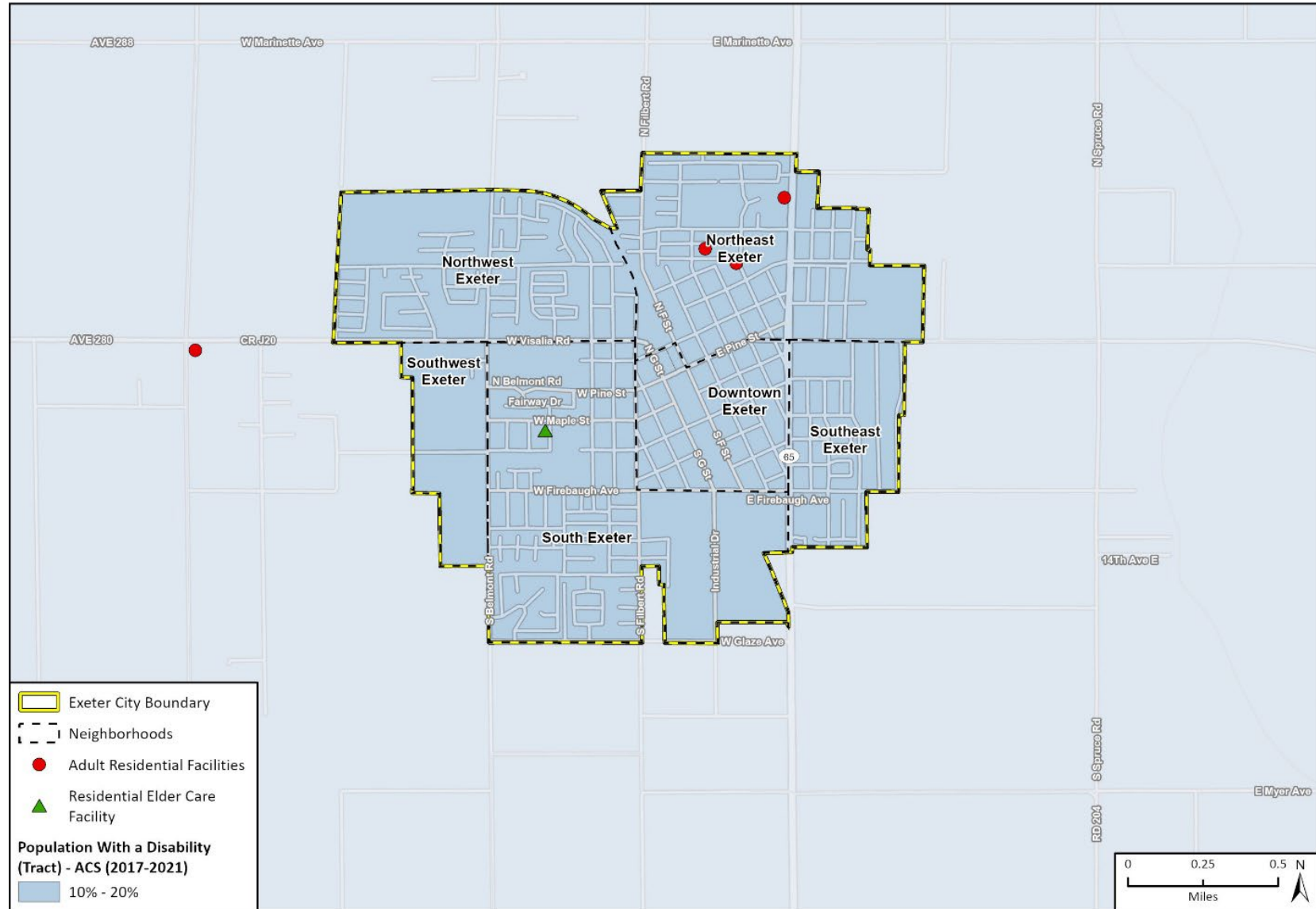
There has been some discussion about the need for ADA/sidewalk improvements in Downtown Exeter. The city is in the process of completing an Active Transportation Plan (ATP) that will include accessibility improvements in this neighborhood.

Figure B5-6 Percent of Population with a Disability (City of Exeter)



Source: AFFH Viewer, 2023.

Figure B5-7 Percent of Population with a Disability and Residential Care Facilities (City of Exeter)



Fresno County Dept. PWP, California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

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Familial Status

As described in Chapter B2, *Housing Needs Assessment*, familial status refers to the presence of children under the age of 18 and the marital status of the head of the household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Examples of differential treatment that are potentially discriminatory include limiting the number of children in an apartment complex or confining households with children to a specific location. Single-parent households are protected by fair housing law.

As of 2021 (latest available data), households with children comprised approximately 39 percent of the total households in the city, which is similar to the county. Married-couple families with children comprised the largest share of households with children (52 percent), which is higher than the county average of 24 percent. Female, single-parent households comprised the next largest category of households with children (40 percent), while male single-parent householders with children comprised 7.5 percent of all households with children. Single-parent, female-headed households are more likely to rent than own, comprising approximately 28 percent of all renter-occupied households in the city but only eight percent of owner-occupied households (Table B5-2).

Table B5-2 Tenure by Household Type and Presence of Children (City of Exeter)

Household Type	Residing in Owner-Occupied Household	Percent of Total Owner-Occupied Households	Residing in Renter-Occupied Household	Percent of Total Renter-Occupied Households	Percent of Households with Children
Married Couple Family, with Children Present	377	48.9%	265	22.8%	51.8%
Single-Parent, Male Householder, no Spouse Present	58	2.8%	35	3.0%	7.5%
Single Parent, Female Householder, No Spouse Present	175	8.6%	329	28.3%	40.6%
Total Households with Children Present	610	30.2%	629	45.8%	
Total Households	2,015		1,160		

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure by Household Type and Presence and Age of own Children 2017-2021 Estimates.

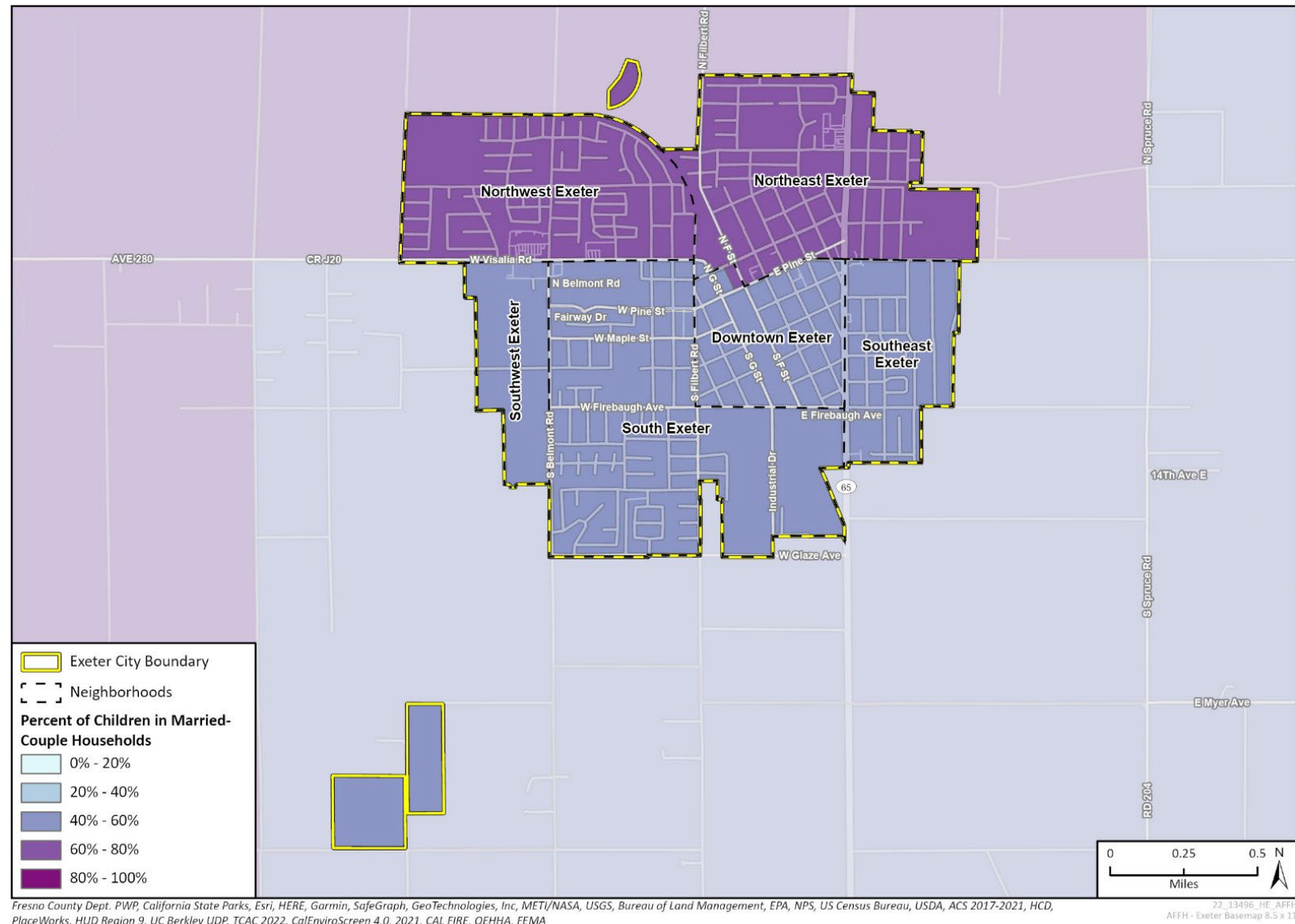
The percentage of children residing in female-headed, single-parent households is evenly distributed throughout the entire city, with 20 to 40 percent of children living in a female-headed, single-parent household in all census tracts (Figure B5-8).

The percentage of children residing in married-couple households is highest in the northern part of the city, with between 60 and 80 percent of children residing in married couple households, as shown in Figure B5-9. The southern part of the city has a lower percentage of children residing in married-couple households.

Child care centers and single-parent female-headed households at the tract-level are shown in Figure B5-10. There are three child care centers in Northeast Exeter, two in Downtown and one in the central portion of the city. Child care centers are accessible to most Exeter populations. Further, there are additional family child care homes in the city, but locations of these facilities are unavailable due to security and privacy reasons.

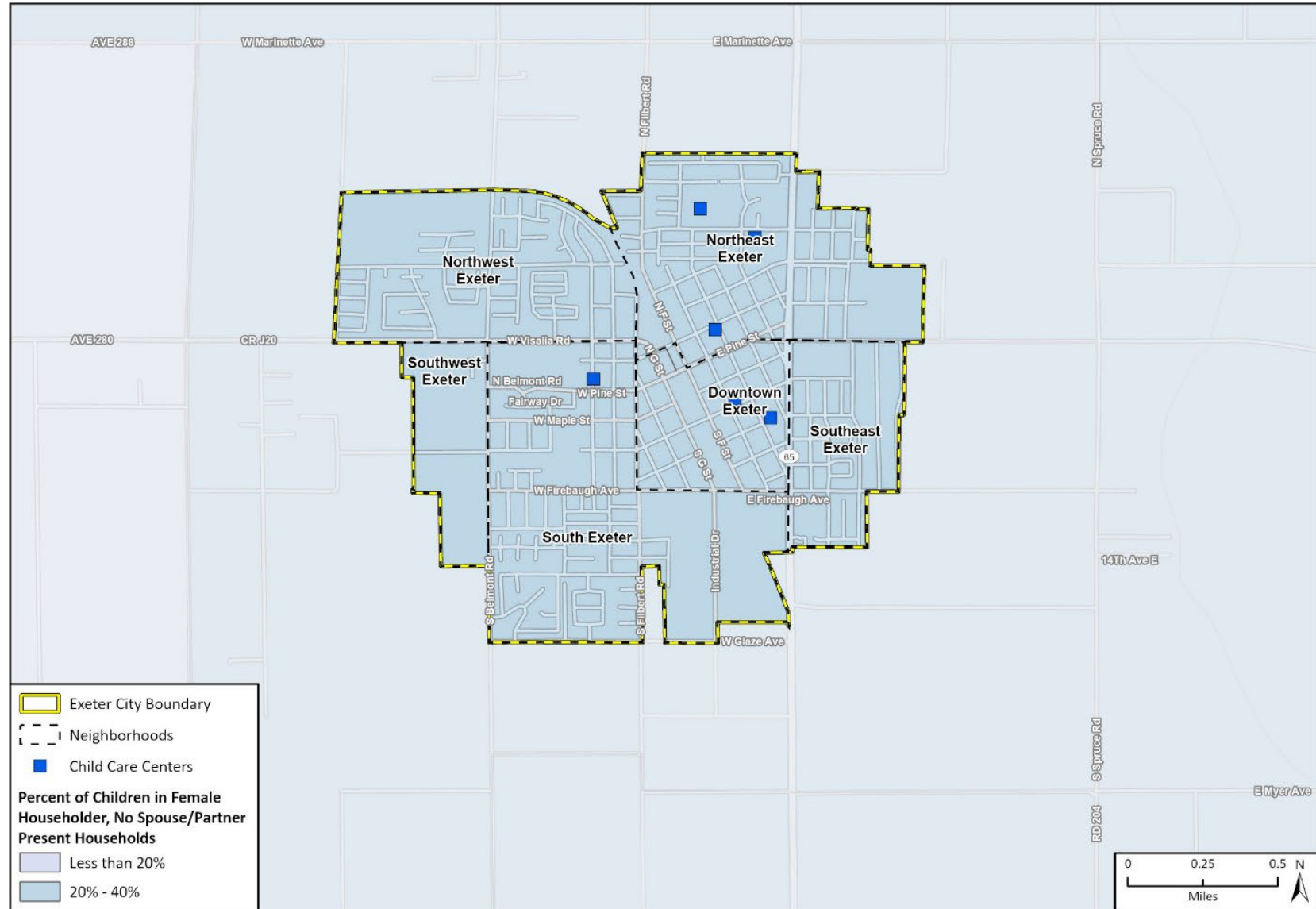


Figure B5-9 Children in Married-Couple Households (City of Exeter)



Source: AFFH Viewer, 2023.

Figure B5-10 Children in Female-Headed Households, No Spouse/Partner Present and Child Care Centers (City of Exeter)



Fresno County Dept. PWP, California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, USFWS, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEIMA

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Household Income

Household income is directly connected to the ability to afford housing. Higher-income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have choices in housing opportunities—that is, when they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

This section identifies household income disparities using data based on median household income and LMI geographies. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI. The definition of low or moderate income is based on HUD income definitions of up to 80 percent of the area median income (AMI). Data for this analysis is from the HUD Low- and Moderate-Income Summary and is based on the 2011-2015 American Community Survey (most recent available data).¹



As of 2021 (most recent available data), Exeter had a median household income of \$55,519 per year, three percent less than the county's median income of \$57,394 and lower than the state median household income of \$87,100.

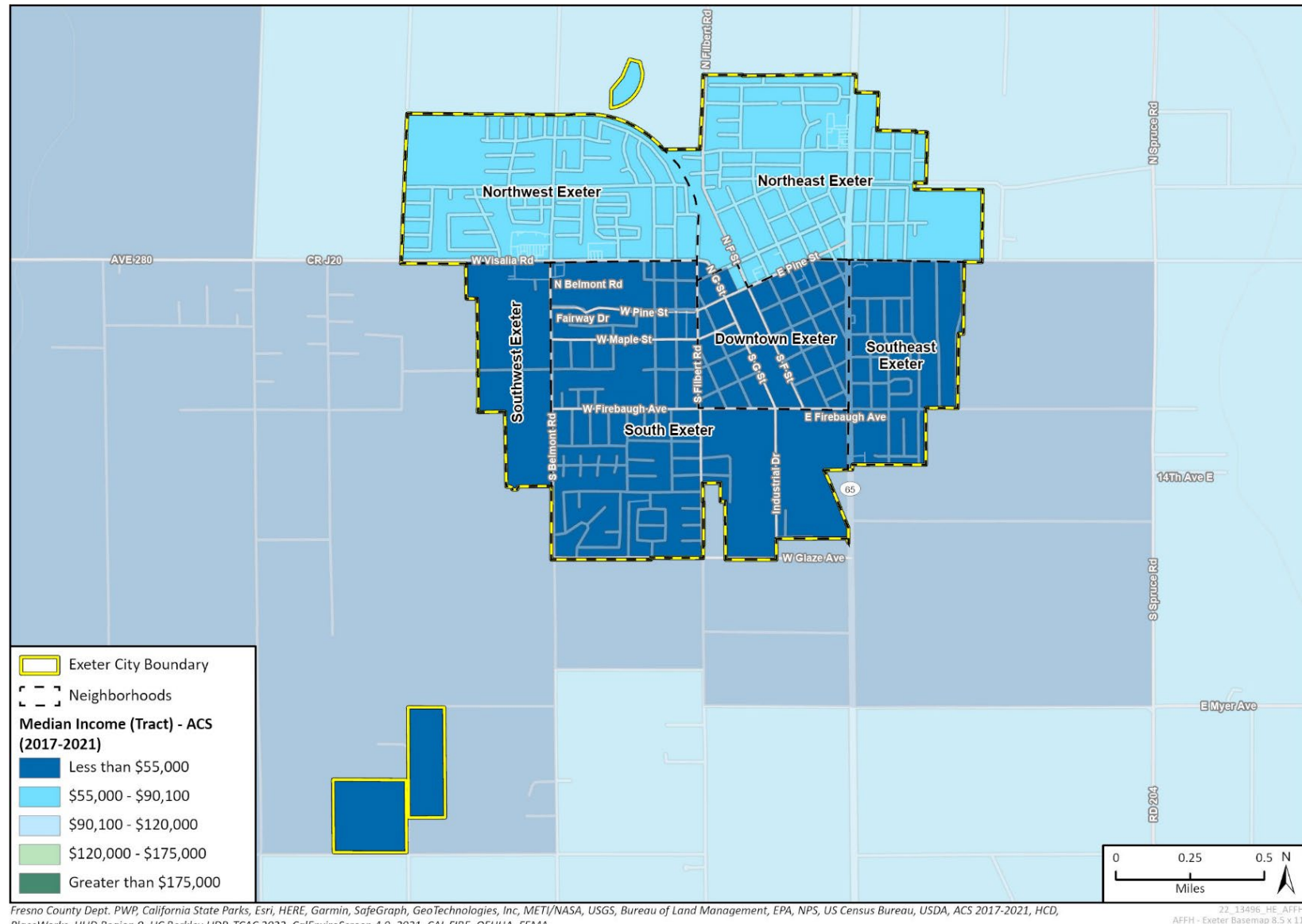
While Exeter has a lower median household income than the county and the state, it has a higher median income than other nearby jurisdictions. According to 2021 ACS data, Exeter has a median income of \$55,519 and nearby Farmersville has a median income of \$47,975. Northern Exeter has a higher median income than the southern portion of Exeter. Median incomes of northern Exeter households are higher than in southern areas, ranging between \$55,000 and \$90,100, while median incomes in southern Exeter are less than \$55,000 (Figure B5-11).

LMI populations are prevalent throughout Exeter and generally follow the same patterns as median household income. Every neighborhood of the city has more than 25 percent of residents that are considered LMI. Downtown Exeter has the highest percentage of LMI residents compared to other neighborhoods (Figure B5-12), where between 75 and 100 percent of the population consists of LMI residents. Northeast, Southwest, and South Exeter have the lowest percentage of LMI residents compared to other parts of the city where between 25 and 50 percent of the population is considered LMI.

¹ HUD Exchange 2021: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

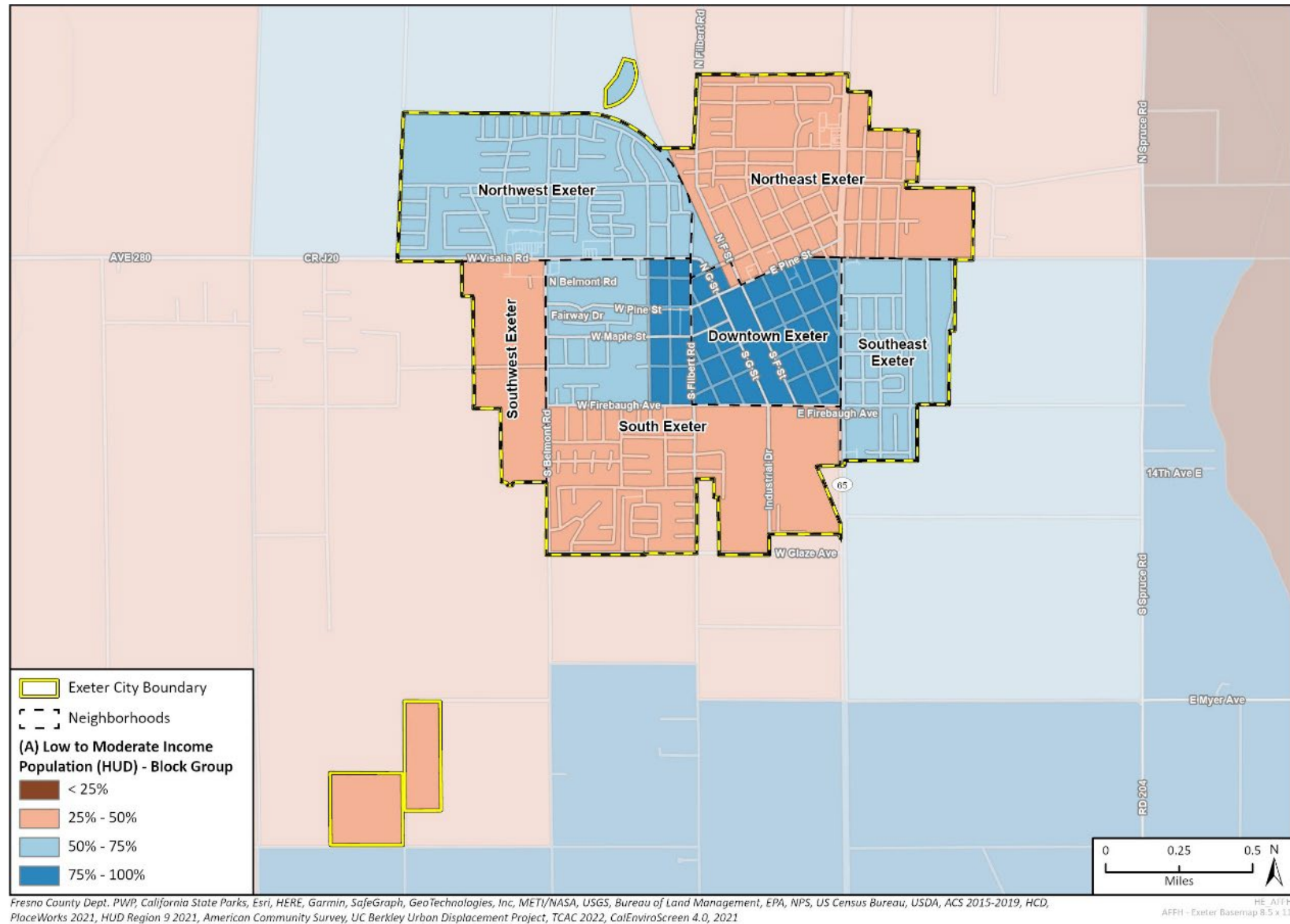
Based on an interview conducted with City staff, older areas of the city, including Downtown Exeter, tend to have smaller, more affordable homes compared to newer neighborhoods. According to the 2018-2022 ACS, the areas south of Visalia Road and Pine Street have higher concentrations of housing units built prior to 1980 compared to North Exeter. As shown in Figure B5-11, this area also has a lower median income. Less than 20 percent of housing units in both the north and south tracts are structures with two or more units (multifamily housing). Additionally, there are 144 affordable units, located in four subsidized housing projects in northern Exeter neighborhoods. Southern Exeter neighborhoods have one project with 24 affordable units. The disparity in median income between North and South Exeter can be attributed largely to the availability of smaller, older, more affordable housing units in Southern Exeter rather than a concentration of multifamily or subsidized housing.

Figure B5-11 Median Household Income (City of Exeter)



Source: AFFH Viewer, 2023

Figure B5-12 Low and Moderate Income Population (City of Exeter)



Source: AFFH Viewer, 2023

Racially and Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), TCAC includes a poverty concentration and racial segregation filter that aligns with HUD's R/ECAP methodology.

TCAC categorizes census tracts that have both a poverty rate of over 30 percent and that are designated as being racially segregated (overrepresentation of people of color relative to the county) as areas of high segregation and poverty. There are no areas of high segregation and poverty in Exeter. However, while not classified as an area of high segregation and poverty, Downtown Exeter has a low household median income of less than \$55,000 (Figure B5-11), a high percentage of LMI residents (Figure B5-12), and a high percentage of non-white residents (Figure B5-1).

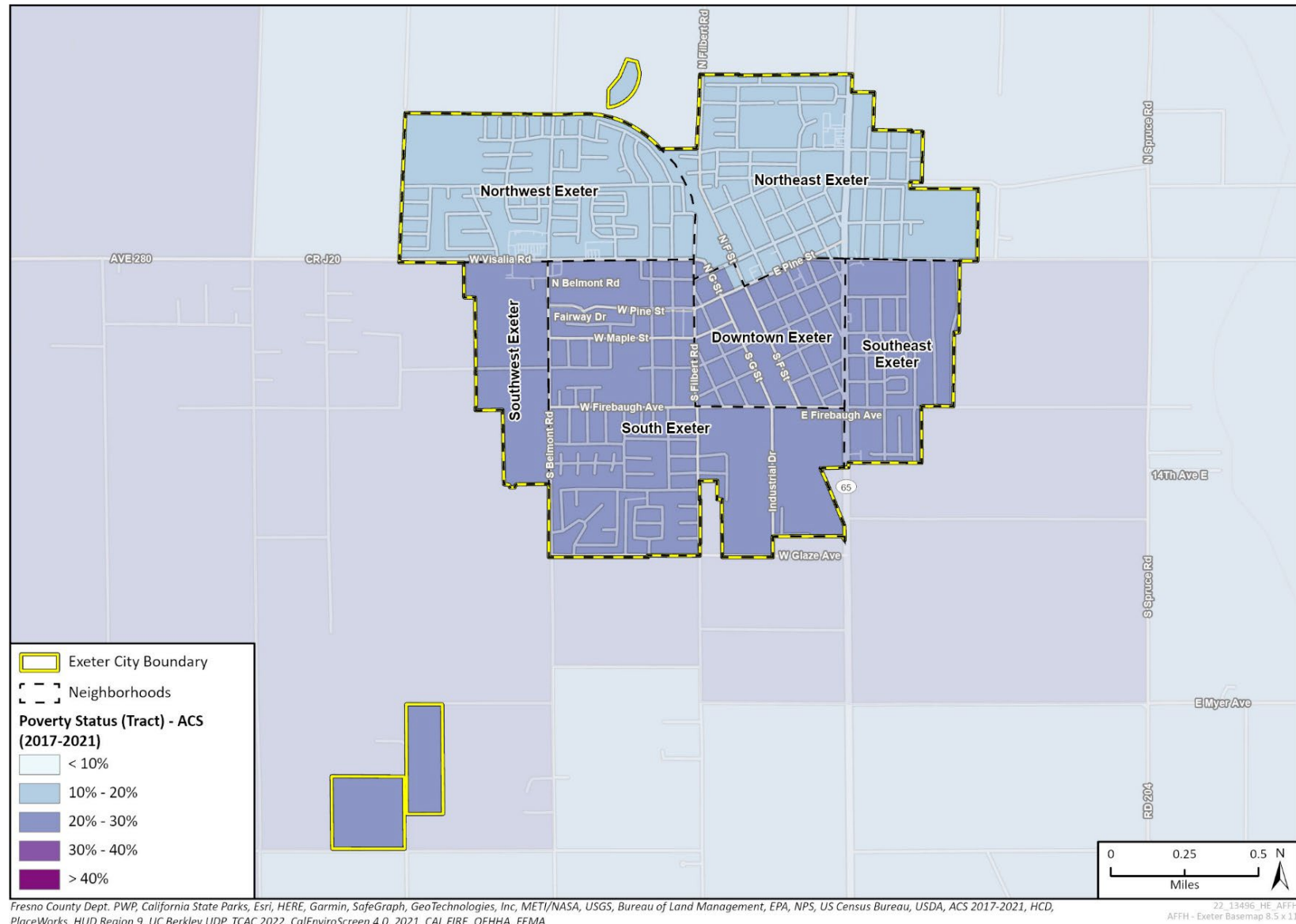
Poverty and Segregation

Poverty rates are higher in the southern portion of the city. Throughout Southwest, South, Downtown, and Southeast Exeter (Figure B5-13), at least 30 percent of households earn an income below the poverty line. The northern portion of the city has the lowest percentage of residents below the poverty line. Downtown Exeter has the highest percentage of residents earning below the poverty line (about 34 percent).

Concentrated Areas of Affluence

The AFFH Data Viewer identifies RCAAs as census tracts that have a white population that is 1.25 times higher than the Council of Governments (COG) region and a household median income 1.5 times higher than the AMI. There are no RCAAs in Exeter as defined by HCD. However, Northeast, Southwest and South Exeter have incomes that exceed the county's household median income of \$52,534 per year, with median incomes of approximately \$63,207 and \$73,942 respectively. In northern Exeter, the percentage of white residents is approximately 56 percent, approximately 43 percent higher than the percentage of white residents in the county as a whole (39 percent).

Figure B5-13 Poverty Status (City of Exeter)



Source: AFFH Viewer, 2023

B5.8 Disparities in Access to Opportunities

Transit Access and Walkability

Several transit organizations operate throughout the city, offering fixed route bus services to residents.

Transit Opportunities Operating in Exeter



- Visalia Transit operates one fixed bus route through the city (Route 9A), offering bus services to residents. This bus route provides transportation to nearby communities of Farmersville and Visalia. It takes approximately 37 minutes to reach the Visalia Transit Center from Exeter. Visalia Transit's service operates from 6:00 am to 9:30 pm on weekdays and shorter hours on the weekends.
- Visalia Transit also operates Dial-a-Ride that services the city, which is a shared ride, advanced reservation, origin-to-destination service for persons with disabilities. The Dial-a-Ride service area includes anywhere within city limits.
- The Tulare County Regional Transit Agency (TCRTA) operates Tulare County Area Transit (TCaT) which provides fixed route bus services to the surrounding cities, including Visalia, Tulare, and Lindsay, and the communities of Woodville, Springville, and Ducor.
- TCaT also offers its own Dial-A-Ride program that includes anywhere within three-quarters of a mile of TCaT Routes C10-C90.

The Visalia Transit 2016 Short-Range Transit Plan and the Visalia Long-Range Transit Plan propose modifications to Route 9 to reduce travel times for Exeter residents heading to Downtown Visalia and other service areas. Weekday service frequency is slated to improve from 45 to 30 minutes, with additional midday trips on Thursdays and Sundays. Despite these changes, Route 9's configuration within Exeter remains unchanged, with no new stops planned.

Residents in Exeter have lower access to transit and lower transit ridership compared to residents in other cities in the region such as Visalia and Tulare. Exeter received an average AllTransit performance score of 3.6 out of 10, which is based on a combination of a low number of transit trips per week and low number of jobs accessible by transit.² For comparison, the cities of Visalia and Tulare received slightly higher performance scores, 6.5 and 5.4 respectively. According to ACS estimates, 91 percent of commuters commute by driving alone, 11 percent carpool, two percent walk, and less than one percent

² AllTransit.Org, 2023. <https://alltransit.cnt.org/>

commute through other means. No resident reported using public transportation or biking. The only neighborhood with access to bus service is Downtown Exeter, with two bus stops: one on Belmont Road and Maple Street, and another at Palm Street and B Street. The remainder of the city is not within proximity of a transit stop. Several areas in the city that are zoned for multifamily, such as between Filbert Avenue, Firebaugh Avenue and G Street, and along Quince Avenue, are not within proximity to a transit stop. Transit access is particularly important for residents living in higher density housing because these residents tend to be lower-income and may not have reliable access to a vehicle. Based on local knowledge, additional transportation options are needed for Exeter residents and workers.

Walk Score is a private company that offers a walkability index on its website and measures the pedestrian friendliness of a given location by analyzing walking routes to nearby amenities and examining population density and road metrics, including block length and intersection density.³ According to Walk Score, Downtown Exeter received a walk score of 88 out of 100, which is considered “very walkable.” The Environmental Protection Agency (EPA) walkability index ranks block groups according to their relative walkability. According to the EPA index, the most walkable area in the city is Downtown Exeter. Southwest, Northwest, Northeast, and South are considered below average walkable, and Southeast Exeter is the least walkable (Figure B5-14). The eastern boundary of Southeast Exeter is made up of industrial uses with long uninterrupted blocks and railroad tracks. There are also few commercial resources within the neighborhood, reducing the walkability of the neighborhood.

At the time of publication, bike lane locations have been identified as part of the General Plan, but their construction is ongoing as development occurs in Exeter. Traffic calming measures are emphasized with new development.

According to the Tulare County Association of Governments (TCAG) 2022 Regional Active Transportation Plan for the Tulare County Region, priority active transportation improvements in Exeter emphasize creating safe routes to schools and improving pedestrian and bicycle connections throughout the city, particularly in Downtown Exeter. Projects include installation of Americans with Disabilities Act (ADA)-compliant sidewalks and ramps to create safe pedestrian routes to local elementary, middle, and high schools and school-related recreational facilities and creating bike lanes throughout the city, including along Belmont Road. In addition, Visalia plans to construct a multi-use trail along the south side of the San Joaquin Valley Railroad tracks from Visalia to Rocky Hill that would connect Exeter to Visalia and Farmersville. These improvements will increase walkability and access to active transportation throughout Exeter, especially surrounding local schools.

The City recently applied for funding for Safe Routes to School (SRTS) improvements. If funding is secured, the City will conduct a SRTS study to identify areas and improvements that would best serve the community. The City also adopted an Active Transportation Plan (ATP) in October 2024. The ATP is consistent with and integrates principles from the City’s 2022 Complete Streets with ADA Compliance and Active Transportation Safety Enhancement (“Complete Streets”) Plan, Exeter’s General Plan, the 2022 Tulare County Regional Active Transportation Plan, and the City’s Active Transportation Program Grant Application – City of Exeter State Route 65 Active Transportation and Complete Streets Corridor.

Under the 2022 Complete Streets Plan, the city has identified opportunities for bicycle and bike parking facilities throughout Exeter. High-priority bikeways include:

- B Street from Palm Street to Rocky Hill Drive – Class II
- Rocky Hill Drive from B Street to east City limits – Class III

³ Walk Score, 2023. <https://www.walkscore.com/methodology.shtml>

- San Juan Avenue from Kaweah Avenue/SR 65 to Crespi Avenue - Class III
- Crespi Avenue from San Juan Avenue to Rocky Hill Drive – Class III

High-priority bikeways are primarily located in the Downtown area. However, bikeway opportunities have been identified in all Exeter’s neighborhoods (Northwest, Northeast, Southwest, Southeast, and South). The ADA Compliance plan also recommends adding 10 more bicycle parking facilities around the schools, parks, and public spaces.

As stated in the ATP, the City’s pedestrian infrastructure exhibits disparities, particularly noticeable between older and newer sections of the city. Older areas, primarily located south of Visalia Road and east of downtown, often lack continuous sidewalks, presenting physical barriers to pedestrian movement. The ATP identified Pine Street, Rocky Hill Drive, Chestnut Street, and the Exeter High School track as heavily utilized corridors. Missing sidewalks or sidewalks in need of replacement have been identified citywide but tend to be slightly more concentrated in central Exeter areas. The ATP also identified existing physical barriers hindering pedestrian mobility (e.g., damaged sidewalks, uneven surfaces due to tree roots, overgrown vegetation obstructing walkways, and urban fixtures such as fire hydrants, utility boxes, narrow sidewalks) and crosswalk infrastructure. Recommendations from the ATP include, but are not limited to, the following.

Bicycle Projects: Includes 27 proposed bicycle projects, 17 of which were referenced in the Complete Streets Plan, and one referenced in the Tulare County Regional Transportation Plan. Beyond the bikeways listed above, the ATP identified Kaweah Avenue (SR 65) (from Atkinson Way to Firebaugh Avenue) and North G Street (from W Palm Street to Firebaugh Avenue) as high-priority bikeway projects. The Kaweah Avenue (SR 65) path spans nearly the entire city, running between the Downtown and Southeast neighborhoods through the northern city boundary in the Northeast neighborhood. The North G Street bikeway spans the Downtown neighborhood, connecting Northwest and South Exeter. While bikeway improvements in the central areas of the city are prioritized, opportunities have been identified citywide. These improvements prioritize areas in need of improvements and would also serve vulnerable populations identified in Exeter, such as lower-income households.

Pedestrian Projects: Identifies 31 proposed corridor projects (ten referenced in the Complete Streets Plan and one referenced in the Tulare County Regional Transportation Plan). Corridor projects include gap closures, high-visibility crosswalk installations, changes in parking facility types, adding bicycle parking stalls, installation of advance warning signs, removal of sidewalk obstructions, railroad crossing improvements, installing ADA curb ramps, transit stop improvements, adding wayfinding signs and other improvements. The following planned priority pedestrian improvement corridors were identified in the Complete Streets Plan.

- Katelyn Court (from Vine Street to West Glaze Avenue) bisects Southwest and South Exeter and continues through Northwest Exeter.
- West Visalia Road/Pine Street/Rocky Hill Drive (from North Elberta Road to eastern city boundary) runs from the western city boundary in Northwest Exeter through Southwest, South, Downtown, Northeast, and Southeast Exeter.
- Chestnut Street (from South Orange Avenue and 1st Street) connects the South, Downtown, and Southeast neighborhoods.
- West Firebaugh Avenue (from Katelyn Court to 3rd Street) begins at the intersection of the Southwest and South Exeter neighborhoods and spans Downtown and Southeast Exeter through the eastern city boundary.

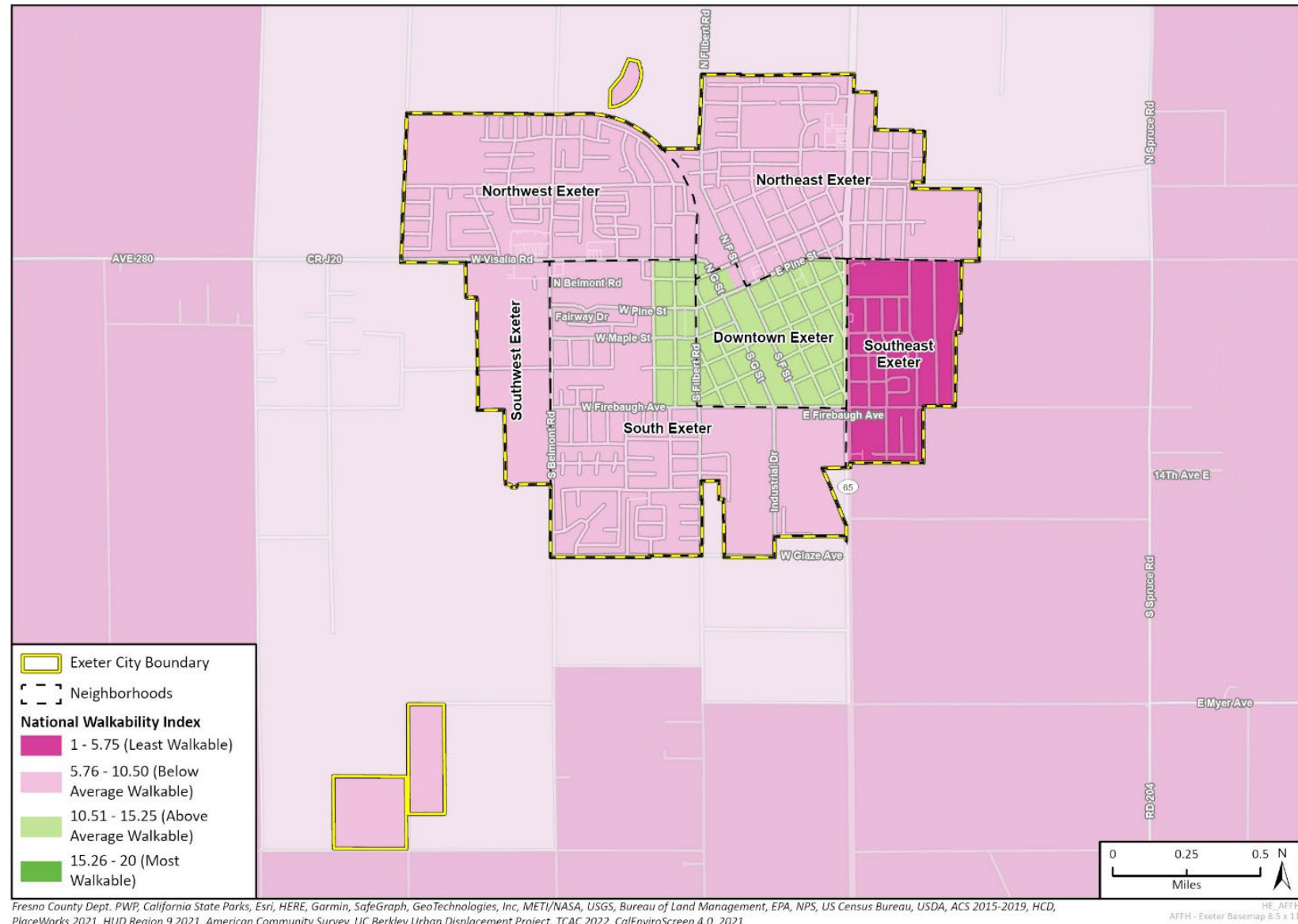
- D Street (from Sequoia Drive to SR 65) connects the Downtown and Southeast neighborhoods to Northeast Exeter.

