

F6 Housing Resources and Site Inventory Analysis

This section documents the methodology and results of the Site Inventory analysis conducted to demonstrate the City of Los Banos’ ability to meet its share of the 6th cycle Regional Housing Needs Allocation (RHNA). This section also discusses infrastructure, services, and financial and administrative resources that are available for the development, rehabilitation, and preservation of housing in the City of Los Banos. 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 available land, and community input. Community engagement events, including a community workshop held in Los Banos on August 31, 2023, influenced the selection of opportunity sites.

F6.1 Regional Housing Needs Allocation

This Housing Element covers the planning period of January 2024 through January 2032 (also referred to as the 6th cycle). The Merced County Association of Governments (MCAG), as the metropolitan planning organization for the Merced 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

Los Banos must identify adequate land with appropriate zoning and development standards to accommodate its assigned share of the region’s housing need. Los Banos’ share of the RHNA is 3,132 units, which is distributed among five income categories, as shown in Table F6-1.

Table F6-1 Los Banos 2024-2032 RHNA

Income Category (Percent of Tulare County Area Median Income [AMI])	Number of Units	Percent of Total Units
Extremely Low (< 30% of AMI)*	375	12.0%
Very Low (30 to 50% of AMI)	344	11.0%
Low (51 to 80% of AMI)	493	15.7%
Moderate (81% to 120% of AMI)	566	18.1%
Above Moderate (> 120% of AMI)	1,354	43.2%
Total	3,132	100%

*The RHNA does not project the need for extremely low-income units, but pursuant to Government Code (GC) Section 65583(a), 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 719 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, 26.2 percent of households in the city earned less than 50 percent of the AMI. Among these households, 52.1 percent earned incomes below 30 percent (extremely low). Therefore, the City’s RHNA allocation of 719 very low-income units was distributed as 375 extremely low (52 percent of the 719 very low-income units required by the RHNA) and 344 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: MCAG, 2022. Final Regional Housing Needs Plan.

F6.2 Meeting the RHNA

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

Once the City has demonstrated 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 available funding resources to and facilitate the development of affordable housing.

F6.2.1 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.

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 are under construction but 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 F6-2 and the locations of these projects are shown on Figure 6.4-6-2. For the purpose of this Housing Element, the city is divided into four neighborhoods: Central Los Banos, North Los Banos, South Los Banos, and East Los Banos.

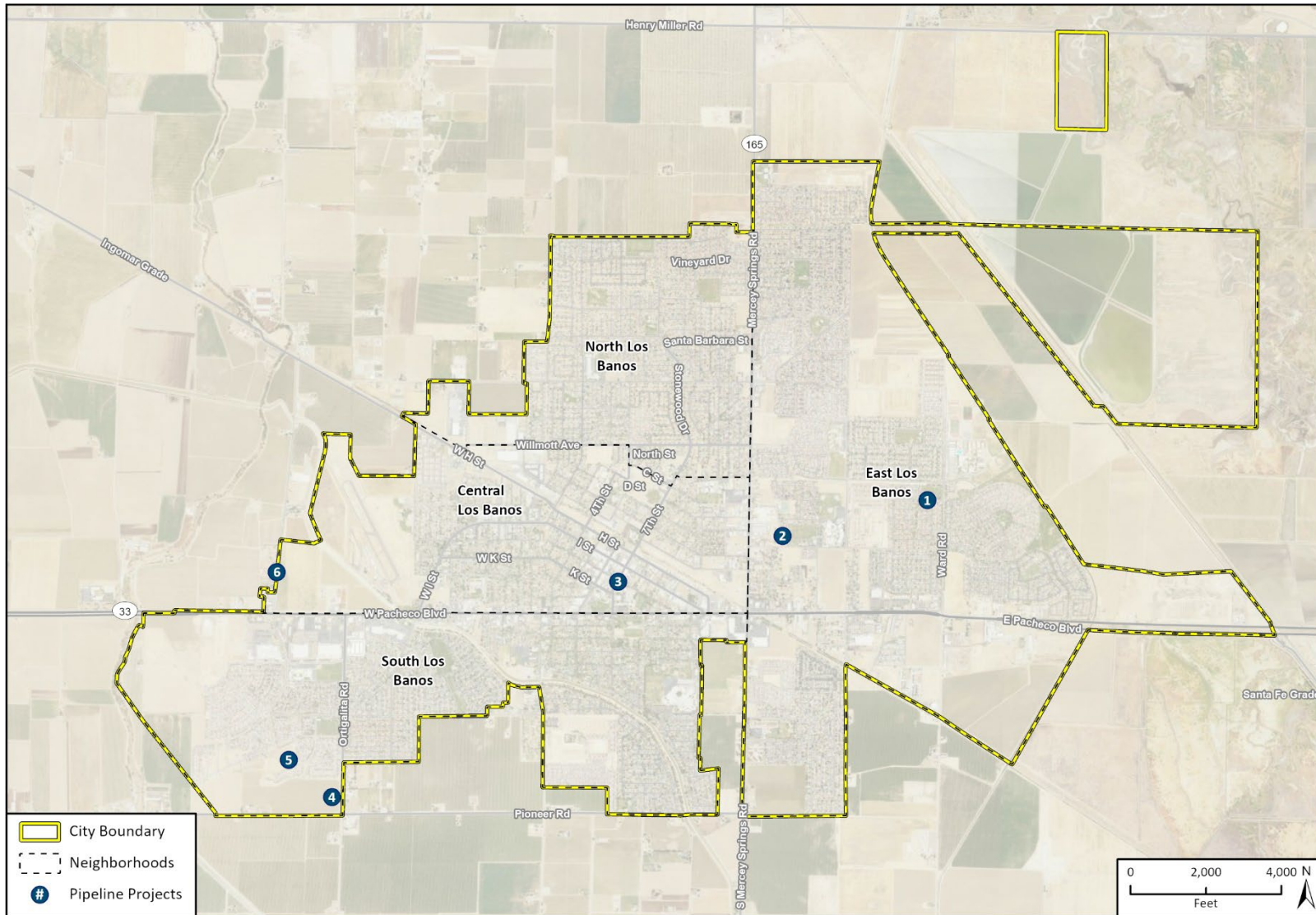
Pipeline projects are mostly concentrated in Northeast and Northwest Los Banos and consist of single-family and multi-family projects. Based on the current status of these projects, all units are expected to receive Certificates of Occupancy during the 2023-2031 planning period. La Plaza Inn Conversion has units available for extremely low-income households as a homeless permanent supportive housing complex. There are no known barriers that would impede the completion of these projects.

