21 Elements

Town of Colma Fair Housing Assessment
This document was drafted by Root Policy and edited by the Town of Colma

What is AFFH?

The State of California's 2018 Assembly Bill (AB 686) requires that all public agencies in the state affirmatively further fair housing (AFFH) beginning January 1, 2019. Public agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD) are also required to demonstrate their commitment to AFFH. The federal obligation stems from the fair housing component of the federal Civil Rights Act mandating federal fund recipients to take "meaningful actions" to address segregation and related barriers to fair housing choice.

AB 686 requires all public agencies to "administer programs and activities relating to housing and community development in a manner that affirmatively furthers fair housing and take no action inconsistent with this obligation."[1]

AB 686 also makes changes to Housing Element Law to incorporate requirements to AFFH as part of the housing element and general plan to include an analysis of fair housing outreach and capacity, integration and segregation, access to opportunity, disparate housing needs, and current fair housing practices.

Affirmatively Furthering Fair Housing

"Affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development. (Gov. Code, § 8899.50, subd. (a)(1).)"

Source: California Department of Housing and Community Development Guidance, 2021, page 14.

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[1] California Department of Housing and Community Development Guidance, 2021, page 9.

History of segregation in the region. The United States' oldest cities have a history of mandating segregated living patterns—and Northern California cities are no exception. ABAG, in its recent Fair Housing Equity Assessment, attributes segregation in the Bay Area to historically discriminatory practices—highlighting redlining and discriminatory mortgage approvals—as well as "structural inequities" in society and "self-segregation" (i.e., preferences to living near similar people).

This history of segregation in the region is important not only to understand how residential settlement patterns came about—but, more importantly, to explain differences in housing opportunity among residents today. In sum, not all residents had the ability to build housing wealth or achieve economic opportunity. This historically unequal playing field in part determines why residents have different housing needs today.

Researcher Richard Rothstein's 2017 book The Color of Law: A Forgotten History of How Our Government Segregated America chronicles how the public sector contributed to today's segregation. Rothstein highlights several significant developments in the Bay Area region that played a prominent role in where the region's non-White residents settled.

Pre-civil rights San Mateo County faced resistance to racial integration. Yet, it was reportedly less direct than in some Northern California communities, taking the form of "blockbusting" and "steering" or intervention by public officials. These local discriminatory practices were exacerbated by the actions of the Federal Housing Administration, which excluded low-income neighborhoods, where the majority of people of color lived, from its mortgage loan program.

According to the San Mateo County Historical Association. San Mateo County's early African Americans worked in various industries, from logging to agriculture, to restaurants and entertainment. Expansion of jobs, particularly shipbuilding during and after World War II, attracted many new residents to the Peninsula, including the first sizable migration of African Americans. Enforcement of racial covenants after the war forced the migration of the county's African Americans into neighborhoods where they were allowed to occupy housing—housing segregated into less desirable areas, next to highways, and concentrated in public housing and urban renewal developments.

The private sector contributed to segregation through activities that discouraged (blockbusting) or prohibited (restrictive covenants) integrated neighborhoods. In the City of San Mateo, builders of the Hillsdale neighborhood in the mid-1900s recorded deeds that specified that only "members of the Caucasian or White race shall be permitted" to occupy sold homes—the exception being "domestics in the employ[ment] on the premises."[2] This developer developed many race-restricted neighborhoods in the Bay Area, became president of the National

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[2] https://www.nytimes.com/2020/08/14/opinion/sunday/blm-residential-segregation.html

Association of Home Builders (NAHB), became national president of the Urban Land Institute (ULI), and was inducted into California's Homebuilding Foundation Hall of Fame.

The segregation effect of blockbusting activities is well-documented in East Palo Alto. In 1954, after a White family in East Palo Alto sold their home to an African American family, the then-president of the California Real Estate Association set up an office in East Palo Alto to scare White families into selling their homes ("for fear of declining property values") to agents and speculators. These agents then sold these homes at over-inflated prices to African American buyers, some of whom had trouble making their payments. Within six years, East Palo Alto—initially established with "whites only" neighborhoods—became 82% African American. The FHA prevented re-integration by refusing to insure mortgages held by White buyers residing in East Palo Alto.