New priority pedestrian improvement corridors identified by the ATP are primarily located in Downtown Exeter. High-priority corridors are located in Downtown and Northeast Exeter, medium-priority corridors are located in Downtown and South Exeter, and low-priority corridors are located in Downtown, Northeast, and Northwest Exeter.

Supporting Infrastructure: The ATP also made recommendations to support the Exeter Recreation Department. Recommendations include trailhead locations, trail parking, benches, water stations, wayfinding signs, bicycle parking and storage facilities, pedestrian countdown signals, and shade trees.

The City's efforts to improve transportation opportunities in Exeter are ongoing. Existing initiatives, efforts, and programs will increase mobility and accessibility in the city, serving vulnerable populations that may have reduced access to transportation opportunities, such as persons with disabilities and lower-income households.

Figure B5-14 Walkability Index (City of Exeter)



Source: National Walkability Index, 2023

Access to Quality Education

TCAC educational outcomes are measured through the educational opportunity index, which measures the percentage of 4th graders who meet math and literacy proficiency standards, percentage of high schoolers who graduate on time, and percentage of students not receiving free or reduced-price lunch. Scores are generated by comparing census tracts to all other census tracts within the same COG. Scores range from 0-1, with 1 being the most positive educational outcome, and 0 being the least positive educational outcome. Educational outcomes are higher in southern Exeter than in northern Exeter (Figure B5-15). The City's educational outcomes are more positive than other nearby jurisdictions in Tulare County, particularly in southern Exeter.

Exeter is served by the Exeter Unified School District (EUSD), which manages six schools, including one community day school, one high school, one alternative high school, one middle school, and two elementary schools. During the 2022-2023 EUSD enrolled approximately 2,637 students.

According to Kidsdata.org, a data compilation program of the Lucile Packard Foundation for Children's Health, EUSD had a high school graduation rate of 92 percent in 2020. The student population at EUSD is majority Hispanic/Latino and white (65 percent), followed by white (35 percent), and less than one percent are Native American/Alaskan Native, Black/African American, Asian/Pacific Islander, and multiracial. English learners comprise 14 percent of students, and approximately 70 percent are eligible for free or reduced-price meals.^{4,5} In addition, approximately one percent of students are eligible for the Migrant Education Program, meaning their parent/guardian is a migratory worker in the agricultural, dairy, lumber, or fishing industries and whose family has moved during the past three years.^{6,7}

Education attainment levels of Exeter residents are higher than the county and tri-county averages. According to Census, 69 percent of the City's adult population (25 years of age and older) does not have a college degree (compared to 86 percent of the county and 83 percent of the tri-county area), and 16 percent of residents do not have a high school degree (compared to 30 percent in the county and 25 percent in the tri-county area).

The City recently applied for funding for Safe Routes to School (SRTS) projects. If funding is secured, the City will conduct a SRTS study to identify areas and improvements that would best serve the community. City staff also annually coordinate with EUSD to facilitate discussion on housing and the need for additional school facilities. As of August 2025, the City, in collaboration with EUSD, has not identified the need for an additional public school or other educational facility.

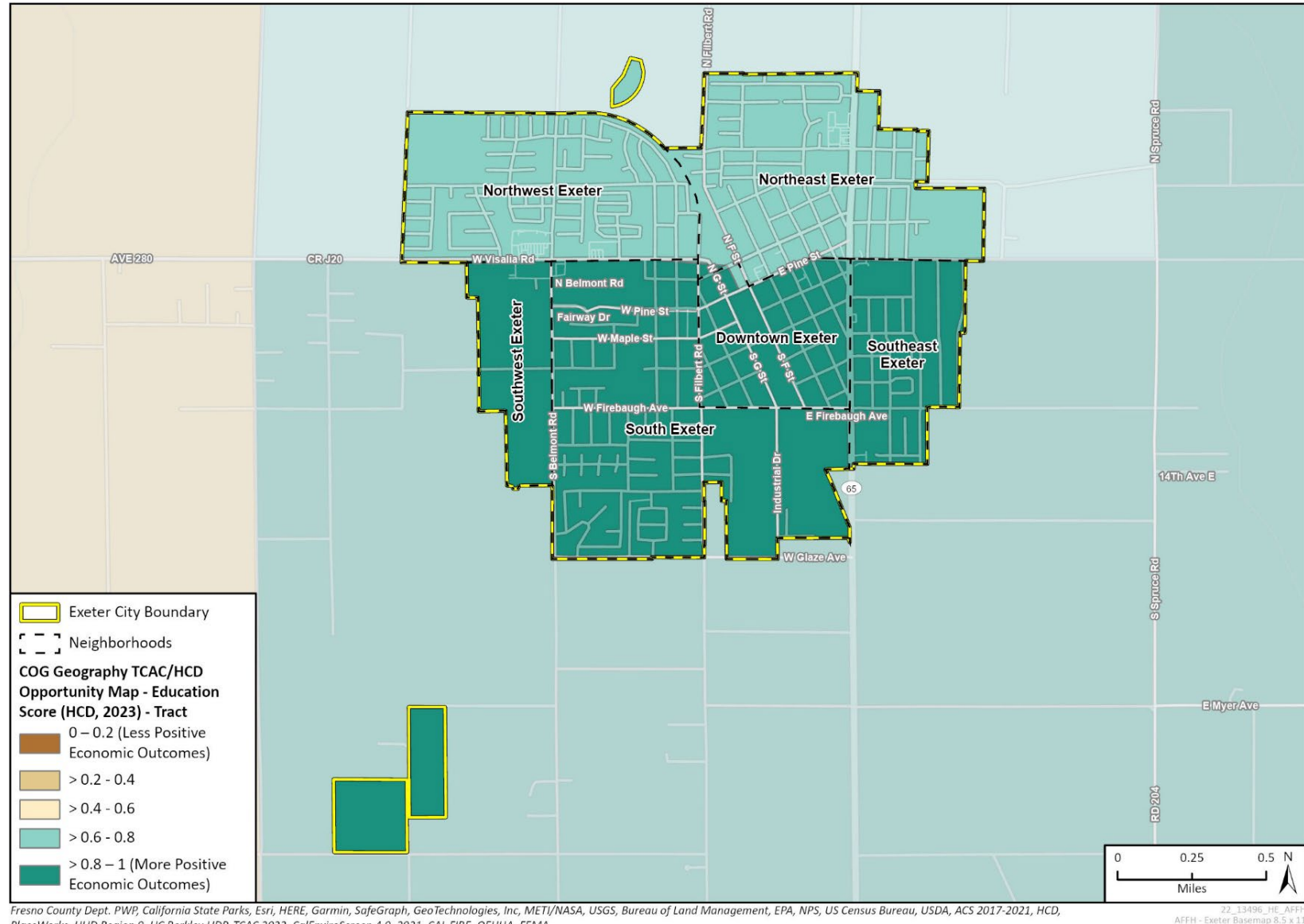
⁴ EUSD. 2022-23 Local Control and Accountability Plan (LCAP) Overview. <https://4.files.edl.io/2ae5/06/23/22/225618-30c4c70e-0780-48d8-8a8e-1b9ecf4f0133.pdf>

⁵ Ed-Data. 2023. Exeter Unified. <http://www.ed-data.org/district/Tulare/Exeter-Unified>

⁶ Kidsdata.org. 2023. Exeter Unified. <https://www.kidsdata.org/region/2150/exeter-unified/results#cat=18>

⁷ California Department of Education. 2023. Overview of Migrant Education in California. <https://www.cde.ca.gov/sp/me/mt/overview.asp>

Figure B5-15 TCAC Opportunity Areas – Education Outcomes (City of Exeter)



Source: AFFH Viewer, 2023

Economic Outcomes

TCAC economic opportunities, measured by census tract, considers poverty, adult education attainment, employment rate, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes compared to other census tracts within the same COG.

Economic outcomes in Exeter are average compared to other cities in the county. The City does not contain any areas with the least positive economic outcomes, nor does it contain areas with the most positive economic outcomes. However, Northwest and Northeast Exeter have more positive economic outcomes than the southern portion of the city (Figure B5-16).

In 2021, Exeter had a labor force participation rate of 48 percent for persons 16 years and older, lower than the labor force participation rate for the county and tri-county area. This lower rate could be due to the relatively higher senior population of adults over 65 in Exeter than that of Tulare County overall (around 13 percent and 11 percent respectively). The largest industries in Exeter are educational services, health care, and social assistance (26 percent of employed population); retail trade (nine percent); and professional, scientific, and management, and administrative and waste management services (nine percent). Educational Services, health care, and social assistance, and retail are also the largest industries in the county based on employment.

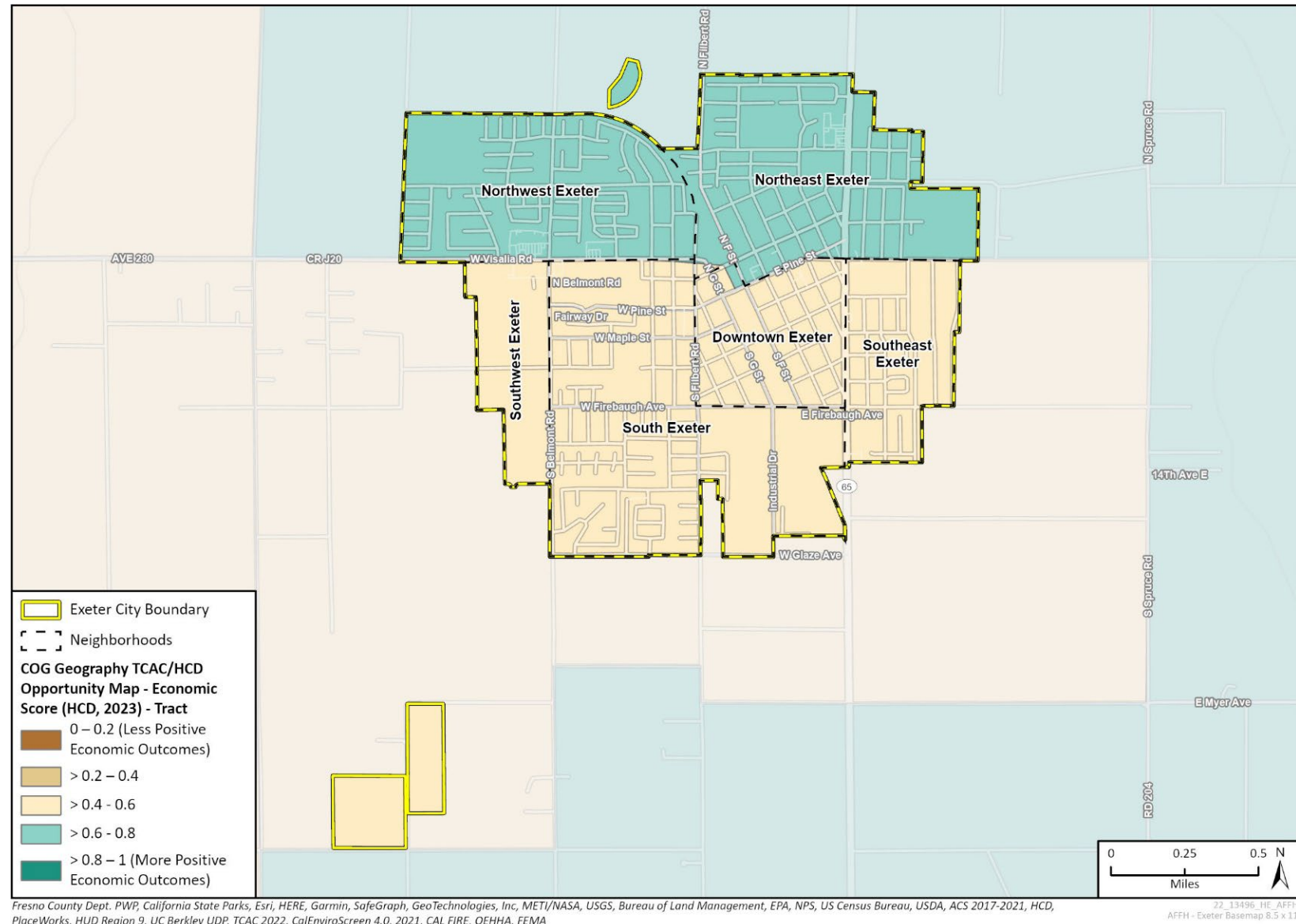
According to the Tulare County Economic Development Corporation, some of the largest employers in the city are Svenhards Bakery, International Paper, Waterman Industries, and the San Joaquin Valley Railroad.⁸ Beyond industrial employment opportunities, major employers in Exeter include grocers and smaller businesses, specifically in the Downtown area. The City actively collaborates with the Tulare County Economic Development Corporation. As of August 2025, there are no major economic development initiatives expected to occur in Exeter.

Most of the land zoned for commercial, industrial, and public facility uses is in Downtown, Southeast and Southwest Exeter. Most of Northeast, Northwest, and South Exeter is not zoned for uses that provide employment opportunities and are primarily zoned for residential uses. The majority of residents who work commute outside the city for work (85 percent). Approximately 18 percent of employed Exeter residents work in Visalia, 15 percent work in Exeter, six percent work in Porterville, and six percent work in Tulare.⁹ Many who work in Exeter commute long distances to find affordable housing, even if it is substandard in nature.

⁸ Tulare County Economic Development Corporation. City of Exeter. Available online at: <http://tularecountyedc.com/wp-content/uploads/2019/09/City-of-Exeter.pdf>, accessed March 22, 2023.

⁹ U.S. Census Bureau. 2023. OnTheMap Work Destination Analysis. <https://onthemap.ces.census.gov/>

Figure B5-16 TCAC Opportunity Areas - Economic (City of Exeter)



Source: AFFH Viewer, 2023

Healthy and Safe Housing Environment

Pollution burden in Exeter is comparable to most of the western tri-county area, including the western urbanized area of Tulare County and Fresno County and the entirety of Kings County. The CalEnviroScreen map for Exeter identifies the degree to which communities are considered burdened by pollution by comparing the scores of each census tract to every other census tract in the state. CalEnviroScreen identified a high degree of pollution burden throughout most of the city but highest in the southern portion of the city (Figure B5-17). Pollution burden associated with pesticide use, groundwater threats, hazardous wastes, and impaired waters are higher in the northern area of the city, while pollution burden associated with lead from housing and cleanup sites are higher in the southern area of the city. Pollution burden associated with ozone, particulate matter, toxic releases, and drinking water contaminants are high throughout the entire city.

Pollution burden is high throughout Exeter, particularly associated with ozone, particulate matter, toxic releases, and drinking water contaminants. Additionally, population characteristics that make Exeter residents more vulnerable to pollution include cardiovascular disease, low education attainment, high rates of housing burden for low-income households, high poverty and unemployment, and linguistic isolation.



The TCAC environmental opportunity map also identifies pollution burden, using CalEnviroScreen scores. However, unlike CalEnviroScreen, the TCAC map compares census tracts to other census tracts within the same council of governments to show differences in pollution burden within the region. According to the TCAC opportunity map, the northern portion of Exeter has lower environmental outcome scores than the southern portion of Exeter (Figure B5-18). Environmental outcome scores in Exeter are higher than other jurisdictions within the western urbanized area of Tulare County. According to CalEnviroScreen, the city does not contain any toxic release inventory (TRI) facilities, it has lower traffic volumes, lower levels of asthma, and no impaired water bodies, compared to the rest of the western portion of the county.

Senate Bill (SB) 535 tasks the California Environmental Protection Agency with identifying disadvantaged communities. Disadvantaged communities are low-income areas that are disproportionately affected by environmental pollution and other hazards. Under SB 535, a minimum of 25 percent of funds from the Greenhouse Gas Reduction Fund, funded by revenue from the State's cap-and-trade emissions program, goes to projects that benefit disadvantaged communities. Under SB 535, the southern portion of the city (Southwest, South, Downtown, and Southeast Exeter) is considered a disadvantaged community (Figure B5-19). The neighborhoods in this area generally have lower percentages of LMI and non-white populations compared to the rest of the city (Figure B5-2. and Figure B5-12). Northwest Exeter and Northeast Exeter are not considered disadvantaged communities.

Access to parks and open space is also crucial in providing healthy and safe neighborhoods for housing. As mentioned previously, Exeter encompasses only two square miles. Given the small footprint of the city, opportunities and resources are generally equally accessible citywide. According to the Parks Master Plan (July 2025), the city currently maintains 12 parks and one trail, encompassing 33.48 acres. Developed parkland accounts for 31.8 acres. With a population of 10,179, the City maintains a ratio of

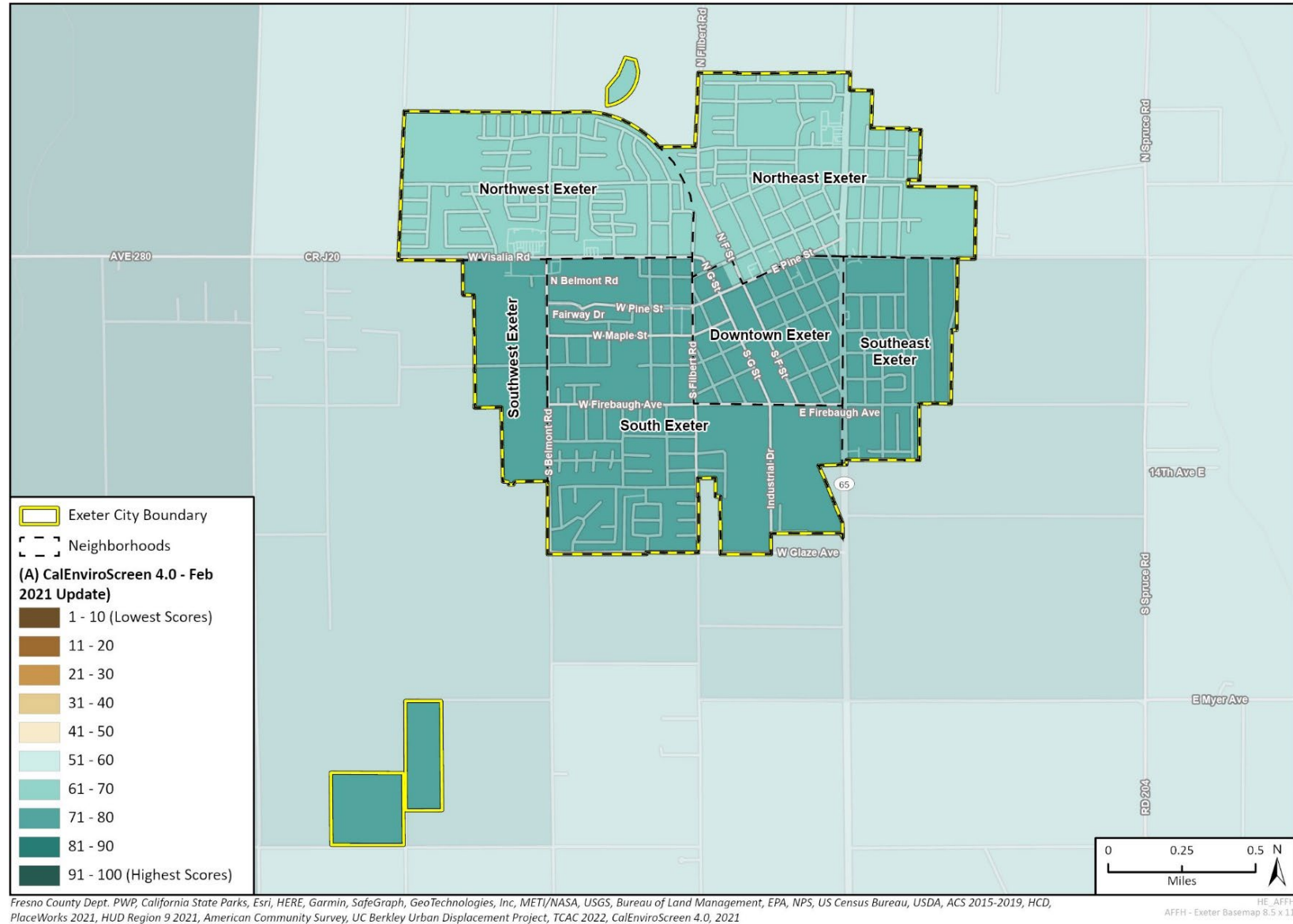
3.1 park acres per 1,000 population. This is less than the recommended ratio of five acres per 1,000 residents set forth in the Parks Master Plan, but is superior to most other California cities with comparable populations. Smaller parks are most concentrated in the Central Exeter area (Downtown/South/Northeast neighborhoods), while larger parks such as Dobson Field, Schroth Park, and Unger Park are located in Southeast, Northwest, and South Exeter, respectively. Overall, most of the city is within a 15-minute or less walking distance from one or more parks. Designs for new subdivisions also typically incorporate trails and paths as part of the City's ongoing effort to include parkways or access to existing parks.

The Parks Master Plan recommends improvements to existing parks (e.g., landscaping, ADA, access, parking, lighting, etc.) in addition to identifying opportunities for new park development. Per the Parks Master Plan, the City will prioritize bringing existing parks to standard and ensuring they are properly maintained before constructing new parks. Additional recommendations include:

- **Storm drain basin conversions** – Consider the feasibility of converting portions of future city-owned storm drainage basins into usable park space.
- **Regional park** – Consider expanding the size of Dobson Field to include either an active (e.g., sports complex, community center) or passive recreation area.
- **Trailways** – Create connective paths throughout the community by utilizing the existing canal and railroad corridors as trails and walkways. Paths are also recommended to be incorporated into existing and future parks where feasible. The Parks Master Plan referenced the pedestrian and bikeway improvements included in the ATP and identified an opportunity to create a trailway corridor along the continuous off-road land, like canals, adjacent to rail lines.
- **New specialty facilities** – Community center/youth center, learning and technology centers, community gardens, sharing of school facilities, etc.

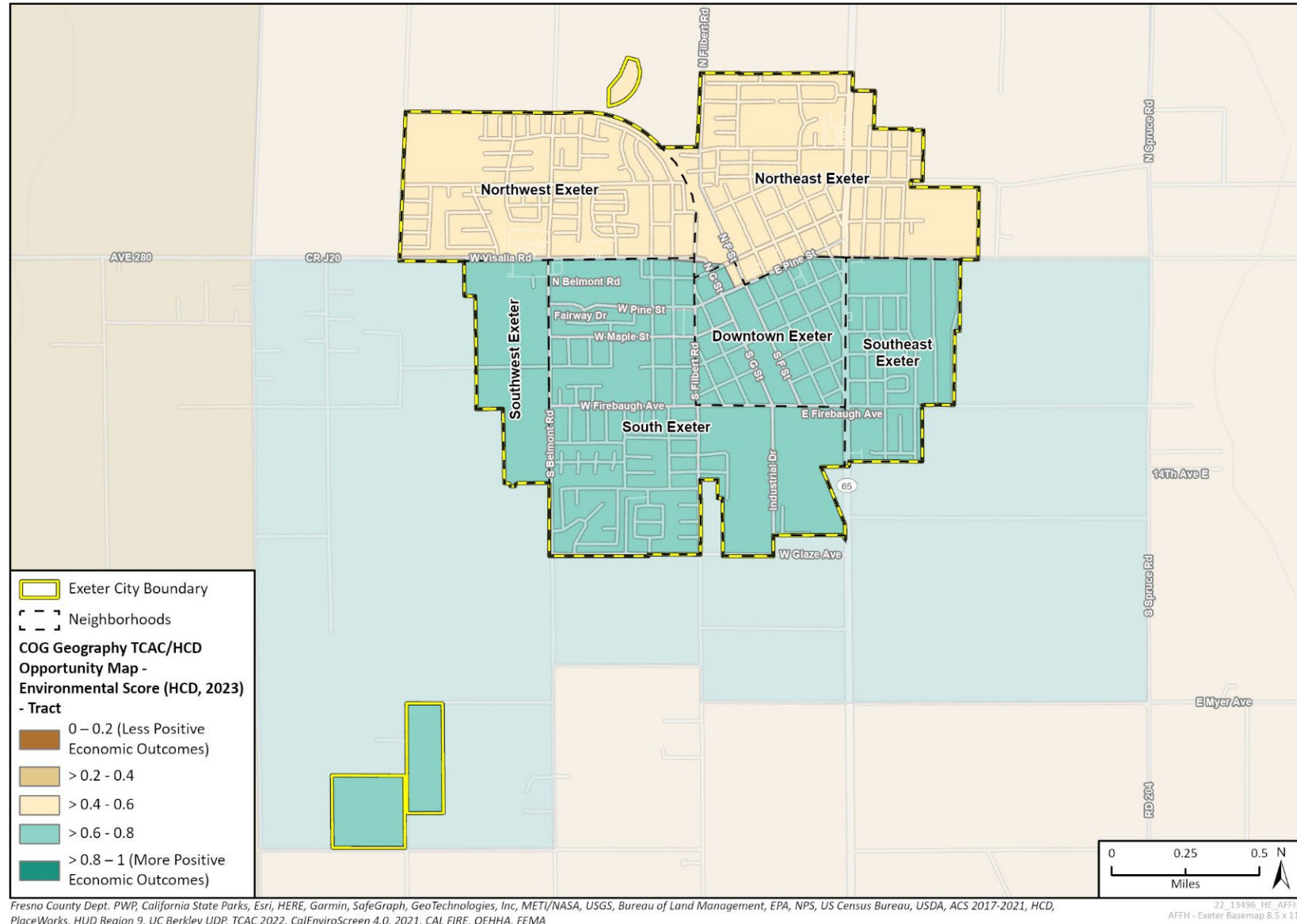
The Parks Master Plan also includes recommended priorities for existing park renovations. High priority improvements include accessible routes/parking/signage, ADA improvements, and storm drain replacements.

Figure B5-17 CalEnviroScreen 4.0 Percentile Scores (City of Exeter)



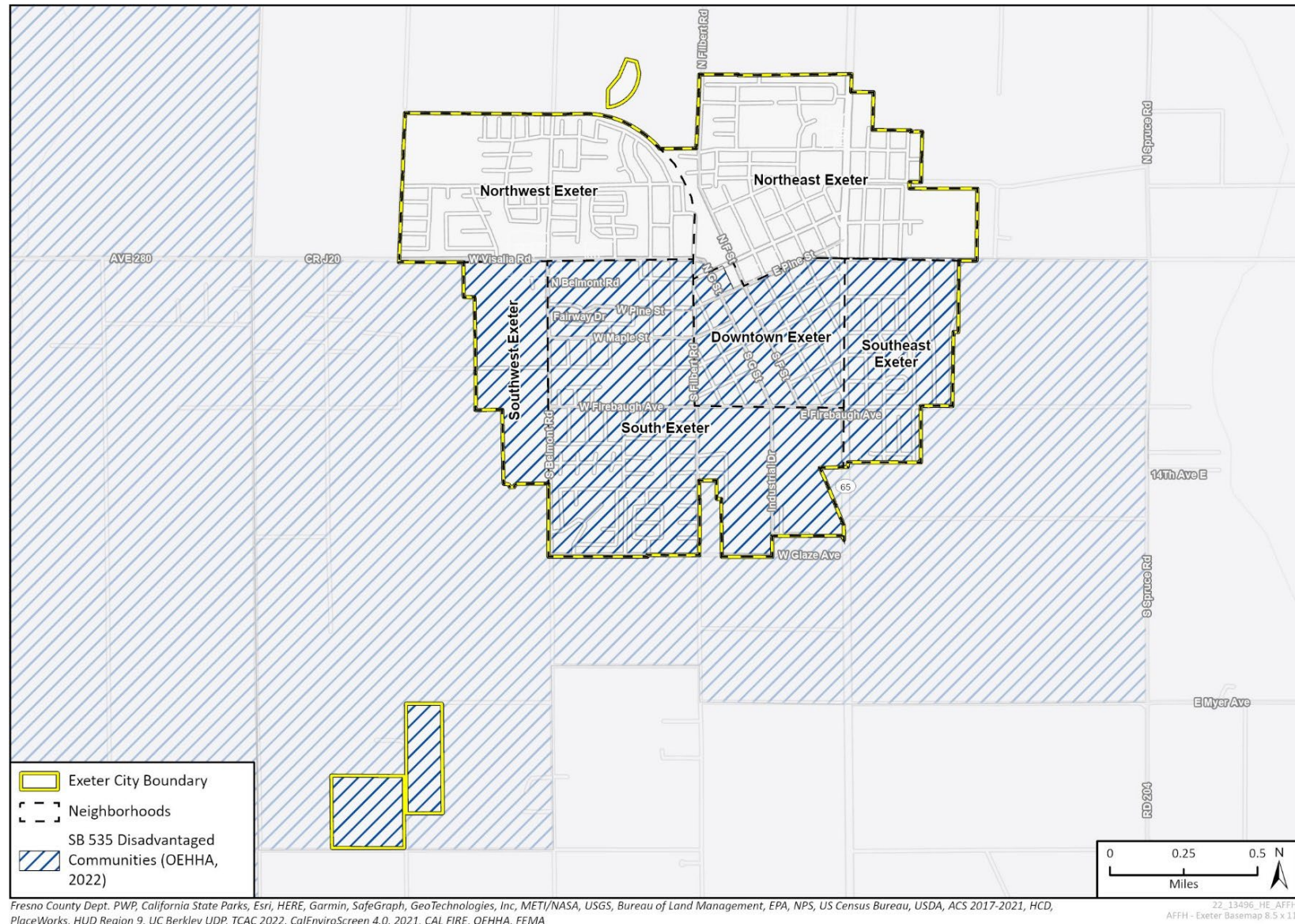
Source: AFFH Viewer, 2023

Figure B5-18 TCAC Opportunity Areas - Environmental (City of Exeter)



Source: AFFH Viewer, 2023

Figure B5-19 SB 535 Disadvantaged Communities (City of Exeter)



B5.9 Disproportionate Housing Needs

Housing Problems

Housing problems, as defined by HUD, include overcrowding, cost burden, lack of complete kitchen facilities, and lack of complete plumbing facilities. Approximately 42 percent of households in Exeter are experiencing housing problems and 22 percent of households are experiencing severe housing problems. The percent of households experiencing housing problems and severe housing problems in Exeter is slightly lower than the average rates for the county and tri-county area, where 44 percent of are experiencing housing problems and 26 percent of households are experiencing severe housing problems.

Substandard Housing

HUD considers housing units to be “standard units” if they comply with local building codes, whereas housing units are considered “substandard” if they lack complete plumbing or kitchen facilities. According to ACS estimates, Exeter has approximately 20 substandard housing units which comprises approximately 0.6 percent of the total occupied units in the city. Of the total substandard units, all lack complete kitchen facilities but none are lacking plumbing facilities. The percentage of substandard housing units in Exeter is similar to Tulare County (0.7 percent substandard units) and other jurisdictions in the region.

Approximately 63 percent of the City’s housing stock was constructed prior to 1990 and is more than 30 years old. Housing units older than 30 years have a higher likelihood of needing repair and modernization improvements. The areas of Exeter with older housing or housing more likely in need of repair are Southeast and Downtown Exeter. In recent years, newer housing development has been concentrated in Northeast and Northwest Exeter due to the availability of land in these areas. According

to local knowledge, many residents live in substandard housing due to the lack of affordable housing options in Exeter.

Housing cost burden is higher among renters than homeowners. Approximately 55 percent of renters are cost burdened, and 27 percent of homeowners are cost burdened in Exeter.



Exeter’s downtown and older residential neighborhoods are in a triangular area that is formed by the SP Railroad on the west, the Visalia Electric Railroad on the north, and State Route 65 on the east (see Section B5.10, *Local Area Knowledge*). Consistent with the history of development in Exeter, the southern tract encompassing Southwest, Southeast, South, and Downtown Exeter has a higher concentration of housing units built prior to 1980 (60.7 percent) compared to the northern tract (36.6 percent). The northern tract has a slightly higher concentration of multifamily structures

(18.8 percent) compared to the southern tract (14.7 percent). However, structures with two or more units generally make up a small share of housing citywide.

Housing Cost Burden

The rate of cost burden (spending more than 30 percent of household income on housing costs) among Exeter residents is high but comparable to the percentage of cost burdened households in the county.

Approximately 37 percent of all households are cost burdened in Exeter, compared to 38 percent in the county and 18 percent in the tri-county area. Housing cost burden is higher among renters than homeowners.

Thirty-seven percent of homeowners in Exeter experience housing cost burden. Cost burden among homeowners is higher in southern Exeter, where 40 to 60 percent of homeowners are cost burdened (Figure B5-20). Twenty to 40 percent of homeowners are cost burdened in northern Exeter. Comparatively, 55 percent of renters experience housing cost burden in Exeter. The percentage of renters experiencing cost burden is evenly distributed across Exeter, where 40 to 60 percent of renters are cost burdened (Figure B5-21).

As household income increases, the likelihood of experiencing cost burden decreases (Table B5-3). Extremely low-income households have the highest percentage of cost burden: 80 percent of homeowners and 69 percent of renters. Among low-income households, 30 percent of homeowners are cost burdened, and 30 percent of renters are cost burdened. Moderate- and above moderate-income households have the lowest rates of cost burden among the different income levels: 11 percent of owners and five percent of renters are cost burdened.

Table B5-3 Assistance Needs of Lower-Income Households (City of Exeter)

Household by Tenure, Income, and Housing Problem	Renters		Owners		Total Households	
	Total	Percent	Total	Percent	Total	Percent
Extremely low-income (0-30% AMI)	435		230		665	
With any housing problem	300	69%	185	80%	485	73%
With cost burden >30%	300	69%	185	80%	485	73%
With cost burden >50%	275	63%	95	41%	370	56%
Very low-income (31-50% AMI)	330		250		580	
With any housing problem	270	82%	155	62%	425	73%
With cost burden >30%	270	82%	145	58%	415	72%
With cost burden >50%	60	18%	90	36%	150	26%
Low-income (51-80% AMI)	240		460		700	
With any housing problem	135	56%	175	38%	310	44%
With cost burden >30%	84	35%	140	30%	224	32%
With cost burden >50%	4	2%	10	2%	14	2%
Moderate & Above Income (>80% AMI)	200		1,285		1,485	
With any housing problem	35	18%	170	13%	205	14%
With cost burden >30%	10	5%	135	11%	145	10%
With cost burden >50%	0	0%	0	0%	0	0%
Total Households	1,200		2,225		3,425	
With any housing problem	740	62%	685	31%	1,425	42%
With cost burden >30%	664	55%	605	27%	1,269	37%

Household by Tenure, Income, and Housing Problem	Renters		Owners		Total Households	
	Total	Percent	Total	Percent	Total	Percent
With cost burden >50%	339	28%	195	9%	534	16%

Note: Housing Problems: There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 or more of these 4 problems.

Cost burden: Monthly housing costs (including utilities) exceeding 30% of monthly income.

Severe cost burden: Monthly housing costs (including utilities) exceeding 50% of monthly income.

Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2015-2019 release

Overcrowding

As discussed in Chapter B2, *Housing Needs Assessment*, Exeter has 597 large households (households with five or more people), approximately 18 percent of all households in the city, which is slightly less than the rate for the county (21 percent) and the state average (13 percent). There is a higher percentage of renter households (26 percent) that are large households compared to owner households (13 percent) in Exeter.

Approximately eight percent of households in Exeter are overcrowded, which is less than the rate of overcrowded households in the county (10 percent) and tri-county area (10 percent), and equal to the state average (8.3 percent). The rate of overcrowded housing is higher in the southern portion of Exeter, where five to ten percent of the households are overcrowded, compared to the northern portion of Exeter, where less than five percent of the households are overcrowded (Figure B5-22). Overcrowding rates are much lower in Exeter than other cities in the county. Overcrowded household rates in nearby Farmersville range from nine percent to 21 percent. In Lindsay, the percentage of overcrowded household rates range from 11 percent to 19 percent.

Persons Experiencing Homelessness

The 2023 Kings and Tulare County Point-In-Time (PIT) Count did not record the number of persons experiencing homelessness in Exeter. In Tulare County, 1,053 persons experiencing homelessness were recorded in 2023. The cities of Porterville, Tulare, and Visalia have a disproportionately high percentage of the county's homeless population compared to their share of the total population, with a total of 1,017 homeless residents were recorded in these three cities, and a remaining 36 individuals located throughout the rest of the county. The Exeter Police Department estimates that there are 12 homeless individuals in the city. Therefore, Exeter has a lower percentage of the county's homeless population in comparison to the share of the county's population. However, based on local knowledge, there are no permanent supportive housing options for these individuals.

The number of homeless individuals has remained consistent over the last five years. The City's Police Department estimates that approximately 25 percent of the homeless population have mental health issues. The majority of the homeless population is white (not Hispanic/Latino), followed by Hispanic/Latino. Homeless individuals are typically located in proximity to public parks and shopping centers. The following city parks are located in Exeter: Dobson Field (17 acres), City Park (2.5 acres), Brickhouse Park (one acre), Joyner Park (0.5 acres), Water Tower Park (0.25 acres), Rose Garden Park (0.22 acres), Schelling Park (0.01 acres), Planter Park (0.01 acres), Schroth Park (5 acres), Unger Park (4.7 acres).

Because the unhoused population is relatively small, consistent with the city as a whole, the City does not have encampments or specific parks/areas where unhoused populations typically congregate. The City has transportation opportunities citywide and other services available to those experiencing homelessness.

As discussed above, Exeter has the following transportation services available in the city:

- Visalia Transit operates one fixed bus route through the city (Route 9A)
- Visalia Transit also operates Dial-a-Ride that services the city
- The Tulare County Regional Transit Agency (TCRTA) operates Tulare County Area Transit (TCaT)
- TCaT also offers its own Dial-A-Ride program that includes anywhere within three-quarters of a mile of TCaT Routes C10-C90

Bus stops are located throughout the city, generally along the main roads of Avenue 276, State Route 65, and Belmont Road. Dobson Field and City Park are located along or adjacent to these roadways. As mentioned previously, Exeter is also considered a very walkable community.

The Exeter Unified School District offers food, clothing, and shelter services to students who may be experiencing homelessness.