Table F6-2 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	Percent of Maximum Density Achieved	Status	Estimated Completion Date
1	Southpointe Phase 8	428-220-001 thru 063	0	0	0	63	63	84%	Permitted	24-Feb
2	Racquet Club Estates	428-320-001 thru 014	0	0	30	0	30	48%	Approved	24-Jun
3	Sunset Hills Development	026-053-008, 021, 022	0	4	11	0	15	167%	Planned	2025
4	Villages at Stonecreek IX	430-060-020	0	0	0	72	72	62%	Approved	2027
5	Villages at Stonecreek IV	430-060-022, 023	0	0	0	160	160	85%	Approved	2025
6	La Plaza Inn Conversion	081-140-008	60	0	0	0	60	83%	Planned	2024
Total			60	4	41	295	400			

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.

Figure F6-1 Pipeline Projects



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Additional data provided by County of Merced, 2023.

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Pipeline Projects - Los Banos

Accessory Dwelling Units

Based on an analysis of ADU production in Los Banos over the last five years (2018 through 2022), ADU production that will occur during the 6th housing cycle has been estimated and assumed against the City’s RHNA obligation.

The City issued an average of five ADU building permits per year during the last five years. Extrapolated over the 2024-2032 Housing Element planning period, the City can assume the production of 40 ADUs. ADUs permitted in previous years have been reported in the very low and low-income categories without deed restrictions. While it is likely that some ADUs may be affordable to lower- or moderate-income households, due to the relatively small sample size of permitted ADUs, all anticipated ADUs were conservatively assigned to the above moderate-income category. Table F6-3 shows the recent history of ADU permit issuance.

Table F6-3 Accessory Dwelling Unit Production

Reporting Year	ADU Building Permits Issued
2018	0
2019	2
2020	1
2021	18
2022	4
Total	25
Annual Average	5

F6.3 Summary of RHNA Credits

The City can satisfy approximately 14 percent of its RHNA requirement with planned and approved units and projected ADU development. 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 2,692 units. This unit count is broken down by household income level. As shown on Table F6-4, Los Banos has a remaining RHNA of 659 units affordable to very low-income households, 489 units affordable to low-income households, 525 units affordable to moderate-income households, and 1,019 units affordable to above moderate-income households.

Table F6-4 Remaining Share of RHNA

Affordability Category (Percent of AMI)	RHNA Allocation	Units Pending or Approved or under Construction	Estimated ADUs	Remaining RHNA
Very Low	719	60	0	659
Low	493	4	0	489
Moderate	566	41	0	525
Above Moderate	1,354	295	40	1,019
Total	3,132	400	40	2,692

F6.4 Methodology

F6.4.1 Suitable Sites for Affordable Housing

State law requires that jurisdictions demonstrate in the Housing Element that the land inventory is adequate to accommodate that jurisdiction's share of the regional growth. State law has established "default" density standards for the purpose of estimating potential units by income range. In a suburban jurisdiction, a density standard of 20 or more units per acre (primarily for higher-density multi-family developments) would facilitate the development of housing in the lower-income category.

In addition to default density standards, the California Legislature established size requirements for parcels intended to support the development of lower-income units. Government Code Section 65583.2 establishes that sites between 0.5 and 10 acres in size which are zoned for residential development at greater than 20 units per acre are suitable for lower-income projects. Very small parcels, even when zoned for high densities, may not facilitate the scale of development required to access competitive funding resources. Conversely, typically lower-resource affordable housing developers may be unable to finance the scale of project necessitated by very large parcels. No standalone parcels smaller than 0.5 acres are assumed to accommodate lower-income units. The City assumed no more than 150 lower-income units on any individual site.

F6.5 Nonvacant Sites

Nonvacant sites included on 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 Merced County has occurred primarily on vacant sites and sites occupied by agriculture.