Throughout the county, neighborhood associations, and city leaders, we're hesitant to integrate communities. Although some neighborhood residents supported integration, most did not, and it was not unusual for neighborhood associations to require the acceptance of all new buyers. Builders with intentions to develop for all types of buyers (regardless of race) found that planning councils rezoned their development sites, required substantial minimum lot sizes, were denied public infrastructure to support their developments, and/or charged prohibitively high amounts for infrastructure.

In addition to historical discriminatory practices that embedded segregation into living patterns throughout the Bay Area, it's also necessary to recognize the historical impacts of colonization and genocide on Indigenous populations and how those atrocities are still being felt today. The original inhabitants of present-day San Mateo County are the Ramaytush Ohlone, who have "…lived on the San Francisco Peninsula for thousands of years and continue to live here as respectful stewards of the land."[3] However, "[d]ue to the devastating policies and practices of a succession of explorers, missionaries, settlers, and various levels of government over the centuries since European expansion, the Ramaytush Ohlone lost the vast majority of their population as well as their land."[4] The lasting influence of these policies and practices have contributed directly to the disparate housing and economic outcomes collectively experienced by Native populations today.[5]

The timeline of major federal Acts and court decisions related to fair housing choice and zoning and land use appears on the following page.

The timeline shows that exclusive zoning practices were common in the early 1900s. Courts struck down only the most discriminatory and allowed those that would be considered today to have a "disparate impact" on classes protected by the Fair Housing Act. For example, the 1926

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[3] https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html

[4] https://www.smcoe.org/for-communities/indigenous-people-of-san-mateo-county.html

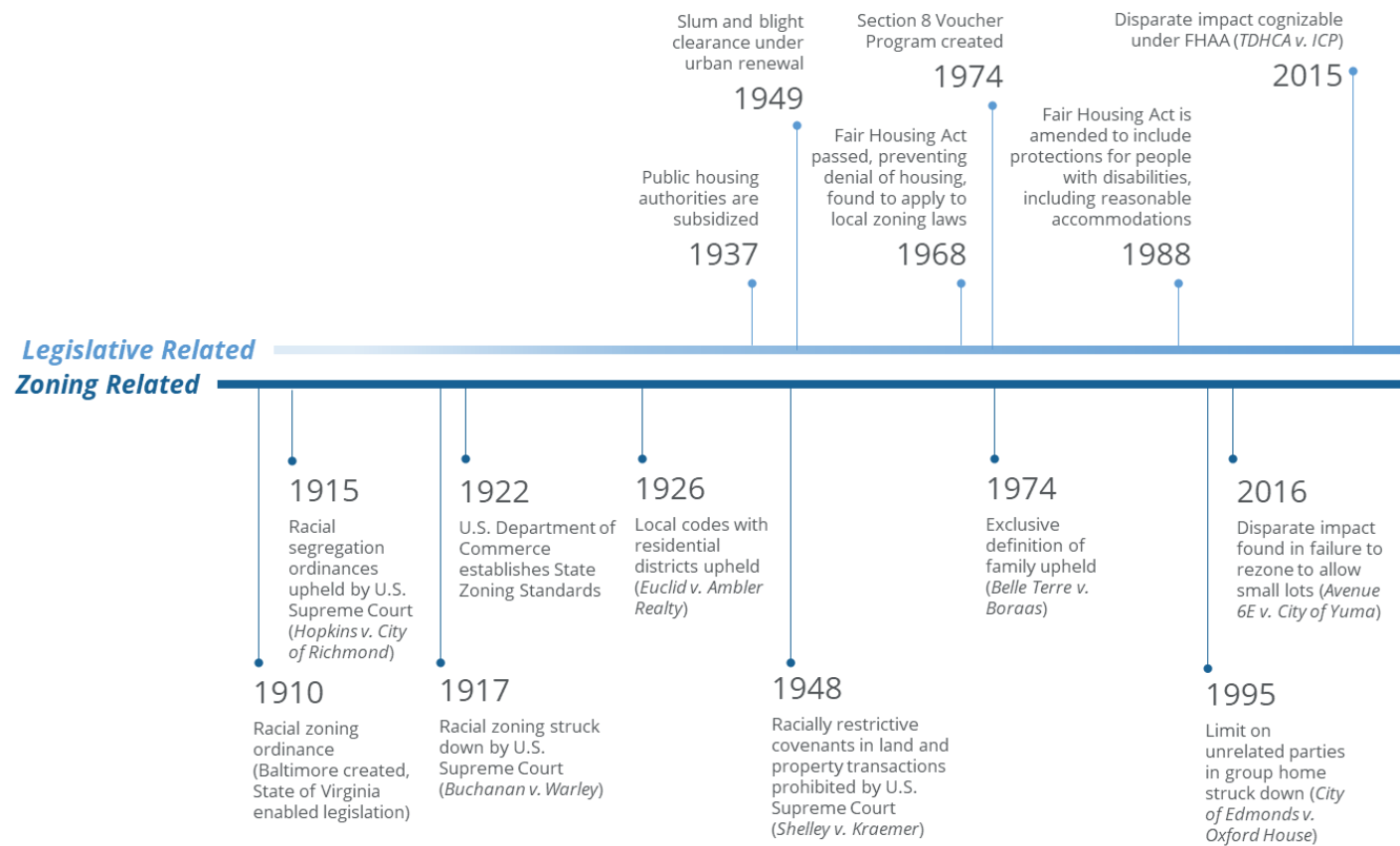[5] https://www.americanprogress.org/article/systemic-inequality-displacement-exclusion-segregation/