Displacement

The Urban Displacement Project (UDP) designates census tracts as “sensitive communities” if the share of very low-income residents is greater than 20 percent and have any of the two following characteristics:

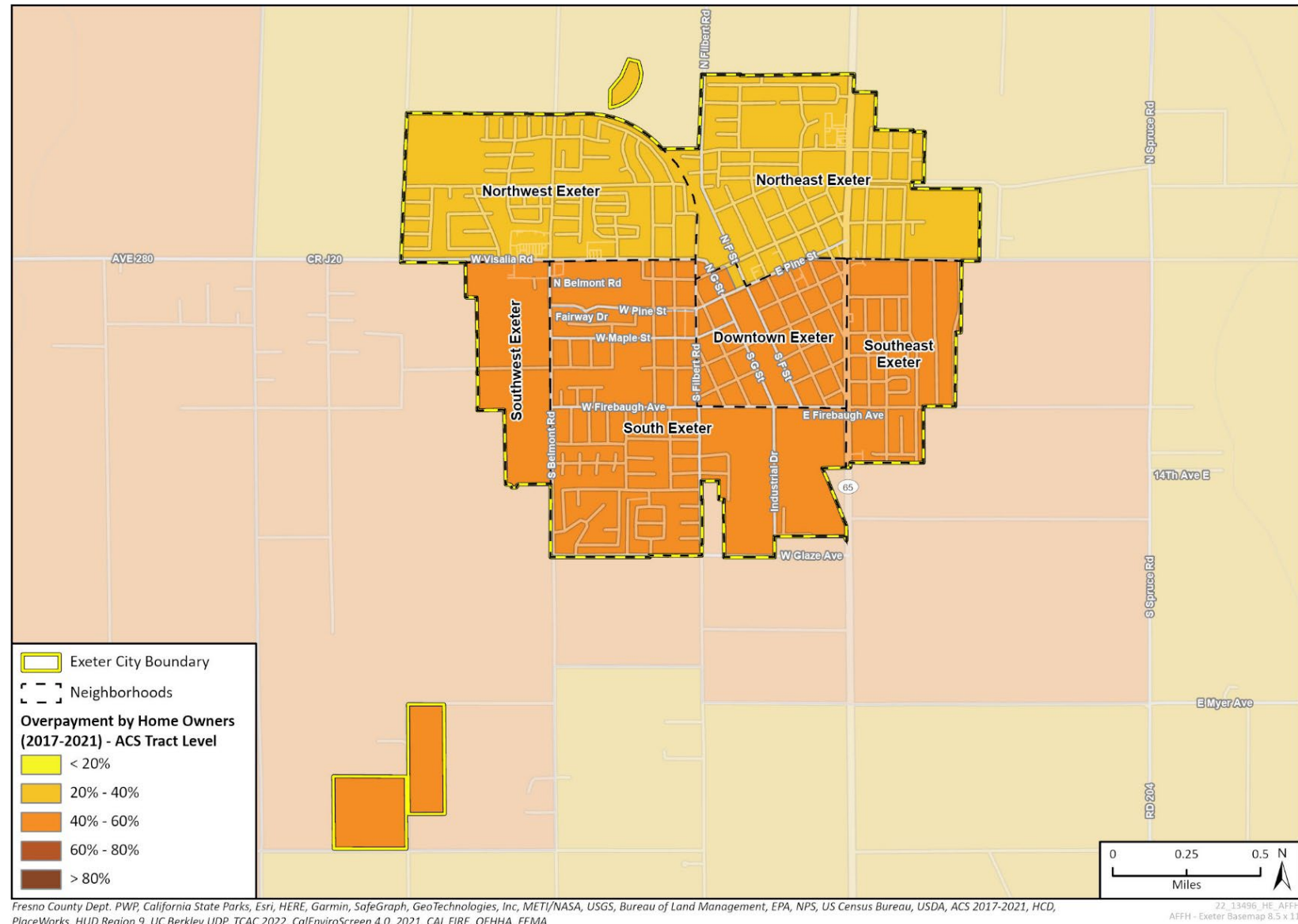
- The share of renters is above 40 percent
- The share of people of color is above 50 percent
- The share of very low-income households that are severely rent burdened is above the county median
- The percent change in rent is above the county median for rent increases

According to the UDP, Exeter is considered to have lower risk of displacement (Figure B5-23). The risk of displacement is lower compared to other cities within Tulare County. For example, almost all of nearby Farmersville is considered vulnerable to displacement.

While housing prices in Exeter have historically been higher than neighboring areas, displacement due to cost of housing is not a primary issue. According to the most recent 2019-2023 ACS data, 56.6 percent of households in Exeter are owner-occupied. Owners tend to be at a lower risk of displacement compared to renters. Based on the same data, 30.4 percent of owners with a mortgage, 17.2 percent of owners without a mortgage, and 42.5 percent of renters in Exeter pay 30 percent or more of their income on housing. Exeter has smaller proportions of overpaying owners with mortgages and renters compared to the county.

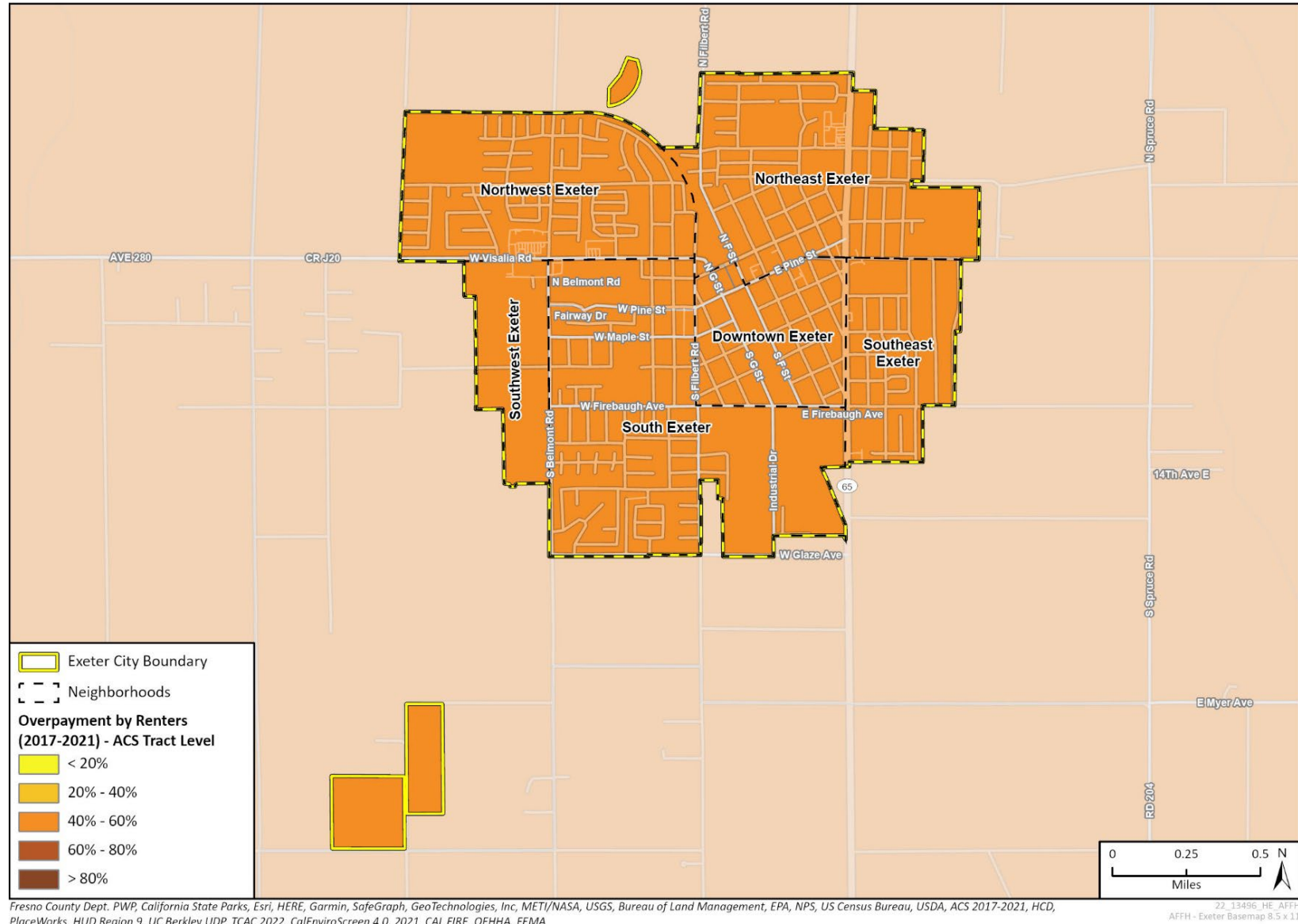
Exeter is also generally not a high-risk area for displacement due to natural disaster.

Figure B5-20 Overpayment by Home Owners (City of Exeter)



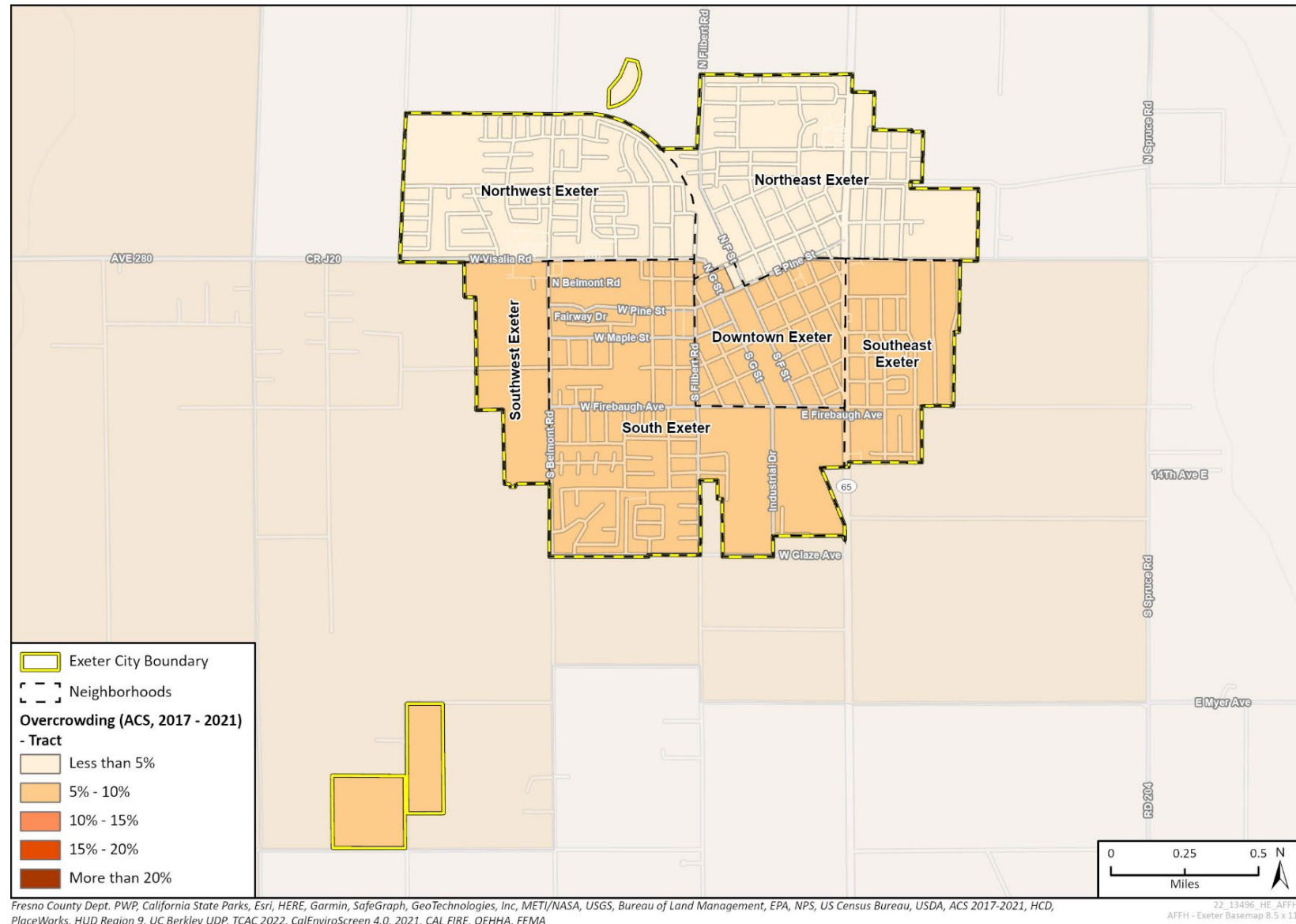
Source: AFFH Viewer, 2023

Figure B5-21 Overpayment by Renters (City of Exeter)



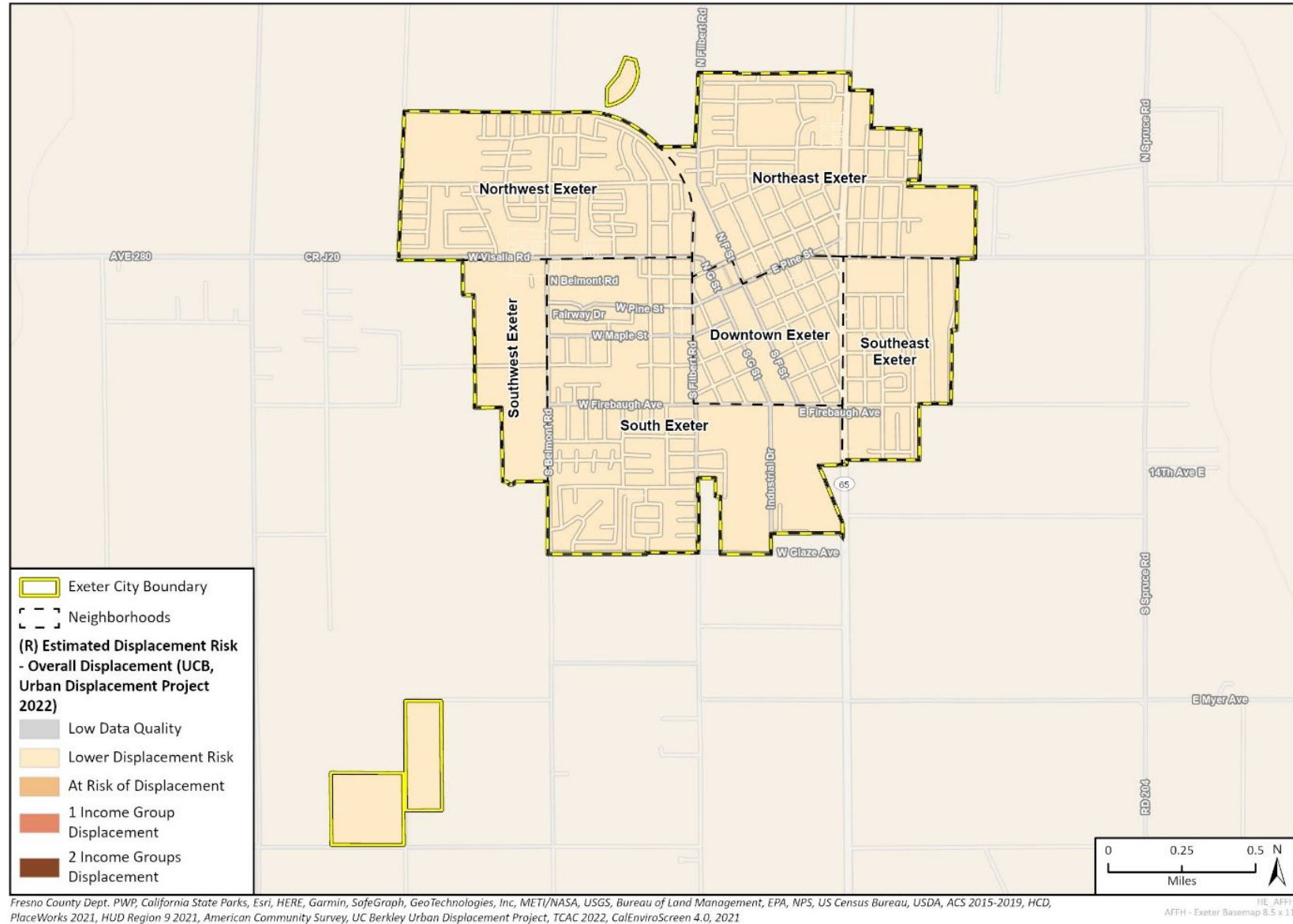
Source: AFFH Viewer, 2023

Figure B5-22 Overcrowded Households (City of Exeter)



Source: AFFH Viewer, 2023

Figure B5-23 Displacement Risk (City of Exeter)



Source: AFFH Viewer, 2023

B5.10 Local Area Knowledge

The original Exeter township was formed by the Southern Pacific (SP) Railroad through its subsidiary, Pacific Improvement Company. The original townsite encompassed 240 acres, and the railroad and adjoining right-of-way occupied approximately 40 acres. The SP Railroad traversed the townsite in a northwest to southeast direction. The railroad essentially divided the city in half. In 1905, the Visalia Electric Railroad began operation. The Visalia Electric railroad connected Exeter to Visalia to the west and Lemon Cove to the northeast. The SP railroad, which runs from the SP Railroad to the east towards the foothills, has limited development in the northeast quadrant of town.

The Sante Fe Railroad was constructed in 1914. The Sante Fe line formed the eastern border of urbanized Exeter. Except for the development of agriculturally related industries (packing houses, cold storage) along the track, development has not occurred east of the Sante Fe Railroad. The railroad depot was situated between Pine and Maple Streets on the east side of the railroad tracks.

As was the case in many early railroad-sponsored towns, Exeter's first streets were laid out parallel with and perpendicular to the railroad tracks. In 1911, at the time of incorporation, the City had shifted the orientation of its newer streets to north/south and east/west alignments. The early town site contained the downtown and older surrounding residential neighborhoods with some industrial uses along the SP Railroad. The SP Railroad bound the trapezoidal-shaped town site on the west, the Visalia Electric Railroad on the north, and State Route 65 (Kaweah Avenue) on the east.

Urban growth in Exeter has extended in all directions from the original 1911 town site. However, since 1980, residential development has occurred primarily in the north, northwest, and southwest sections of town. As shown in Figure B5-11, these areas also have the highest median incomes in the city. Newer construction in these areas tend to be comprised of large lot single family home developments. In contrast, Downtown Exeter contains older housing on smaller lots.

Since 1980, most of the residential development occurring in Exeter has been dominated by single-family construction. This is a trend that was spurred by development pressures from nearby Visalia, and single-family homes have continued to be the dominant development type. Some apartment complexes have been constructed during this time period; however, they comprise less than 10 percent of new housing stock. There has been no construction of mobile home parks since 1980. Development in Exeter has not matched the growth and need to provide for lower-income households. There has been reluctance to allow for a diverse housing stock to preserve the small-town atmosphere of the city.

In October 1929, tensions between Filipino agricultural laborers and white workers led to a riot, wherein local vigilantes attacked Filipino workers, causing injuries and displacing workers from the area. The Exeter incident was one of the first in a broader pattern of anti-Filipino violence in California's agricultural communities and was followed by larger attacks, including the 1930 Watsonville riots. The violence and surrounding political rhetoric contributed to growing anti-Filipino sentiment and calls to restrict Filipino immigration and labor.¹⁰ An exclusion bill restricting Filipino Labor was proposed in the U.S. Senate and the Congress. In 2011, the California Assembly passed a bill expressing the Legislature's apology for the discrimination experienced by the Filipino community in the 1920s and 30s.¹¹

¹⁰ Erskine, Thomas L. 2018. *Anti-Filipino race riot of 1929*. <https://www.ebsco.com/research-starters/history/anti-filipino-race-riot-1929>

¹¹ Open States. ACR 74. 2011. Available online at: <https://openstates.org/ca/bills/20112012/ACR74/>, accessed March 31, 2023.

Exeter has a strong agricultural economy. The citrus industry today (oranges, lemons, grapefruit, tangerines) dominates the visual and economic landscape. Sectors of the economy within Exeter are also strongly dependent on the citrus industry and include trucking, packing, cold storage, spraying, irrigating, processing, and marketing.¹² Cattle ranching is also an integral part of Exeter's history. The Gill Cattle Company of Exeter was established in the late 1800s and is still in operation. The company owned and leased more than six million acres of land in nine western states.¹³

Stakeholder and Community Input

The City held a community workshop on May 25, 2023 with one person in attendance. The participant noted that the largest barrier to desirable housing is the lack of availability of rent-restricted, affordable housing. The participant listed affordability, availability of desired housing, and housing quality as the most urgent housing issues in Exeter. Rent restricted affordable housing, renter protections and support, and a variety of new housing development were identified as the three top housing needs in Exeter.

An online survey was available in both English and Spanish on the TCAG Housing Element project website from February 6 to March 16, 2023 and available for print in community places such as libraries. The survey asked participants about housing issues and the types and location of housing development they would like to see in their city. Overall, most respondents for all jurisdictions selected "cost of quality housing" as the largest barrier to affording desirable housing, particularly housing that is rent restricted. Exeter community members also identified a low supply of housing overall in the city and that short-term rentals such as Airbnb and VRBO have led to a shortage of rental housing.

Other Relevant Factors

Other factors to fair housing issues in Exeter that have not been previously discussed in this analysis include land use and zoning patterns, widespread social vulnerability of residents, limited availability of affordable housing, and lack of farmworker housing.

History of Exeter

The original Exeter township was formed by the Southern Pacific (SP) Railroad through its subsidiary, Pacific Improvement Company. The townsite was established after the Pacific Improvement Company bought land from John Firebaugh in 1888, a local landowner. Exeter received its name from an early promoter of the improvement company, D.W. Parkhurst. He named the city Exeter after his home city of Exeter, England. The original town was 240 acres where the SP Railroad bisected the town in the northwest to southeast direction. The railroad depot was situated between Pine and Maple streets on the east side of the railroad tracks. In 1911, when Exeter incorporated, the city had already shifted the orientation of its newer streets to north/south and east/west alignments. This reorientation created numerous triangular-shaped blocks where the two street patterns joined. Today, many of these blocks are used either as park or church sites.

Railroads, agriculture, and building materials forged the city's land use patterns. The SP railroad divided the city in half. In 1905, the Visalia Electric Railroad began operation. This railroad connected Exeter to Visalia to the west and Lemon Cove to the northeast. This railroad, which runs from the SP Railroad to

¹² City of Exeter. History. Available online at: <https://cityofexeter.com/history/#:~:text=In%201888%2C%20as%20the%20railroad,after%20Parkhurst's%20native%20Exeter%2C%20England.,> accessed March, 13, 2023.

¹³ Exeter Chamber of Commerce. Exeter's Historical Past. Available online at: <https://www.exeterchamber.com/explore/exeters-historical-past/>, accessed March 31, 2023.

the east towards the foothills, has limited development in the northeast quadrant of town. The Sante Fe Railroad was constructed in 1914. The Sante Fe line formed the eastern border of urbanized Exeter. Except for the development of agriculturally-related industries (packing houses, cold storage) along the track, development has not occurred east of this railroad.

Exeter's downtown and older residential neighborhoods are in a triangular area that is formed by the SP Railroad on the west, the Visalia Electric Railroad on the north, and State Route 65 on the east. While agricultural-related industrial uses are located along the Southern Pacific Railroad, the A.T. & S.F. Railroad, and Industrial drive, south of the original townsite.

Land Use and Zoning

As shown on the City's Zoning Map (Figure B5-24), most housing units in the city are single-unit detached structures (80 percent). Eighteen percent of the city's housing stock consists of multifamily units, and two percent of the City's housing stock consists of mobile home development. Most of the land zoned for residential uses is comprised of low-density residential zones. Zoning for medium and high-density residential uses is concentrated in Downtown Exeter and along Quince Avenue, Filbert Street, Pine Street, and Visalia Road in the South and Northwest Exeter neighborhoods. Single-family homes in low-density residential neighborhoods are generally more expensive than housing in multifamily developments. In addition, residents living in single-family housing generally own their home while multifamily housing residents tend to rent. Low-income households and people living on fixed incomes, such as seniors, often cannot afford to buy or live in single-family homes and therefore are limited to choosing more affordable housing options, such as multifamily housing in Downtown Exeter. Based on local knowledge, there is a lack of affordable housing options in Exeter due to the lack of adequately zoned sites in addition to community opposition to affordable housing projects, particularly in certain neighborhoods. Other land use issues need to be addressed in the City, including adequate open space, employment and transportation opportunities.

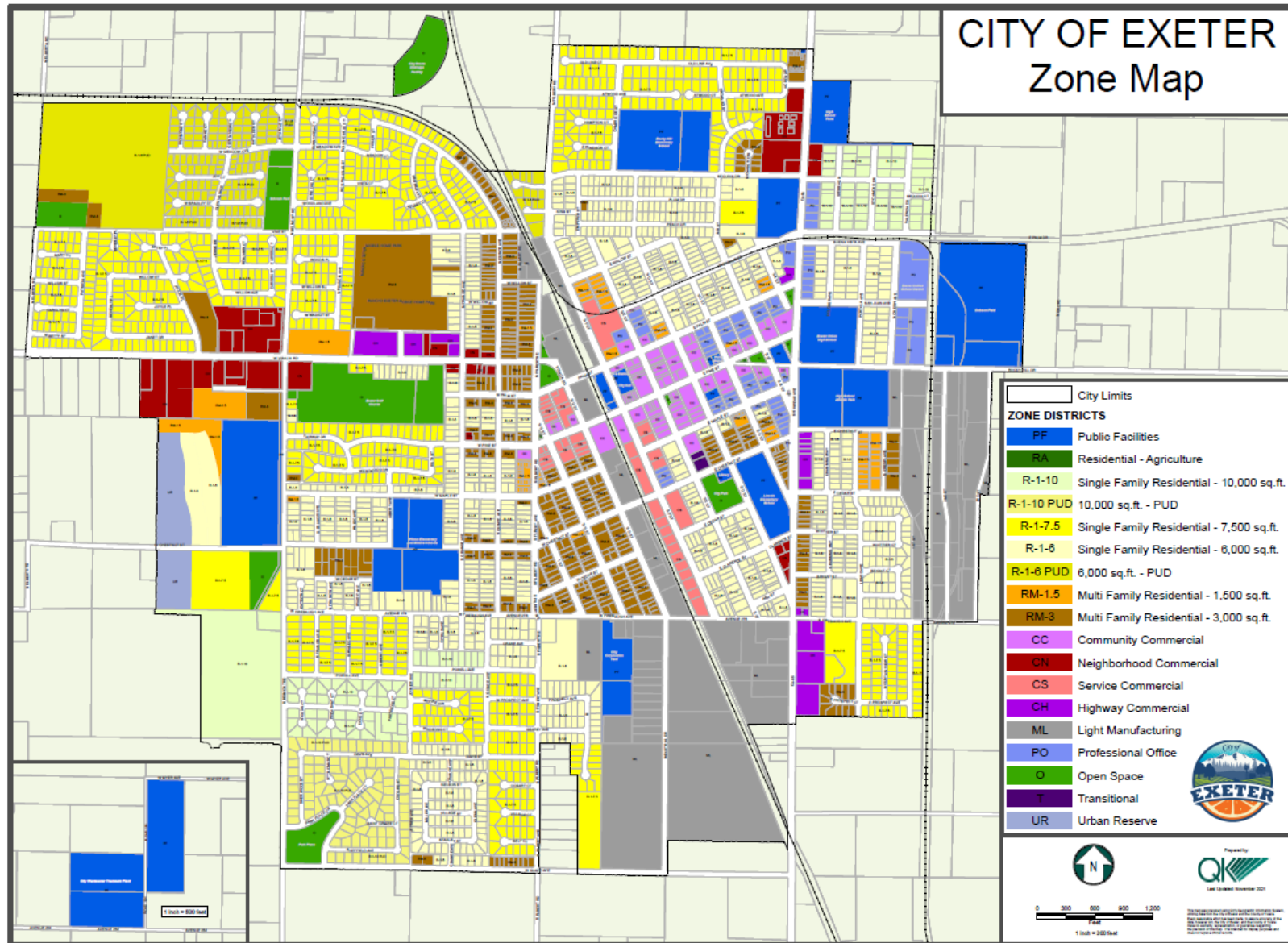
Social Vulnerability Index

The Center for Disease Control and Prevention and Agency for Toxic Substances and Disease Registry created the Social Vulnerability Index (SVI) to identify communities that exhibit social conditions that would make them more vulnerable to hazardous events such as natural disasters. The SVI can also serve as an identifier of vulnerable communities that are underprivileged and underserved and are more susceptible to experiencing housing issues and lack of housing opportunities. The SVI ranks census tracts based on 16 social factors grouped into four categories: socioeconomic status, household characteristics, racial and ethnic minority status, and housing type and transportation.¹⁴

The SVI identifies all of Exeter as having higher vulnerability than most of the state, based on a high level of vulnerability for each of the four categories. Southern Exeter scored particularly high for socioeconomic status, which includes social factors such as poverty and unemployment, and Northern Exeter scored particularly high on housing type/transportation, such as the percent of the housing stock consisting of multi-unit structures and mobile homes and the percent of residents without a vehicle. All of Exeter scored high on household characteristics, which includes social factors such as the percentage of children/senior residents and disabilities.

¹⁴ Agency for Toxic Substances and Disease Registry. 2023. CDC SVI Documentation 2020.
https://www.atsdr.cdc.gov/placeandhealth/svi/documentation/SVI_documentation_2020.html

Figure B5-24 City of Exeter Zoning Map



Farmworker Housing Needs

Much of the land surrounding Exeter is utilized for agricultural operations, and approximately seven percent of Exeter's population (230 persons) works in the agriculture, forestry, fishing and hunting, and mining industries. Exeter is located near the jurisdictions of Visalia, Farmersville, Lindsay, and Tulare, all of which contain expansive agricultural operations. Farmworkers employed by nearby agricultural businesses may seek housing in Exeter. However, the migratory and sometimes seasonal nature of farm work often makes it difficult for farmworkers to find affordable housing options. There is currently no public or subsidized housing for farmworkers in Exeter. The HATC operates multiple properties for farmworkers throughout the county, but none are within Exeter's city limits.

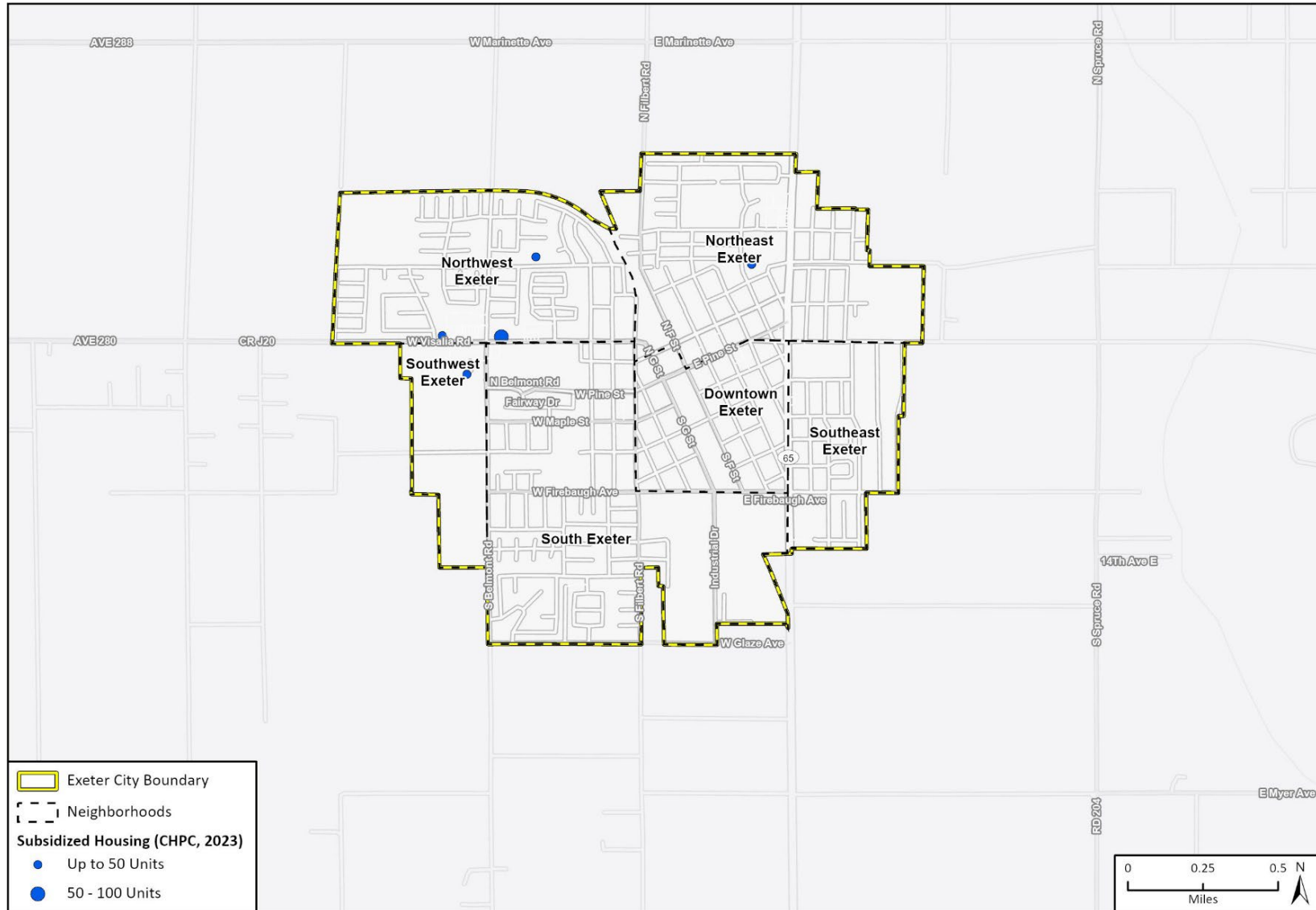
B5.11 Subsidized Housing

Subsidized housing consists of affordable rental units that are subsidized by federal and State agencies but are owned by private owners. Subsidies including HUD, the U.S. Department of Agriculture, the California Housing Finance Agency, HCD, and the Low-Income Housing Tax Credit program administered by TCAC. In Exeter, there are five subsidized affordable housing developments totaling 196 units in Exeter, including the Belmont Family Apartments, which is operated by the HATC. According to the Consolidated Plan, HATC has no intention to purchase additional units or sell existing units. Affordable housing developments are primarily located in Northwest and Southwest Exeter (Figure B5-25).

Public housing includes affordable rental units that are owned and operated by the government. In Exeter the HATC manages public housing units which are available to low-income households, the elderly, and persons with disabilities. According to HUD's Public Housing Program, there are no public housing developments in Exeter. However, HATC owns and operates the Belmont Family Apartments (24 housing units) in Southwest Exeter.

The HATC administers housing choice vouchers (HCVs) in the City of Exeter. While HATC administers the HCV program in Exeter, housing units themselves are owned by private landlords that accept HCVs on behalf of renters. According to the AFFH Data Viewer, there are 68 households receiving rental assistance through HCVs in the city in 2023. The use of HCVs is evenly distributed across Exeter, where less than five percent of the households are HCV holders (Figure B5-26). City staff has not encountered reluctance from property owners about participating in the HCV program; however, in their work, Self-Help Enterprises have found a landlords hesitate to take HCVs.

Figure B5-25 Subsidized Housing (City of Exeter)

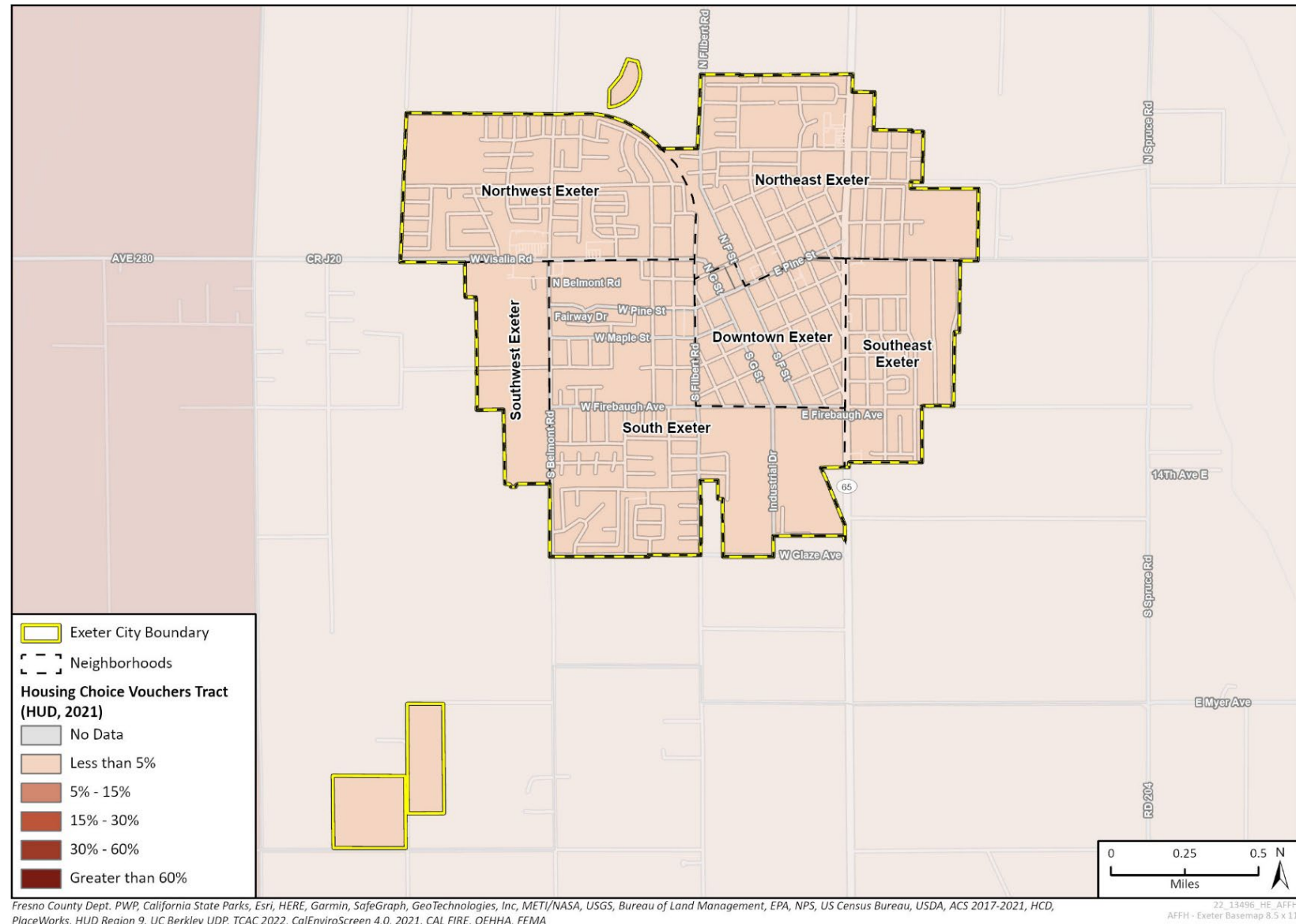


Fresno County Dept. PWP, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA

22_13496_HE_AFFH
 AFFH - Exeter Basemap 8.5 x 11

Source: AFFH Viewer, 2023

Figure B5-26 Housing Choice Vouchers (City of Exeter)



Source: AFFH Viewer, 2023

B5.12 Housing Sites Inventory Analysis

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

Housing Sites by TCAC Opportunity Area

For purposes of evaluating fair housing, resource levels designated by TCAC/HCD denote access to economic and educational opportunities such as low-cost transportation, jobs, and high-quality schools and the quality of environmental factors in the area such as proximity to hazards and air quality. TCAC has a composite opportunity score for each census tract. The entire City of Exeter is designated a high resource area. Figure B5-27 shows the housing opportunity sites by TCAC designated resource area. All housing opportunity sites, as well as the planned and approved projects, are located in high resource areas.

The City's Site Inventory can accommodate 865 housing units. Figure B5-27 shows the housing opportunity sites by TCAC designated resource area. The housing opportunity sites are designated by income category – whether the sites could accommodate housing appropriate for low-, moderate-, or above moderate-income households. The “appropriateness” of sites for various affordability levels is dictated by State housing element law and HCD guidance and includes allowable density, size of site, realistic capacity, existing use(s), and other factors. More information about the sites and income designations is available in Chapter B4, *Housing Resources*.

All the housing opportunity sites are in high-resource areas, primarily in South and Southwest Exeter, in part due to the availability of large vacant and underutilized parcels in these neighborhoods.

A small portion of the City's RHNA of 844 housing units will be satisfied by planned and approved projects (80 units). Planned and approved projects will add 80 above moderate-income units. This analysis considers the Site Inventory capacity of 854 potential units.