The Housing Element must analyze the extent to which existing uses may impede additional residential development. The Site Inventory accommodates approximately 83 percent of its lower-income RHNA, 67 percent of its moderate-income RHNA, and 72 percent above moderate-income RHNA on vacant sites. As a result of insufficient available vacant land, the City identified the remaining 17 percent of its lower-income RHNA, 33 percent of its moderate-income RHNA, and 28 percent above moderate-income RHNA is proposed on sites currently used by agricultural uses.



F6.5.1 Adequacy of Nonvacant Sites

Of the 66 sites included in the Site Inventory, 60 are vacant and six are on agricultural land. The City anticipates development of these uses to accommodate low- and medium-density residential uses. In considering sites, the City has identified that agricultural land could facilitate the development of a variety of housing types throughout the city. Housing development on agricultural lands are discussed below. All identified nonvacant sites are on sites currently uses as agriculture and were selected for their redevelopment potential and higher probability of turnover, as seen in Table F6-5 were selected through average number of units and average acreage. Of the nonvacant sites in agricultural land, the average number of units is 123 and the average acreage is 14.93.

These sites have similar predevelopment characteristics as the following regional projects discussed in Chapter 4, *Regional Housing Resources*:

- Stocking Street
- Manzanita
- Sundance Village
- The Villas
- Westbrook

Table F6-5 Representative Nonvacant Sites

Site Address	Description	Size (Acres)	Capacity (Units)	Aerial Image
Overland Dr	This 13.96-acre parcel is currently utilized as agricultural land and is zoned low-density residential. With its current zoning designation, the site could accommodate 76 dwelling units.	13.96	76	
Place Rd	This 15.80-acre parcel is currently utilized as agricultural land and is zoned low-density residential. With its current zoning designation, the site could accommodate 86 dwelling units.	15.80	86	

F6.6 Development Trends

As discussed in detail in Chapter 4, *Regional Housing Resources*, 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. Out of the 17 projects identified, 13 are single-family developments, and four are multi-family developments. Approximately 12 percent of these projects include affordable units.

The densities of these projects range from 1.64 to 51.34 dwelling units per acre due to the various zoning requirements in each jurisdiction. The average density of projects with affordable units is approximately 37 dwelling units per acre, and these projects typically achieved a density of 135 percent of the maximum density allowed by the zoning district.

Projects located in low-, medium-, and high-density residential zones typically achieved a density of 67, 60, and 84 percent, respectively, of the maximum density allowed by the zoning district. Overall, the average achieved density is 8.8 dwelling units per acre, which is low. This can be attributed to the predominance of single-family residential developments in the region.

Of the projects discussed in Chapter 4, *Regional Housing Resources*, two projects used to determine regional development trends are in Los Banos: Manzanita and Sundance Village. Both projects consist of market rate single family units. These projects have an average density of approximately four units per acre with an average achieved density of 55 percent of the maximum density allowed by the zoning district, as shown in Table F6-6.

Table F6-6 Los Banos Development Trends

Project Name	Total Units	Acreage	Density	Zoning District	Zoning District Density (du/ac)	Number of Units Allowed	Percent Density Achieved
Overland Court Apartments	70	4.68	14.96	Multi-family (high density)	30	140.40	50%
The Villas	231	58.95	3.92	Single-Family (medium density)	18	1061.10	22%
Sunrise Ranch	197	43	4.58	Single-Family (low density)	6	258.00	76%
Westbrook	162	37.81	4.28	Single-Family (low density)	6	226.86	71%
Los Banos Average			6.94				55%
Regional Average			8.80				70%

F6.6.1 Realistic Development Capacity

To create a realistic development assumption, 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. Sites do not always develop to their full capacity potential due to factors such as site-specific conditions and development standards such as open space or parking requirements. To determine a realistic development achievement on the sites in the inventory, the City reviewed pipeline and recently developed projects in the region. On average, the pipeline projects in Los Banos, as shown in Table F6-2, achieved an average density of 88 percent of the maximum density allowed on the site based on the site's zoning and development standards. As discussed in Chapter 4, *Regional Housing Resources*, the average achieved density for projects collectively in the region is 70 percent. Based on the local and regional trends, the City conservatively assumes the realistic capacity of each site would be 70 percent of the maximum density allowed under the applicable zoning or general plan designation.

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

- Low Density Residential (R-1): This district allows for single-family residential uses with one unit per 6,000 square feet of lot area, equal to a residential density of 7.26 dwelling units per acre.
- Medium Density Residential (R-2): This district allows for triplexes, duplexes, attached or detached single-family dwellings residential uses with one unit per 4,000 square feet of lot area, equal to a maximum residential density of 10.89 dwelling units per acre.
- High Density Residential (R-3): This district allows for multi-family residential uses, including apartments and triplexes with one unit per 1,500 square feet of lot area, equal to a maximum residential density of 30 dwelling units per acre.
- Mixed-Use Residential (R-C): This district allows for mixed-use residential uses with a maximum residential density of 30 units per acre.

The distribution of income levels among sites was determined by zone, district, and parcel size. It is typical for units in single-family zones to be affordable only to above moderate-income households. Within multi-family zones that have a higher density, units are more likely to be affordable to lower- and moderate-income households.

Table F6-7 details the realistic capacity of available sites by zoning district.