case Village of Euclid v. Amber Realty Co. (272 U.S. 365) supported the segregation of residential, business, and industrial uses, justifying separation by characterizing apartment buildings as "mere parasite(s)" with the potential to "utterly destroy" the character and desirability of neighborhoods. At that time, multifamily apartments were the only housing options for people of color, including immigrants.

The Federal Fair Housing Act was not enacted until nearly 60 years after the first racial zoning ordinances appeared in U.S. cities. This coincided with a shift away from federal control over low-income housing toward locally-tailored approaches (block grants) and market-oriented choice (Section 8 subsidies)—the latter of which is only effective when adequate, affordable rental units are available.

Major Public and Legal Actions that Influence Fair Access to Housing

Slum and blight clearance under urban renewal
1949

Section 8 Voucher Program created
1974

Disparate impact cognizable under FHAA (*TDHCA v. ICP*)
2015

Fair Housing Act passed, preventing denial of housing, found to apply to local zoning laws
1968

Public housing authorities are subsidized
1937

Fair Housing Act is amended to include protections for people with disabilities, including reasonable accommodations
1988

Legislative Related
Zoning Related

1915
Racial segregation ordinances upheld by U.S. Supreme Court (*Hopkins v. City of Richmond*)

1922
U.S. Department of Commerce establishes State Zoning Standards

1926
Local codes with residential districts upheld (*Euclid v. Ambler Realty*)

1974
Exclusive definition of family upheld (*Belle Terre v. Boraas*)

2016
Disparate impact found in failure to rezone to allow small lots (*Avenue 6E v. City of Yuma*)

1910
Racial zoning ordinance (Baltimore created, State of Virginia enabled legislation)

1917
Racial zoning struck down by U.S. Supreme Court (*Buchanan v. Warley*)

1948
Racially restrictive covenants in land and property transactions prohibited by U.S. Supreme Court (*Shelley v. Kraemer*)

1995
Limit on unrelated parties in group home struck down (*City of Edmonds v. Oxford House*)

Maps and data referenced in this section. Throughout this section, there are references to maps created by HCD to support the AFFH and data tables produced by HCD, the Association of Bay Area Governments (ABAG), and the consultant team. Those maps and tables appear in an Appendix A and follow the organization of this section and the state guidance. The maps, in particular, help demonstrate how the Town of Colma compares with surrounding jurisdictions and the county overall in offering housing choices and access to opportunity.