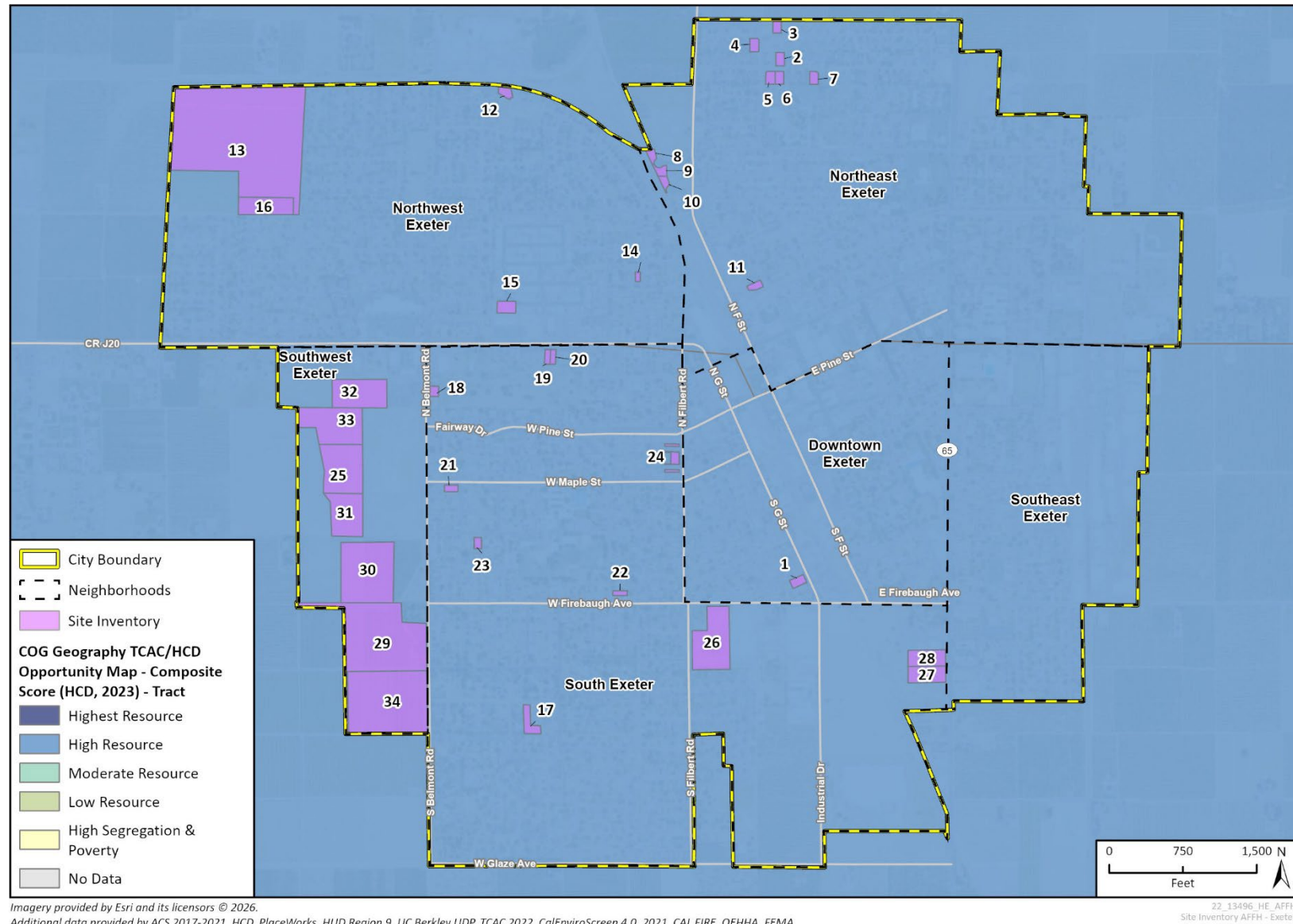
Total Units by Resource Area

Forty-three percent of Site Inventory units (368 units) will be lower-income units, 19 percent (167 units) will be moderate-income units, and 38 percent (330 units) will be above moderate-income units. Table B5-4 shows the number of proposed housing units by income level.

Table B5-4 Proposed Housing Units by Resource Area (Housing Opportunity Sites)

Income Level	Lower-Income	Moderate-Income	Above-Moderate Income	Total Units
High Resource Areas	368 units (43% of units)	167 units (19% of units)	330 units (38% of units)	865 units

Figure B5-27 Housing Opportunity Sites by TCAC Resource Area (City of Exeter)



All units will be in high resource areas; therefore, overall housing development during the planning period will not contribute to patterns of segregation based on resource designation. The City's Site Inventory will accommodate lower and moderate-income housing in areas designated high resource, which will increase the mix of housing at all income levels.

Sites by Income Population

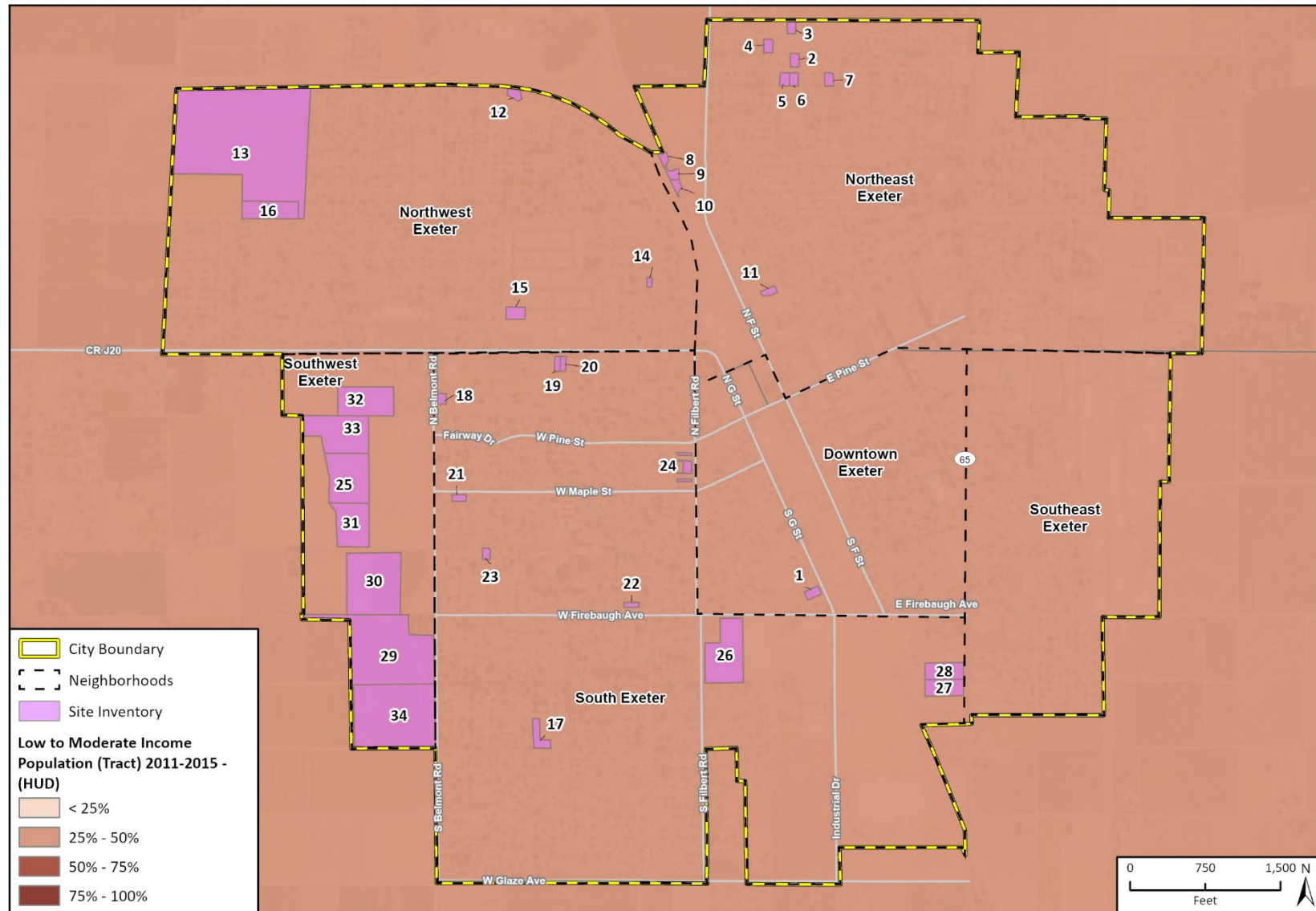
Low- and moderate-income (LMI) households comprise 25 to 50 percent of the population throughout Exeter, as shown in Figure B5-28. All of the housing opportunity sites are located in areas with a high percentage of LMI households.

Higher median incomes are located in Northeast and Northwest Exeter, while areas with lower median incomes are located in Downtown, South, and Southeast Exeter, as shown in Figure B5-29. The Site Inventory assumes that the northern portion of the city, where the median income exceeds the county's median income of \$57,394, could accommodate 208 units, including 38 units appropriate for moderate-income households (23 percent of the total moderate-income units) and 170 above moderate-income households (50 percent of the total above moderate-income units). The Site Inventory assumes the southern portion of the city, where the median income is below the county's median income, could accommodate 654 units, including 368 units appropriate for lower-income households, 126 units appropriate for moderate-income households, and 160 units for above moderate-income households. All lower-income units, 75 percent of the moderate-income units, and 49 percent of the above moderate-income units are located in areas with lower median incomes. The southern portion of Exeter, identified as an area for housing opportunities by residents, will benefit from the mix of households of differing income levels and provide new housing options in areas that need them. Housing Plan Program 11 focuses on the need for housing preservation and housing issues for residents Southeast Exeter, Housing Plan Program 12 directs the City to collaborate with other agencies to assist in the development of housing for lower-income residents with an emphasis on the southern areas of Exeter, and Housing Plan Program 13 prioritizes South, Southwest, Downtown, and Southeast Exeter in assessing the need for public infrastructure improvements.

Sites by Overcrowded Households

Census tract 15.02 encompasses Downtown, South, Southeast, and Southwest Exeter, has higher rates of overcrowded households compared to the northern areas of the city, as shown in Figure B5-30. These neighborhoods have a mixture of low-, medium-, and high-density residential development alongside public facility, commercial, and industrial land uses. Approximately seven percent of households in southern Exeter are overcrowded, while approximately three percent of households in northern Exeter are overcrowded. Housing Plan Program 9 aims to provide additional affordable housing units and to eliminate the disparity in percent of households in poverty between northern and southern Exeter. Additionally, Housing Plan Program 12 targets the southern areas to provide assistance in finding affordable and subsidized housing options and directs the City to seek funds to construct affordable infill housing in these areas. The Site Inventory assumes that sites in southern Exeter could accommodate 654 housing units, of which 368 would be lower-income, equal to approximately 76 percent of the total housing units included in the Site Inventory and 100 percent of the total lower-income sites. The remaining 208 housing units could be accommodated in northern Exeter, which has lower rates of overcrowding. The Site Inventory will add new housing opportunities in areas that need them and not exacerbate existing issues of overcrowded households.

Figure B5-28 Housing Opportunity Sites by Low- and Moderate-Income Population (City of Exeter)

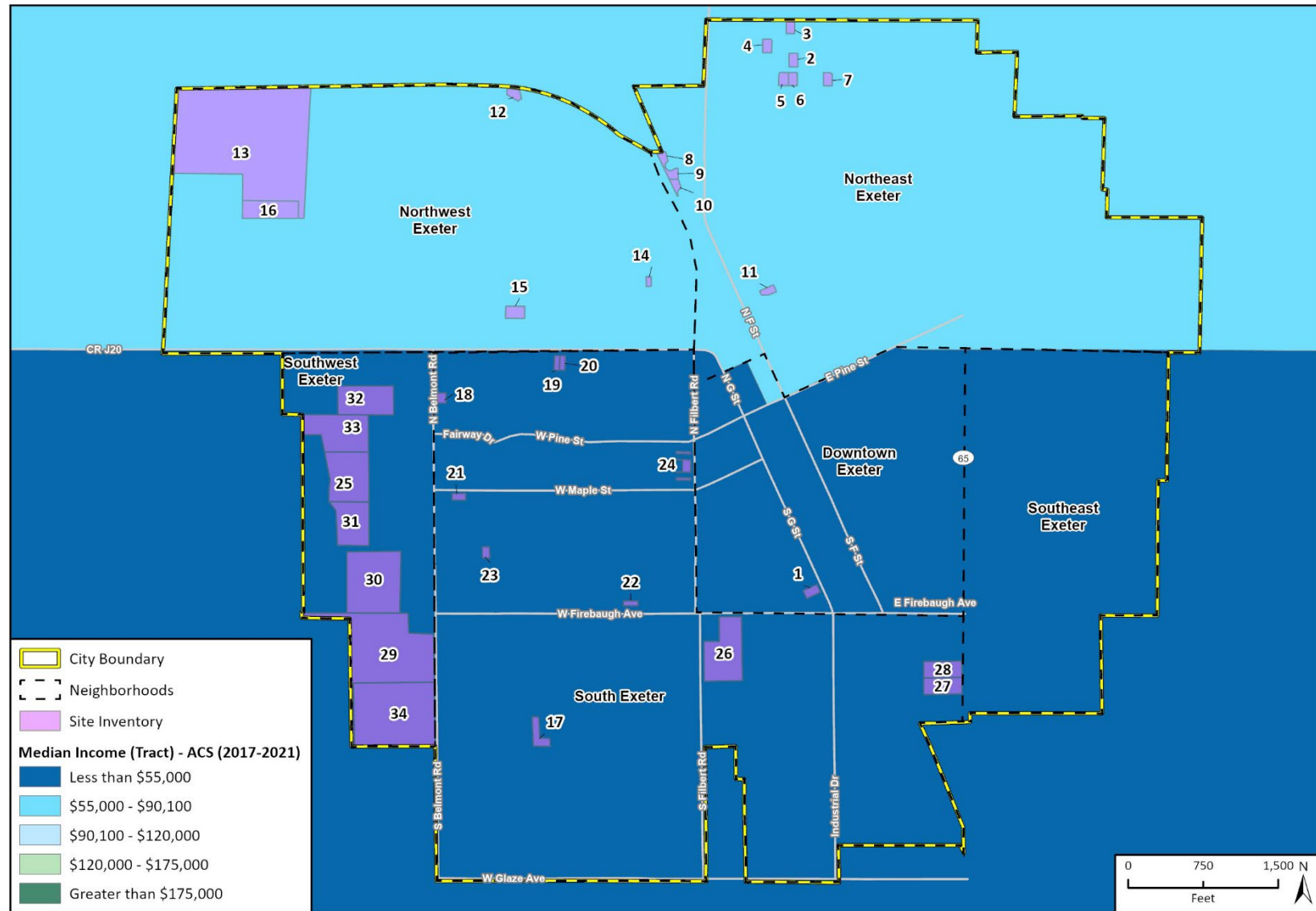


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 Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

Source: AFFH Viewer, 2023

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 Site Inventory AFFH - Exeter

Figure B5-29 Housing Opportunity Sites by Median Income (City of Exeter)



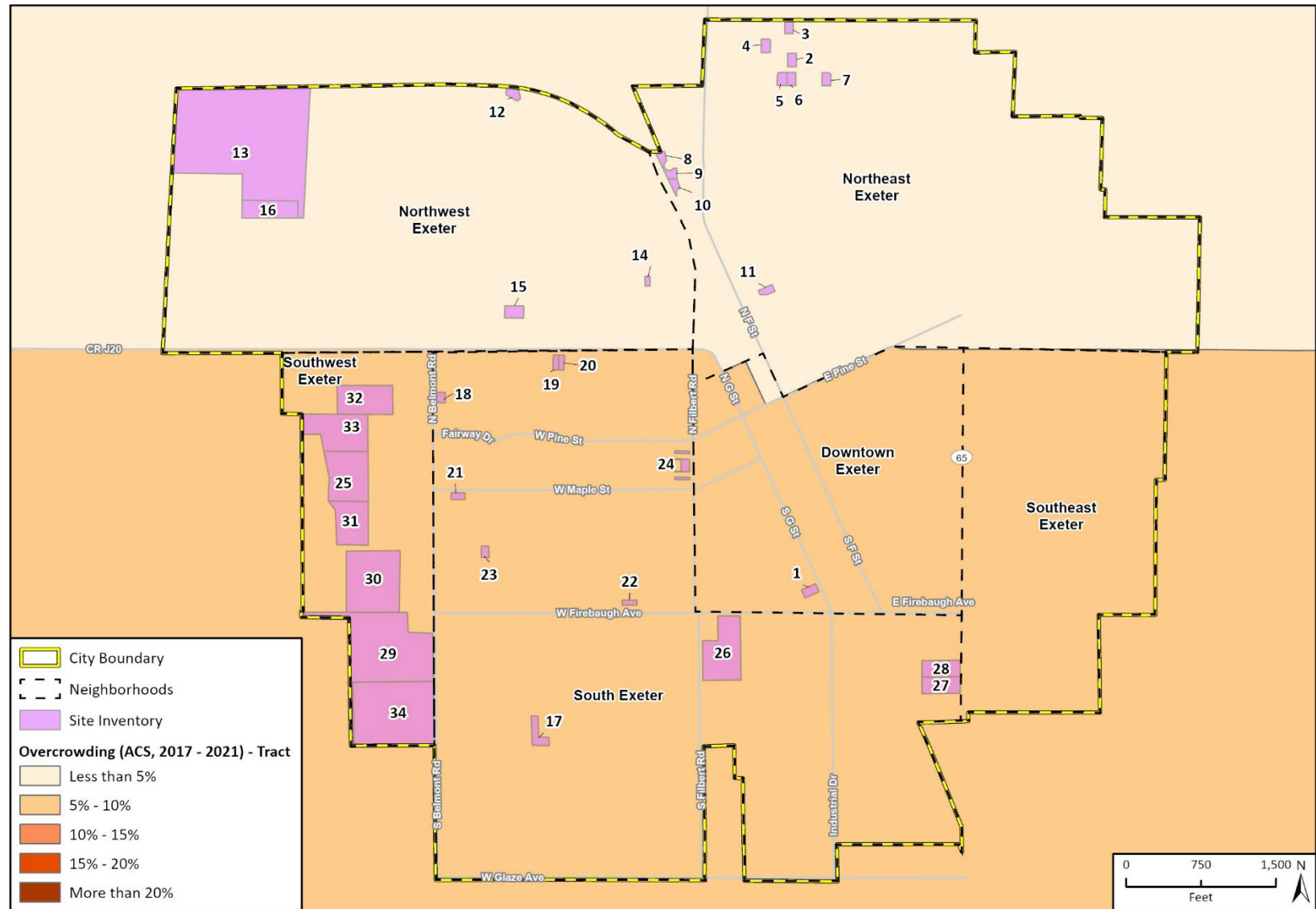
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 Site Inventory AFFH - Exeter

Source: AFFH Viewer, 2023

Figure B5-30 Housing Opportunity Sites by Overcrowding (City of Exeter)



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Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

Source: AFFH Viewer, 2023

22_13496_HE_AFFH
Site Inventory AFFH - Exeter

Sites by Overpayment by Renters

The percentage of overpayment by renters ranges between 40 and 60 percent throughout all of Exeter. The percentage of overpayment is highest in Downtown Exeter, South Exeter, Southeast Exeter, and Southwest Exeter, where 59 percent of renters are experiencing overpayment (Figure B5-31).

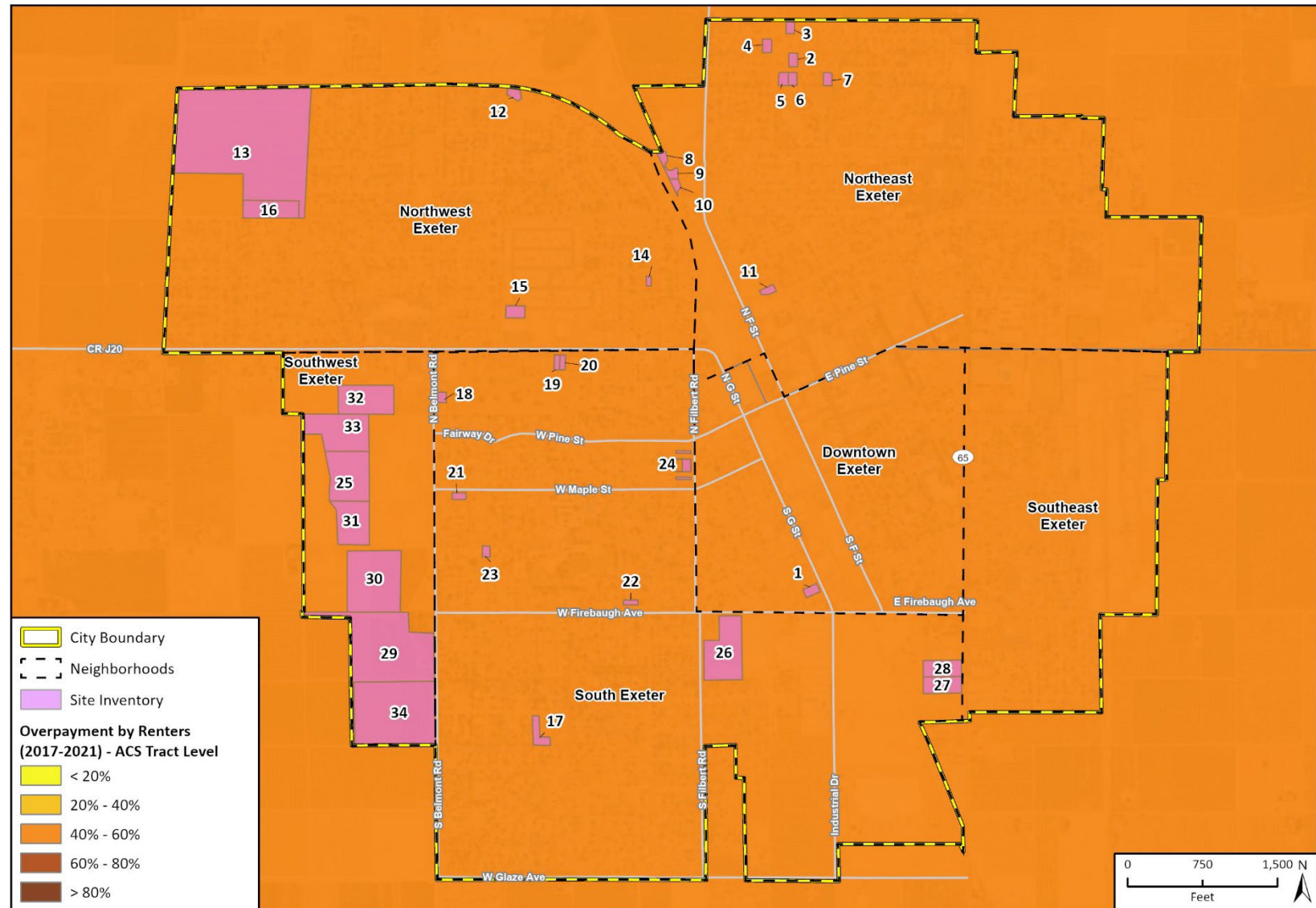
The housing opportunity sites will provide housing opportunities for a mix of income levels in Downtown, South, and Southwest Exeter, including 368 units appropriate for lower-income households, 129 units appropriate for moderate-income households, and 160 units appropriate for above-moderate-income households. In Northwest and Northeast Exeter, where 42 percent of renters experience overpayment, the housing opportunity sites will provide 38 units appropriate for moderate-income households, and 170 units for above-moderate-income households. Most of these housing units will likely be rental units, based on trends in planning entitlements and developer interest. According to the UDP, new market-rate construction in gentrifying areas neither worsens nor eases rates of people moving out of the area. It increases rates of people moving to an area across all socio-economic groups, particularly high-socio-economic residents. The UDP recommends subsidized housing construction and housing preservation to help existing residents stay in their neighborhood. The mix of lower-, moderate- and above moderate-income housing units in Downtown, South, and Southwest Exeter will provide affordable housing options for existing lower-income residents as well as encourage higher-income households to move into the area. The Site Inventory will add new rental housing opportunities which may alleviate overcrowding and high costs due to lack of availability.

Sites by Areas of Integration and Segregation

The southern portion of Exeter, including Downtown, South, Southeast, and Southwest Exeter, is the most racially and ethnically diverse area in the city, with the highest percentage of non-white residents (61 percent), compared to the northern portion (42 percent), as shown in Figure B5-32. Housing opportunity sites in Exeter accommodate a mix of income levels in areas that already have a diverse mix of ethnic and racial groups. The Site Inventory assumes that sites in southern Exeter could accommodate 654 housing units, of which 368 would be lower-income, equal to approximately 75 percent of the total housing units included in the Site Inventory and 100 percent of the total lower-income sites. The remaining 208 housing units would be accommodated in northern Exeter, which has lower levels of non-white residents. The Site Inventory will not contribute to segregation based on race/ethnicity or income level.

As discussed in Chapter B2, *Housing Needs Assessment*, approximately 15 percent of the City's population has one or more disabilities. For persons with disabilities who live independently or with other family members, independent living can be supported with special housing features, financial support, and in-home supportive services. The location of housing is also an important factor for people with mobility restrictions who rely on public transportation for travel. There are no concentrated areas with residents with a disability in Exeter. The Site Inventory proposes housing units for a mix of income levels in Exeter with an emphasis on creating housing in areas with greater walkability and in proximity to transit stops to allow more opportunities for housing near transit for residents who are unable to drive. Additionally, as discussed in B5.8 Disparities in Access to Opportunities, the 2022 Regional Active Transportation Plan for the Tulare County region includes priority active transportation improvements in Exeter to increase walkability and connectivity to transit stops and include installation of ADA compliant sidewalks and ramps to create safe pedestrian routes throughout the city, particularly in Downtown Exeter. The City will implement Housing Plan Program 1 to identify active transportation needs and apply for funding to implement projects to meet the transit needs in the southern areas of the city by the end of the planning period.

Figure B5-31 Housing Opportunity Sites by Overpayment by Renters (City of Exeter)



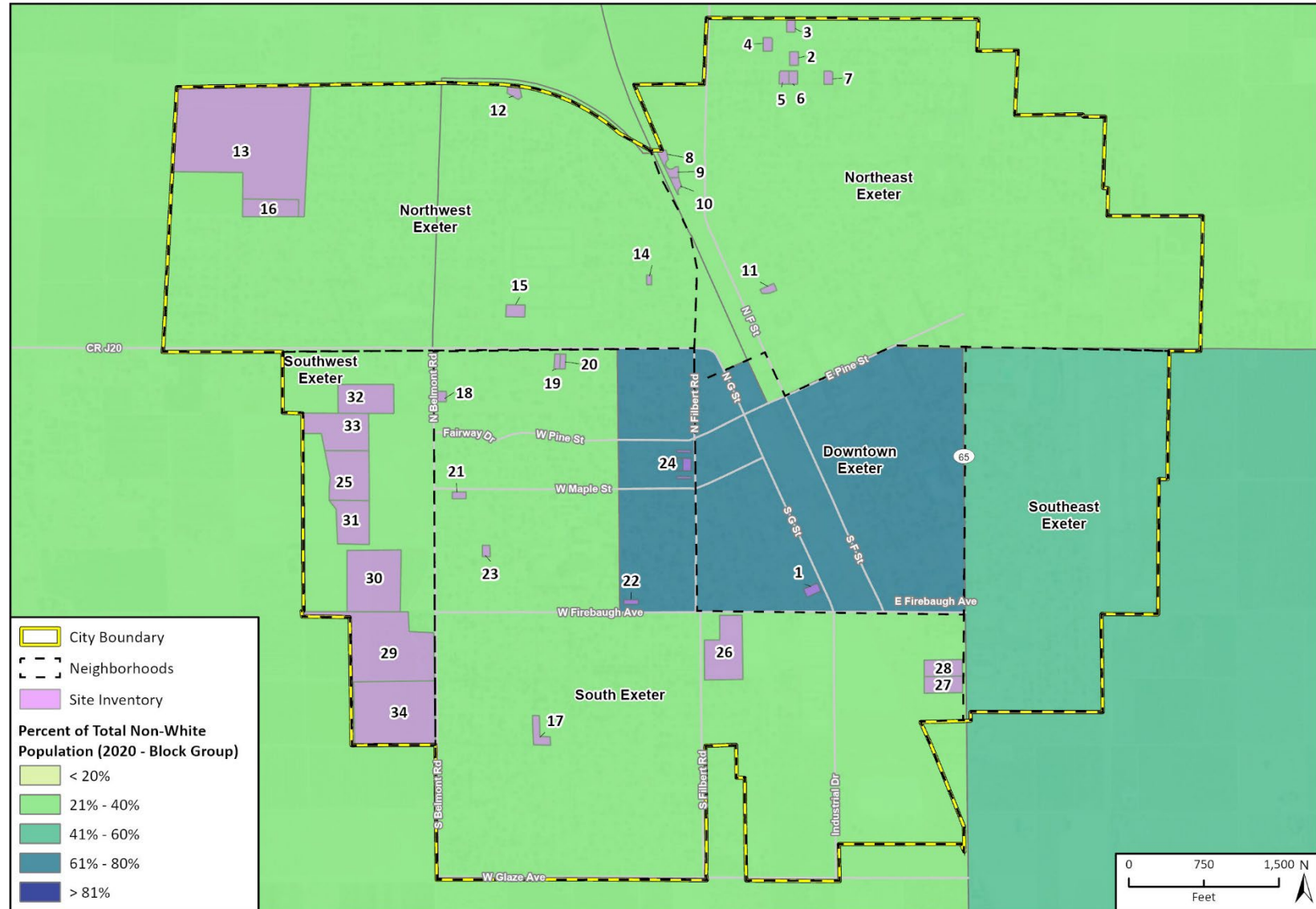
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Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

Source: AFFH Viewer, 2023

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Site Inventory AFFH - Exeter

Figure B5-32 Housing Opportunity Sites by Total Non-White Population (City of Exeter)



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Source: AFFH Viewer, 2023

22_13496_HE_AFFH
 Site Inventory AFFH - Exeter

Sites by Communities Vulnerable to Displacement

The entire City of Exeter is considered to have a lower displacement risk by the UDP, as shown in Figure B5-33. The Site Inventory includes capacity for 368 units appropriate for lower-income households, 167 units for moderate-income households, and 330 units for above moderate-income households. Lower-income units will provide affordable housing options for existing very low and low-income residents, allowing residents to remain in place.

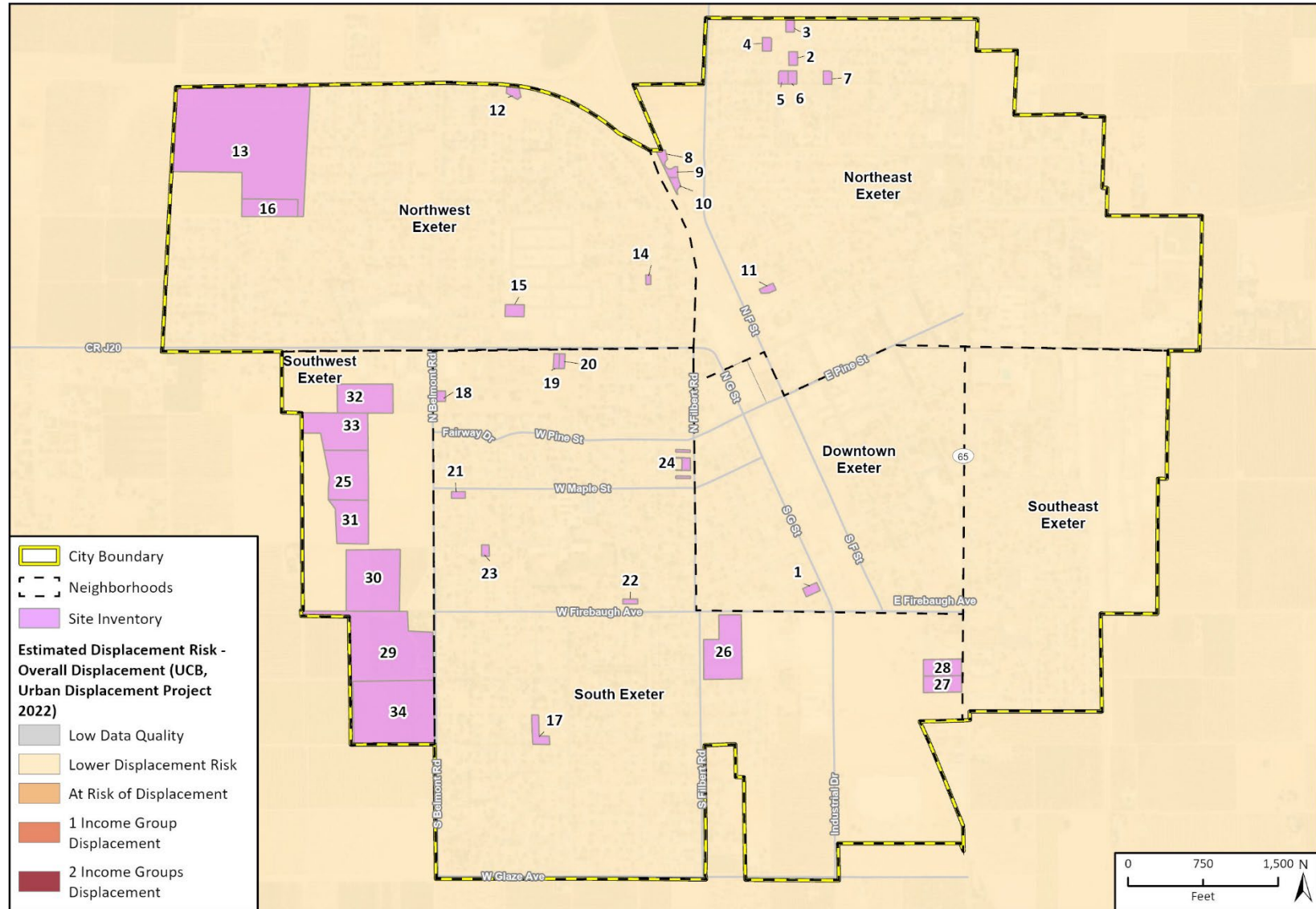
Sites by CalEnviroScreen Score

CalEnviroScreen scores range between the 60 and 80 percentiles throughout Exeter, as shown in Figure B5-34. Northwest and Northeast Exeter have a slightly higher CalEnviroScreen score (65) than Downtown, Southeast, Southwest, and South Exeter (63). The Site Inventory assumes that the sites in southern Exeter could accommodate 654 units (approximately 75 percent of the total Site Inventory). Housing opportunity sites in Northwest and Northeast Exeter, which has a higher CalEnviroScreen score, accommodate zero units appropriate for lower-income households, and only 25 percent of the total Site Inventory. Therefore, the Site Inventory would not concentrate lower-income units in areas of higher pollution burden.

Sites Analysis Summary Data

Table B5-5 summarizes the sites inventory by development priority area, sites, number of units by income level, and census tract characteristics.

Figure B5-33 Housing Opportunity Sites by Displacement Risk (City of Exeter)

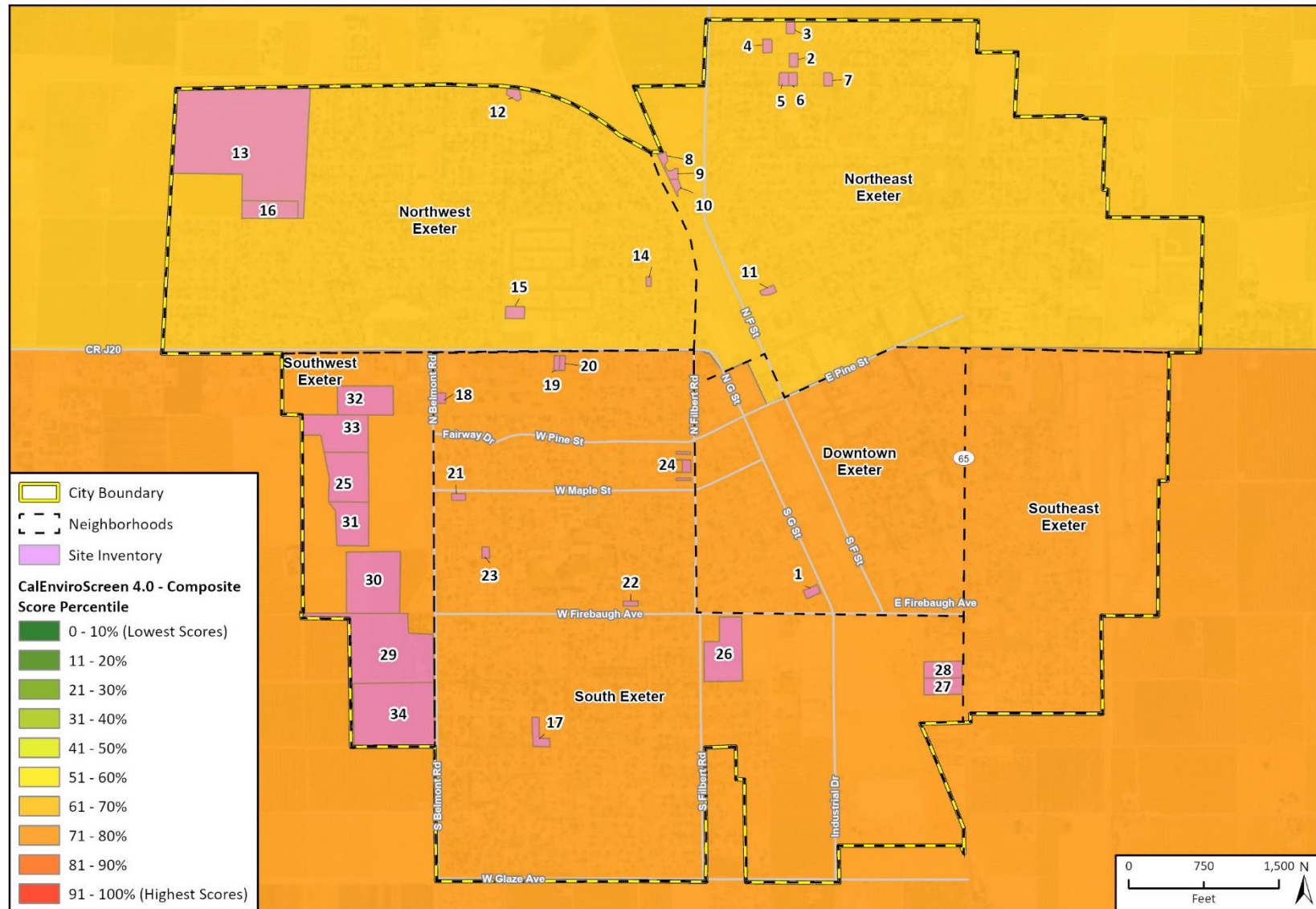


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 Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

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 Site Inventory AFFH - Exeter

Source: AFFH Viewer, 2023

Figure B5-34 Housing Opportunity Sites by CalEnviroScreen Percentile Score (City of Exeter)



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Additional data provided by ACS 2017-2021, HCD, PlaceWorks, HUD Region 9, UC Berkeley UDP, TCAC 2022, CalEnviroScreen 4.0, 2021, CAL FIRE, OEHHA, FEMA.

Source: AFFH Viewer, 2023

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Site Inventory AFFH - Exeter

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Table B5-5 Sites Inventory by Census Tract Characteristics

Priority Development Area	Census Tract Number	Number of Existing Households	Sites Inventory Capacity (Units)			AFFH Indicators							CalEnviroScreen Percentile
			Lower-Income	Moderate-Income	Above Moderate-Income	Percent Non-White	Median Household Income	Percent LMI Households	TCAC Opportunity Area	Percent Overpayment by Renters	Percent Overcrowded Households	Displacement Sensitivity	
Downtown	06107001502	1,727	0	3	0	60.6%	\$49,653	47.1%	High Resource	59.0%	7.4%	Lower Displacement Risk	63.6%
Northeast	06107001501	1,800	0	5	9	40.4%	\$66,548	41.4%	High Resource	41.8%	3.2%	Lower Displacement Risk	65.6%
Northwest	06107001501	1,800	0	33	161	40.4%	\$66,548	41.4%	High Resource	41.8%	3.2%	Lower Displacement Risk	65.6%
South	06107001501	1,727	90	15	12	60.6%	\$66,548	41.4%	High Resource	59.0%	7.4%	Lower Displacement Risk	63.6%
Southwest	06107001502	1,727	278	111	148	60.6%	\$49,653	47.1%	High Resource	59.0%	7.4%	Lower Displacement Risk	63.6%
Total			368	167	330								
Source: California Tax Credit Allocation Committee (TCAC)/California Housing and Community Development (HCD), Opportunity Maps (2023); U.S. Census Bureau, American Community Survey 5-Year Data (2017-2021)													

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B5.13 Contributing Factors and Meaningful Actions

AB 686 requires an identification and prioritization of contributing factors to fair housing issues based on all the previously required analysis (outreach, fair housing assessment, site inventory). This section lists contributing factors that create, perpetuate, or increase the severity of one or more fair housing issues that were identified in community outreach and the analysis in this document. Contributing factors were prioritized based on their impact on fair housing issues as well as the City's ability to address the contributing factors.

Enforcement and Outreach

Fair housing information is not provided on the City's website, nor does it provide links to partner organizations that provide fair housing services. HATC provides fair housing assistance to residents regionally, but there is no referral provided to HATC on the City's website.

Contributing factors to insufficient enforcement and outreach in Exeter include:

- Lack of sufficient distribution of fair housing information (Priority Level – High): The City does not provide information on fair housing organizations or fair housing information on the City's website.
- Language barriers (Low): Thirty-four percent of Exeter residents speak a language other than English. The City's website is only provided in English.

Segregation and Integration Patterns and Trends

Southwest, South, Downtown, and Southeast Exeter have a higher concentration of non-white residents and residents living below the poverty line than other areas of the city. Downtown Exeter in particular has the highest LMI population in the city, the lowest median income and the highest concentration of non-white residents. In contrast, Northwest and Northeast Exeter has a predominantly white population, lower percentage of residents living below the poverty line, and lower CalEnviroScreen score.

Contributing factors to segregation and integration patterns and trends in Exeter include:

- Land use and zoning patterns (High): The majority of medium and high density multifamily residential zoning/land use designations are concentrated in Downtown Exeter, the lower part of Northwest Exeter, and the northeastern corner of South Exeter. Land use designations throughout the rest of the city primarily consist of low density/single-family zoning.
- Location and type of affordable housing (Medium): Public housing and subsidized housing is concentrated in Northeast Exeter, and one subsidized housing complex in Northeast Exeter, and one in Southwest Exeter. The remainder of the city, particularly Downtown, Southeast, and South Exeter, does not contain subsidized housing units.