Table F6-7 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	177.32	7.26	5.08	0	0	891	891
R-2	98.81	20	14	767	625	160	1,552
R-3	37.40	30	21	470	32	279	781
R-C	9.08	30	15	133	0	0	133
Total	316.31			1,370	657	1,330	3,357

F6.6.2 Likelihood of 100 Percent Nonresidential Uses on Sites

The City identifies units in zones that allow for 100 percent nonresidential uses. In accordance with state law, the housing element must consider the likelihood of nonresidential development on sites that allow for nonresidential uses. To determine likelihood, the city reviewed development that has occurred in nonresidential zones within the last five years. During this time period, there have not been any developments constructed in the R-C zone. Under Program 7, the city commits to expand affordable housing options across all income categories through contacting non-profit and private developers to facilitate housing production and pursue funding opportunities.

Given the lack of development trends, the Site Inventory considers potential nonresidential development in the R-C zone by assuming conservative realistic densities compared to past and current regional trends and maintaining an adequate buffer of units for all RHNA income categories. All units on R-C sites were allocated to the lower-income category. If 100 percent of the sites in the R-C zone were developed with 100 percent nonresidential uses, the Site Inventory would still maintain a 7 percent buffer of lower-income units. Additionally, the inventory conservatively assumes a realistic allowable density of 15 dwelling units per acre in the R-C zone, 50 percent of the maximum density allowed in the R-C zone. The City will continue to evaluate all future mixed-use development to determine how often development has a residential component edits look good and make adjustments, as necessary, to maintain adequate sites throughout the planning period.

F6.7 Site Inventory

The Site Inventory lists all sites or parcels that are intended to accommodate residential development in fulfillment of Los Banos’ RHNA. The inventory is broken up into four distinct geographic areas of the city:

- North Los Banos
- Central Los Banos
- South Los Banos
- East Los Banos

Sites included in the inventory are listed in Table F6-8 and Table F6-9. 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 Section 65583.2(b)1))
- Size in acres (Government Code Section 65583.2(b)(2))
- General Plan land use designation (Government Code Section 65583.2(b)(2))
- Zoning designation (Government Code Section 65583.2(b)(2))
- Description of existing uses (Government Code Section 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 Section 65583.2(c))
- Total number of units realistically assumed on the site
- Opportunity category as designated by the California Tax Credit Allocation Committee (TCAC)¹

The current zoning of the selected sites is shown geographically in Figure F6-2. There are no known barriers outside of financing that would preclude development of these parcels in the planning period.

These sites are also assessed by TCAC Opportunity area which range from areas of High Segregation and Poverty to the Highest Resource areas. The more positive economic, educational, and health outcomes for low-income families, particularly long-term outcomes for children, the higher the score. The scores in each CDP are listed below and a breakdown of each opportunity category is discussed in Chapter F5: *Affirmatively Furthering Fair Housing*.

North Los Banos

North Los Banos is bounded by city boundaries to the north and west, West Willmott to the south, and North Mercy Springs Road to the east. This area primarily consists of low-density residential zones. North Los Banos is in an area of minimal flood hazard². This neighborhood can accommodate three sites and has an assumed capacity of 24 low-income units and 103 above moderate-income units. All sites identified in this area are currently vacant. All sites are in areas of the city that have a TCAC designation of High Resource or Moderate Resource.

¹ 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>

² 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.

Central Los Banos

Central Los Banos is bounded by West Willmott Avenue to the north, West Pacheco Boulevard to the south, North Mercy Springs Road to the east, and city boundaries to the west. This area primarily consists of commercial, industrial, and medium density residential zones. Downtown Los Banos is in an area of minimal flood hazard. This neighborhood can accommodate 18 sites with an assumed capacity of 151 lower-income units, 49 moderate-income units, and two 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 Segregation and Poverty.