Report content and organization. This Fair Housing Assessment follows the April 2021 State of California State Guidance for AFFH. The study was conducted as part of the 21 Elements process, which facilitates the completion of Housing Elements for all San Mateo County jurisdictions.

Primary Findings, Contributing Factors, and Fair Housing Action Plan identifies the primary factors contributing to fair housing challenges and plans to take meaningful actions to improve access to housing and economic opportunity.

Section I. Fair Housing Enforcement and Outreach Capacity reviews lawsuits/enforcement actions/complaints against the jurisdiction; compliance with state fair housing laws and regulations; and jurisdictional capacity to conduct fair housing outreach and education.

Section II. Integration and Segregation identifies areas of concentrated segregation, degrees of segregation, and the groups that experience the highest levels of segregation

Section III. Access to Opportunity examines differences in access to education, transportation, economic development, and healthy environments.

Section IV. Disparate Housing Needs identifies which groups have disproportionate housing needs, including displacement risk.

Appendices.

- Map and Data packet—includes data tables and maps that support this section

- Resident survey results—findings from a survey of San Mateo County residents on their experience finding and remaining in housing

- Disparate Access to Educational Opportunities—findings from a countywide analysis of protected class access to education and educational outcomes.

- State Fair Housing Laws and Regulations—summary of key state laws and regulations related to mitigating housing discrimination and expanding housing choice.

Primary Findings

This section summarizes the primary findings from the Fair Housing Assessment for the Town of Colma, including the following sections: fair housing enforcement and outreach capacity, integration and segregation, access to opportunity, disparate housing needs, and contributing factors, and the city's fair housing action plan.

No fair housing complaints were filed in the Town of Colma from 2017 to 2021. While no complaints were filed during this period, Tthe Town recognizes that a language barrier and general unawareness of fair housing resources may be a reason why there were unreported cases. Currently, on the Town's website, resources are provided in English. However, there is a translation button that converts the contents into many languages. This option may be hard to navigate, therefore, to increase the accessibility of fair housing information, and provide resources for residents experiencing housing discrimination, the Town will of Colma could include some information regarding Fair Housing resources in English, Chinese, Spanish, and Tagalog. improve the accessibility of fair housing information on their website and resources for residents experiencing housing discrimination.

Racial and ethnic minority populations are **disproportionately impacted by poverty, low household incomes, overcrowding, and homelessness** compared to the non-Hispanic White population in the Town of Colma. Additionally, racial and ethnic minorities are more likely to be denied a home mortgage loan.

➢ Aside from Asian/API residents, racial and ethnic minority populations generally have higher poverty rates (Figure II-5). Black or African American incomes (Figure II-4) are the lowest of any racial or ethnic minority population in the Town of Colma.

➢ Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding (Figure IV-17). Low and moderate-income households are also more likely to be overcrowded (Figure IV-18).

➢ People who identify as American Indian or Alaskan Native, Black, White, and Hispanic are overrepresented in the homeless population compared to their share of the general population (Figure IV-22).

➢ Hispanic and Asian/API households have the highest denial rates for mortgage loan applications in 2018 and 2019 (Figure IV-33).

▪ Colma is entirely contained within a single census tract—the standard geographic measure for "neighborhoods" in U.S. Census data products. As such, the town does not contain any racial/ethnic concentrations, poverty concentrations, nor concentrations of housing problems.

▪ The composite opportunity score for Colma shows the town to be a "moderate resource area," and the Social Vulnerability Index (SVI) provided by the Centers for Disease

Control and Prevention (CDC) ranks the town as "moderately vulnerable" to a disaster (based on four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation).

- The Town of Colma has a **slight concentration of residents with a disability with 10% of the population compared to 8% in the county** (Figure III-17). Residents living with a disability in the town are all employed, while only 1% of residents without a disability are unemployed. Additionally, the aging population is putting a strain on paratransit access countywide.