Disproportionate Housing Needs

Cost burden among homeowners is high throughout most of the city. Cost burden among renters is highest in Northwest and Northeast Exeter. Approximately eight percent of the city is overcrowded. Housing problems are a widespread issue throughout the city. Approximately 42 percent of all households in Exeter, especially extremely low-, very low-, and low-income households, are experiencing housing problems. Exeter has an older housing stock; 63 percent of the City's housing stock

was built before 1990. High rates of cost burden across the city may indicate that homeowners may not be able afford to afford to pay for repair and maintenance on their homes.

Contributing factors to disproportionate housing needs in Exeter include:

- **High housing costs (Medium):** Home values and rent has increased significantly in Exeter over the past decade, which causes increased cost burden among homeowners and renters. According to 2015-2019 ACS estimates, approximately 37 percent of all households in Exeter were cost burdened. The median price of a home increased approximately 22 percent in ten years, from 192,400 in 2011 to 234,400 in 2021. The median rent increased 31 percent, from \$779 in 2011 to \$1,017 in 2021. Exeter has a higher ratio of single-family units to multifamily units than other cities in the county and compared to the statewide average. The lack of smaller housing typologies causes residents to spend more on housing.
- **Lack of affordable housing in a range of sizes (High):** The majority of the housing stock (80 percent) is comprised of detached single-family homes, which may not be affordable to lower income households. Twenty percent of all housing units contain four or more bedrooms, which can accommodate large families without overcrowding.
- **Cost of housing maintenance and repairs (Low):** Exeter's older housing stock may indicate that a significant number of housing units are in need of repair.

Disparities in Access to Opportunities

Northern Exeter is considered a high resource area, and Southern Exeter is considered a moderate resource area. Southern Exeter and Downtown are considered disadvantaged communities and have the highest non-white residents, highest pollution burden, and lowest economic opportunity scores in the city.

Contributing factors to disparities in access to opportunities in Exeter include:

- **Lack of access to high paying jobs (Medium):** Job proximity is relatively low across most of Exeter, particularly in the western portion of the city. Southeast Exeter has the highest job proximity score in the city.
- **The availability, type, frequency, and reliability of public transportation (Low):** There is only one fixed bus route that operates within the city. This route provides transportation to nearby communities of Farmersville and Visalia. It takes approximately 37 minutes to reach the Visalia Transit Center from Exeter.
- **Lack of walkability (Low):** Downtown Exeter is considered above average walkable by the National Walkability Index. However, other areas of the city have low walkability.
- **Land use and zoning patterns (High):** Types of zoning that accommodate land uses with employment opportunities, such as industrial and commercial, are concentrated in South and Southeast Exeter. Most of the other areas of the city primarily consist of residential and public facility zones. There is a relatively low percentage of multifamily units in the city (13 percent of housing units).
- **High pollution burden (High):** Northern Exeter is ranked in the 61st to 70th percentile for pollution burden by CalEnviroScreen and the southern half of the city is within the 81st to 90th percentile.

B5.13.1 Meaningful Actions to Address Fair Housing Issues

Based on the analysis conducted in this AFFH document, meaningful actions were developed to address fair housing issues and contributing factors that impede access to safe, affordable, and vibrant housing in Exeter. Furthermore, the findings of this analysis were used to develop meaningful actions, metrics and milestones that promote inclusive communities, increase housing opportunities, and address racial/ethnic and economic disparities in the city. The contributing factors were prioritized to better formulate policies and programs and carry out meaningful actions to further fair housing. The contributing factors of highest priority in Exeter are lack of smaller housing typologies and sufficient affordable housing, high housing costs, cost of maintenance and repairs, and lack of sufficient distribution of fair housing information/language barriers. Meaningful actions to address fair housing issues are included in the housing programs located in Chapter B7, *Housing Plan*.

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B6 Review of Past Accomplishments

To develop appropriate programs to address the housing issues identified in the 2023-2031 Housing Element, the City of Exeter reviewed the housing programs adopted in the 2015-2023 Housing Element and evaluated the effectiveness of these programs in delivering housing services and assistance. Table B6-1 and Table B6-2 summarize the City's construction, rehabilitation, and preservation goals and accomplishments during the 5th cycle planning period and Table B6-3 Provides a detailed program-level assessment of housing accomplishments over the last planning period.

B6.1 Overview of Accomplishments

During the 5th cycle Housing Element, the City implemented programs to support infill development, market-rate and affordable housing production, home repair, ADU development, and preservation of existing housing stock. Through the implementation of these programs, the City supported housing needs for lower-income households, people experiencing poor housing conditions, and renters. Most notably, the City implemented the following:

- **Program 7 (Adequate Sites):** The City worked with the Tulare County Housing Authority to construct 25 tax-credit units.
- **Program 5 (Conserve and Improve the Existing Housing Stock):** The City hired a dedicated community enforcement officer to support the rehabilitation of housing units. One fourplex was rehabilitated.
- **Program 6 (Assist in the Development):** The City conducted land use and zoning amendments to support the development of 55 multifamily units.

B6.2 Effectiveness in Addressing Special Needs

Special needs communities are demographic or occupational groups that call for specific program responses to address unique housing needs. State law specifically requires analysis of the special housing needs of people who are elderly or disabled (including developmental disabilities), female-headed households, large families, farmworkers, and people experiencing homelessness. These special-needs groups often spend a disproportionate amount of their income to secure safe and decent housing and are sometimes subject to discrimination based on their specific needs or circumstances.

During the 5th cycle, the City took the following actions to address special needs housing:

- The City adopted amendments to the Zoning Code to support the development of transitional and supportive housing, group homes, and farmworker housing.

Cumulatively, 5th cycle Housing Element programs were not effective in addressing the housing needs for special needs groups. Additional actions must be taken to support the housing needs of the community, including but not limited to, low- and extremely low-income households, people experiencing homelessness, persons with disabilities, seniors, large families, and farmworkers. Overall, 5th cycle Housing Element programs served as a starting point for the 6th cycle Housing Plan programs. The City aims to better respond to the specific needs of the community by including more thorough and targeted actions objectives for housing programs in the 6th cycle.

Evaluating the resources for senior-headed households and resources for seniors in Chapter B2, *Housing Needs Assessment*, there are 142 total senior renter-occupied households, of which 132 are lower-income and an additional 33 of those 142 households are experiencing a cost burden. Since there are 40 income restricted senior units in the city, there are sufficient housing units for renter-senior households. The City implemented Program 5 during the 5th cycle, which directed the City to meet with developers to obtain available sources of funding and prioritize available funds, including tax credit apartment projects including one senior project. The program is ongoing and will be continued as Housing Plan Program 9 in the 6th cycle to provide housing resources and facilitate housing for special needs groups, including seniors.

Section B2, *Housing Needs Assessment*, identifies a need for housing that addresses the needs of people with disabilities, as there are only 10 rental units in the city designated to serve residents with disabilities and 1,301 individuals with at least one disability. In the 5th cycle, Program 10 intended to address the special housing needs for persons with disabilities, which aimed to encourage housing providers to designate a portion of new affordable housing developments for persons with disabilities, pursue funding sources designated for persons with disabilities, and enact Zoning Ordinance amendments to reduce constraints to housing development. The City adopted an ordinance update to include Universal Design Standards. However, no units were developed during the 5th cycle that served persons with disabilities. The City will implement Housing Plan Program 9 in the 6th cycle to facilitate affordable housing production for people with disabilities in the community. The program has new objectives and actions which aim to streamline permitting and seek funding annually for affordable housing development for special needs groups, including people with disabilities.

Large households face difficulties in securing affordable housing with a sufficient number of rooms, which results in overcrowding. As described in Chapter B2, *Housing Needs Assessment*, there are sufficient housing options with four or more bedrooms for large households. However, increasing the development of affordable housing options for large households could help to further reduce overcrowding as income can often be a limiting factor in a sufficient number of bedrooms for large households. There were no 5th cycle programs to specifically create housing opportunities for large households. The City will implement Housing Plan Program 9 in the 6th cycle to support the development of affordable housing for residents with special needs, including large households, by implementing permit streamlining and pursuing funding.

The 5th cycle housing Program 9 implemented the Zoning Code amendments to allow emergency shelters in the CS, ML, and I zones in order to provide housing resources for people experiencing homelessness. As noted in Chapter B2, *Housing Needs Assessment*, although there is a relatively small number of people experiencing homelessness residing in the city compared to other jurisdictions in the county, there is an identified lack of resources for this special needs group. To address housing needs in the 6th cycle, the City will implement Housing Plan Program 1 to encourage and coordinate development of emergency shelters and low barrier navigation centers and Housing Plan Program 6 to support the development of shelter housing and supportive services for people experiencing homelessness.

Chapter B2, *Housing Needs Assessment*, describes how farmworkers frequently experience high rates of poverty, barriers to securing housing, and often reside in overcrowded and poor housing conditions. There are units affordable to farmworker households managed by the Housing Authority of Tulare County in the nearby cities of Farmersville, Visalia, and Woodlake; however, there is still a need for farmworker housing to specifically meet the needs of farmworkers in Exeter. The 5th cycle housing element Program 6 amended the City's Zoning Ordinance to allow farmworker housing and emergency shelters as conditionally permitted uses in certain zones. However, this amendment is not in compliance with state law. In the 6th cycle, the City will implement Housing Plan Program 6 to allow farmworker

housing in accordance with state law and Program 9 to conduct additional actions to provide incentives for housing development of farmworker housing such as expedited permit processing and fee waivers/reductions.

In the 5th cycle, the City employed several programs to encourage the development of affordable housing units to address the needs of low- and extremely low-income (ELI) households. Exeter has 610 extremely low-income households, comprising 18.5 percent of the total households in the city. Of these, 65 percent of ELI households are renters and 77 percent of ELI renters experience a housing cost burden. Additionally, ELI households have overlapping special housing needs. For example, single female-headed households, seniors and persons with disabilities often are identified as part of the extremely low-income group. To better meet the needs of ELI households, the City will implement new actions and objectives in the 6th cycle through Housing Plan Program 12 to facilitate housing assistance for low-income households in coordination with the Housing Authority and increase awareness of the HCV program and other available assistance programs. The City will also apply for HCD's HOME Investment Partnerships Program (HOME) and Community Development Block Grant (CDBG) funds to support the development of affordable housing units.

B6.3 Quantified Objectives

Table B6-1 summarizes the City's progress toward meeting the 5th cycle Housing Element objectives to rehabilitate and conserve/preserve existing housing stock. The City did not meet the objectives for housing rehabilitation or conservation/preservation of below market rate housing.

Table B6-1 Quantified Housing Objective and Achieved Accomplishments (2015-2023)

Income Levels ¹	Rehabilitation		Conservation/Preservation	
	Objectives	Actual	Objectives	Actual
Very Low Income (<50% AMI)	11	2	23	0
Low Income (50-80% AMI)	21	3	33	0
Moderate Income (80-120% AMI)	0	0	0	0
Above Moderate (>120% AMI)	0	0	0	0
Total	32	0	56	0

¹ Income levels are based on Area Median Income (AMI).

As shown in Table B6-2, the City did not reach its 5th cycle RHNA goals for any income category, but nearly achieved the RHNA target for moderate income group. The lowest number of permits were issued for low-income housing units, and no permits were issued for units that would be affordable to very low-income households. The City commits to quantified actions to support adequate housing development for all income levels as described in Chapter B7, *Housing Plan*.

Table B6-2 RHNA Progress (2015-2023)

Income Levels¹	5th Cycle RHNA	Permits Issued	Percent RHNA Progress with Permits Issued
Very Low Income (<50% AMI)	143	0	0%
Low Income (50-80% AMI)	125	7	<1%
Moderate Income (80-120% AMI)	85	9	10.6%
Above Moderate (>120% AMI)	272	21	7.7%
Total			

¹ Income levels are based on Area Median Income (AMI).

B6.4 Review of Past Accomplishments

Table B6-3 provides a detailed program-level assessment of housing accomplishments during the 5th cycle Housing Element planning period.

Table B6-3 Review of Past Accomplishments

Program	Description and Objectives	Progress and Continued Appropriateness
(B) Adequate Sites. Where the inventory of sites pursuant to paragraph (3) of subdivision (a) does not identify adequate sites to accommodate the need for farm worker housing, the program shall provide for sufficient sites to meet the need with zoning that permits farm worker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farm worker housing for low- and very low-income households.		
1.	The Planning Department completed an update to its General Plan in 2003. The Land Use Element has added more land to Exeter's residential land inventory, some of which will be designated for high density residential, 29 units per acre. In addition, in 2007, Exeter adopted the Southwest Exeter Specific Plan for the 320-acre planning area. In total, this planning area will accommodate over 5,000 persons who will live in a variety of housing types, including multifamily projects.	Due to the completion of the program, it will not be continued in the 6th cycle.
2.	The City of Exeter will redesignate and rezone 3.16 acres to the RM-1.5 zone district, the parcels of which are listed in Table 36 (sites identified zoned ML and CS) of the Element. These reclassifications will provide rental housing for lower-income households. If tax credit projects can be attracted to the community, very low-income households.	Following the rezone, the Tulare County Building Department processed a 44-unit apartment complex for moderate-income and low-income households. This program will be revised and continued with new affordable housing development objectives and the City will rezone sites to provide housing opportunities for lower-income households as part of Program 2 in the 6 th housing cycle.
3.	The Exeter General Plan Update shall provide enough land for 125 percent of the land required for residential development through 2024.	The General Plan Update has been completed. This program will be revised with new objectives to ensure adequate sites to meet the RHNA in the 6th housing cycle as part of Program 2.
4.	The Land Use Element Update will provide a range of residential designations, including very low, low, medium and high density residential.	The General Plan Update has been completed. This program will not be continued in the 6 th cycle as it has been completed.
5.	The City of Exeter will allow residential infill development by allowing lot sizes less than 6,000 square feet when using Exeter's existing Planned Development combining district.	The City approved a final map for a 40-acre residential development that will be composed of 2 acres of multifamily development, 10 acres of single family residential on lots under 6,000 square feet, and the balance of land proposed for development of single-family lots over 7,000 square feet. A final subdivision map has been submitted for land within Exeter's Southwest Specific Plan. The final map proposes 66 lots that average 7,500 square feet in size, and 40 lots averaging less than 6,000 square feet in size. This program will be revised and continued in Programs 9 and 12 with new actions to support infill housing development by seeking funds and coordinating with local agencies for infill housing projects in the 6th housing cycle.

Tulare County Association of Governments
Tulare County Regional Housing Element

Program	Description and Objectives	Progress and Continued Appropriateness
6.	Work with developers and employers to identify farmworker housing needs. The City will also support applications for funding to assist in the development of farmworker housing. The Zoning Ordinance will be revised to be consistent with the Health and Safety Code. Amend the Exeter Zoning Ordinance to add farm labor housing (36 beds) to the UR and A districts, and emergency shelters to the CS and ML districts as a permitted use to the conditional use list to the city's residential zone districts to permit fewer than six farmworkers to occupy a residential unit in a multifamily residential zone district. The Exeter Zoning Ordinance will be amended to add this use to the permitted use list of the RM-3 and RM-1.5 zone districts. Exeter does not have an agricultural zone. It does, however, have an UR (urban reserve) zone, which is the City's holding zone until such time as the land is ready to be developed to some type of urban use. It would not be appropriate to permit housing for farm labor housing in this holding zone since the land will eventually be developed residential subdivisions, industrial uses, or other types of intensive urban uses. Section 17021, 17021.5 and 17021.6.	Exeter's Zoning Ordinance has been amended to add farmworker housing and emergency shelters as conditionally permitted uses in certain zones, which is not in compliance with state law. This program will be revised and continued as Program 6 with new actions to support housing for special needs groups, including zoning code amendments to support farmworker and employee housing, and for compliance with recent state laws in the 6th housing cycle.
7.	The City shall pursue appropriate state and federal funding sources to support the efforts of non-profit and for-profit developers to meet new construction and rehabilitation needs of lower- and moderate-income households. The City shall also specifically target funding to address the needs of extremely low-income households. The City shall periodically update and review available housing programs to identify appropriate funding sources to meet Exeter's housing needs.	The City worked with the Tulare County Housing Authority to construct 25 tax-credit units in the city to assist developers in constructing lower-income units. This program will be revised and continued as Program 9 with new affordable housing development and housing rehabilitation objectives in the 6th housing cycle and Program 11 to identify funding sources for the rehabilitation programs for lower-income households.
8.	Amend the Exeter Zoning Ordinance to add transitional and supportive housing without the 6 or fewer persons requirement to permitted use in all residential zones and subject to only those standards/regulations that apply to other residential dwellings of the same type in the same zone list of the City's residential zone districts. The City will remove the CUP requirement for group homes to comply with Health and Safety Code Sections 1267.8, 1566.3, 1568.08 requiring local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses.	This program was completed with the amendment of the Exeter Zoning Ordinance. This program will be revised and continued at Program 6 with new objectives to support transitional and supportive housing and to comply with recent state laws in the 6th housing cycle.
9.	Shall amend the Exeter Zoning Ordinance to add emergency shelters to the permitted use list of Exeter's CS and I districts. Emergency shelters provide homeless persons with short-term housing accompanied by limited supplemental services. Emergency shelters are not explicitly identified in the City's Zoning Ordinance. The City has identified the CS and ML zones as the most appropriate zones for the development of emergency shelters.	This program was completed with the amendment of the Exeter Zoning Ordinance. This program will be revised and continued as Program 6 with new objectives to support emergency shelters and to comply with new state laws in the 6th housing cycle.

Program	Description and Objectives	Progress and Continued Appropriateness
10.	Housing element law requires that in addition to the need’s analysis for persons with disabilities, the housing element must analyze potential governmental constraints to the development, improvement and maintenance of housing for persons with disabilities, demonstrate local efforts to remove any such constraints and provide for reasonable accommodations for persons with disabilities through programs that remove constraints. In order to assist in the housing needs for persons with Developmental Disabilities, the City will implement programs to coordinate housing activities and outreach with the Regional Center and, encourage housing providers to designate a portion of new affordable housing developments for persons with disabilities, especially persons with developmental disabilities, and pursue funding sources designated for persons with special needs and disabilities. Exeter's adoption of a comprehensive update of its Zoning Ordinance added a Reasonable Accommodations chapter, however, it did not add a Universal Design Ordinance to its zoning ordinance. The City of Exeter will incorporate a Universal Design Ordinance into its Zoning Ordinance in 2016. This Ordinance would serve to ensure the following: ▪ Compliance with fair housing laws; ▪ Provision for group homes over six specifically for people with disabilities, other than those residential zones covered by State law; ▪ A broadened definition of family that 1) provides zoning code occupancy standards specific to unrelated adults and, 2) complies with Fair Housing Law; ▪ Siting or separation requirements for licensed residential care facilities, to determine extent to which the local restrictions effect the development and cost of housing; ▪ Granting concessions and incentives for housing developments that include units affordable to special needs households: assisting, supporting or pursuing funding applications; and working with housing developers coordinate and implement a strategy for developing housing affordable to special needs households;	The City adopted the Universal Design Ordinance in 2016. This program will be revised and continued as Program 6 with new objectives to support housing for people with disabilities in the 6th housing cycle, as needed.

Tulare County Association of Governments
Tulare County Regional Housing Element

Program	Description and Objectives	Progress and Continued Appropriateness
C. Assist in the Development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households (Government Code Section 65583(c)(2)).		
1.	Exeter will continue to contract with Self-Help Enterprises for the rehabilitation of substandard residential dwellings in Exeter. Self-Help will rehab five dwelling units per year. Annually, Self-Help Enterprises applies for CDBG funds on behalf of Exeter. The annual figure is \$500,000. As families that have taken advantage of this rehabilitation program repay the low interest loan, this money is placed into a Program Income fund. These monies can be used for housing rehabilitation as well as other improvements that benefit low- to moderate-income households, including sidewalks, sewer and water lines, and curbs and gutters.	The City continues to contract with Self-Help Enterprises for rehabilitation of substandard homes using Community Development Block Grant (CDBG) funds. On average, Self-Help completes three housing rehabilitations per year. This program will be continued as Program 11 with new objectives to support housing rehabilitation and infrastructure improvements in the 6th housing cycle.
2	Exeter and Self-Help Enterprises will work together to construct single-family homes that are affordable for low- and moderate-income households. These homes will be constructed on infill residential lots, some of which may have originally contained dilapidated homes that have been demolished. Exeter will build two new residential units per year.	No progress was made on this program. Self-Help Enterprises will continue to search for opportunities to construct affordable infill housing using the First Time Home Buyer program. This program will be continued as Program 12 with new objectives to support affordable housing and homeownership opportunities in the 6th housing cycle.
3.	The City of Exeter will encourage private developers who are proposing residential development to a PD (planned development) combining district. This district allows for greater flexibility in residential design and better utilization of land. These opportunities allow the developer to potentially provide a more affordable housing product. The City will encourage the use of these zone districts by providing information that shows that they will increase the density of a residential development while at the same time reducing improvement costs and impact fees per residential unit.	The City approved a final map for a 40-acre residential development that will be composed of 2 acres of multifamily development, 10 acres of single-family units on lots under 6,000 square feet, and the balance of lots over 7,000 square feet. The City used its PD district designation to create lots that were less than 6,000 square feet. This program will be revised and continued as Program 9 with new objectives to support affordable and market rate housing development in the 6th housing cycle.
4.	The City of Exeter will assist the Tulare County Housing Authority's implementation of the conventional Public Housing Rental Program and the Section 8 Existing Program, which provides rent subsidies directly to participating landlords, and will support that Agency's attempts to secure additional funding for expanded programs. Currently, the Housing Authority manages 50 Section 8 housing units in Exeter. The Exeter Building Department will identify for the Housing Authority additional rental housing stock that can be used for the Section 8 Program.	The Housing Authority continues to provide Section 8 housing within the city limits of Exeter. This program will be continued as Program 12 with new objectives to support housing vouchers in the 6th housing cycle.

Program	Description and Objectives							Progress and Continued Appropriateness																					
5.	Work with developers to obtain available sources of funding and prioritize available funds, as appropriate, for projects including units affordable to extremely low-income households. Exeter will actively court two tax credit apartment projects to Exeter. One will be a senior project that will be located in the Downtown and the second will be a family apartment project on the fringe of the community. To assist the financing of the projects, the Agency will collect development impact fees when the units are occupied. Work with non-profit and for-profit developers to target tax credit projects in Exeter and pursue appropriate State and Federal funding sources to support the efforts of non-profit and for-profit developers to meet new construction and rehabilitation needs of lower- and moderate-income households. The City will target sites for development and provide incentives such as density bonus to developers, in accordance with Section 65915 of the Government Code. The Agency also has other tools that can be used to entice a tax credit project to the community. The most effective tool would be for the City to approve a Density Bonus for either or both projects. In addition to the density bonus, the City can offer one or more deviations from the zoning ordinance standards. These tax credit projects are particularly helpful for the hard to reach extremely low-income households. Generally, about ten percent of the units in a tax credit project are affordable to the ELI group.							The City continues to encourage the development of tax credit projects in Exeter, most recently a tax credit was offered for the 25-unit Tulare County Housing Authority project. This program will be revised and continued as Program 12 with new objectives to support housing for extremely low-income households in the 6th housing cycle.																					
6.	Exeter will support and encourage a general plan amendment and/or zoning ordinance amendment on parcels that are currently zoned for non-residential uses. To generate the residential units detailed in Table 36, the City will be required to initiate general plan amendments and/or zone change amendments to promote single and multifamily development on parcels currently zoned to the PF, ML and CS zone districts. The specific parcels that will be rezoned for single and multifamily development will include the following: <table><tr><td>138-123-018</td><td>0.66</td><td>ML</td><td>Industrial</td><td>Vac</td><td>10 units</td><td>Requires GP amend</td></tr><tr><td>138-043-004</td><td>1.0</td><td>ML</td><td>Industrial</td><td>Vac</td><td>29 units</td><td>Requires GP amend</td></tr><tr><td>135-160-08</td><td>1.5</td><td>CS</td><td>Ser. Comm.</td><td>Vac</td><td>43 units</td><td>Requires GP amend</td></tr></table> These rezoning actions will generate 82 multifamily dwellings.							138-123-018	0.66	ML	Industrial	Vac	10 units	Requires GP amend	138-043-004	1.0	ML	Industrial	Vac	29 units	Requires GP amend	135-160-08	1.5	CS	Ser. Comm.	Vac	43 units	Requires GP amend	The City is working with a developer that has proposed to construct apartments on a 1.38-acre parcel that is currently zoned CS. A general plan amendment and rezone to the RM-1.5 district is in progress to support the development of 44 apartments. One lot was rezoned from the RM-3 to the RM-1.5 district with developer interest. The approved rezoning will add 10 apartments units to an infill lot near the downtown. This program will be revised and continued as Program 2 with new objectives to support market rate housing development in the 6th housing cycle.
138-123-018	0.66	ML	Industrial	Vac	10 units	Requires GP amend																							
138-043-004	1.0	ML	Industrial	Vac	29 units	Requires GP amend																							
135-160-08	1.5	CS	Ser. Comm.	Vac	43 units	Requires GP amend																							

Program	Description and Objectives	Progress and Continued Appropriateness
7.	Exeter lacks parcels of land that are within the city limits and zoned to the RM-1.5 (multifamily residential, one unit per 1,500 square feet), 29 units per acres. It is this zoning that generates significant affordable housing for persons in the extremely low- and very low-income categories. Given this finding, the City of Exeter will support and encourage resignation and rezoning of 3 acres of land for high density multifamily development. This rezoning action will be ongoing and should generate 82 multifamily residential units.	The City is working with a developer proposing to construct apartments on a 1.38-acre parcel that is currently zoned CS. A general plan amendment and rezone to the RM-1.5 district is in progress to support the development of 44 apartments. One lot was rezoned from the RM-3 to the RM-1.5 district with developer interest. The approved rezoning will add 10 apartments units to an infill lot near the downtown. This program will be revised and continued as Program 2 to support rezoning efforts to accommodate the RHNA and/or reduce constraints to development.
D. Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action (Government Code Section 65583.(c)(4)).		
1.	The City of Exeter shall facilitate residential development in Exeter that is well designed and maintained, attractive and affordable. Affordable housing units will be accomplished through increased unit densities; attractive design through architectural review and maintenance; and through the City's site plan review process, conditions such as maintenance through a landscaping and lighting district.	Except for single family dwellings, all residential development is processed through the City's site plan review process, which ensures that projects meet various development standards including, setbacks, parking, landscaping, and infrastructure requirements. This program will be revised and continued with Program 9 with new objectives to support affordable housing development and/or revise the City's development review process to reduce constraints to housing development as needed within the 6th housing cycle.
2.	The City will continue to identify dilapidated housing units in Exeter that require demolition. The City will notify the property owner of this requirement. Once the lot is vacant, the city will work with the property owner to facilitate the construction of a new residential unit, or a multifamily unit if properly zoned. The City will work with Self-Help Enterprises to utilize CDBG funds to construct single-family homes that are affordable to low- and moderate-income households on sites where a dilapidated building was demolished. From 2001 to 2008, 10 dilapidated homes were demolished and replaced with new housing that was affordable to lower-income (apartments) and moderate-income (single family dwelling) households. During the planning period, the City will facilitate the demolition of two dilapidated residences per year, as needed.	In 2018, a substandard fourplex was demolished and rebuilt in compliance with current building, parking, and landscaping standards. This program will be continued as Program 11 with new objectives to support code enforcement, housing rehabilitation, and affordable housing development in the 6th housing cycle.
3.	Exeter will continue to annually apply for CDBG funds for rehabilitation of housing in Exeter. The City will contract with Self-Help Enterprises to provide this service. From 2001 to 2008, Self-Help Enterprises rehabilitated 31 substandard single-family dwellings. During the planning period, Exeter working with Self-Help will rehab three dwellings per year.	No rehabilitation of single-family units occurred during the 5th housing cycle. This program will be continued as Program 11 with new objectives to support housing rehabilitation in the 6th housing cycle.

Program	Description and Objectives	Progress and Continued Appropriateness
4.	Exeter will continue to ensure that the long-term affordability of its subsidized apartment projects remains in place for the contracted time period, which ranges from 30 to 55 years. Should the owners of the assisted living units detailed in this Element, containing 224 lower-income units elect to change to market-rate units, the City of Exeter will contact Self-Help Enterprises, Tulare County Housing Authority and other tax credit developers to discuss how the long-term affordability of these units can be continued. Strategies that the city employee would include 1) having one of these entities purchase the project, and 2) encourage the current owner of the affordable housing project to continue to own it with financial assistance from the City of Exeter with the condition that the project would remain affordable to lower- income households.	There were no affordable housing units that were at risk of conversion to market rate during the 5 th housing cycle. This program will be revised and continued as Program 10 with new objectives to support affordable housing units at risk of conversion to market rate in the 6 th housing cycle.
5.	Exeter will continue to employ a code enforcement officer in its police department who will ensure that neighborhoods are free of blight, including abandoned cars, weed infested lots, and dwellings that accumulate junk and debris. The Officer will inspect 10 sites per week.	The City of Exeter continues to provide code enforcement services throughout the city. In 2020, the City hired a dedicated community enforcement officer. This program will be revised as Program 11 with new objectives to support code enforcement by providing resources for rehabilitation programs and financial assistance to qualified property owners in the 6 th housing cycle.
6.	Exeter will work with the Tulare County Housing Authority to identify apartment complexes that could be purchased and renovated and be made available for long-term rental for lower-income households. This potential purchase and renovation could be added to the stock of housing developments (page 56) whose units are subsidized and are affordable to lower- income households. This strategy will also serve to upgrade blighted apartment complexes that may be having an adverse impact on their respective neighborhoods.	The Housing Authority did not purchase any apartment units for rehabilitation during the 5 th housing cycle. This program will be revised as Program 10 with new objectives to support multifamily housing unit rehabilitation in the 6 th housing cycle.
E. Preserve Units At-Risk of Conversion to Market Rates Uses		
Preserve for lower income households the assisted housing developments identified pursuant to paragraph (8) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (8) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance (Government Code Section 65583(c)(6)).		
1.	Work with local contractors to construct or rehabilitate single-family homes that can be made available for Section 8 households. Exeter will work to increase the number of Section 8 units in Exeter by two units per year over the planning period.	The City works with Self Help Enterprises by leveraging CDBG Grant funds to rehabilitate housing in the city at the discretion of property owners. This program will be continued as Program 12 with new objectives to support housing rehabilitation and housing vouchers in the 6 th housing cycle.

Tulare County Association of Governments
Tulare County Regional Housing Element

Program	Description and Objectives	Progress and Continued Appropriateness
2.	Exeter will work with the Tulare County Housing Authority to work with households that are displaced by owners of Section 8 units that opt-out of the program. The Agency will use some of its CDBG funds to rehab homes that can be made available for Section 8 housing. The Agency will rehab one potential Section 8 unit per year during the planning period.	No owners of Section 8 housing in Exeter opted out of the program during the 5 th housing cycle. This program will be revised as Program 4 with new objectives to support tenant protections in the 6 th housing cycle.
3.	Exeter will monitor owners of at-risk projects on an ongoing basis, at least every six months, in coordination with other public and private entities to determine their interest in selling, prepaying, terminating or continuing participation in a subsidy program.	There were no units at risk of conversion during the 5 th housing cycle. This program will be revised and continued as Program 10 with new objectives to support affordable housing units at risk of conversion to market rate in the 6 th housing cycle.
4.	The City of Exeter will work in concert with the Tulare County Housing Authority to purchase deteriorated apartment complexes and rehabilitate them so that they can pass health and safety codes. These units, when upgraded, would be rented to lower-income households.	The Housing Authority did not purchase any deteriorated housing units during the 5 th housing cycle. This program will be revised and continued as Program 12 with new objectives to support rehabilitation of multifamily housing units in the 6 th housing cycle.
5.	The City of Exeter will preserve all 212 units in the six at-risk properties. Exeter will monitor, every year, the status of any HUD receipt/approval of Notices of Intent and Plans of Action filed by property owners to convert to market-rate units.	There were no units at risk of conversion during the 5 th housing cycle. This program will be continued as Program 10 with new objectives to support affordable housing units at risk of conversion to market rate in the 6 th housing cycle.
F. Address and Remove or Mitigate Constraints		
Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, or provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities (Government Code Section 65583(c)(3)).		
1.	The Exeter Planning Department shall require through site plan or conditional use permit conditions that ten percent of all ground floor units in new multifamily projects be handicapped-accessible.	Accessibility to ground floor units is memorialized as a condition of approval in resolutions approved for all development projects. This program will be revised as Program 6 with new objectives to support housing for persons with disabilities with new objectives to revise the Building Code to adopt standards from the most recent California Building Code.
2.	The City of Exeter will consider not collecting development impact fees until occupancy, excluding school impact fees, if the project is a single-family residential infill project, or a downtown mixed-use project that includes an affordable residential component.	To date, the City has not modified its approach to collecting development impact fees; however, developers are able to request fee modifications. This program will be revised as Program 9 with new objectives to support the development of affordable housing, including density bonuses, potential fee reductions, and permit streamlining.

Program	Description and Objectives	Progress and Continued Appropriateness
3.	The City of Exeter contracts with Collins & Schoettler, Planning Consultants, to provide planning services for the community. All planning projects are streamlined from submittal of the application to the final decision-making step. It is the role of this consulting firm to ensure that the design of the project meets good urban design standards and that the project is processed in an expeditious manner. The consulting firm is responsible for all matters pertaining to the processing of the project, including public hearing notices, staff reports, resolutions/ordinances, environmental documents, and presentations before the Commission and City Council.	This streamlining process has been implemented by Collins & Schoettler. This program will be revised and continued as Program 9 with new objectives to improve permit processing and project streamlining.
4.	The City of Exeter will continue to process State licensed group homes administratively. To date, the processing of this type of home can be completed in about two weeks.	The City continues to process State licensed group homes administratively. This program will be revised and continued through Program 6 with new objectives and zoning code amendments to obtain compliance with recent state law on group homes and to reduce constraints to the development of group homes.
5.	The City of Exeter will continue to process fast-track all multi-family projects, except in the case where a density bonus is required, and the project is required to be reviewed and approved by the City Council.	The City of Exeter continues to process all multifamily projects in a timely manner as described. This program will be revised and continued as Programs 6 and 9 with new objectives to improve permit processing and project streamlining for multifamily projects and housing for special needs groups.
6.	The City of Exeter will establish specific procedures to grant priority for water and sewer services to developments with units affordable to lower-income households (Section 65589.7).	The City established specific procedures to grant priority for water and sewer services to developments with units affordable to lower-income households to comply with state law. As it was completed, this program will not be continued in the 6 th housing cycle.
7.	The City of Exeter will annually review its general plan to ensure internal consistency as well as implementing the programs of the housing element.	The City annually reviews its general plan to ensure internal consistency among elements. This program is considered a standard function of City staff and therefore will not be continued into the 6 th housing cycle.

Program	Description and Objectives	Progress and Continued Appropriateness
G. Housing Programs: Equal Housing Opportunities Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability (Government Code Section 65583(c)(5))		
1.	Exeter will work with Tulare County Housing Authority to maintain a local Fair Housing Information Program. This Program will distribute educational materials to property owners, apartment managers, and tenants, and it will respond to complaints of discrimination (i.e., in-taking, investigation of complaints, and resolution) by referring the affected party to the appropriate agencies.	The City provides residents with educational materials and fair housing information by directing them to the Housing Authority's Fair Housing Information Program. The Housing Authority continues to maintain a Fair Housing Information Program and provides additional data on how many residents have been assisted annually. Generally, through the County's Section 8 program, this information is provided directly to persons residing in their housing units or on their waitlists. This program will be revised and continued as Program 14 with new objectives to support fair housing services and outreach during the 6th housing cycle.

B7 Housing Plan

This eight-year Housing Plan (2023-2031) sets forth a strategy, including goals, policies, and programs, to address housing issues identified in the City of Exeter.

B7.1 Goals and Policies

Goal 1: Regional Collaboration

Work collaboratively with jurisdictions in the county to efficiently address housing issues and find regional solutions.

Policy 1.1 Proactively coordinate with cities, Tulare County, and other agencies and organizations to create effective policies and programs and respond to opportunities for achieving common housing goals.

Policy 1.2 Participate in, as appropriate, pursuit of state and federal housing funds to address regional housing issues.

Goal 2: Housing Development

Provide an adequate supply and range of housing types to meet the diverse needs of residents.

Policy 2.1 Provide adequate sites for new housing development to accommodate the regional housing needs allocation (RHNA) throughout the planning period.

Policy 2.2 Facilitate a range of housing development that will meet the needs of all income levels including extremely low, very-low, low-, moderate- and above moderate households.

Policy 2.3 Encourage a range of housing types and sizes in large-scale development and annexations.

Policy 2.4 Promote infill development on vacant and underutilized sites within developed areas.

Policy 2.5 Encourage higher density and mixed-use residential development along major transportation and transit corridors and/or near existing or planned community facilities and services.

Policy 2.6 Enact programs that facilitate well-designed, energy efficient development and flexible standards to encourage high quality projects.

Goal 3: Affordable Housing Options

Facilitate the development of affordable housing and protect the existing supply of affordable housing to extremely low, very low-, low- and moderate-income households.

Policy 3.1 Provide a range of incentives and tools to encourage affordable housing for all lower-income levels, including extremely low-income.

Policy 3.2 Support the Housing Authority of Tulare County (HATC) by promoting Housing Choice Voucher (HCV) opportunities.

Policy 3.3 Ensure permit processing procedures to ensure streamlining is available for affordable housing development projects (SB 35).

Policy 3.4 Support the development of Accessory Dwelling Units (ADUs) as an affordable housing option.

Policy 3.5 Promote home ownership for lower- and moderate- income households by pursuing grant funding for downpayment assistance and other homeownership loan programs.

Policy 3.6 Monitor existing affordable housing developments and pursue preservation strategies to maintain their affordability.

Goal 4: Housing and Neighborhood Preservation

Maintain and improve the city's existing housing stock.

Policy 4.1 Preserve existing residential neighborhoods by promoting balanced design and architecture.

Policy 4.2 Support code enforcement efforts to work with property owners with repairs and rehabilitation of housing to preserve existing housing stock.

Policy 4.3 Utilize Capital Improvement Programs for repairs and improvements of public infrastructure and facilities in existing neighborhoods.

Goal 5: Housing for Persons with Special Needs

Support and provide housing and services for people with special needs in the community. People with special needs include, but are not limited to, seniors, families with children, people with disabilities, single-parent families, farmworkers, and people who are experiencing homelessness or at risk of becoming homeless.

Policy 5.1 Assist in local and regional efforts that address the housing needs of special needs residents.

Policy 5.2 Provide reasonable accommodation for individuals with disabilities to access housing opportunities.

Policy 5.3 Support the development of affordable housing units for farmworkers and farmworker families by encouraging the use of federal, state, and local resources.

Policy 5.4 Coordinate with regional agencies and local non-profit/private developers on housing options and services for people who are experiencing homelessness or at risk of becoming homeless.

Policy 5.5 Proactively apply for and utilize available resources to provide and maintain housing for special needs groups.

Goal 6: Resource Conservation and Sustainable Development

Utilize energy conservation and sustainable measures for new and rehabilitated housing.

Policy 6.1 Support and, as appropriate, incentivize the use of green building techniques for new housing and rehabilitation.

Policy 6.2 Promote energy conservation and efficiency in residential developments.

Goal 7: Affirmatively Furthering Fair Housing

Promote housing opportunities and access for residents regardless of age, race, religion, sex, marital status, ancestry, national origin, color, disability, or economic level in compliance with local, state, and federal fair housing laws.

- Policy 7.1** Promote meaningful and informed participation of residents, community groups, and governmental agencies in all local housing and community development activities.
- Policy 7.2** Comply with federal, state, and local fair housing anti-discrimination laws ensuring equal access to housing regardless of circumstances as protected by fair housing laws.
- Policy 7.3** Provide fair housing services to city residents and ensure that residents are aware of their fair housing rights.
- Policy 7.4** Provide residents with housing mobility options by facilitating the development of a variety of housing types and expanding access to housing services.
- Policy 7.5** Protect tenants from discriminatory housing practices and displacement.
- Policy 7.6** Promote the integration of affordable and special needs housing in existing and planned neighborhoods.

B7.2 Implementing Programs

Program 1: Regional Collaboration

Collaborate with other jurisdictions in the region on housing efforts, including funding opportunities, best practices, and other efforts to address housing, transit, economic development, and homeless issues in Tulare County.