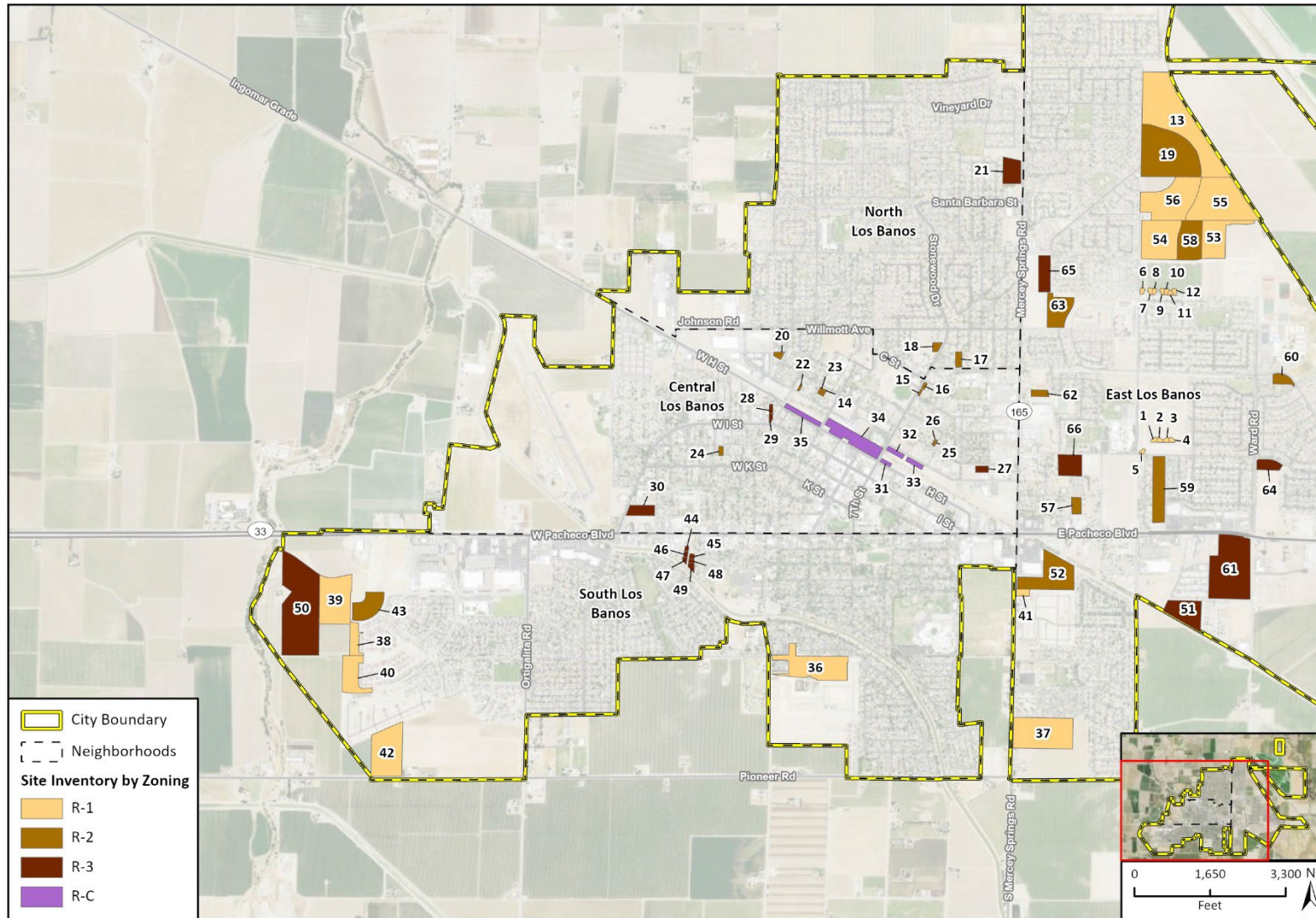
South Los Banos

South Los Banos is bounded by West Pacheco Boulevard to the north, city boundaries to the south and west, and North Mercy Springs Road to the east. This neighborhood primarily consists of low-density residential and commercial zones. South Los Banos is in an area of minimal flood hazard. South Los Banos can accommodate 13 sites with an assumed capacity of 150 low-income units, 59 moderate-income units, and 387 above moderate-income units. All sites identified in this area are currently vacant. All sites are in areas of the city that have a TCAC designation of High or Moderate Resource.

East Los Banos

East Los Banos is bounded by city boundaries to the north, south and east, El Monte Way to the north, and North Mercy Springs Road to the east. This neighborhood primarily consists of low density residential and commercial zones. East Los Banos is in an area of minimal flood hazard. East Los Banos can accommodate 32 sites with an assumed capacity of 1,045 lower-income units, 554 moderate-income units, and 834 above moderate-income units. All sites identified in this area are currently vacant or on agricultural land. All sites are in areas of the city that have a TCAC designation of Moderate Resource.

Figure F6-2 Los Banos Site Inventory



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Additional data provided by County of Merced, 2023.

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Site Inventory - Los Banos

Table F6-8 Los Banos Site Inventory – Opportunity Sites

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above	Total Capacity	TCAC Opportunity Category
											Moderate-Income Capacity		
North Los Banos													
17	East B St	025284035	1.07	Medium Density	R-2	Vacant	0	20	14	0	0	14	High Segregation and Poverty
18	7th St	082420047	0.75	Medium Density	R-2	Vacant	0	20	10	0	0	10	Moderate Resource
21	N Mercey Springs Rd	082030051	4.91	High Density	R-3	Vacant	0	30	0	0	103	103	Moderate Resource
Total			6.73						24	0	103	127	
Central Los Banos													
14	F St	025052025	0.26	Medium Density	R-2	Vacant	0	20	0	3	0	3	High Segregation and Poverty
15	708 D St	025081010	0.17	Medium Density	R-2	Vacant	0	20	0	2	0	2	High Segregation and Poverty
16	711 C St	025081014	0.26	Medium Density	R-2	Vacant	0	20	0	3	0	3	High Segregation and Poverty
20	First St	025042001	0.58	Medium Density	R-2	Vacant	0	20	0	8	0	8	High Segregation and Poverty
22	208 G St	025051014	0.17	Medium Density	R-2	Vacant	0	20	0	2	0	2	High Segregation and Poverty
23	F St	025052024	0.26	Medium Density	R-2	Vacant	0	20	0	3	0	3	High Segregation and Poverty

Merced County Association of Governments
Merced County Multi-Jurisdictional Housing Element (2024-2032)