- Black, Hispanic and Pacific Islander students in the Town of Colma—served by the Jefferson Union High School District and the Jefferson Elementary School District— **experience poor educational outcomes compared to other students**. Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. **Black and Hispanic students in Jefferson Union High School District were less likely to meet the admission standards with rates of 23% and 32%, respectively.**

- Jefferson Elementary school district had a 17 percentage point gap between their overall chronic absenteeism rate (12%) and their chronic absenteeism rate among Black students (28%). **While Jefferson Union has the lowest dropout rates in the county — just 3% of students — the highest dropout rates were still found among Black (7%) and Hispanic students (6%)**.

- Nearly **half of all renter households in the Town of Colma are cost-burdened**— spending more than 30% of their gross income on housing costs—and more than one in four are extremely cost-burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). There are **disparities in housing cost burden in the Town of Colma for Hispanic households** (Figure IV-11).

Fair Housing Issues and Contributing Factors

This section summarized the fair housing issues identified for the Town of Colma and the factors contributing to those issues.

Fair housing issue: **No residents have filed fair housing complaints, indicating a potential lack of awareness about fair housing rights**.
Contributing factors:

- Lack of access to information about fair housing rights.

- Limited knowledge of fair housing by residents.

Fair housing issue: Residents of color experience disproportionate housing needs. Black residents experience lower income and higher poverty rates, Hispanic and Asian

households experience high rates of mortgage loan denials when trying to purchase homes in Colma (43% and 33%, respectively), and Hispanic households also experience higher rates of cost burden.

*Contributing factors***:**

- Higher poverty rates among Colma's Black residents stem from decades of discrimination in employment, education, and housing markets. These residents have faced greater challenges in building wealth through economic mobility and homeownership.

- It is well documented that persons of color—particularly African American residents—were denied loans to purchase homes, were not allowed to buy in many neighborhoods because of restrictive covenants and were harassed if they managed to purchase a home in a predominantly White neighborhood. These historical actions have led to a significant homeownership gap among racial and ethnic minorities.

Fair housing issue: Affordable housing is limited and the ability to add affordable housing is constrained by land use.

- Colma offers relatively more affordable housing opportunities than surrounding cities. However, because most land is zoned for cemeteries, there is limited land available for residential development. Additionally, there are no areas of the town that are zoned for multifamily housing, which is disproportionately occupied by residents of color.

The Fair Housing Action Plan (FHAP) is included in the Housing Element Draft section, Housing Goals Policies and Programs.

SECTION I. Fair Housing Enforcement and Outreach Capacity

This section discusses fair housing legal cases and inquiries, fair housing protections and enforcement, and outreach capacity.

Fair housing legal cases and inquiries. California fair housing law extends beyond the protections in the Federal Fair Housing Act (FHA). In addition to the FHA protected classes—race, color, ancestry/national origin, religion, disability, sex, and familial status—**California law offers protections for age, sexual orientation, gender identity or expression, genetic information, marital status, military or veteran status, and source of income** (including federal housing assistance vouchers).

The California Department of Fair Employment in Housing (DFEH) was established in 1980 and is now the **most prominent civil rights agency in the United States**. According to its website, the DFEH's mission is "to protect the people of California from unlawful discrimination in employment, housing and public accommodations (businesses) and from hate violence and human trafficking in accordance with the Fair Employment and Housing Act (FEHA), Unruh Civil Rights Act, Disabled Persons Act, and Ralph Civil Rights Act."[6]

DFEH receives, evaluates, and investigates fair housing complaints. DFEH plays a particularly significant role in investigating fair housing complaints against protected classes that are not included in federal legislation and therefore not investigated by HUD. DFEH's website provides detailed instructions for filing a complaint, the complaint process, appealing a decision, and other frequently asked questions.[7] Fair housing complaints can also be submitted to HUD for investigation.

San Mateo County has several **local enforcement organizations**, including Project Sentinel, the Legal Aid Society of San Mateo County, and Community Legal Services of East Palo Alto. These organizations receive funding from the County and participating jurisdictions to support fair housing enforcement and outreach and education in the County (Figure I-1).

From 2017 to 2021, **57 fair housing complaints in San Mateo County were filed with the U.S. Department of Housing and Urban Development (HUD) (Figure I-2) —no complaints were filed in the Town of Colma (Figure I-3)**. Most complaints submitted to HUD cited disability status as the bias (56%), followed by race (19%) and familial status (14%).