Regional collaboration efforts can include, but are not limited to:

- Affordable housing development opportunities
- Regional housing programs and outreach efforts
- Economic development opportunities
- Creation of a regional Housing Trust Fund
- Coordination on funding applications and administration
- Transit opportunities and access near new and established residential areas
- Environmental mitigation that can improve the quality of life for residents
- Efforts for the development of emergency shelters, low barrier navigation centers, transitional and supportive housing as well as support services for persons experiencing homelessness or at risk of becoming homeless in the county, including participation in the Kings/Tulare Homeless Alliance

Specific Actions, Objectives and Timelines	- Starting in 2026, at least annually, participate in regional meetings related to housing and homeless issues to pursue funding and coordination opportunities. Annually pursue funding opportunities for regional housing issues. - Starting in 2026, at least annually, partner with the Kings/Tulare Homeless Alliance to proactively address shelter, housing and support services for people experiencing homelessness. Collaborate with TCaT and/or TCAG on the 2023 Tulare County Coordinated Human Services Transportation Plan to identify ways to bridge the transit service gap for seniors, persons with disabilities and low income persons. Participate in the Coordinated Human Services Transportation Plan's update scheduled for 2028. - Coordinate with TCaT and TCAG to ensure that actions from the Coordinated Human Services Transportation Plan correspond with the priority areas identified in the City's Complete Streets with ADA Compliance and Active Transportation Safety Enhancement Plan. - Starting in 2026, utilize the monthly TCAG Technical Advisory Committee (TAC) meetings to ensure the effective implementation of the Housing Element. Topics at these meetings can include resource sharing, implementation of planning strategies and joint efforts to address regional housing needs and achieve the goals in the Housing Element, including affirmatively furthering fair housing needs and farmworker needs. - Annually, invite affordable housing developers, Community Based Organizations (CBOs), and other interested parties to discuss affordable housing production in the County.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund; federal, state, and local grant funds
Relevant Policies	1.1, 1.2
AFFH Themes	- Outreach and Education - Housing Mobility - New Housing Opportunities in Areas of Higher Resources - Anti-Displacement and Tenant Protection
AFFH Geographic Targeting	Citywide, with an emphasis on southern Exeter
AFFH Outcomes	Increase the percentage of residents commuting by public transit by 5 percent by December 2031 with 2020 data as baseline.

Program 2: Adequate Sites for RHNA and Monitoring of No Net Loss

For the 6th cycle Housing Element, Exeter has been assigned a RHNA of 844 units, including:

- Very Low-Income: 197 units
- Low-Income: 121 units
- Moderate-Income: 146 units
- Above Moderate-Income: 380 units

The City is committed to ensuring that adequate sites at appropriate densities remain available during the planning period, as required by law. As of December 2023, the City has identified capacity for 80 units through projects under construction, approved, or permitted, that will be available during the RHNA projection period. Accounting for these units, the City has a remaining RHNA of 764 units (197

very low-income, 121 low-income, 142 moderate-income, and 304 above moderate-income units) for which the City must identify adequate sites for potential development.

The City has identified vacant and nonvacant sites with potential for development/redevelopment, or adaptive reuse of existing uses over the next eight years. However, existing zoning for some of these properties may not be adequate to facilitate housing development. Under existing zoning, the City would have a shortfall of site capacity of 290 units (139 lower-income, 113 moderate-income, and 38 above moderate-income units).

To fully accommodate the remaining RHNA, the City identified six sites that will be rezoned to facilitate additional residential development. The sites will be rezoned to medium- and high-density residential with a maximum density of at least 14.5 and 29 dwelling units per acre, respectively. These sites encompass 26.6 acres and can accommodate a total of 189 lower income units, 134 moderate-income units, and 68 above moderate-income units (391 total units).

This program describes the actions the City will take to ensure that adequate sites are designated consistent with Government Code §65583c)(1)(A) and 65583.2. The rezoned sites shall include the following components pursuant to Government Code §65583.2(i):

- Permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means approval without discretionary review.
- Permit the development of at least 16 units per site.
- Establish a minimum density of 20 units per acre and a maximum density of at least 20 units per acre for all rezone sites to accommodate lower income RHNA.
- Ensure that either: a) at least 50 percent of the shortfall of low- and very-low-income regional housing need can be accommodated on sites designated for exclusively residential uses; or b) if accommodating more than 50 percent of the low- and very-low-income regional housing need on sites designated for mixed uses, all sites designated for mixed uses must allow 100 percent residential use and require that residential uses occupy at least 50 percent of the floor area in a mixed-use project.

To ensure that the City complies with SB 166 (No Net Loss), staff will monitor the consumption of residential and mixed-use acreage to ensure an adequate inventory is available to meet RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction in capacity below the residential capacity needed to accommodate the remaining need for lower and moderate-income households, the City will identify and if necessary, rezone sufficient sites to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

The City of Exeter is the provider of water and sewer services within city limits. The City confirms that adequate water and sewer services are available to fully accommodate the RHNA.

Pursuant to SB 1087, as the City’s water and sewer service provider, the City has not adopted a policy to prioritize the allocation of water/sewer services to affordable housing projects.

Specific Actions, Objectives and Timelines	- Concurrent with the adoption of the Housing Element, rezone/upzone properties as outlined above and detailed in the Housing Resources section of this Housing Element to fully accommodate the remaining RHNA of 764 units and specifically a RHNA shortfall of 290 units (139 lower-income; 113 moderate-income; and 38 above moderate-income units). As part of the rezoning/upzoning, establish appropriate development standards (including parking, height, setback, lot coverage, FAR, etc.) to ensure maximum allowable densities at the respective zones can be achieved. - Maintain an inventory of available vacant and prospective sites that can accommodate new housing; update annually. Make this inventory available to the public and interested developers on the City website. - Annually meet with property owners and interested developers to pursue housing development in the city. - Concurrent with the adoption of the Housing Element, develop a formal procedure to monitor no net loss in capacity pursuant to SB 166. - By January 2026, complete update to water and sewer master plans. - Concurrent with the adoption of the Housing Element, adopt a policy to prioritize the allocation of water and sewer services to affordable housing projects (SB 1087) - Within one week of adoption, provide a copy of the adopted 2023-2031 Housing Element to the City's Public Works Department (Government Code Section 65589.7). - In 2027, the City will evaluate the progress of pending projects counted toward the RHNA to ensure that development of housing units is occurring as projected. If it is determined after consultation with developers that the projects are not proceeding as planned and would result in a shortfall in RHNA sites, the City will identify alternative sites strategies (including potential rezoning) within six months.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.2, 2.4, 3.1
AFFH Themes	- Housing Mobility - New Housing Opportunities in Areas of Higher Resources
Geographic Targeting	N/A
AFFH Outcomes	N/A

Program 3: By-Right Approval

Pursuant to Government Code Section 65583.2, reusing the following types of sites in the City's Site Inventory for lower income RHNA are subject to by-right approval exempt from CEQA and subject only to design review based on objective standards when a project includes 20 percent of the units affordable to lower-income households:

Reuse Sites (No Rezoning Required):

- Vacant sites that were identified in the City's 4th and 5th cycles Housing Element as sites for lower income RHNA; and
- Nonvacant sites that were identified in the City's 5th cycle Housing Element as sites for lower income RHNA.

The by-right approval requirement of reuse sites is effective December 31, 2023. Rezoning of sites past the statutory deadline of the Housing Element to meet the lower income RHNA are subject to the by-right approval requirement. The by-right approval requirement of rezone sites is triggered by the rezoning. By-right shall mean the local government’s review shall not require:

- A conditional-use permit
- A planned unit development permit
- Other discretionary, local-government review or approval that would constitute a “project” as defined in Section 21100 of the Public Resources Code.

This provision does not preclude local planning agencies from imposing design review standards. However, the review and approval process must remain ministerial, and the design review must not constitute a “project” as defined in Section 21100 of the Public Resources Code.

The Site Inventory does not contain parcels that would be subject to by-right approval pursuant to State law. Sites that are reused from the 4th and 5th housing cycle, but do not propose lower-income units, are identified in Chapter B4, *Housing Resources*.

Specific Actions, Objectives and Timelines	At the time of Housing Element adoption, concurrent with the Zoning Code update to provide adequate sites for the RHNA (see Program 2), update the Zoning Code to address the by-right approval requirements. The zoning code will be amended to address the by-right approval requirements for lower-income sites included in the site inventory with a proposed zoning change, as well as vacant sites identified in two previous housing elements and non-vacant sites identified in the previous housing element, in compliance with Government Code Section 65583.2(h) and (i), to permit owner-occupied and rental multifamily uses by right (i.e., without discretionary approval) for developments in which 20 percent or more of the units are affordable to lower-income households. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.1, 2.2, 3.1
AFFH Themes	▪ Housing Mobility ▪ New Housing Opportunities in Areas of Higher Resources
Geographic Targeting	Citywide
AFFH Outcomes	N/A

Program 4: Replacement Housing

Development on non-vacant sites with existing residential units that are vacated or demolished is subject to replacement requirements, pursuant to AB 1397. Specifically, AB 1397 requires sites with a residential use within the last five years the replacement of units affordable to the same or lower income level as a condition of any development on a non-vacant site consistent with those requirements set forth in state Density Bonus Law.

Specific Actions, Objectives and Timelines	Concurrent with the adoption of the Housing Element, amend the Zoning Code to address the replacement housing requirements.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.2, 3.6
AFFH Themes	▪ Housing Mobility ▪ New Housing Opportunities in Areas of Higher Resources ▪ Anti-Displacement and Tenant Protection
Geographic Targeting	Citywide
AFFH Outcomes	▪ Replace all units as required pursuant to AB 1397

Program 5: Accessory Dwelling Units

ADUs provide an important affordable housing option in the city. The City's second dwelling ordinance does not presently comply with all current provisions of housing legislation. Exeter will amend the Zoning Code in compliance with state laws.

The City will continue to encourage the production of ADUs and work to provide affordable units for lower income households.

Specific Actions, Objectives and Timelines	▪ Amend the Zoning Code to comply with state law by July 2026. ▪ Promote the development of ADUs, prioritizing Northeast and Northwest Exeter. ▫ Beginning in January 2026, facilitate the production of ADUs through efforts including, but not limited to, offering expedited reviews for ADU applications. ▫ Conduct three educational workshops, campaigns, or outreach events to promote ADU development in the city to residents, with at least three targeted to residents and developers in Northeast and Northwest Exeter, by December 2026. ▫ Update the ADU webpage to include available resources for ADU production, such as grants for pre-development costs available to lower-income homeowners through California Finance Agency (CalHFA). ▫ Participate in regional collaboration efforts to create pre-approved ADU plans. Work with other cities as part of the TCAG TAC meetings to share resources. ▫ Train staff every two years to properly educate property owners on ADUs and garage conversions. ▫ Develop an ADU application checklist and publish the checklist on the City's website by December 2026. Work with other cities as part of the TCAG TAC meetings to share resources. ▪ Determine and implement strategy to promote ADUs for moderate- and lower-income households. ▫ Prepare a report on potential strategies to encourage affordability of ADUs for moderate and lower-income households, including but not limited to, promoting the use of Section 8 vouchers or development of cost incentive programs or no-interest loan program for ADU developers in exchange for income restrictions. Prepare report by January 2026 and present to City Council for adoption of a pilot program by August 2026. If adopted, implement pilot program by January 2027.
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Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.2, 2.3, 3.1, 3.4
AFFH Themes	- Outreach and Education - Housing Mobility - New Housing Opportunities in Areas of Higher Resources
Geographic Targeting	Northeast and Northwest Exeter
AFFH Outcomes	Support the development of at least five ADUs in northern Exeter during the planning period.

Program 6: Zoning Code Amendments

In order to facilitate a variety of housing types, especially housing for lower income households and those with special needs, the City will remove constraints to housing development by amending the Zoning Code.

Specific Actions, Objectives and Timelines	Include the following Zoning Code Amendments by the end of 2026, unless otherwise indicated: Parking Standards: Revise the Zoning Code to amend the parking requirements related to studios and 1-bedroom multifamily units to require no more than one space per unit. Density Bonus: Update Chapter 17.58: Density Bonus to include provisions relative to density bonuses, incentives, and concessions as required by state law. Accessory Dwelling Units: Revise the Zoning Code for compliance with state law and remove criteria that require the occupant of the second unit to be an immediate family member. Multifamily Housing: Concurrent with Housing Element adoption, revise the Zoning code to remove the requirement of an on-site manager for multifamily developments of 16 or more units. Revise the Zoning Code provisions for RM districts to prohibit single-family uses. Maximum Allowable Height: Revise the Zoning Code to increase the permissible height requirements in the RM-3, RM-1.5, and CC districts from 35 feet to 40 feet. Community Care Facilities: Revise the Zoning Code to allow residential facilities of six and fewer and seven or more residents in all zones that permit residential uses, approved with objectivity and certainty, and subject only to the requirements of residential uses of similar type and form, regardless of licensing status or type of care. Emergency Shelters: Concurrent with Housing Element adoption, revise the Zoning Code to allow emergency shelters by-right in the R-M zoning district and ensure that emergency shelters are only subject to objective design standards that apply to uses in the same zone. Revise the Zoning Code to be consistent with AB 2339, expanding the definition of emergency shelters to include other interim interventions, including but not limited to, navigation centers, bridge housing, and respite or recuperative care as well as ensuring emergency shelters are only subject to objective development standards that apply to residential to commercial development within the same zone. Additionally, revise parking requirements for emergency shelters to comply with AB 2339.
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- **Low Barrier Navigation Centers (LBNC):** AB 101 requires a Low Barrier Navigation Center be permitted by-right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. Amend its Zoning Code to explicitly allow the development of Low-Barrier Navigation Centers, by-right in mixed-use zones and nonresidential zones permitting multifamily uses.
- **Single-Room Occupancy (SRO) Housing:** Amend the Zoning Code to establish SRO as a permitted use in zones where multi-family and mixed-use residential developments are permitted. Also, establish a procedure to encourage and facilitate SRO development in the allowable zoning district(s), including development standards.
- **Transitional and Supportive Housing (AB 2162):** Revise the Zoning Code to permit Permanent Supportive Housing without discretionary action in zones that permit multifamily housing and comply with Government Code section 65651, including but not limited to, processing and parking requirements for projects located within half-mile from transit. In addition, revise the zoning ordinance, as appropriate, to permit transitional/supportive housing as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.
- **Farmworker Housing:** Review and revise the Zoning Code to ensure compliance with the Employee Housing Act (H&S Code Section 17021.6 and 17021.8), which requires that any farmworker housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single family or household shall be deemed an agricultural land use for the purposes of this section. For the purpose of all local ordinances, farmworker housing shall not be deemed a use that implies that the farmworker housing is an activity that differs in any other way from an agricultural use. No conditional use permit, zoning variance, or other zoning clearance shall be required of this farmworker housing that is not required of any other agricultural activity in the same zone. The permitted occupancy in farmworker housing in a zone allowing agricultural uses shall include agricultural employees who do not work on the property where the farmworker housing is located.
- **Employee Housing:** Review and revise the Zoning Code to ensure compliance with the Employee Housing Act (H&S Code Section 17021.5), which requires that housing provided by an employer for up to six employees is considered a residential use, subject to the same standards as single-family residences. Also revise the Zoning Code to ensure compliance with H&S Code Section 17021.8, which permits proposed projects on agricultural land to be allowed a streamlined review process (if certain criteria are met).
- **Definition of Family:** Revise the Zoning Code definition of “family” to mean all persons, related and unrelated, who occupy a single housing unit.
- **Building Code:** Revise the Building Code and adopt the most recent (2022) California Building Code.
- **Permit Processing:** Revise the procedure for Site Plan Review approval for residential development to be limited to the Site Plan Review Committee instead of the Planning Commission.
- **Discretionary Permits:** Revise findings for discretionary permits to be objective. Specifically, remove the requirement for discretionary permits that projects must be related to neighborhood character (“inharmonious with properties or improvements in the vicinity”).
- **SB 35 and SB 330 Procedures:** Concurrent with the Housing Element adoption, amend the Zoning Code to provide a clear permitting process for SB 35 eligible projects and create an SB 35 application checklist.

Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.2, 3.1, 3.4, 5.2, 5.3, 7.4
AFFH Themes	- Housing Mobility - New Housing Opportunities in Areas of Higher Resources - Anti-Displacement and Tenant Protection
Geographic Targeting	Citywide
AFFH Outcomes	Facilitate the development of 20 units for special needs populations during the planning period.

Program 7: General Plan

The General Plan includes four residential land use designations with a density range from zero to 29 dwelling units per acre. The density range of six persons per acre for Very Low Density Residential is a constraint to housing. The City of Exeter's General Plan was adopted in March 2003 and was intended to serve the community until 2020; however, the General Plan has yet to be updated.

Specific Actions, Objectives and Timelines	Concurrent with the adoption of the Housing Element, remove the requirement of a maximum of six persons per acre for the Very Low Density Residential land use designation.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.1; 2.2
AFFH Themes	- Housing Mobility - New Housing Opportunities in Areas of High Resources
AFFH Geographic Targeting	Citywide
AFFH Outcomes	N/A

Program 8: Transparency in the Development Process

To increase transparency in the development process, the City's website publishes resources that help developers and homeowners navigate the residential development and home improvement processes. Specifically, the Planning Division webpage (<https://cityofexeter.com/departments/administration/planningbuilding>) provides a zoning map, information on the permit center and staff contacts, the public hearing calendar, and planning and building permit resources. The zoning code and zoning map, plan review procedures, fee schedule and forms and handouts, among other documents are available online.

The City provides general information and handouts regarding the development process on the City website. The City will evaluate its compliance with the new transparency requirements per Government Code Section 65940.1(a)(1) make changes as necessary.

Specific Actions, Objectives and Timelines	By December 2026, evaluate compliance with the new transparency requirements per Government Code Section 65940.1(a)(1) and make changes as necessary.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.2; 2.4; 2.6

AFFH Themes	▪ Outreach and Education
AFFH Geographic Targeting	Citywide
AFFH Outcomes	N/A

Program 9: Facilitating Affordable Housing Development

The City is committed to expanding affordable housing options for households of all income levels using development tools such as density bonus provisions, potentially waiving development fees, and streamlining the application process. The City will contact local non-profit and private developers to facilitate the production of this housing as well as pursue funding opportunities available at the local, regional, state, and federal levels.

On a case-by-case basis, the City will facilitate affordable housing by public, private and non-profit groups by coordinating off-site improvements and physical infrastructure as Capital Improvement Projects. Assistance provided by the City may include traffic, street, and sewer upgrades as well as other pedestrian and mobility improvements.

Specific Actions, Objectives and Timelines	▪ In annual coordination with Self-Help Enterprises, proactively work with Self-Help and other housing developers to locate sites and housing opportunities in infill sites in high opportunity areas. Pursue funding designed to assist in the affordable housing space. ▪ Starting in 2026, annually pursue funding at the local, regional, state, and federal levels such as State Community Development Block Grant (CDBG), CalHome, Permanent Local Housing Allocation (PLHA), and Project Homekey funds. ▪ Work with other jurisdictions in Tulare County to create a regional list of affordable housing developers by 2026. Annually conduct outreach to these developers with information on potential sites, available regulatory concessions and incentives, and potential funding opportunities. ▪ By December 2026, revise the Density Bonus Ordinance in compliance with State law (Government Code §65915) to equally provide for density bonuses in all zoning districts where residential uses are permitted and to include provisions relative to density bonuses, incentives, and concessions as required by State law. ▪ Starting 2026, facilitate the development of affordable housing by allowing required on- and off-site improvements to be negotiated. ▪ Starting 2026, facilitate the development of affordable housing through the provision of the following regulatory concessions and incentives: ▫ Density increases under the City's Density Bonus Ordinance. ▫ Expedited and streamlined project application review involving any of the following housing categories: above-moderate-income households; very low-income households; large families; persons with disabilities or developmental disabilities; and farmworkers. ▫ Potential fee waivers/reductions/deferrals. ▪ Develop a web-based Housing Development Toolkit that outlines a step-by-step process for residential development, including identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development. Publish the Housing Development Toolkit on the City's website by August 2026. ▪ Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of
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	dwelling types and sizes households (e.g., duplexes, triplexes, fourplexes, townhouses, courtyard buildings), prioritizing opportunities and sites in Northeast and Northwest Exeter. Review General Plan, Specific Plans, and Zoning Code and Zoning Map by January 2026 and implement any changes by January 2027 (see Program 6). - Acquire funds from the state and federal grant opportunities, including the HCD Infill Infrastructure Grant Program, to support the development of affordable housing, housing for special needs, and support service projects. Leverage City funding to partner with affordable housing developer on new affordable housing developments in the city. Prioritize subsidies for financing for rental housing units affordable to extremely low-income households, senior households, farmworkers, persons with disabilities, veterans, large households, and other households with special needs on sites in Northeast and Northwest Exeter. - Apply for state and federal funds in 2026 and annually thereafter to facilitate the development of affordable housing, including housing for extremely low-income households and those with special housing needs.
Primary Responsible Departments	Planning Department
Funding Sources	Local, state and federal resources, General Fund, CDBG
Relevant Policies	2.1, 2.2, 2.3, 3.1, 4.1, 4.3, 7.4
AFFH Themes	- Housing Mobility - New Housing Opportunities in Areas of Higher Resources
Geographic Targeting	Citywide with emphasis on moderate resource census tracts.
AFFH Outcomes	- Increase the percent of the City's housing stock that is multifamily from 13 percent to 16 percent by December 2030, using 2020 Census data as a baseline. - Eliminate disparity between census tracts in northern and southern Exeter based on median income level and percent of households in poverty. - Partner with nonprofit housing developers to support the entitlement of at least 100 subsidized housing units affordable to extremely low-, very low-, and low-income households in the city during the planning period, including at least 30 percent of units outside of areas of high segregation and poverty or near public transit and services. - Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types and household sizes with the goal of at least three new opportunities for middle housing in northern Exeter.

Program 10: Preservation of At-Risk Housing

The City has 168 housing units that are deed restricted as affordable housing for lower-income households. Of these units, 68 are considered at risk of conversion during this Housing Element planning period. The City will work to preserve these at-risk units and will proactively monitor all other units to encourage continued affordability beyond existing covenants and work proactively with owners of affordable units to assist in rehabilitation needs.

Specific Actions, Objectives and Timelines	▪ Monitor affordable units during the planning period and preserve 168 affordable units, including 68 at-risk units. ▪ Ensure tenants are properly noticed by the property owners should a Notice of Intent to opt out of low-income use is filed. Notices must be filed three years, one year, and six months in advance of conversion. Additionally, the City shall provide tenants with information about available resources and their tenant rights during the Notice of Intent period. ▪ In the event of potential conversion, conduct outreach to other nonprofit housing providers to acquire projects opting out of low-income use. As funding permits, assist in funding the acquisition or support funding applications by nonprofit providers. ▪ Maintain annual contact with property owners of affordable housing regarding any change in status/intent or need for assistance, such as rehabilitation assistance. ▪ Maintain the AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. Update annually.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	3.6, 5.5
AFFH Themes	▪ Anti-Displacement and Tenant Protection
Geographic Targeting	Citywide
AFFH Outcomes	▪ Preserve all 168 affordable housing units.

Program 11: Housing Preservation and Rehabilitation

Nearly half (49 percent) of the housing stock in Exeter was built prior to 1980 and is more than 40 years old and may need repairs and rehabilitation. The City's code enforcement office reports that it is aware of a residential unit that is fire damaged from a burn and in need of rehabilitation, but otherwise is not aware of other units in critical need of repair.

Self-Help Enterprises (SHE) is a community development organization that offers a variety of programs for low-income families in the region. This includes deferred payment loans available to qualified homeowners for essential health and safety repairs such as roofing, plumbing, electrical, heating/cooling, foundation, windows, and handicap accessible modifications. The loan is due and payable upon sale, change of title or change of use.

Exeter contracts with Self-Help Enterprises to administer its housing rehabilitation program funded by the Community Development Block Grant (CDBG) Fund. Priority is afforded to lower-income households based on health and safety needs, followed by energy conservation needs, extension of the unit's useful life, and complying with the Uniform Building Code. Annually, Self-Help Enterprises applies for CDBG funds on behalf of Exeter. As families that have taken advantage of this rehabilitation program repay the low interest loan, this money is placed into a Program Income fund. These monies can be used for housing rehabilitation as well as other improvements that benefit low- to moderate-income households, including sidewalks, sewer and water lines, and curbs and gutters. As of December 2023, SHE indicated that there are 19 waitlisted applicants for the owner-occupied rehab program, at housing units located throughout the city. SHE's website notes that there is funding available for critical repairs for residents of Exeter.¹

¹ <https://www.selfhelpenterprises.org/programs/housingrehabilitation/>

Specific Actions, Objectives and Timelines	- Coordinate with Self-Help Enterprises to fund rehabilitation efforts in the City. Annually research funding opportunities, such as California Housing Finance Agency (CalHFA), for rehabilitation grants. - Advertise available rehabilitation grant programs on the City’s website. (See Program 14) - Monitor the impacts of short-term rentals on housing availability and affordability. Based on the findings of the report, consider adopting a short-term rental ordinance to regulate short-term rentals, including a potential short-term rental fee that would fund affordable housing development. - Expand awareness and connect residents to Self-Help Enterprises’ Housing Rehabilitation Program. - Publish resources on homeowner rehabilitation assistance on the City’s website by July 2026. - Apply for additional funding for the Local Rehabilitation Program by 2026. - Connect qualified property owners with code violations to Self-Help Enterprises to receive financial assistance through the Housing Rehabilitation Program. Refer at least five property owners with housing units in need of repair to Self-Help Enterprises annually. - Pursue/provide rehabilitation assistance that includes energy conservation and weatherization improvements as eligible activities.
Primary Responsible Departments	Planning Department, Code Enforcement
Funding Sources	General Fund
Relevant Policies	3.6, 4.1, 4.2, 4.3, 5.5
AFFH Themes	- Outreach and Education - Place-Based Strategy for Neighborhood Improvements
Geographic Targeting	Southeast and Downtown Exeter
AFFH Outcomes	Assist with 20 rehabilitation projects over 8 years.

Program 12: Lower-Income and Special Needs Housing

The City uses HOME and CDBG funds to assist in the development of housing to meet the needs of extremely low, very low- and low-income households. For Exeter, HOME funds are made available on an annual, competitive basis through HCD’s HOME Investment Partnerships Program. Approximately \$245,776.18 is available to develop and support affordable multifamily rental housing, owner-occupied housing rehabilitation, and home ownership affordability. Exeter uses HOME funds primarily for first-time homebuyers (down payment assistance), owner-occupied rehabilitation, and rental-rehabilitation. In addition, the City received approximately \$298,094.19 from the State administered HUD funds in 2022. Exeter utilizes CDBG funds for rental and owner housing rehabilitation activities and infrastructure improvement. Exeter contracts with Self-Help Enterprises to administer its housing rehabilitation program funded by the CDBG Fund.

It can be difficult for very low-, low-, and moderate-income first-time homebuyers to acquire sufficient savings and income to pay for a down payment, closing costs, monthly mortgage, and tax and insurance payments. To address this problem, Exeter administers the First Time Homebuyer Program (FTHB), a special low-interest, deferred-payment loan program designed to provide “silent” second mortgages of up to \$40,000, funded by CDBG. Applicants must demonstrate financial need and pre-approval for a first mortgage; the second mortgage will be financed as a three percent-interest, 30-year deferred loan payment.

HATC offers the following programs:

- **Housing Choice Vouchers (HCVs):** Offers affordable, decent, and safe housing in open market rentals selected by Voucher holders. Under the Moving to Work program, you receive a fixed subsidy, which the Housing Authority pays directly to the landlord, and you pay the rest of the rent for your unit. There is a five-year time limit to this type of rental assistance in most cases because the fixed subsidy helps families to stabilize their housing costs as they work to achieve self-sufficiency and save for other housing opportunities. Furthermore, in 2020, the State passed SB 222 and SB 329 that identify public assistance as a legitimate source of income for housing payments. Landlords are no longer permitted to reject HCV recipients.
- **Public Housing:** Provides rental assistance to low-income families and individuals. The HATC owns and manages all rental units offered under this program, which are located in communities throughout Tulare County.
- **Subsidized Housing:** Provides rental assistance to low- and moderate-income families and individuals. There are four subsidized complexes in Exeter: Exeter Apartments, Exeter Senior Villa, Exeter Station, and Jacob Square. These housing complexes that are not managed, owned nor are associated with HATC. However, such complexes have been developed through the utilization of a variety of federal, state, and other local subsidies.²

The City will continue to work with HATC to obtain HCVs and provide the community with information about HATCs and other available programs. Additionally, Self-Help Enterprises offers a variety of programs for low-income families in the region, including a Downpayment Assistance program and Home Ownership Education programs.

Please also refer to Program 1, Regional Collaboration, to see the efforts underway to help with transportation needs for persons with special needs (including persons with disabilities, seniors and low income persons).

Specific Actions, Objectives and Timelines
▪ Assist 53 Exeter households through HCVs. ▪ Work with HATC and Self-Help Enterprises to continue assistance in the community. ▪ Over the 8-year planning period, subsequent to each Point-in-Time Count, conduct workshops for the Planning Commission and City Council to share the data from the count. Invite the Kings/Tulare Homeless Alliance to attend. ▪ Identify potential programs to aid moderate-income homeownership opportunities and develop a list of resources by July 2026. Apply for feasible funding opportunities by December 2026. ▪ Develop an inventory of affordable housing, with contact information and the number of affordable units, and publish the inventory on the City's website by July 2026. ▪ Coordinate with Self-Help Enterprises to construct affordable infill housing and offer homeownership opportunities using the First Time Home Buyer Program. ▪ Provide a link to the City's reasonable accommodation policy on the Housing page of the City website, including contact information for Staff that oversee the application process. ▪ In collaboration with the Housing Authority, provide education to property owners and managers to expand awareness of the Housing Choice Voucher (HCV) program to increase acceptance of tenant-based

² <https://www.hatc.net/subsidized-housing-referral-listing.php?city=Exeter>.

HCVs and to facilitate mobility and provide choices for lower-income households throughout the city. Identify and address challenges that property owners/managers have with existing or prospective HCV holders.

- In collaboration with the Housing Authority, annually conduct one workshop for landlords on the HCV program, starting in 2026, for a total of seven workshops during the planning period.
- Support moderate-income homeownership, such as Homes for Heroes and other moderate-income loan opportunities. Identify potential programs to aid moderate-income homeownership opportunities and develop a list of resources by December 2026. Apply for feasible funding opportunities by December 2026.
- Consistent with State law that mandates the provision of housing for ELI households, the City will prioritize processing and funding allocation for projects that include units for ELI households, especially farmworker housing.
- Consistent with State law that mandates the provision of housing for special needs households, the City will prioritize processing and funding allocation for projects that include units for special needs households.
- Beginning in 2026 and annually thereafter, pursue funding available at the state and federal levels for affordable housing development. Specifically, pursue funding programs that target the needs of extremely low and very low-income households.
- Provide letters of support to funding applications by developers if the proposed projects are consistent with the goals and objectives of this Housing Element, as requested.
- The City and Tulare region collaboration partners will pursue a variety of strategies and funding to encourage the development, rehabilitation and conservation of housing for farmworkers such as such as funding development, integrating housing for farmworkers into development, developer identification, maintaining an inventory of suitable sites, site development, ensure zoning and development standards facilitate a variety of housing types for farmworker housing needs. The City and collaborative partners will make a specific and at least annual effort to assist in the development of housing for farmworkers and conserve and improve the existing housing stock for farmworkers, including but not limited to:
 - Contacting nonprofit developers at least every other year to identify opportunities for the development or improvement of housing for farmworkers.
 - Coordinating and participating with regional organizations, including non-profit, academic, and employers, to raise awareness, share and employ strategies, or target new resources.
 - Coordinating annually with organizations that represent or serve farmworkers.
 - Providing incentives and other strategies beyond state density bonus law to encourage housing for farmworkers, including setting aside housing for farmworkers within developments, supporting funding applications, prioritizing entitlements and establishing appropriate zoning and development standards.
- Targeting code enforcement and other resources to the existing housing stock with the most need for rehabilitation and sanitary conditions that could be more likely to house farmworkers and work with regional or other organizations to improve living conditions for farmworkers.

Primary Responsible Departments	Planning Department
Funding Sources	HUD, Self-Help Enterprise funding sources
Relevant Policies	3.2, 5.1, 5.4, 5.5, 7.4
AFFH Themes	- Outreach and Education - Housing Mobility - New Housing Opportunities in Areas of High Resources - Anti-Displacement and Tenant Protection
Geographic Targeting	Citywide; southern Exeter
AFFH Outcomes	- Assist with 20 rehabilitation projects over 8 years. - Assist 5 households through the First Time Homebuyer Program - Promote with the goal of expanding the use of HCVs in the city by 10 percent by December 2030, using 2023 data as baseline.

Program 13: Infill Development, Design, and Infrastructure

The City will promote infill development by supporting project design and prioritizing housing infrastructure assistance for residential infill projects.

Specific Actions, Objectives and Timelines	- Provide technical and financial assistance for project design (e.g. site planning, engineering, and/or preliminary architectural services) and infrastructure improvements (e.g. cost-sharing and/or fee waivers) for infill housing/redevelopment projects and developments that promote land or energy conservation. - Prioritize housing infrastructure assistance for development projects which: 1) improve the infrastructure connectivity and/or capacity in infill areas; or 2) housing development projects that promote land or energy conservation by creating a Priority Housing Sites List to highlight opportunity sites for affordable housing development near public transit and existing or planned services.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	2.4, 2.5, 2.6
AFFH Themes	Housing Mobility New Housing Opportunities in Areas of Higher Resources
Geographic Targeting	Citywide
AFFH Outcomes	N/A

Program 14: Community and Economic Development

Well-maintained infrastructure creates a safe and accessible urban environment, fostering a sense of community and belonging. Moreover, investing in such improvements attracts businesses and investments, contributing to economic growth and ensuring equal access to essential services. The City will implement the following actions to expand community and economic development citywide.

Upon adoption, the City of Exeter will provide the Housing Element to all water and sewer service districts and notify all districts of the requirement to prioritize water and sewer service allocation for new affordable housing development (Government Code Section 65589.7).

Specific Actions, Objectives and Timelines	- Annually coordinate with the Workforce Investment Board (WIB) of Tulare County to carry out the WIB's Local Plan, including identified workforce priorities that will benefit the residents of Exeter. - Annually coordinate with the Public Works Department to review the City's Capital Improvement Projects (CIP) to ensure public facilities and infrastructure are supportive of the needs of underserved communities. - As part of the annual CIP program updates, evaluate public improvement needs in South, Southwest, Downtown, and Southeast Exeter, and prioritize improvements on sites that accommodate the City's lower income RHNA. - Coordinate with Public Works to ensure priorities from the adopted City's <i>Complete Streets with ADA Compliance and Active Transportation Safety Enhancement Plan</i> are incorporated. Complete 3 projects by the end of the planning period, focusing on South Exeter. - Coordinate with Tulare County and the San Joaquin Valley Air Pollution Control District to develop and implement a plan to reduce pollution burden throughout the city, targeting air quality, water quality, and pesticide use. Assess pollution burden in South, Southwest, Downtown, and Southeast Exeter and create an action plan to reduce pollution burden in these neighborhoods, as well as addressing proper remediation plans for cleanup sites and hazardous waste sites. - Beginning in 2026, and every two years thereafter, assess and monitor pollution burden in each census tract, using tools such as CalEnviroScreen and identify major sources of pollution. Develop a pollution burden reduction strategy for the city and for South, Southwest, Downtown, and Southeast Exeter by 2027 with metrics and timelines. - Concurrent with Housing Element adoption, at least every other year, identify funding sources and apply for funding to support community development efforts, such as neighborhood revitalization, parks, safe routes to school, community facilities, and pollution mitigation, with the goal of securing funding for two additional community revitalization projects during the planning period. Target Downtown and Southern Exeter for any additional community revitalization projects.
Primary Responsible Departments	Planning Department
Funding Sources	General Funds
Relevant Policies	3.1, 4.4
AFFH Themes	Place-based Strategies for Neighborhood Improvement
Geographic Targeting	South, Southwest, Downtown, and Southeast Exeter
AFFH Outcomes	- Complete 5 CIP projects during the planning period. - Improve CalEnviroScreen scores citywide by December 2031. - Apply for additional funding for community revitalization projects at least every other year with the goal of securing funding for two projects in the Downtown or Southern Exeter neighborhoods during the planning period.

Program 15: Fair Housing Outreach and Enforcement

The City of Exeter works with HATC to provide fair housing information and resources to residents and housing providers. Exeter works with HATC to provide a local Fair Housing Information Program which includes distribution of educational materials to property owners, apartment managers, and tenants, and responding to complaints of discrimination (i.e., in-taking, investigation of complaints, and resolution) by referring the affected party to the appropriate agencies.

The City refers fair housing issues and complaints to Fair Housing Council of Central California (FHCCC) and the State Department of Fair Employment and Housing. The Department of Fair Employment and Housing (DFEH) maintains a record of housing discrimination complaints filed in local jurisdictions.

HATC refers fair housing issues and complaints to the U.S. Department of Housing and Urban Development (HUD). HUD's Office of Fair Housing and Equal Opportunity (FHEO).

Specific Actions, Objectives and Timelines	▪ Coordinate with FHCC/other fair housing nonprofit organizations to provide fair housing and tenant/landlord services, including investigation of discrimination complaints, fair housing counseling and education, fair housing testing, and tenant/landlord counseling and mediation. ▪ Coordinate with non-profit organizations, local community groups, and service organizations to increase awareness of and access to housing resources and fair housing assistance. Starting in 2026: ▫ Hold at least one fair housing workshop annually for residents about housing rights and resources, materials in English and Spanish. ▫ Release educational program about housing rights and resources to be conducted annually, in English and Spanish. The educational program will include a variety of media outlets, including but not limited to, social media, print media, newspaper, radio, and/or television. ▫ Update the City's website by December 2026 to include fair housing rights and responsibilities for landlords and lenders. Add a language translation feature to the City's website by December 2026. ▫ Coordinate with TCAG to offer outreach on housing services and opportunities in conjunction with other regional planning efforts. Organize one workshop in Exeter to provide information on housing services and programs in 2026. ▫ Provide fair housing guide with ADU applications. Provide fair housing guide with ADU applications starting in July 2026. ▫ Provide Spanish translation services for all City-led workshops and outreach events. Develop on-call contract with Spanish translation provider by summer 2026. ▫ Provide annual trainings to City staff on how to refer residents for fair housing complaints starting in 2026. ▪ Annually, conduct outreach and education on water conservation measures through a social media campaign.
Primary Responsible Departments	Planning Department
Funding Sources	General Fund
Relevant Policies	3.1, 4.4
AFFH Themes	▪ Enforcement and Outreach
Geographic Targeting	Citywide with emphasis in South, Southwest, Downtown, and Southeast Exeter
AFFH Outcomes	▪ Assist at least 15 residents and landlords with fair housing services annually, throughout planning period.

B7.3 AFFH Actions Summary

Government Code §8899.50 requires “meaningful actions” well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. Actions to affirmatively further fair housing include:

- Enhancing housing mobility strategies
- Encouraging development of new affordable housing in high resource areas
- Increasing fair housing enforcement and fair housing outreach capacity
- Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing
- Protecting existing residents from displacement

Actions to affirmatively furthering fair housing are summarized below.

Affirmatively Furthering Fair Housing Action Matrix

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Fair Housing Enforcement and Outreach				
Program 15: Fair Housing Outreach and Enforcement	- Coordinate with FHCCC/other fair housing nonprofit organizations to provide fair housing and tenant/landlord services, including investigation of discrimination complaints, fair housing counseling and education, fair housing testing, and tenant/landlord counseling and mediation. - Coordinate with non-profit organizations, local community groups, and service organizations to increase awareness of and access to housing resources and fair housing assistance. Starting in 2026: - Hold at least one fair housing workshop annually for residents about housing rights and resources, materials in English and Spanish. - Release educational program about housing rights and resources to be conducted annually, in English and Spanish. The educational program will include a variety of media outlets, including but not limited to, social media, print media, newspaper, radio, and/or television. - Update the City's website by December 2026 to include fair housing rights and responsibilities for landlords and lenders. Add a language translation feature to the City's website by December 2026. - Coordinate with TCAG to offer outreach on housing services and opportunities in conjunction with other regional planning efforts. Organize one workshop in Exeter to provide information on housing services and programs in 2026. - Provide fair housing guide with ADU applications. Provide fair housing guide with ADU applications starting in July 2026 - Provide Spanish translation services for all City-led workshops and outreach events. Develop on-call contract with Spanish translation provider by summer 2026.	Starting 2026, then update as necessary	Citywide with emphasis in South, Southwest, Downtown, and Southeast Exeter	Assist at least 15 residents and landlords with fair housing services annually, throughout planning period.