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above		Total Capacity	TCAC Opportunity Category
											Moderate-Income Capacity	Income Capacity		
24	305 W J St	027081024	0.48	Medium Density	R-2	Vacant	0	20	0	6	0	6	High Segregation and Poverty	
25	860 F ST	025102006	0.13	Medium Density	R-2	Vacant	0	20	0	0	1	1	High Segregation and Poverty	
26	860 F ST	025102007	0.13	Medium Density	R-2	Vacant	0	20	0	0	1	1	High Segregation and Poverty	
27	1133 F ST	25152005	0.90	High Density	R-3	Vacant	0	30	18	0	0	18	High Segregation and Poverty	
28	Raven Ln	027060004	0.37	High Density	R-3	Vacant	0	30	0	8	0	8	High Segregation and Poverty	
29	Raven Ln	027060007	0.32	High Density	R-3	Vacant	0	30	0	7	0	7	High Segregation and Poverty	
30	West I St	027130002	0.32	High Density	R-3	Vacant	0	30	0	7	0	7	High Segregation and Poverty	
31	H St	025114015	0.46	Mixed Use	R-C	Vacant	0	30	6	0	0	6	High Segregation and Poverty	
32	G St	025114011	0.92	Mixed Use	R-C	Vacant	0	30	13	0	0	13	High Segregation and Poverty	
33	G St	025114012	0.92	Mixed Use	R-C	Vacant	0	30	13	0	0	13	High Segregation and Poverty	

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above	Total Capacity	TCAC Opportunity Category
											Moderate-Income Capacity		
34	Henry Miller Plaza	025072036	4.77	Mixed Use	R-C	Vacant	0	30	71	0	0	71	High Segregation and Poverty
35	H St	025054006	2.02	Mixed Use	R-C	Vacant	0	30	30	0	0	30	High Segregation and Poverty
Total			13.44						151	49	2	202	
South Los Banos													
36	Center Ave	431270015	16.72	Low Density	R-1	Vacant	0	7.26	0	0	84	84	High Resource
38	Nettle Wy	430010024	3.43	Low Density	R-1	Vacant	0	7.26	0	0	17	17	High Resource
39	Prairie Springs Dr	430010027	16.32	Low Density	R-1	Vacant	0	7.26	0	0	82	82	High Resource
40	Dock Ave	430060005	7.70	Low Density	R-1	Vacant	0	7.26	0	0	39	39	High Resource
42	Pioneer Rd	430060017	16.17	Low Density	R-1	Vacant	0	7.26	0	0	82	82	High Resource
43	Prairie Springs Dr	430103002	7.02	Medium Density	R-2	Vacant	0	20	0	49	49	98	High Resource
44	Souza Rd	027171038	0.22	High Density	R-3	Vacant	0	30	0	4	0	4	High Resource
45	Souza Rd	027171040	0.29	High Density	R-3	Vacant	0	30	0	6	0	6	High Resource
46	Souza Rd	027171005	0.24	High Density	R-3	Vacant	0	30	0	0	5	5	High Resource
47	Souza Rd	027171006	0.29	High Density	R-3	Vacant	0	30	0	0	6	6	High Resource
48	Souza Rd	027171044	0.25	High Density	R-3	Vacant	0	30	0	0	5	5	High Resource

Merced County Association of Governments
Merced County Multi-Jurisdictional Housing Element (2024-2032)

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above		TCAC Opportunity Category
											Moderate-Income Capacity	Total Capacity	
49	Souza Rd	027171045	0.44	High Density	R-3	Vacant	0	30	0	0	9	9	High Resource
50	Highway 152	430010035*	7.60	High Density	R-3	Vacant	0	30	150	0	9	159	High Resource
Total			76.69						150	59	387	596	
East Los Banos													
1	Place Rd	428360003	0.27	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
2	Place Rd	428360004	0.28	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
3	Place Rd	428360009	0.27	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
4	Place Rd	428360010	0.28	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
5	Place Rd	428370041	0.24	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
6	Overland Dr	424220010	0.29	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
7	Overland Dr	424220012	0.27	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
8	Overland Dr	424220031	0.27	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
9	Overland Dr	424220033	0.28	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
10	Overland Dr	424220052	0.27	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
11	Overland Dr	424220053	0.23	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource

City of Los Banos
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	Total Capacity	TCAC Opportunity Category
											Moderate-Income Capacity		
12	Overland Dr	424220054	0.28	Low Density	R-1	Vacant	0	7.26	0	0	1	1	Moderate Resource
13	Westminster Wy	424010005	28.50	Low Density	R-1	Vacant	0	7.26	0	0	144	144	Moderate Resource
13	Westminster Wy	424010005*	28.50* *	Medium Density	R-2	Vacant	0	20	150	277	0	427	Moderate Resource
37	Marcy Springs Rd	083100019	20.00	Low Density	R-1	Agriculture	0	7.26	0	0	101	101	Moderate Resource
41	Mercey Springs Rd	083100009	1.00	Low Density	R-1	Vacant	0	7.26	0	5	5	5	Moderate Resource
51	Gilbert Gonzalez Jr Dr	083100084*	8.48	High Density	R-3	Vacant	0	30	150	0	27	177	Moderate Resource
52	Mercey Springs Rd	083130042	14.00	Low Density	R-2	Vacant	0	7.26	0	0	71	71	Moderate Resource
53	Overland Dr	424120031	10.15* **	Low Density	R-1	Agriculture	0	7.26	0	0	51	51	Moderate Resource
53	Overland Dr	424120031*	11.00* *****	Medium Density	R-2	Agriculture	0	20	150	0	0	150	Moderate Resource
54	Place Rd	424120030	15.80	Low Density	R-1	Agriculture	0	7.26	0	0	80	80	Moderate Resource
55	Place Rd	424010006	24.31* ***	Low Density	R-1	Agriculture	0	7.26	0	0	123	123	Moderate Resource
55	Place Rd	424010006*	19.45* ****	Medium Density	R-2	Agriculture	0	20	150	272	0	422	Moderate Resource
57	Canal Farm Ln	428150001	1.77	Medium Density	R-2	Vacant	0	20	24	0	0	24	Moderate Resource
59	San Luis St	428160001	5.24	Medium Density	R-2	Vacant	0	20	0	0	73	73	Moderate Resource
60	Snow Goose Dr	084010094	2.04	Medium Density	R-2	Vacant	0	20	0	0	28	28	Moderate Resource