Countywide, no cause determination was found in 27 complaints, followed by successful conciliation or settlement with 22 complaints. Fair housing inquiries in 2020 were primarily submitted from the City of San Mateo, Redwood City, Daly City, and Menlo Park (Figure I-3, Figure I-4, and Figure I-5).

Fair housing complaints filed with HUD by San Mateo County residents have been on a declining trend since 2018 when 18 complaints were filed. In 2019, complaints dropped to 5, increased to 11 in 2020, and reached six by mid-2021. Colma has not been a party to fair housing complaints or legal action in the past eight years, nor has the town been required to operate under a consent decree related to fair housing.

Nationally, the National Fair Housing Alliance (NFHA) reported a "negligible" decrease in the number of complaints filed between 2019 and 2020. The primary bases for complaints nationally were nearly identical to San Mateo County's: disability (55%) and race (17%). Familial

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[6] https://www.dfeh.ca.gov/aboutdfeh/

[7] https://www.dfeh.ca.gov/complaintprocess/

status represented 8% of complaints nationally, whereas this basis comprised 14% of cases in the county.

NFHA identifies three significant trends in 2020 that are relevant for San Mateo County:

- First, fair lending cases referred to the Department of Justice from federal banking regulators have been declining, indicating that state and local government entities may want to play a more significant role in examining fair lending barriers to homeownership.

- Second, NFHA identified a significant increase in the number of complaints of harassment—1,071 complaints in 2020 compared to 761 in 2019.

- Finally, NFHA found that 73% of all fair housing complaints in 2020 were processed by private fair housing organizations rather than state, local, and federal government agencies—reinforcing the need for local, active fair housing organizations and increased funding for such organizations.[8]

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[8] https://nationalfairhousing.org/2021/07/29/annual-fair-housing-report-shows-increase-in-housing-harassment/
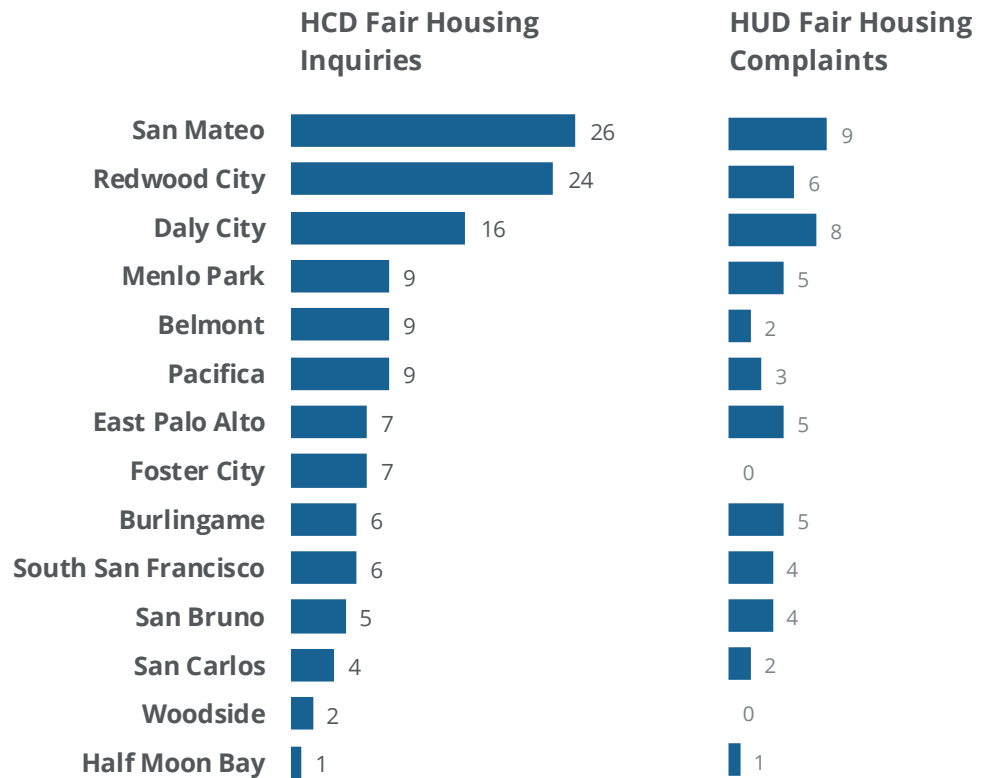
Fair Housing Complaints and Inquiries