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	- Provide annual trainings to City staff on how to refer residents for fair housing complaints starting in 2026. - Annually, conduct outreach and education on water conservation measures through a social media campaign.			
Housing Mobility				
Program 1: Regional Collaboration	- Starting in 2026, at least annually participate in regional meetings related to housing and homeless issues to pursue funding and coordination opportunities. - Collaborate with TCaT and/or TCAG on the 2023 Tulare County Coordinated Human Services Transportation Plan to identify ways to bridge the transit service gap for seniors, persons with disabilities and low income persons. Participate in the Coordinated Human Services Transportation Plan's update scheduled for 2028.	Annually	Southern Exeter	Annually pursue funding opportunities for regional housing issues. Coordinate with TCaT and TCAG to ensure that actions from the Coordinated Human Services Transportation Plan correspond with the priority areas identified in the City's Complete Streets with ADA Compliance and Active Transportation Safety Enhancement Plan.
	Invite affordable housing developers, Community Based Organizations (CBOs), and other interested parties to discuss affordable housing production in the County.	Annually	Citywide	Utilize the monthly TCAG TAC meetings to identify at least one joint effort or planning strategy annually.
Program 5: Accessory Dwelling Units	- Amend the Zoning Code in compliance with state law by July 2026. - Beginning in January 2026, facilitate the production of ADUs through efforts including, but not limited to: - Updating ADU webpage to include available resources for ADU production, such as grants for pre-development costs available to lower-income homeowners through California Finance Agency (CalHFA). - Offering expedited reviews for ADU applications. - Participate in regional collaboration efforts to create pre-approved ADU plans. Work with other cities as part of the TCAG TAC meetings to share resources. - Train staff every two years to properly educate property owners on ADUs and garage conversions.	By July 2026 Beginning January 2026	Northeast and Northwest Exeter	Support the development of at least five ADUs in northern Exeter during the planning period.

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Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	- Develop an ADU application checklist and publish the checklist on the City's website by December 2026. Work with other cities as part of the TCAG TAC meetings to share resources. - Promote the development of ADUs, prioritizing Northeast and Northwest Exeter. - Conduct three educational workshops, campaigns, or outreach events to promote ADU development in the city to residents, with at least three targeted to residents and developers in Northeast and Northwest Exeter, by December 2026. - Determine and implement strategy to promote ADUs for moderate- and lower-income households by January 2027. - Prepare a report on potential strategies to encourage affordability of ADUs for moderate and lower-income households, including but not limited to, promoting the use of Section 8 vouchers or development of cost incentive programs or no-interest loan program for ADU developers in exchange for income restrictions. Prepare report by January 2026 and present to City Council for adoption of a pilot program by August 2026. If adopted, implement pilot program by January 2027	By December 2026 January 2026/ January 2027		
Program 12: Lower Income and Special Needs Housing	- Work with HATC and Self-Help Enterprises to continue providing assistance in the community. - The City and Self-Help Enterprises will work together to search for opportunities to construct affordable infill housing and offer homeownership opportunities using the First Time Home Buyer Program. - Over the 8-year planning period, subsequent to each Point-in-Time Count, conduct workshops for the Planning Commission and City Council to share the data from the count. Invite the Kings/Tulare Homeless Alliance to attend. - Identify potential programs to aid moderate-income homeownership opportunities and develop a list of	Annually July 2026/ December 2026	Citywide; southern Exeter	Assist 53 Exeter households through HCVs. Promote with the goal of expanding the use of HCVs in the city by 10 percent by December 2030, using 2023 data as baseline. Assist with 20 rehabilitation projects over 8 years. Assist 5 households through the First Time Homebuyer Program.

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	resources by July 2026. Apply for feasible funding opportunities by December 2026.			
	Develop an inventory of affordable housing, with contact information and the number of affordable units, and publish the inventory on the City's website by July 2026.	By July 2026		
	- In collaboration with the Housing Authority, provide education to property owners and managers to expand awareness of the Housing Choice Voucher (HCV) program to increase acceptance of tenant-based HCVs and to facilitate mobility and provide choices for lower-income households throughout the city. Identify and address challenges that property owners/managers have with existing or prospective HCV holders. - In collaboration with the Housing Authority, annually conduct one workshop for landlords on the HCV program, starting in 2026, for a total of seven workshops during the planning period.	By January 2026, then ongoing		
	Support moderate-income homeownership, such as Homes for Heroes and other moderate-income loan opportunities. Identify potential programs to aid moderate-income homeownership opportunities and develop a list of resources by December 2026. Apply for feasible funding opportunities by December 2026.	December 2026/ December 2027		
	Provide a link to the City's reasonable accommodation policy on the Housing page of the City website, including contact information for Staff that oversee the application process.	By July 2026		
	Beginning in 2026 and annually thereafter, pursue funding available at the State and Federal levels for affordable housing development. Specifically, pursue funding programs that target the needs of extremely low and very low-income households.	Beginning 2026 and annually thereafter		
	The City and collaborative partners will make a specific and at least annual effort to assist in the development of housing for farmworkers and conserve and improve the existing housing stock for farmworkers.	Annually		

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
New Housing Opportunities in Higher Opportunity Areas				
Program 2: Adequate Sites for RHNA	- Concurrent with the adoption of the Housing Element, rezone/upzone properties as outlined above and detailed in the Housing Resources section of this Housing Element to fully accommodate the remaining RHNA of 764 units and specifically a RHNA shortfall of 263 units (123 lower-income; 116 moderate-income; and 24 above moderate-income units). As part of the rezoning/upzoning, establish appropriate development standards (including parking, height, setback, lot coverage, FAR, etc.) to ensure maximum allowable densities at the respective zones can be achieved. - By January 2026, complete update to water and sewer master plans. - Concurrent with adoption of the Housing Element, adopt a policy to prioritize the allocation of water and sewer services to affordable housing projects (SB 1087) - Maintain an inventory of available vacant and prospective sites that can accommodate new housing; update annually. Make this inventory available to the public and interested developers on the City website. - Annually meet with property owners and interested developers to pursue housing development in the city. - Concurrent with the adoption of the Housing Element, develop a formal procedure to monitor no net loss in capacity pursuant to SB 166 - Evaluate the progress of pending projects counted toward the RHNA to ensure that development of housing units is occurring as projected. If it is determined after consultation with developers that the projects are not proceeding as planned and would result in a shortfall in RHNA sites, the City will identify alternative sites strategies (including potential rezoning) within six months.	Concurrent with the adoption of the Housing Element By January 2026 Concurrent with adoption of the Housing Element Annually Concurrent with adoption of the Housing Element By 2027	Citywide	Facilitate the development of 844 units over 8 years (197 very low-income, 121 low-income, 146 moderate-income, and 380 above moderate-income units).

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
Program 3: By Right Approval	At the time of Housing Element adoption, concurrent with the Zoning Code update to provide adequate sites for the RHNA (see Program 2), update the Zoning Code to address the by-right approval requirements. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act.	Concurrent with Housing Element adoption	Citywide	Facilitate the development of 844 units over 8 years (197 very low-income, 121 low-income, 146 moderate-income, and 380 above moderate-income units).
Program 6: Zoning Code Amendments	Complete Zoning Code Amendments outlined in Program 6 to facilitate the development and remove constraints to the development of housing for special needs populations.	By the end of 2026 unless otherwise indicated by Program 6.	Citywide	Facilitate the development of 20 units for special needs populations during the planning period.
Program 8: Transparency in Government	By December 2026, the City will evaluate its compliance with the new transparency requirements per Government Code Section 65940.1(a)(1) and make changes as necessary.	December 2026	Citywide	Facilitate the development of 654 units over 8 years (135 very low-income, 83 low-income, 121 moderate-income, and 315 above moderate-income units).
Program 9: Facilitating Affordable Housing Development	- In annual coordination with Self-Help Enterprises, proactively work with Self-Help and other housing developers to locate sites and housing opportunities in infill sites in high opportunity areas. Pursue funding designed to assist in the affordable housing space. - Starting in 2026, annually pursue funding at the local, regional, state, and federal levels such as State Community Development Block Grant (CDBG), CalHome, Permanent Local Housing Allocation (PLHA), and Project Homekey funds. - Work with other jurisdictions in Tulare County to create a regional list of affordable housing developers. Annually conduct outreach to these developers with information on potential sites, available regulatory concessions and incentives, and potential funding opportunities. - By December 2026, revise the Density Bonus Ordinance in compliance with State law (Government Code §65915) to equally provide for density bonuses in all zoning districts where residential uses are permitted and to include provisions relative to density bonuses, incentives, and concessions as required by State law.	Annually Starting in 2026 and annually thereafter December 2026 Starting in 2026	Citywide with emphasis on moderate resource census tracts. Increase housing choice through removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types and household sizes, prioritizing northern Exeter. Acquire funds through grant opportunities such as the HCD Infill Infrastructure Grant	Increase the percent of the city's housing stock that is multifamily from 13 percent to 16 percent by December 2030, using 2020 Census data as a baseline. Eliminate disparity between census tracts in northern and southern Exeter based on median income level and percent of households in poverty. Partner with nonprofit housing developers to support the entitlement of at least 100 subsidized housing units affordable to extremely low-, very low-, and low-income households in the city during the planning period, including at least 30 percent of units outside of areas of high segregation Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate

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Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	- Facilitate the development of affordable housing by allowing required on- and off-site improvements to be negotiated. - Facilitate the development of affordable housing through the provision of the following regulatory concessions and incentives: - Density increases under the City's Density Bonus Ordinance. - Expedited and streamlined project application review involving any of the following housing categories: above-moderate-income households; very low-income households; large families; persons with disabilities or developmental disabilities; and farmworkers. - Potential fee waivers/reductions/deferrals. - Develop a web-based Housing Development Toolkit that outlines a step-by-step process for residential development, including identifying steps in the entitlement and building permit process, detailed information on development incentives, and funding programs and resources for affordable housing development. Publish the Housing Development Toolkit on the City's website by August 2026. - Review the General Plan, applicable Specific Plans, and Zoning Code and Zoning Map to evaluate opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types and sizes households (e.g., duplexes, triplexes, fourplexes, townhouses, courtyard buildings), prioritizing opportunities and sites in northern Exeter. Review General Plan, Specific Plans, and Zoning Code and Zoning Map by January 2026 and implement any changes by January 2027 (see Program 6). - Acquire funds from the state and federal grant opportunities, including the HCD Infill Infrastructure Grant Program, to support the development of affordable housing, housing for special needs, and support service projects. Leverage City funding to partner with affordable housing developer on new affordable	August 2026 January 2026/ January 2027	Program to increase affordable housing opportunities, particularly in northern Exeter.	opportunities for removing barriers to housing production, adding housing capacity, and accommodating a greater mix of dwelling types and household sizes with the goal of at least three new opportunities for middle housing in northern Exeter.

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	housing developments in the city. Prioritize subsidies for financing for rental housing units affordable to extremely low-income households, senior households, farmworkers, persons with disabilities, veterans, large households, and other households with special needs. Apply for state and federal funds by 2026 and annually thereafter to facilitate the development of affordable housing, including housing for extremely low-income households and those with special housing needs.	In 2026, then as funding becomes available.		
Place-based Strategies for Neighborhood Revitalization				
Program 1: Regional Collaboration	Coordinate with TCaT and TCAG to ensure that actions from the Coordinated Human Services Transportation Plan correspond with the priority areas identified in the City's Complete Streets with ADA Compliance and Active Transportation Safety Enhancement Plan	Annually	Citywide, with an emphasis on southern Exeter	Implement at least two active transportation projects in southern Exeter by the end of the planning period. Increase the percentage of residents commuting by public transit by 5 percent by December 2031 with 2020 data as baseline.
Program 11: Housing Preservation and Rehabilitation	- Coordinate with Self-Help Enterprises to fund rehabilitation efforts in the city. Annually research funding opportunities, such as California Housing Finance Agency (CalHFA), for rehabilitation grants. - Advertise available rehabilitation grant programs on the City's website. (See Program 14) - Monitor the impacts of short-term rentals on housing availability and affordability. Based on the findings of the report, consider adopting a short-term rental ordinance to regulate short-term rentals, including a potential short-term rental fee that would fund affordable housing development. - Expand awareness and connect residents to Self-Help Enterprises' Housing Rehabilitation Program. - Publish resources on homeowner rehabilitation assistance on the City's website by July 2026. - Apply for additional funding for the Local Rehabilitation Program by 2026.	Annually Annually July 2026	Southeast and Downtown Exeter	Assist with at least 20 rehabilitation projects over 8 years.

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	▪ Connect qualified property owners with code violations to Self-Help Enterprises to receive financial assistance through the Housing Rehabilitation Program. Refer at least five property owners with housing units in need of repair to Self-Help Enterprises annually. ▪ Pursue/provide rehabilitation assistance that includes energy conservation and weatherization improvements as eligible activities.	Annually		
Program 14: Community and Economic Development	▪ Annually coordinate with the Workforce Investment Board (WIB) of Tulare County to carry out the WIB’s Local Plan, including identified workforce priorities that will benefit the residents of Exeter. ▪ Annually, coordinate with the Public Works Department to review the City’s Capital Improvement Projects (CIP) to ensure public facilities and infrastructure are supportive of the needs of underserved communities. ▫ As part of the annual CIP program updates, evaluate public improvement needs in South, Southwest, Downtown, and Southeast Exeter, and prioritize improvements on sites that accommodate the City’s lower income RHNA. ▪ Coordinate with Public Works to ensure priorities from the adopted City’s Complete Streets with ADA Compliance and Active Transportation Safety Enhancement Plan are incorporated. Complete 3 projects by the end of the planning period, focusing on South Exeter. ▪ Coordinate with Tulare County and the San Joaquin Valley Air Pollution Control District to develop and implement a plan to reduce pollution burden throughout the city, targeting air quality, water quality, and pesticide use. Assess pollution burden in South, Southwest, Downtown, and Southeast Exeter and create an action plan to reduce pollution burden in these neighborhoods, as well as addressing proper remediation plans for cleanup sites and hazardous waste sites. ▫ Beginning in 2026 and every two years thereafter, assess and monitor pollution burden in each census	Annually Annually Beginning in 2026 and every two years thereafter	South, Southwest, Downtown, and Southeast Exeter	Complete 5 CIP projects during the planning period. Improve CalEnviroScreen scores citywide by December 2031. Apply for additional funding for community revitalization projects at least every other year with the goal of securing funding for two projects in the Downtown or Southern Exeter neighborhoods during the planning period.

Program	Specific Commitment	Timeline	Geographic Targeting	Eight-Year Metrics
	tract, using tools such as CalEnviroScreen and identify major sources of pollution. Develop a pollution burden reduction strategy for the city and for South, Southwest, Downtown, and Southeast Exeter by 2026 with metrics and timelines. Concurrent with Housing Element adoption, at least every other year, identify funding sources and apply for funding to support community development efforts, such as neighborhood revitalization, parks, safe routes to school, community facilities, and pollution mitigation, with the goal of securing funding for two additional community revitalization projects during the planning period. Target Downtown and Southern Exeter for any additional community revitalization projects.	Concurrent with Housing Element adoption and every other year thereafter.		
Tenant Protection and Anti-Displacement				
Program 1: Regional Collaboration	Starting in 2026, annually partner with the Kings/Tulare Homeless Alliance to proactively address shelter, housing and support services for people experiencing homelessness.	Annually	Citywide	Annually coordinate meetings with the Kings/Tulare Homeless Alliance to address need in Exeter.
Program 4: Replacement Housing	Amend the Zoning Code to address the replacement housing requirements.	Concurrent with Housing Element adoption	N/A	Replace all units as required pursuant to AB 1397.
Program 10: Preservation of At-Risk Housing	- Monitor affordable units during the planning period. - Ensure tenants are properly noticed by the property owners should a Notice of Intent to opt out of low-income use is filed. Notices must be filed three years, one year and six months in advance of conversion. Additionally, the City shall provide tenants with information about available resources and their tenant rights during the Notice of Intent period. Maintain annual contact with property owners of affordable housing regarding any change in status/intent or need for assistance, such as rehabilitation assistance. - Maintain the AB 987 database to include detailed information on all subsidized units, including those that have affordability covenants. Update annually.	Annually	Citywide	Monitor affordable units during the planning period and preserve 168 affordable units, including 68 at-risk units.

B7.4 Quantified Objectives

Exeter has established quantified objectives for housing production and rehabilitation for the Housing Element. These objectives are based upon expected availability of resources to address the City's housing needs, expectations regarding future housing development, as well as prior objectives established in earlier housing plans. Table B7-1 below summarizes the City's quantified objectives for implementing its various programs and actions outlined above.

Table B7-1 Quantified Objectives 2023-2031

Target Income and Affordability Level	New Construction	Rehabilitation	Conservation
Extremely Low	105	5	79
Very Low	92	5	79
Low	121	5	78
Moderate	146	5	10
Above Moderate	380	–	8
Total	844	20	254



City of Exeter 2023-2031 Housing Element Update

General Plan EIR Addendum (State Clearinghouse
Number 2002051062)

prepared by

City of Exeter, Planning Department

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June 2026



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Abbreviations and Acronyms

AB	Assembly Bill
ADU	Accessory Dwelling Unit
AMI	Area Median Income
EIR	Environmental Impact Report
CAL FIRE	California Department of Forestry and Fire Protection
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
DOC	California Department of Conservation
DOF	California Department of Finance
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
GHG	Greenhouse gas
HCD	California Department of Housing and Community Development
NAHC	California Native American Heritage Commission
RHNA	Regional Housing Needs Allocation
SB	Senate Bill
SR	State Route
SRA	State Responsibility Area
TCAG	Tulare County Association of Governments
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled

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1 Introduction and Project Summary

1.1 Project Title

City of Exeter Housing Element Update and Rezones

1.2 Lead Agency Name and Address

City of Exeter
350 W. Firebaugh Avenue
Exeter, California 93221

1.3 Contact Person and Phone Number

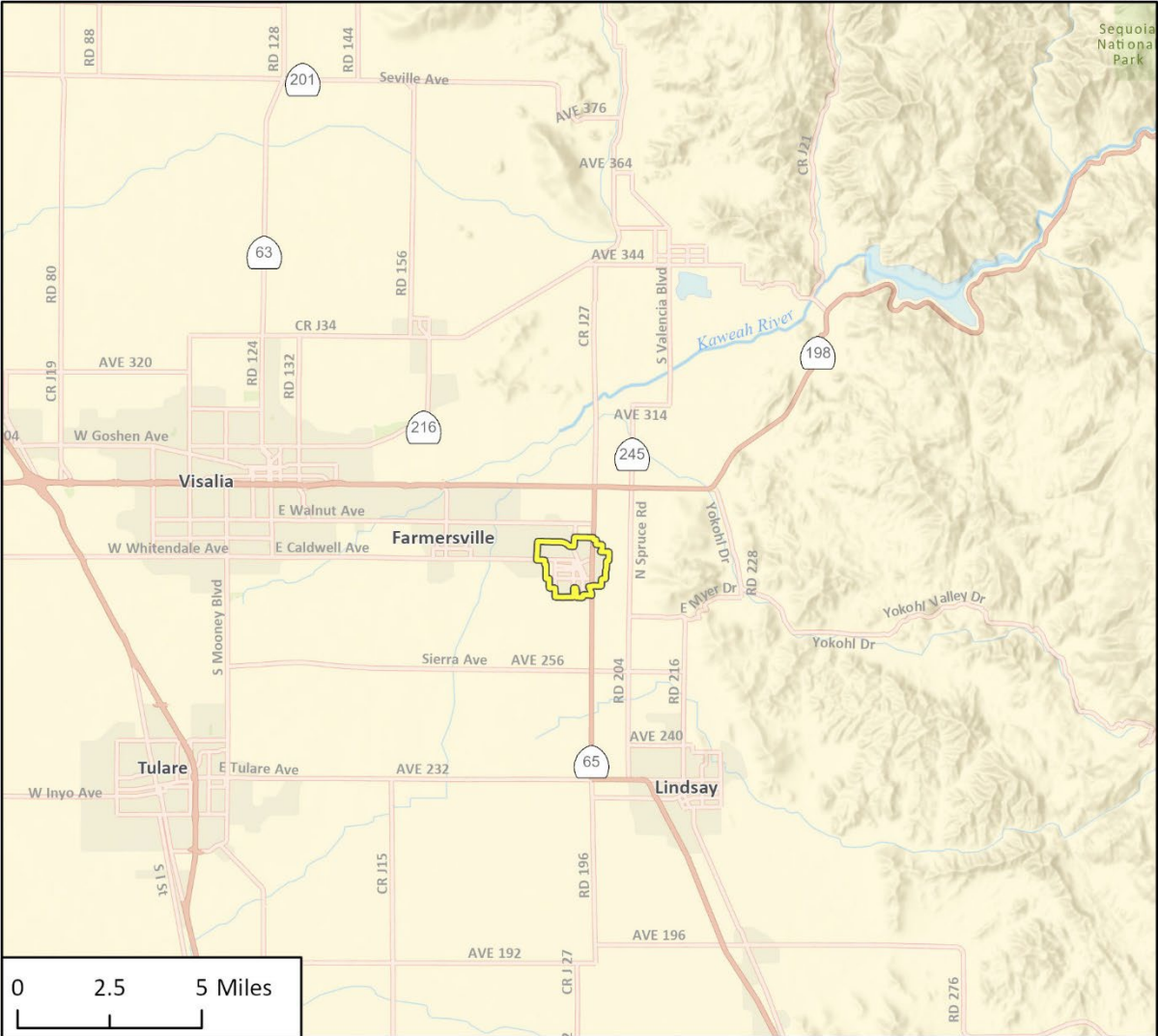
Jason Ridenour, City Administrator, City of Exeter
phone: 559-592-4539
email: jridenour@exetercityhall.com

1.4 Project Location

The City of Exeter is located along State Route 65 (SR 65) in western Tulare County, approximately eleven miles to the southeast of the City of Visalia.

Figure 1 shows a regional map of the city's relationship to nearby cities, communities, and the regional transportation system, and Figure 2 shows the city limits. The Housing Element Update applies to all lands within the city limits. The location of the Housing Element Update Site Inventory rezone sites is shown in Figure 3.

Figure 1 Regional Location



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Fig 1 Regional Location

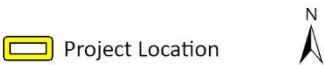
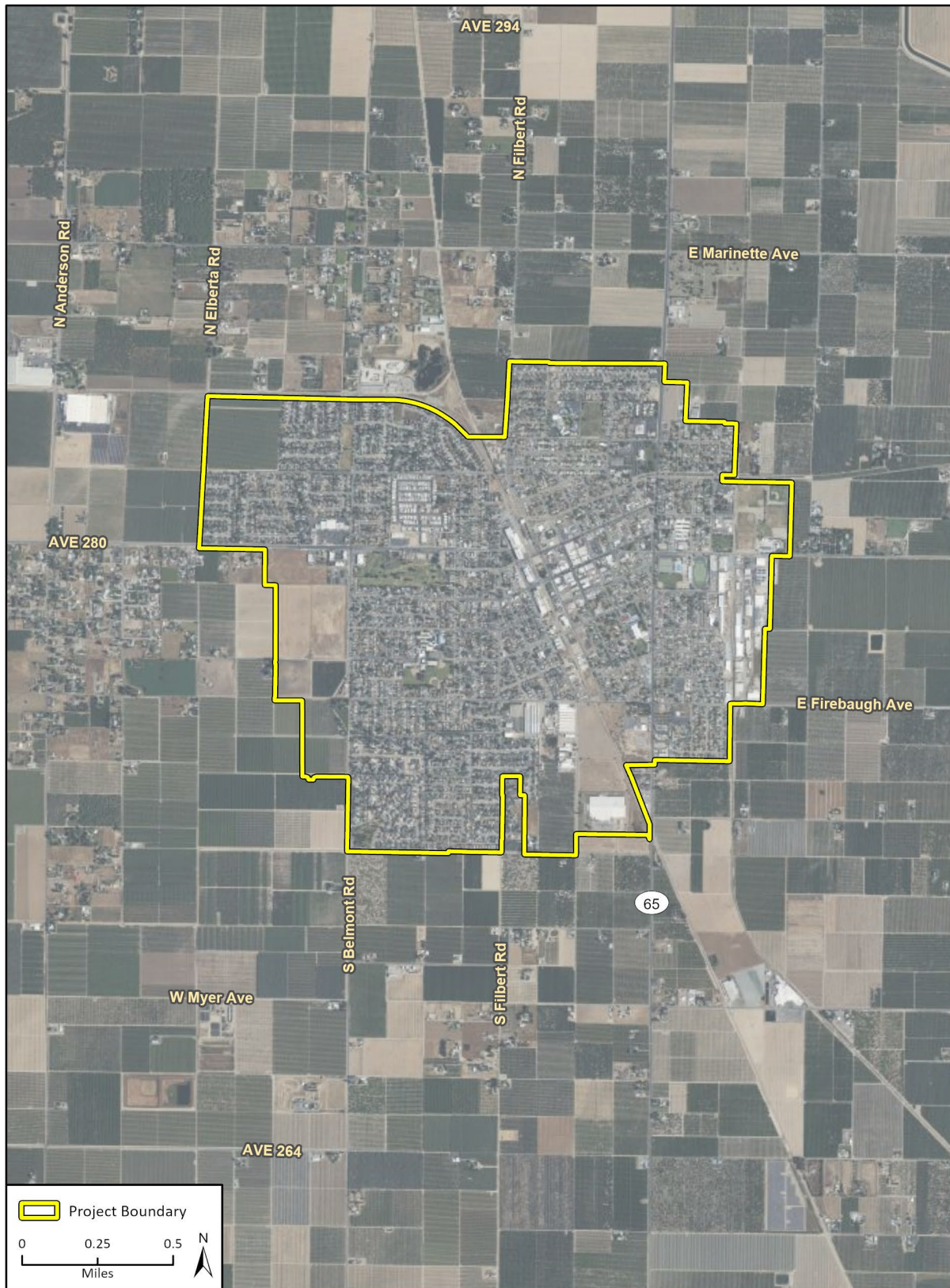


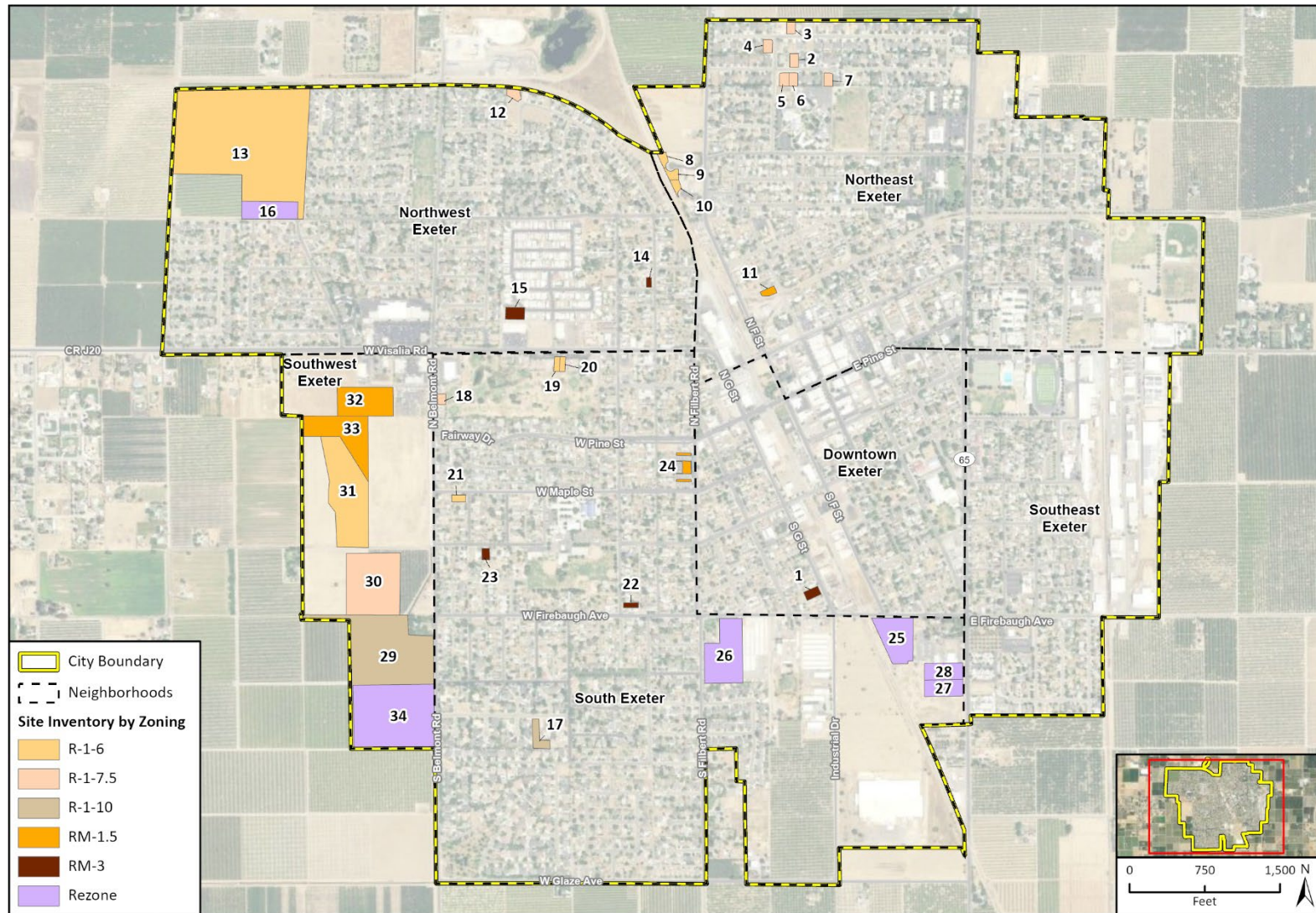
Figure 2 City Limits



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Fig 2 Project Location

Figure 3 City of Exeter Housing Element Site Inventory



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Additional data provided by County of Tulare, 2019.

22_13496 HE Affix
Site Inventory - Exeter

1.5 Project Description

The Project is a comprehensive update to the City of Exeter's General Plan Housing Element, General Plan and Zoning map amendments to rezone sites pursuant the Housing Element, and a Zoning Text amendment to establish a by-right ordinance consistent with State law. These project components are described in more detail below.

Housing Element Update

The Housing Element is one of the seven General Plan elements required by State law (Government Code Section 65302). Unlike other General Plan elements, it is required by State law to be updated every eight years (California Government Code Section 65588). Each eight-year period is referred to as a "cycle." For Exeter, the current (6th) cycle planning period runs from December 2023 through December 2031.

Regional Housing Needs Allocation (RHNA) and Site Inventory

Each Housing Element cycle, the California Department of Housing and Community Development assigns each region a share of the state's housing need, and the regional government (in this case, the Tulare County Association of Governments) assigns each jurisdiction a share of the Regional Housing Need Allocation (RHNA). The RHNA is divided among income categories according to need and based on a household's income as a percentage of the Area Median Income (AMI). Table 2 shows Exeter's share of the RHNA for the 6th cycle.

Table 1 2023-2031 Regional Housing Need Allocation

Income Category	Exeter's Share of RHNA (Number of Units)	Percentage of Total (Exeter)	Tulare County Regional Housing Need (Number of Units)	Percentage of Total (Region)
Very low ($\leq$ 50% AMI)	197	23.3%	8,497	25.6%
Low ($>$ 50-80% AMI)	121	14.3%	5,238	15.8%
Moderate ($>$ 80-120% AMI)	146	17.3%	5,424	16.3%
Above Moderate ($>$ 120% AMI)	380	45.0%	14,055	42.3%
Total	844	100%	33,214	100%

AMI = Area Median Income (established annually by the Department of Housing and Urban Development)

Source: TCAG 2022

The Housing Element must demonstrate through the Site Inventory that the City has capacity to meet its share of the RHNA. Exeter's share of the RHNA for the current planning period is 844 units, consisting of 318 very low- and low-income housing units, 146 moderate-income housing units, and 380 above moderate-income housing units.

The City can demonstrate sufficient capacity by calculating credits against its share of the RHNA (planned, approved, and pending projects projected to develop during the planning period), opportunity sites (land zoned appropriately for residential development), and if there is still a shortfall of capacity, the City must commit to rezoning sites.

Table 4 shows the City’s share of RHNA and housing unit yield per income category that is met by housing credits and opportunity sites. The City identified 80 planned and approved units in two projects (one single-family development and one multifamily development) in Downtown and Northeast Exeter. The City identified 34 opportunity sites, leaving a shortfall of capacity and an obligation to rezone sites to accommodate its remaining share of the RHNA. The required rezoning is described in Site Rezoning, below.

Table 2 Summary of Site Inventory Analysis

	Number of Lower-Income Units	Number of Moderate-Income Units	Number of Above Moderate-Income Units	Total Number of Units
City’s Share of RHNA	318	146	380	844
Credits (Planned and Approved Projects)	0	0	80	80
Housing Opportunity Sites	195	26	280	501
Remaining RHNA Obligation	123	120	20	236

Sources: City of Exeter

Of the 34 sites included in the City’s Site Inventory, 27 are vacant and seven are nonvacant, with currently operational agricultural uses. All seven nonvacant sites are currently zoned for residential use and two of these sites are proposed for rezone from very low- and low-density to medium-density residential. The City anticipates development of these sites to accommodate medium low- and medium high-density residential uses.

Chapter B4 of the Housing Element (Housing Resources and Site Inventory Analysis) details the City’s Site Inventory. The summary of the residential Site Inventory is presented in Table 5. Housing opportunity sites and rezone sites are shown in Figure 3.

Table 3 Housing Element Site Inventory Summary

	Number of Lower-Income Units	Number of Moderate-Income Units	Number of Above Moderate-Income Units	Total Units
Remaining RHNA Obligation	318	146	300	764
Opportunity Sites	195	26	280	501
Rezone Sites	169	127	57	353
Total Capacity of Opportunity and Rezone Sites	364	153	337	854

Contents of the Housing Element

The 2023-2031 Housing Element Update has the following major components:

- An **Introduction and Community Engagement** section that provides an overview of the housing element update and efforts Exeter made to engage the public and gather input to inform development of this Housing Element Update. (Chapter B1)
- A **Housing Needs Assessment** for the City of Exeter, summarizing demographic, employment, and housing characteristics. (Chapter B2)

- A **Housing Constraints Analysis** analyzing constraints to the development of adequate and affordable housing including market, governmental, infrastructure, and environmental factors. (Chapter B3)
- A **Housing Resources and Site Inventory Analysis** section documenting the methodology and results of the Site Inventory Analysis conducted to demonstrate the City of Exeter's ability to meet its share of the 6th cycle RHNA. (Chapter B4)
- An analysis of issues related to **Affirmatively Furthering Fair Housing (AFFH)** for the City of Exeter. (Chapter B5)
- A **Review of Past Accomplishments** to review the housing programs adopted in the 5th Cycle Housing Element and evaluate the effectiveness of these programs in delivering housing services and assistance. (Chapter B6)
- A **Housing Plan**, which is comprised of the Goals, Policies, and Programs that the City intends to implement over the next eight-year planning cycle. (Chapter B7)

HOUSING PLAN GOALS, POLICIES, AND PROGRAMS

A critical component of the Housing Element is the goals, policies, and actions contained in the Housing Plan, and designed to facilitate the development of all housing types, explore innovative housing solutions, address the needs of the City's residents, and affirmatively further fair housing. The 2023-2031 Housing Element Update goals, policies, and programs are summarized below and referenced throughout this Addendum as appropriate:

- **Regional Collaboration.** The 2023-2031 Housing Element Update includes policies and programs to foster collaboration with jurisdictions within Tulare County to address housing issues.
- **Housing Development.** State law requires that the goals and policies of the housing element shall encourage and facilitate the production of a range in types of housing affordable to households of varied income levels. The 2023-2031 Housing Element Update includes policies and programs to provide an adequate supply and range of housing types to meet the diverse needs of residents.
- **Affordable Housing.** The 2023-2031 Housing Element Update includes policies and programs to facilitate the development of affordable housing and protect the existing supply of affordable housing to extremely low-, very low-, low- and moderate-income households.
- **Housing and Neighborhood Preservation.** The 2023-2031 Housing Element Update includes policies and programs to preserve and improve the City's existing housing stock.
- **Housing for Persons with Special Needs.** The 2023-2031 Housing Element Update includes policies and programs to support and provide housing and services for people with special needs in the community.
- **Resource Conservation and Sustainable Development.** The 2023-2031 Housing Element Update includes policies and programs to ensure development of energy efficient and sustainable new housing.
- **Affirmatively Furthering Fair Housing.** The 2023-2031 Housing Element Update includes policies and programs to promote housing opportunities and access for residents regardless of age, race, religion, sex, marital status, ancestry, national origin, color, disability, or economic level in compliance with local, State, and federal fair housing laws.

Site Rezoning

As described above, the City identified six sites for rezoning to accommodate the shortfall of capacity once credits and opportunity sites were counted against the City’s share of the RHNA. Site Rezoning requires General Plan Land Use Map Amendments and Zoning Map amendments to rezone the six as described in Table 4, below. The Project would facilitate multi-family housing development and ensure the City can meet its RHNA obligations outlined in the 6th Cycle Housing Element.

Rezone sites are located throughout the city with the most units in South Exeter, as shown in Figure 3. These sites encompass 24.41 acres and can accommodate a total of 353 units (169 low-income units, 127 moderate-income units, and 57 above moderate-income units). The sites would be rezoned from low-density residential, general commercial, and planned development to high-density residential and central commercial.

Table 4 Site Rezoning

Site ID	Current Land Use Designation	Current Zoning	Proposed Land Use Designation	Proposed Zoning
135-190-072-000	Public/Quasi-Public	ML	High Density Residential	RM-1.5
135-190-063-000	Low Density Residential	R-1-6	High Density Residential	RM-1.5
135-190-039-000	General Industrial	ML	High Density Residential	RM-1.5
135-190-037-000	General Industrial	ML	High Density Residential	RM-1.5
133-080-047-000	Very Low Density Residential	R-1-10	Medium Density Residential	RM-3
	Low Density Residential	R-1-6	Low Density Residential / Medium Density Residential	R-1-6 / RM-3
133-060-008-000				

Zoning Text Amendment

The Project includes a Zoning Ordinance text amendment to establish a By-Right Approval Ordinance (Chapter 59). The ordinance will require ministerial approval for eligible affordable housing projects, and per State law, exempts those projects from CEQA. Codified under Government Code Sections 65583.2 and 65913.4, this applies to:

- Permanent supportive housing;
- Low-barrier navigation centers; and
- Residential or mixed-use projects that include at least 20 percent of units affordable to lower-income households on sites assumed to accommodate lower-income development in the Housing Element site inventory that are vacant and used in two prior Housing Element site inventories, or nonvacant and listed in one prior Housing Element site inventory.

The ordinance brings the Zoning Ordinance into compliance with State law, which requires qualifying projects to proceed without discretionary review and exempts them from CEQA. These by-right requirements for Site Inventory reuse sites would apply to the sites listed in Table 6. These sites are in the City’s 6th Cycle Housing Element inventory and meet the criteria for reuse sites described above.

Table 5 Sites Used in Previous Planning Periods

Address	APN	Acres	Land Use	Zoning	Existing Use
E Elberta Rd. & Vine St.	133060008	25.00	Low	R-1-6	Agriculture
E Elberta Rd. & Vine St.	133060008	5.00	Medium	RM-3	Agriculture

1.6 Discretionary Action

Adoption of the Housing Element would require the following discretionary actions by the City of Exeter Planning Commission/City Council:

- Approval of a General Plan Amendment to incorporate the 2023-2031 Housing Element Update
- General Plan Land Use map amendment for six sites from Public/Quasi-Public, Low Density Residential, General Industrial, and Very Low Density Residential to High Density Residential, Medium Density Residential, and Low Density Residential / Medium Density Residential.
- Zoning map amendment to rezone six sites from ML, R-1-6, and R-1-10 to RM-1.5, RM-3, and R-1-6 / RM-3.
- Approval of a Zoning Ordinance text amendment to add Chapter 59, By-Right Approval
- Consideration of this Addendum

The California Department of Housing and Community Development (HCD) will review and certify that the Housing Element complies with State law. Aside from HCD, no other approvals by outside public agencies are required.

1.7 Prior Environmental Document(s)

City of Exeter, General Plan Environmental Impact Report (2003 General Plan EIR). State Clearinghouse Number 2002051062, certified March 2003.

1.8 Location of Prior Environmental Document(s)

City of Exeter website: <https://cityofexeter.com/document/general-plan/>

2 Project Context

The California Legislature has identified the attainment of a decent home and suitable living environment for every resident as the State's major housing goal. Recognizing the important role of local planning programs in pursuing this goal, the legislature mandated that all cities and counties prepare a housing element as part of their comprehensive general plans. Government Code Sections 65580 to 65589.8 set forth the specific components to be contained in a community's housing element.