Merced County Association of Governments
Merced County Multi-Jurisdictional Housing Element (2024-2032)

Map ID	Site Address or Street	APN	Acres	Land Use	Zoning	Current Use	Minimum Density	Maximum Density	Lower-Income Capacity	Moderate-Income Capacity	Above		TCAC Opportunity Category
											Moderate-Income Capacity	Total Capacity	
61	1445 Ward Rd	083140021*	11.00	Medium Density	R-3	Vacant	0	20	150	0	4	154	Moderate Resource
62	Mercey Springs Rd	428030006	1.00	Medium Density	R-2	Vacant	0	20	14	0	0	14	Moderate Resource
63	Willmott Road	428310011	7.54	Medium Density	R-2	Vacant	0	20	105	0	0	105	Moderate Resource
64	Ward St	84020038	2.61	High Density	R-3	Vacant	0	30	54	0	0	54	Moderate Resource
65	Overland Ave	424120034	4.70	High Density	R-3	Vacant	0	30	98	0	0	98	Moderate Resource
66	San Luis St	428121012	5.48	High Density	R-3	Vacant	0	30	0	0	115	115	Moderate Resource
Total			225.80						1,045	549	838	2,432	
Los Banos Total			322.66						1,370	657	1,330	3,357	

* Up to 150 units are being used for lower-income.

** This parcel is split zoned and approximately 28.50 acres are R-2. 63.33 acres total.

*** This parcel is split zoned and approximately 13.96 acres are R-1. 21.15 acres total.

**** This parcel is split zoned and approximately 24.31 acres are R-1. 48.62 acres total.

***** This parcel is split zoned and approximately 19.45 acres are R-2. 48.62 acres total.

***** This parcel is split zoned and approximately 11 acres are R-2. 21.15 acres total.

F6.7.1 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 Cycle may be reused in this Housing Element to accommodate lower-income housing, and must allow residential use by right for housing projects that have at least 20 percent of the units set aside as affordable for lower-income households (i.e., can be approved administratively without requiring Planning Commission or City Council approval). A total of 12 sites included in the Site Inventory are subject to this by-right requirement, as shown on Table F6-9.

Table F6-9 Sites Used in Previous Planning Periods

Address	APN	Acres	Land Use	Zoning	Existing Use	Total Units
Westminster Wy	424010005	28.5	Low Density	R-1	Vacant	144
Place Rd	424010006	24.31	Low Density	R-1	Agriculture	123
Place Rd	424010006	19.45	Medium Density	R-2	Agriculture	422
Canal Farm Ln	428150001	1.77	Medium Density	R-2	Vacant	24
Mercey Springs Rd	428030006	1	Medium Density	R-2	Vacant	14
7th St	82420047	0.75	Medium Density	R-2	Vacant	10
Westminster Wy	424010005	28.5	Medium Density	R-2	Vacant	399
Gilbert Gonzalez Jr Dr	83100084	8.48	High Density	R-3	Vacant	177
G St	25114011	0.92	Mixed Use	R-C	Vacant	13
G St	25114012	0.92	Mixed Use	R-C	Vacant	13
Henry Miller Plaza	25072036	4.77	Mixed Use	R-C	Vacant	71
H St	25054006	2.02	Mixed Use	R-C	Vacant	30
Total		121.39				1,440

F6.7.2 Adequacy of Residential Site Inventory in Meeting RHNA

The Site Inventory identifies 1,370 lower-income units, 657 moderate-income units, and 1,330 above moderate-income units on 66 sites. In accordance with HCD’s default density and size requirements, no sites smaller than one-half acre in size are used to accommodate lower-income housing.

Of the identified sites, six are located on land currently occupied by agriculture, while all the other sites are vacant. Since the land is currently zoned for residential uses, the existing agricultural uses are not subject to the Williamson Act. Regional trends indicate a high likelihood of redevelopment of sites with agricultural uses to residential development.

The Site Inventory includes a surplus of 222 lower-income units, giving the City an 18 percent buffer for this income category above the RHNA requirement. The summary of the residential Site Inventory is presented by neighborhood in Table F6-10.

Table F6-10 Adequacy of Residential Site Inventory

	Lower-Income	Moderate-Income	Above Moderate-Income	Total
City's Share of RHNA	1,212	566	1,354	3,132
Planned and Approved Units	64	41	295	400
ADUs Anticipated	0	0	40	40
Remaining RHNA	1,148	525	1,019	2,692
Opportunity Sites (North Los Banos)	24	0	103	127
Opportunity Sites (Central Los Banos)	151	49	2	202
Opportunity Sites (South Los Banos)	150	59	387	596
Opportunity Sites (East Los Banos)	1,045	549	838	2,432
Total Units on Sites	1,370	657	1,330	3,357
Total Unit Surplus	222	132	311	665
Percent Buffer over RHNA	18%	23%	23%	21%

F6.8 Availability of Infrastructure and Services

The City's Public Works Department is responsible for the City's water system, wastewater system, storm drain system, parks system, storm drainage system, street system, landscaped areas, municipal buildings and City vehicles and heavy equipment. As such, the city will ensure adequate capacity of all infrastructure and utilities to accommodate the housing growth discussed in this housing element. All sites included in the inventory have existing and available infrastructure that can support residential development. Within one week of adoption, City will provide a copy of the adopted 2024-2032 Housing Element to the City's Public Works Department Division, pursuant to Government Code Section 65589.7. All services in the City are sufficient to accommodate the number of units allocated by the RHNA.

F6.8.1 Wastewater System

The City of Los Banos' wastewater treatment facility (WWTF) has an average dry weather flow (ADWF) capacity of 4.9 million gallons per day (MGD) and a peak wet weather flow (PWWF) of 12 MGD. The City's average daily load is 3.55 MGD, and its peak daily load is 6.035 MGD. The City's current capacity of their WWTF meets the City's average and peak daily flows.

The City's sanitary sewer collection system consists of sewer pipelines ranging from four to 30 inches in diameter. The city-wide peak daily load was 6.035 MGD, which results in a treatment capacity deficit of 1.135 MGD. However, the City's sanitary sewer collection system has additional capacity to accommodate more loading in the growth areas of the system.

A report conducted by MKN & Associates for the Merced County Association of Governments³ determined that the sewer collection system can accommodate approximately 5,252 additional housing units if growth occurs uniformly in all projected growth areas. This exceeds the RHNA requirement of 3,132. Therefore, the City's existing wastewater treatment system is adequate to accommodate RHNA requirements.

³ Merced County Infrastructure Capacity Assessment, June 2023

F6.8.2 Potable Water System

Domestic water in the Los Banos area is provided by the City of Los Banos. The Public Works Department is responsible for maintaining the existing wells and distribution system. The typical residential demand is approximately 161 gallons per day per person, according to the City's Master Plan for Water Distribution System, dated 2008 and amended in 2010. Growth of the system to serve new development will require continued looping of lines and expansion of fire flow reserve capacities. Additional water wells and storage facilities have been planned for in the City of Los Banos 2008 Master Plan. It is anticipated that the City's existing water supply will be able to meet the demands of the City's RHNA.

F6.8.3 Storm Water and Drainage

Storm water drainage is accomplished in the city through a system of storm water collection facilities that ultimately discharge into a number of canals owned and operated by irrigation or water districts. Although the City of Los Banos Department of Public Works is responsible for implementing the Drainage Master Plan and maintaining the system, drainage maintenance is not an enterprise function of the city. The City's stormwater system has sufficient capacity to serve new residential development necessary to fulfill the City's RHNA.

F6.8.4 Dry Utilities

Dry utilities are defined as electricity, natural gas, cable, and telephone services. In Los Banos, each dry utility has one provider: Pacific Gas and Electric (PG&E) provides natural gas and electricity services, and AT&T provides telecom services. The City does not anticipate any issues with connecting these utilities to future residential development sites during the planning period.

F6.9 Environmental Considerations

As noted in Chapter F4, *Housing Constraints*, environmental constraints to housing development in Los Banos include risk of earthquakes and fire. The sites included in the Site Inventory are all located outside of the identified flood zones.

A city's environmental setting and characteristics can greatly affect the feasibility and cost of developing housing. As noted in Chapter F4, *Housing Constraints*, environmental factors in Los Banos include potential impacts from wildfire, drought, and flood. There are no known barriers on these sites related to shape, access, contamination, easements, property conditions, likelihood of disposition of right-of-way, conservation easements, environmental overlays.

Wildfire

Los Banos is located in an urbanized area and is not exposed to wildfire hazards. The surrounding area is also not designated as a very high or high fire hazard area. The potential impacts of a wildfire would not preclude development of housing in Los Banos.

Drought

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

Flood

Flood hazards are not a constraint to development, although Los Banos Creek runs through the city. There are retention basins that collect runoff from the creek and a reservoir that regulates its flow. as the city does not have any natural watercourses. The potential impacts of a flood would not preclude development of housing in Los Banos.

F6.10 Opportunities for Energy Conservation

The City has promoted energy conservation for residential uses through permitting and Community Development Block Grant (CDBG) funds. Through the building permit process, the City ensures that all new residential development meets or exceeds current state energy efficiency standards. CDBG funds are used to implement the City's housing rehabilitation loan program. As of 2020, the City joined Peninsula Clean Energy, a community partner that brings utility savings, rebates, and clean electricity to residents.