Pursuant to State law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

2.1 Changes in State Law

The Housing Element Update and Zoning Ordinance Update incorporates and addresses all substantive changes to State housing law since the City's last Housing Element was adopted and certified in 2016, including but not limited to:

- Affordable Housing Streamlined Approval Process: Senate Bill (SB) 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill (AB) 1397 (2017)
- Affirmatively Furthering Fair Housing: AB 686 (2017)
- No-Net-Loss Zoning: SB 166 (2017)
- By Right Transitional and Permanent Supportive Housing: AB 2162 (2018) and AB 101 (2019)
- Accessory Dwelling Units: AB 68 (2019), AB 881 (2019), and AB 671 (2019)
- Housing Crisis Act of 2019: SB 330

2.2 City of Exeter General Plan

State law mandates that each city and county in California adopt "a comprehensive, long-term general plan," the purpose of which is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services.

The Exeter General Plan, adopted in March 2003, is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over a 20-year period (2000 to 2020).

A General Plan reflects the priorities and values of the community. City decision-makers (e.g., City Council and Planning Commission), rely on the General Plan as the basis for development proposals, land use changes, and the provision of public facilities (e.g., roads, parks, fire stations). It is also a policy document that guides decisions related to protecting, enhancing, and providing open space, habitat conservation, arts and recreation programming, and community character.

State law requires that every General Plan, at a minimum, address certain subject categories (called "elements"), which include land use, circulation, housing, conservation of natural resources, environmental justice, open space, noise, and safety. A General Plan may also address other subjects that are of importance to the community's future, such as sustainability, community design, and public art. Exeter's General Plan includes the following elements (City of Exeter 2003a):

- Land Use
- Circulation
- Open Space
- Conservation
- Noise
- Safety
- Housing

Exeter General Plan EIR

The City's 2003 General Plan underwent environmental review in the form of an Environmental Impact Report (EIR), which was certified in March 2003 by the City Council (State Clearinghouse No. 2002051062). The General Plan EIR is a comprehensive document and includes discussion of alternatives and growth inducing impacts associated with urban development anticipated by the General Plan.

The 2003 General Plan EIR addressed the potential environmental effects of the planned buildout of the Exeter General Plan through 2020 and concluded that General Plan implementation would result in levels of environmental impacts as detailed in Table 3. Mitigation measures in the General Plan EIR were incorporated as policies in the General Plan to reduce potential impacts from future project development.

Table 6 Summary of Areas of Potential Impact under the 2003 General Plan EIR

Issue Area	Level of Significance After Mitigation	Mitigation Proposed in the General Plan EIR
Aesthetics and Visual Resources	Not Analyzed	None
Agricultural Resources	Significant and Unavoidable	None
Air Quality	Less than Significant	Mitigation Measures related to implementation of the San Joaquin Valley Air Quality Attainment Plan, 2001 Tulare County Regional Transportation Plan, and the General Plan, infill and urban sprawl, smart growth, safe and effective traffic maneuvers, transit and bike infrastructure as well as short-term mitigation measures related to dust control
Biological Resources	Less than Significant	None required
Cultural Resources	Not Analyzed	None
Energy ¹	Not Analyzed	None
Geology and Soils	Less than Significant	None required
Greenhouse Gas Emissions ²	Not Analyzed	None

Issue Area	Level of Significance After Mitigation	Mitigation Proposed in the General Plan EIR
Hazards and Hazardous Materials	Not Analyzed	None
Hydrology and Water Quality	Significant and Unavoidable	Mitigation Measure related to community awareness for water-saving methods, drought-tolerant vegetation, storm ponding retention basins
Land Use and Planning	Not Analyzed	None
Mineral Resources	Not Analyzed	None
Noise	Significant and Unavoidable	Mitigation Measures related to point source noise reduction, installing noise mitigating infrastructure, and increasing the distance of the noise source and sensitive receptors
Population and Housing	Not Analyzed	None
Public Services	Less than Significant	None
Recreation	Not Analyzed	None
Transportation	Not Analyzed	None
Tribal Cultural Resources ³	Not Analyzed	None
Utilities	Not Analyzed	None
Wildfire ⁴	Not Analyzed	None

¹The 2003 General Plan EIR does not analyze energy impacts in detail although Energy was a topic under the Appendix F CEQA Guidelines.

²Greenhouse Gas Emissions are required to be addressed under CEQA pursuant to SB 97, which was passed in 2010, after the General Plan EIR was certified.

³Tribal Cultural Resources are required to be addressed under CEQA pursuant to AB 52, which was passed in 2015, after the General Plan EIR was certified.

⁴The General Plan EIR does not discuss wildfire impacts, as it was certified before the adoption of CEQA thresholds for wildfire impacts
Source: City of Exeter 2003b

2.3 Project Buildout and Comparison to 2003 General Plan EIR

2003 General Plan Buildout Assumptions

The 2003 General Plan has a planning horizon of 2020, but it does not specify or anticipate exactly when buildout would occur, as long-range demographic and economic trends are difficult to predict. The designation of a site in the 2003 General Plan for a certain use does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development depends on property owner initiative. It only means that a certain site has the capacity to develop at a specified intensity by right or without changing its General Plan designation and/or zoning.

As shown on Table 1, *Population Projections*, in Chapter 2 of the 2003 General Plan EIR, new development under the 2003 General Plan would result in an increase of 2,425 new residential units within City limits by 2020, for a total buildout of 5,593 residential units by 2020 (DOF 2012). During

the 20-year time frame, this new growth would increase the City's population by 7,009 new residents for a total of 16,177 residents by 2020 (City of Exeter 2003b).

Housing Element Update and Site Rezoning Buildout

The Housing Element Update component of the Project is programmatic in nature. It is a policy document that includes targeted programs that facilitate and guide housing development towards designated opportunity and rezone sites. The Site Rezoning portion of the project would change land use designations and zoning on six sites. Project buildout is assumed to be the housing unit capacity of the housing opportunity and rezone sites—854 total units. This addendum conducts a comprehensive analysis of project implementation and evaluates environmental effects of Housing Element programs and Site Rezoning and the cumulative impacts of each.

CEQA Baseline and Comparison to the General Plan EIR

The CEQA baseline for this analysis is the maximum allowable development for residential uses under the City's General Plan EIR. The General Plan EIR assumed a buildout of 5,593 residential units and 16,117 residents. Table 5 compares the potential buildout under the Housing Element Update to the buildout contemplated in the General Plan EIR. This analysis represents what changes the Project would have on the existing conditions of the prior CEQA documentation (the General Plan EIR).

As shown in Table 3, Exeter had a population of 9,168 in 2000 (City of Exeter 2003b). As of 2024, Exeter has a population of 10,179 (DOF 2024). This represents an actual increase of 1,011 residents and 501 housing units since the 2003 General Plan EIR was certified. Actual growth in the City has occurred at a slower rate than was anticipated in the 2003 General Plan EIR, and there is a remaining capacity of 1,898 housing units, or 5,938 persons, before the full anticipated General Plan buildout is reached.

The Project is expected to result in an increase of 854 units, or 2,451 residents to meet its state-mandated share of the RHNA.¹ If the anticipated buildout of the Project is achieved, this would result in a total City population of 12,630, which is below the anticipated General Plan total buildout of 16,117 residents. As shown on Table 5, this increase is well within growth projections anticipated in the City of Exeter General Plan EIR.

The projected growth accommodates the growth anticipated by the RHNA. The Project is not directly responsible for increasing the population but rather aims to prepare for the growth that is anticipated within the region. The Project will assist the City in achieving the vision of the existing 2003 General Plan and plan for housing units sufficient to accommodate anticipated growth.

The Project would not exceed the buildout projections considered in the 2003 General Plan EIR, and because the 2003 General Plan EIR analyzed impacts associated with full General Plan buildout, the Project would not be expected to result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. A full analysis of the potential for new or substantially more severe environmental effects is provided in Section 6, *Addendum Evaluation*.

¹ Based on a residential unit increase of 854 units multiplied by 2.87 persons per household (DOF 2024)

Table 7 2003 General Plan EIR Buildout, Actual Growth, and Project Buildout

	2000 (a) ¹	2024 (b)	Actual Growth: 2000 to 2024 (c=b-a)	Buildout Assumed under 2003 General Plan EIR (d)	Buildout Remaining under 2003 General Plan EIR (e=d-b)	Project Buildout (f) ¹
Housing Units	3,194	3,695	+501	5,593	1,898	854
Population	9,168	10,179	+1,011	16,117	5,938 ¹	2,451 ¹

¹ Based on persons per household of 2.87 (DOF 2024)

3 Overview of CEQA Guidelines Sections 15162 and 15164

CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when a project has a previously certified EIR.

CEQA Guidelines Section 15164 states that a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. CEQA Guidelines sections 15162(a) states that no Subsequent or Supplemental EIR shall be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the Project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
 - A. The Project will have one or more significant effects not discussed in the previous EIR.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the Project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the Project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the Project.

According to *CEQA Guidelines* Section 15164, an addendum to a previously certified EIR is the appropriate environmental document in instances when “only minor technical changes or additions are necessary” and when the new information does not involve new significant environmental

effects or a substantial increase in the severity of a significant effect beyond those identified in the previous EIR. *CEQA Guidelines* Section 15164 states that:

- a. The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- b. An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred.
- c. An addendum need not be circulated for public review but can be included in or attached to the final EIR.
- d. The decision-making body shall consider the addendum with the final EIR prior to making a decision on the Project.
- e. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the Project, or elsewhere in the record.

The City has prepared this Addendum, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the Project's environmental impacts are covered by and within the scope of the 2003 General Plan EIR (March 2003, State Clearinghouse No. 2002051062). The following Addendum details any changes in the Project, changes in circumstances under which the Project is undertaken, and/or "new information of substantial importance" that may trigger the need for a Subsequent or Supplemental EIR pursuant to CEQA Guidelines sections 15162(a).

The responses herein substantiate and support the City's determination that the Housing Element Update policies and programs are within the scope of the 2003 General Plan EIR, do not require subsequent review under CEQA Guidelines Section 15162 and, in conjunction with the EIR, adequately analyze potential environmental impacts.

4 Environmental Effects and Determination

4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

To provide a thorough and conservative analysis of potential impacts associated with the modified Project, this addendum addresses all 20 environmental issue areas included in Appendix G of the current CEQA Guidelines. These issue areas include tribal cultural resources, an issue area added to the CEQA Guidelines in September 2016 pursuant to Assembly Bill (AB) 52, after certification of the Final EIR. These issue areas also include energy and wildfire, which were added to the CEQA Guidelines in December 2018.

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

■ None

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

4.2 Determination

Based on this analysis:

- ☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.
- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR is adequate and this evaluation serves as an ADDENDUM to the City of Exeter, General Plan Update Environmental Impact Report (General Plan EIR). State Clearinghouse Number 2002051062 certified March 2003.

_____ Signature	_____ Date
_____ Printed Name	_____ Title

5 Addendum Evaluation Methodology

5.1 General Plan Consistency

The Housing Element is a component of the 2003 General Plan and is periodically updated pursuant to state law. Therefore, the Housing Element Update is consistent with the vision of the General Plan and is supported by goals and policies of the other General Plan Elements. The General Plan Elements and policies that correspond with the goals and policies of the Housing Element are summarized below:

- The **Land Use Element** includes goals, objectives, policies, and standards for residential, commercial, industrial, and public and institutional development within Exeter. Additionally, it includes the Plan Consistency table which identifies the consistent zone district, density, and maximum intensity of persons per acre.
- The **Circulation Element** includes goals, objectives, policies, and standards for establishing a safe and efficient transportation system that provides adequate access throughout the city.
- The **Open Space Element** includes goals, objectives, policies, and standards for preserving agricultural land and providing recreational opportunities for the community.
- The **Conservation Element** includes goals, objectives, policies, and standards for protecting natural resources for the community.
- The **Noise Element** includes goals, objectives, policies, and standards for protecting residents from exposure to excessive noise. It also includes the Land Use Compatibility for New Development near Transportation and Noise Sources table which shows acceptable exterior noise exposure levels, as well as the Maximum Allowable Noise Exposure – Transportation Noise Sources and the Maximum Allowable Noise Exposure – Stationary Noise Sources tables which outlines the maximum noise levels not to be exceeded for transportation sources and stationary sources.
- The **Safety Element** includes goals, objectives, policies, and standards for protecting residents against natural and manmade hazards and ensuring fire and police services are sufficient and effective.
- The **Housing Element** includes goals, objectives, policies, and standards for facilitating housing within the city and ensuring the city satisfies its RHNA numbers.

Adoption of the Housing Element Update would require the City to amend the Housing Element of the 2003 General Plan.

5.2 Preliminary Environmental Constraints

State housing law requires the city to review both governmental and non-governmental constraints to the maintenance and production of housing for all income levels. Since local governmental actions can restrict the development and increase the cost of housing, State law requires the Housing Element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing” (Government Code Section 65583[c][3]). Several factors can constrain residential development. These include market constraints, such as development costs and interest rates, and governmental constraints, which

include land use controls, fees, processing times, and development standards, among others. In addition, environmental and infrastructure constraints can also impede residential development. For purposes of the Addendum, only the potential environmental constraints, as they relate to CEQA, were evaluated.

Environmental constraints to residential development typically relate to the presence of sensitive habitat, flooding, topography, and other natural and physical characteristics that can limit the amount of development in an area or increase the cost of development. The Housing Element Update does not directly result in specific development projects, but rather puts forth goals, policies, and programs that support housing efforts in Exeter. Future housing development projects would be subject to developmental review to determine potential impacts specific to that project site.

6 Addendum Evaluation

6.1 Introduction

As discussed in Section 2, the total buildout for the Project would be 854 units. All of these units, including sites to be rezoned, would be consistent with the 2003 General Plan, and therefore would be within the scope of the 2003 General Plan EIR, since growth within the City has occurred at a slower rate than was anticipated. Therefore, growth anticipated and evaluated under the 2003 General Plan is applicable to the proposed Project. General Plan EIR findings and analysis of the proposed Project's impacts are included for each Appendix G section below.

6.2 Aesthetics

General Plan EIR Findings

The General Plan EIR does not discuss aesthetics in detail. However, even though aesthetics was not formally analyzed, based on preliminary assessments and the nature of the project, it is anticipated that any potential aesthetic impacts would be less than significant.

Addendum Analysis

The Housing Element Update and Rezone would fall within the total growth that was previously analyzed in the General Plan EIR. The Zoning Ordinance Update would not result in any physical development.

The Rezones would change allowable uses on the six rezone sites, but any future development facilitated by the proposed Project would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations, including standards that govern visual quality and community design.

Because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Housing Element Update and Rezone does not directly result in specific projects but puts forth goals and policies that regulate various aspects of new housing development in Exeter. Future developments resulting from the Housing Element Update would be consistent with the buildout anticipated by the General Plan. Because it is a policy document, the Housing Element Update would not directly result in impacts to scenic vistas, scenic resources, or visual character, and would not create new sources of substantial light or glare which could adversely affect views. The Zoning Ordinance Update would exempt certain housing projects from further CEQA review, and would prohibit any discretionary review, which could result in some of the City's discretionary development standards or guidelines not being applied to a qualifying project. However, these limitations are already required under State law, so the Zoning Ordinance Update does not result in any new impacts to aesthetics.

Conclusion

The Project would not result in aesthetics impacts beyond those addressed or analyzed in the General Plan EIR, nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of aesthetics is required.

6.3 Agriculture and Forestry Services

General Plan EIR Findings

The General Plan EIR discussed Agriculture and Forestry resources in Section 4.04 of the General Plan EIR. As discussed therein, the implementation of the general plan would have the potential to urbanize prime agricultural land for non-agricultural land uses. This impact was identified and analyzed as significant and unavoidable in the General Plan EIR. The General Plan EIR also mentions that implementation of the General Plan would impact land use impacts with regards to agricultural land, economic impacts, and scenic qualities.

Addendum Analysis

As discussed in Section 2.7, Buildout of Proposed Project and Comparison to the 2012 General Plan EIR, buildout of the proposed Project is within the buildout projections analyzed in the General Plan EIR. The Zoning Code Update would not result in any physical development.

While the General Plan EIR identified potentially significant agricultural and forestry impacts, the Housing Element Update and Rezone would not facilitate development beyond what was already analyzed. The Housing Element Update and Rezone would not introduce any new or increased impacts on agricultural resources. Higher-density development enabled by the Rezone would not have a greater impact on the site's existing agricultural uses than the lower-intensity uses contemplated by the General Plan EIR. Thus, the Housing Element Update and Rezone aligns with the already established impact analysis and does not alter the impact significance identified in the General Plan EIR.

Additionally, the Project would be consistent with goals and policies included in the General Plan intended to reduce impacts to agricultural lands such as Policies 1 through 4 on page B-2 of the Open Space, Parks, and Recreation Element, which focus on protecting prime agricultural land, reviewing land use changes, creating buffers between urban and agricultural areas, and maintaining clear urban boundaries.

Future development facilitated by the proposed Project would undergo project-specific developmental review, including design review; would be subject to adopted development regulations and would be required to comply with existing general plan policies and land use designations. Because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Housing Element Update does not directly result in specific projects but puts forth goals and policies that regulate various aspects of new housing development in Exeter. Because it is a policy document, the Housing Element Update would not directly result in impacts to the conversion of Important Farmland, forest land, or timber land to non-agricultural uses.

Conclusion

The proposed Project would not result in agricultural and forestry impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of agriculture and forestry is required.

6.4 Air Quality

General Plan EIR Findings

The General Plan EIR discussed air quality impacts in Section 4.08 of the General Plan EIR. The General Plan EIR determined that short-term air quality impacts related to fugitive dust as a result of General Plan implementation would be less than significant with the implementation of mitigation measures. These Mitigation Measures include the impacted sites being watered at least twice daily, work stopping during high winds over 20 mph, and inactive areas being seeded and watered until grass grows. The General Plan EIR also determined that long-term air quality impacts related to VMT and air pollution. The long-term Mitigation Measures focus on improving air quality through various plans and policies. These include implementing the San Joaquin Valley Air Quality Attainment Plan and the 2001 Regional Transportation Plan, promoting smart growth and infill development to reduce urban sprawl, and improving traffic flow, transit, and alternative transportation options such as biking and walking. The mitigation measures also propose enhancing pedestrian and bicycle infrastructure, signaling busy intersections, and promoting mixed-use development to minimize vehicle trips and reduce emissions.

Addendum Analysis

Because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Zoning Code Update would not result in any physical development. The number of units proposed under the Housing Element Update and Rezone would be within the total remaining buildout of the 2003 General Plan EIR. In addition, future development facilitated by the proposed Project would undergo project-specific developmental review and would be required to comply with existing policies and regulations, including the short-term and long-term air quality Mitigation Measures. Because the proposed Project is a policy document consistent with the General Plan and does not directly result in specific projects but puts forth goals and policies that regulate various aspects of new housing development, it would have no impact on air quality.

Conclusion

The Project would not result in air quality impacts beyond those addressed or analyzed in the General Plan EIR, nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the project and no additional environmental assessment of air quality is required.

6.5 Biological Resources

General Plan EIR Findings

The General Plan EIR discusses impacts to biological resources in Section 4.05 of the General Plan EIR. The General Plan EIR determined that impacts to biological resources as a result of General Plan implementation would have a less than significant impact.

Addendum Analysis

The Housing Element Update would not conflict with any local policies or ordinances protecting biological resources as the opportunity and rezone sites are located in urban areas. Furthermore, by increasing density on infill sites within the city, the proposed Project would reduce potential impacts to biological resources by limiting urbanization of natural and undeveloped areas. Future development proposed as a result of the Housing Element Update would be subject to project-specific environmental review and would be required to adhere to policies in the General Plan. Furthermore, future development would be required to comply with adopted federal, state, and local regulations protecting biological resources. Higher-density development enabled by the Rezone would not have a greater impact on the site's biological resources than the lower-intensity uses contemplated by the General Plan EIR. The Zoning Ordinance Update would not result in any physical development.

Because the Housing Element Update and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The Project would not result in biological impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of biological resources is required.

6.6 Cultural Resources

General Plan EIR Findings

The General Plan EIR does not discuss cultural resources in detail. However, even though cultural resources was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential impacts to cultural resources would be less than significant.

Addendum Analysis

The Housing Element Update and Rezone would not increase potential impacts to cultural resources as the opportunity and rezone sites are located within urban areas. Future development facilitated by the Housing Element Update and Rezone would undergo project-specific developmental review and be required to adhere to all state and federal regulations to reduce impacts on cultural resources. Furthermore, because the Housing Element and Rezone would not facilitate

development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Zoning Code Update would not result in any physical development.

Conclusion

The proposed Project would not result in cultural impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of cultural resources is required.

6.7 Energy

General Plan EIR Findings

Energy was added to the CEQA Guidelines in 2018 as a separate environmental issue area. Thus, the General Plan EIR (certified 2003) does not include a chapter or section dedicated to analysis of impacts to Energy. A discussion of energy impacts is provided herein to supplement the General Plan EIR.

Addendum Analysis

Future development facilitated by the Housing Element Update and Rezone would involve the consumption of non-renewable energy resources such as electricity, natural gas, propane, gasoline, and diesel. However, future projects would be required to adhere to applicable regulations and General Plan policies and actions related to energy resources and energy consumption with new residential construction, including California Code of Regulations (CCR) Title 20, Division 2, Chapter 4, Energy Conservation; CCR Title 24, Part 6, *California Energy Code*; and CCR Title 24, Part 11, *California Green Building Standards Code*, Tier 1. These regulations include requirements for the use of more energy-efficient design and technologies as well as the incorporation of more renewable energy resources into building design than were in place during the General Plan EIR analysis.

Because the Housing Element Update and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Housing Element Update does not directly result in specific projects but puts forth goals and policies that regulate various aspects of new housing development in Exeter. Because it is a policy document, the Housing Element Update would not directly result in impacts to energy resources. With compliance with existing regulations, impacts related to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant. The Zoning Ordinance Update would not result in any physical development.

Conclusion

Impacts related to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant. The Project would not result in impacts beyond those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of energy is required.

6.8 Geology and Soils

General Plan EIR Findings

The General Plan EIR discusses impacts related to geology and soils in Section 4.01 of the General Plan EIR. The General Plan EIR determined that impacts associated with seismic and geologic hazards would be less than significant.

Addendum Analysis

The Housing Element Update and Rezone would not increase potential impacts related to geology and soils as the sites are currently zoned for urban development and would not expand potential geology and soils impacts into new areas. Individual projects under the Housing Element Update and Rezone would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations such as the California Building Code and International Building Code's regulations and standards regarding seismic safety of buildings and structures. Because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Zoning Ordinance Update would not result in any physical development.

Conclusion

The proposed Project would not result in geology and soils impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of geology and soils is required.

6.9 Greenhouse Gas Emissions

General Plan EIR Greenhouse Gas Emissions Findings

Greenhouse gas emissions was added to the CEQA Guidelines in 2007 as a separate environmental issue area. Thus, the General Plan EIR (certified February 2003) does not include a chapter or section dedicated to analysis of impacts to greenhouse gas emissions. A discussion of impacts is provided below.

Addendum Analysis

The Housing Element Update is a policy document consistent with the General Plan. Because it is a policy document, the Housing Element Update would not directly result in impacts to greenhouse gas emissions or adopted plans for the purpose of reducing greenhouse gases. Future development consistent with the Housing Element Update and Rezone would be required to adhere to applicable climate and greenhouse gas emissions policies and regulations including consistency with targets established by SB 32, AB 32, SB 97, and SB 375. Furthermore, the proposed Project would facilitate development within the city to accommodate planned growth which would reduce vehicle miles travelled (VMT) and therefore reduce greenhouse gas emissions by promoting the creation of housing in areas near transit and other necessary services. With compliance with existing regulations, impacts related to greenhouse gas emissions would be less than significant. Future development facilitated by the Project would undergo project-specific developmental review and

would be required to adhere to State and City building standards and policies designed to reduce greenhouse gas emissions with new residential construction, such as CCR Title 20, Division 2, *State Energy Resources Conservation and Development Commission*; and CCR Title 24, Part 11, *California Green Building Standards Code*, Tier 1. The Zoning Ordinance Update would not result in any physical development.

Conclusion

The Project would result in less than significant greenhouse gas impacts. The Project would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of greenhouse gas emissions is required.

6.10 Hazards and Hazardous Materials

General Plan EIR Findings

The General Plan EIR does not discuss hazards and hazardous materials impacts in detail. However, even though hazards and hazardous materials was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential hazards and hazardous materials impacts would be less than significant.

Addendum Analysis

The Housing Element Update and Rezone would not increase potential impacts related to hazard and hazardous materials. Individual projects under the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted federal, state, and local regulations. Furthermore, because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. The Zoning Ordinance Update would not result in any physical development.

Conclusion

The proposed Project would not result in hazards and hazardous materials impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of hazards and hazardous materials is required.

6.11 Hydrology and Water Quality

General Plan EIR Findings

The General Plan EIR discusses hydrology and water quality in Sections 4.02, *Flooding*, 4.06, *Ground Water*, and 4.07, *Surface Waters*. The General Plan EIR determined that flooding impacts would be less than significant. The General Plan EIR determined that implementation of the General Plan would result in increased usage of groundwater, which would contribute to cumulative groundwater

overdraft. Several strategies in the Exeter's General Plan would serve as mitigation measures for this impact including, educating the community about water-saving methods for homes and workplace, requiring drought-tolerant trees, shrubs, and groundcovers in current and future parks, and developing storm ponding and retention basins for groundwater recharge, which can also serve as recreational areas or wildlife habitats. Despite this, impacts to groundwater would remain significant and unavoidable. Impacts on surface waters were determined to be less than significant with the implementation of mitigation measures. The mitigation measure includes requiring developments to channel water to retention or detention basins, which help filter contaminants and are managed by the Public Works Department.

Addendum Analysis

The Housing Element Update and Rezone would not increase potential impacts related to hydrology and water quality as the opportunity and rezone sites are located within urban areas and do not expand potential hydrology and water quality impacts into new areas. Individual projects under the Housing Element Update and Rezone would undergo project-specific developmental review, including design review, and would be subject to adopted regulations including Section 7.32 of the Exeter Municipal Code which contains the City's Water Conservation Ordinance. Future developments that result from the implementation of the proposed Project would be subject to existing General Plan policies as well, such as Policies 5 through 8 on page B-1 of the Open Space, Parks, and Recreation element, which promote water conservation and community awareness, require drought-tolerant landscaping in parks, enhance groundwater recharge through stormwater management, and monitor hazardous waste areas to protect water quality. The Housing Element Update and Rezone would also be subject to requirements of applicable permits such as the NPDES and MS4 permits. The Zoning Ordinance Update would not result in any physical development. The proposed Project would not result in new hydrology and water quality impacts from new development as evaluated in the certified EIR.

Conclusion

The proposed Project would not result in hydrology and water quality impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of hydrology and water quality is required.

6.12 Land Use and Planning

General Plan EIR Findings

The General Plan EIR does not discuss land use and planning impacts in detail. However, even though land use and planning was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential land use planning impacts would be less than significant.

Addendum Analysis

Future development facilitated by the Housing Element Update and Rezone would undergo project-specific developmental review, including design review, and would be subject to adopted development standards and policies including those in the Land Use Element of the General Plan.

The opportunity and rezone sites would not result in inconsistencies with current land use plans or divide communities because the rezone sites are located in infill development areas, and would be rezoned from low density residential, general commercial, and planned development to high-density residential and central commercial. The Zoning Ordinance Update would not result in any physical development.

Adherence to the goals and policies included in the Land Use Element of the General Plan would ensure future development would not conflict with a land use plan or policy. Additionally, because the Project would facilitate the development of housing primarily on infill sites within the city, development facilitated by the proposed Project would not divide an established community.

Conclusion

The proposed Project would not result in land use and planning impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of land use and planning is required.

6.13 Mineral Resources

General Plan EIR Findings

The General Plan EIR does not discuss mineral resources impacts in detail. However, even though mineral resources was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential impacts to mineral resources would be less than significant.

Addendum Analysis

There are no known significant mineral resources or mining operations in the city of Exeter. The City of Exeter is not located in a mineral resource zone and the nearest mineral resource zone is 5 miles northwest (DOC 1997). Therefore, the Project would have no impact on mineral resources, similar to the General Plan EIR.

Conclusion

The proposed Project would not result in mineral resource impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of mineral

6.14 Noise

General Plan EIR Findings

The General Plan EIR discusses impacts related to noise in Section 4.03. The General Plan EIR determined Development consistent with the General Plan will increase traffic, leading to higher long-term noise levels in residential areas near major roads. Short-term noise from construction will have minimal impact, while long-term traffic noise could affect sensitive land uses. Mitigation

Measures for noise from roadways include installing sound barriers like walls or berms, or increasing distance between roads and buildings. However, even with the implementation of these measures, the General Plan EIR determined that impacts related to increased noise from roadways to sensitive receptors would remain significant and unavoidable.

Addendum Analysis

Future development facilitated by the Project would undergo project-specific developmental review, including design review, and would be subject to adopted development standards and policies including those in the Noise Element of the general plan and the Mitigation Measures mentioned in the General Plan EIR Findings. The opportunity and rezone sites would not result in overall greater total development than was envisioned by the General Plan. The Zoning Ordinance Update would not result in any physical development. Because the Project would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The proposed Project would not result in noise impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of noise is required.

6.15 Population and Housing

General Plan EIR Findings

The General Plan EIR does not discuss population and housing impacts in detail. However, even though population and housing was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential population and housing impacts would be less than significant.

Addendum Analysis

As discussed in Section 2.7 of this document, the proposed Project would promote the development of housing to meet the City's RHNA requirement and ensure that the Housing Element is in compliance with state law to accommodate anticipated population growth within the city. Future development facilitated by the Housing Element Update and Rezone would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations. The Zoning Ordinance Update would not result in any physical development. Furthermore, because the Housing Element Update and Rezoning would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The proposed Project would not result in population and housing impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more

significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of population and housing is required.

6.16 Public Services

General Plan EIR Findings

The General Plan EIR briefly discusses public services in Section 8 of the General Plan EIR. Impacts resulting from the implementation of the General Plan on law enforcement, fire protection, and medical aid services were determined to be less than significant.

Addendum Analysis

The Housing Element Update and Rezone would not result in an increase in buildout above the buildout assumed in the General Plan EIR. Additionally, the fundamental regulations and requirements of the General Plan and Zoning Code, such as meeting design standards, would still apply to all projects in the city, including the proposed Project. Goals and policies in the Safety Element of the General Plan would enhance public services such as police and fire protection and ensure effective emergency access. These goals, policies, and measures would continue to be required with implementation of the proposed Project.

Future development facilitated by the Housing Element Update would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations, including General Plan policies and community public facilities fees established in the City's Municipal Code. The Zoning Ordinance Update would not result in any physical development. Because the Housing Element Update and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The proposed Project would not result in public services impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of public services is required.

6.17 Recreation

General Plan EIR Findings

The General Plan EIR does not discuss recreation impacts in detail; however, because it is now required, a discussion of impacts is provided below.

Addendum Analysis

The Housing Element Update and Rezone would not result in an increase in buildout above the buildout assumed in the General Plan EIR, thereby resulting in no increase in recreation impacts as compared to the General Plan. Additionally, goals and policies in the Open Space, Parks, and

Recreation Element of the General Plan, such as the policy which requires the City to provide high quality park and open space systems that are convenient, accessible, and affordable to all segments of the City, would continue to apply to future development.

Future development facilitated by the Housing Element Update and Rezone would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations, including General Plan policies and community park and recreation fees established in the City's Municipal Code. The Zoning Ordinance Update would not result in any physical development. Furthermore, because the Housing Element and Rezone would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The proposed Project would not result in recreation impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of recreation is required.

6.18 Transportation

General Plan EIR Findings

The General Plan EIR does not discuss transportation impacts in detail. However, even though transportation was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential transportation impacts would be less than significant. A discussion of impacts is provided below.

Addendum Analysis

No specific developments are being approved as part of the Project; therefore, the Project would not directly or indirectly result in transportation impacts. The Housing Element Update and Rezone promotes infill housing within the city to accommodate planned growth which would reduce VMT by promoting the creation of housing in areas near transit and other necessary services within the city. Future development facilitated by the Project would undergo project-specific developmental review and would be subject to adopted policies and programs identified in the General Plan EIR. The Zoning Ordinance Update would not result in any physical development.

Because the Housing Element Update would not facilitate development beyond what was considered in the General Plan EIR, the Project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

Conclusion

The Project would not result in transportation impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of transportation is required.

6.19 Tribal Cultural Resources

General Plan EIR Findings

Tribal Cultural Resources was added to the CEQA Guidelines in 2016 as a separate environmental issue area. Thus, the General Plan EIR (certified February 2003) does not include a chapter or section dedicated to analysis of impacts to tribal cultural resources. As the Notice of Preparation for the General Plan EIR was published before July 1, 2015, tribal consultation pursuant to Assembly Bill (AB) 52 was not required.

Addendum Analysis

In accordance with the requirements of SB 18, the City requested a tribal contact list from the California Native America Heritage Commission (NAHC) on August 20, 2024. NAHC responded to the City's request on August 23, 2024, providing a list of 32 contacts from 20 Native American tribal organizations that should be invited to consult with the City.

On October 18, 2024, the City sent letters inviting Big Pine Paiute Tribe of the Owens Valley, Big Sandy Rancheria of Western Mono Indians, Bishop Paiute Tribe, Cold Springs Rancheria of Mono Indians of California, Death Valley Timbi-sha Shoshone Tribe, Dumna Wo-Wah Tribal Government, Dunlap Band of Mono Indians, Fort Independence Indian Community of Paiutes, Kern Valley Indian Community, Kitanemuk & Yowlumne Tejon Indians, Lone Pine Paiute-Shoshone Tribe, Mono Lake Kutzadika Tribe, North Fork Mono Tribe, Santa Rosa Rancheria Tachi Yokut Tribe, Table Mountain Rancheria, Traditional Choinumni Tribe, Tubatulabals of Kern Valley, Tule River Indian Tribe, Utu Utu Gwaitu Tribe of the Benton Paiute Reservation, and the Wuksachi Indian Tribe/Eshom Valley Band to consult with the City under the provisions SB 18. The invitations advised the tribes that if consultation was desired, then they must formally accept the invitation in writing within 90 days of receipt of the City's letter pursuant to SB 18. The City received no responses.

The proposed Project would not directly propose or authorize specific development and would not directly result in impacts to tribal cultural resources such as causing a substantial adverse change in the significance of a tribal cultural resource. The proposed rezoning would not increase potential impacts to tribal cultural resources as the opportunity and rezone sites are located within an urban area. Future development facilitated by the Project would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations and possibly subject to AB 52 compliance. The Zoning Ordinance Update would not result in any physical development. Therefore, impacts would be less than significant.

Conclusion

The proposed Project would not result in significant tribal cultural resources impact. Impacts would not be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of tribal cultural resources is required.

6.20 Utilities and Service Systems

General Plan EIR Findings

The General Plan EIR briefly discusses public services in Section 8 of the General Plan EIR. Impacts resulting from the implementation of the General Plan on sewer, water, and storm drainage systems would be less than significant.

Addendum Analysis

As described above, the proposed Project would not exceed the buildout projections considered as part of the 2003 General Plan EIR. As such, the proposed Project would not result in an increase in demand for water supply, wastewater, or solid waste services. Future development facilitated by the Project would undergo project-specific developmental review, including design review, and would be subject to adopted development regulations. The proposed Project would not result in new utilities impacts not discussed in the General Plan EIR or an increase in the severity of utilities impacts.

The proposed Project does not directly propose or authorize specific development. Because the Project is a regulatory update, the proposed Project would not directly result in impacts to electricity and telecommunications utilities. Future development facilitated by the Project would undergo project-specific developmental review, including design review, and would be required to comply with General Plan goals and policies related to utilities and service systems. Therefore, the impacts would be less than significant.

Conclusion

The proposed Project would not result in utility impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the proposed Project and no additional environmental assessment of utilities is required.

6.21 Wildfire

General Plan EIR Findings

The General Plan EIR does not discuss wildfire impacts in detail. However, even though wildfire was not formally analyzed, based on preliminary assessments and the nature of the Project, it is anticipated that any potential wildfire impacts would be less than significant.

Addendum Analysis

There are no State Responsibility Areas (SRAs) or Very High Fire Hazard Severity Zones (VHFHSZ) within the city of Exeter (CALFIRE 2024). The nearest HFHSZ is approximately 1.7 miles east of the City and the nearest VHFHSZ is 14.4 miles east of the City. Because it is a policy document, the Housing Element Update would not directly result in impacts to wildfire. Future development facilitated by the Project would undergo project-specific review and would be subject to adopted development standards including the California Fire Code. With implementation of these standards, impacts would be less than significant. The Zoning Ordinance Update would not result in any physical development.

Conclusions

The proposed Project would have less than significant wildfire impacts. The Project would not result in impacts beyond those addressed or analyzed in the General Plan EIR nor present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the Project and no additional environmental assessment of wildfire is required.

7 Cumulative Impacts

In addition to the specific impacts of individual projects, CEQA requires consideration of potential cumulative impacts of the proposed Project. CEQA defines “cumulative impacts” as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed Project and other past, present, and probable future projects producing related or cumulative impacts. For example, noise impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. The cumulative impact analysis provides a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA Guidelines Section 15130 requires cumulative impact analysis in EIRs to consider either a list of planned and pending projects that may contribute to cumulative effects or a summary of projections contained in an adopted planning document such as a general plan.

7.1 General Plan EIR Findings

Section 7.04 of the General Plan EIR discusses cumulative impacts. The cumulative setting for the analysis in the General Plan EIR is explained in Section 5.6, *Cumulative Setting*. As stated in that section, cumulative impacts of the General Plan were considered based on regional boundaries, projected regional or area-wide conditions, or based on development anticipated within the vicinity of the city. The cumulative analysis considered development allowed by existing general plan documents for adjacent jurisdictions.

The General Plan EIR determined that cumulative impacts related to air quality, agricultural and forestry resources, and hydrology and water quality would be cumulative impacts. All other impacts were determined to have no significant cumulative impacts.

7.2 Addendum Analysis

Since certification of the 2003 General Plan EIR, there has been no new development proposed within the City that was not considered as part of the 2003 General Plan EIR. There are no new substantial cumulative projects in the City or adjacent jurisdictions that were not previously considered in the 2003 General Plan EIR cumulative impact analysis. The cumulative conditions in the 2003 General Plan EIR have not substantially changed; therefore, the cumulative setting in the 2003 General Plan EIR remains the same for the purposes of this analysis.

The proposed Project would not result in new impacts compared to the previous 2003 General Plan EIR as analyzed in this Addendum. While the Project would result in the potential future development of a greater number of housing units in the City than analyzed in the 2003 General Plan EIR, the physical development area of the City would not be modified. Therefore, no new or additional cumulatively considerable contributions to a significant cumulative impact would occur as a result of the Project.

7.3 Conclusion

The proposed Project would not result in new or more severe cumulatively considerable impacts than were identified in the 2003 General Plan EIR. No new or substantially more severe significant effects would occur to cumulative impacts, and no new mitigation measures are required. No substantial changes have occurred that require major revisions to the 2003 General Plan EIR. There is no new information indicating that the proposed Project would have new significant impacts or substantially more severe significant impacts with respect to cumulative impacts than were identified in the 2003 General Plan EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR have been met.

8 Conclusion

The City of Exeter, acting as the lead agency, determined that an addendum is the appropriate environmental document under CEQA because the proposed Project would not require revisions to the certified General Plan EIR due to the involvement of new significant environmental effects or substantial increases in the severity of significant effects previously identified in the General Plan EIR.

There are no changed circumstances or new information that meets the standards for requiring further environmental review under CEQA Guidelines Section 15162. Thus, these circumstances and information would not result in new or more severe impacts beyond what were addressed in the General Plan EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3). No additional analysis is required based on the discussions throughout this addendum. The proposed Housing Element Update would not involve development in areas not assumed for development in the General Plan EIR, nor would it result in population growth and density beyond what was analyzed in the General Plan EIR. The Project would not result in significant or substantially more severe impacts that were not discussed in the General Plan EIR. Also, there are no previously identified significant effects which, as a result of substantial new information that was not known at the time of the previous environmental review, would be substantially more severe than discussed in the General Plan EIR. Accordingly, no additional CEQA review is required.

CEQA Guidelines Section 15164 states that “[t]he lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.” An addendum is therefore appropriate because, as explained above, none of the conditions calling for preparation of a subsequent EIR have occurred.

9 References

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9.2 List of Preparers

Rincon Consultants, Inc. prepared this EIR Addendum under contract to the City of Exeter. Persons involved in data gathering analysis, project management, and quality control are listed below.

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