HUD Fair Housing Complaints, by Basis, San Mateo County, 2017-2021

	Number	Percent
Disability	32	56%
Race	11	19%
Familial Status	8	14%
National Origin	3	5%
Religion	2	4%
Sex	1	2%
Total cases	**57**	**100%**

HCD Fair Housing Inquiries (2013- 2021) and HUD Fair Housing Complaints (2017- 2021)

	HCD Fair Housing Inquiries	HUD Fair Housing Complaints
San Mateo	26	9
Redwood City	24	6
Daly City	16	8
Menlo Park	9	5
Belmont	9	2
Pacifica	9	3
East Palo Alto	7	5
Foster City	7	0
Burlingame	6	5
South San Francisco	6	4
San Bruno	5	4
San Carlos	4	2
Woodside	2	0
Half Moon Bay	1	1

Outreach and capacity. The Town of Colma could significantly improve the accessibility of fair housing information on their website and resources for residents experiencing housing discrimination. The City's website provides information on Project Sentinel, a HUD-approved Housing Counseling Agency that provides counseling on housing discrimination, and a link to the San Mateo County Department of Housing that offers more information on the responsibilities of tenants and landlords. However, there is no dedicated fair housing webpage or specific information or resources for residents experiencing housing discrimination. While no

fair housing complaints have been filed in Colma over the last five years, a more robust section on fair housing resources could be provided on the website for residents experiencing discrimination in housing or the Fair Housing Act.[9] For example, a link to the Regional Assessment of Fair Housing—approved by HUD in November 2017— could be provided.

Compliance with state law. The Town of Colma is compliant with the following state laws that promote fair and affordable housing.

The ~~city~~Town has not been alleged or found in violation of the following:

- State Density Bonuses and Other Incentives Law (Gov. Code. Title 7. Division 1. Chapter 4.3 Density Bonuses and Other Incentives, amended and effective January 1, 2021);

- Housing Accountability Act (Gov Code Section 65589.5) requiring the adoption of a Housing Element and compliance with RHNA allocations;

- No Net Loss Law (Gov Code Section 65863) requiring that adequate sites be maintained to accommodate unmet RHNA allocations, including among income levels;

- Least Cost Zoning Law (Gov Code Section 65913.1);

- Excessive Subdivision Standards Law (Gov Code Section 65913.2);

- Limits on Growth Controls Law (Gov Code Section 65589.5).

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[9] https://www.colma.ca.gov/landlordtenant-information/

Housing-specific policies enacted locally. The Town of Colma identified the following local policies that contribute to the city's regulatory environment for affordable housing development.

Local policies in place to encourage housing development.

- In-Lieu Fees (Inclusionary Zoning)

- Inclusionary/Below Market Rate Housing Policy

- Housing Development Impact Fee

- Commercial Development Impact Fee

- Second Unit Ordinance

- Reduced Parking Requirements

- Streamlined Permitting

- Density Bonus Ordinance

- Homeowner Rehabilitation Program

- Home sharing programs

Local barriers to affordable housing development.

- No barriers identified.

Local policies that are NOT in place but would provide the best outcomes in addressing housing shortages.

- Policies that encourage multimodal mixed-use development and focused housing development at opportunity sites

Local policies are in place to mitigate or prevent the displacement of low-income households.

- Affordable housing impact/linkage fee on new residential and commercial development

- Inclusionary zoning

According to the California Department of Housing and Community Development AFFH Data Viewer (HCD data viewer), the Town of Colma does not have any public housing buildings

(Figure I-6). However, the census tract that Colma is in has moderate housing voucher utilization (approximately 20%) while most other surrounding jurisdictions have less (5-15% or 5% or less) housing voucher utilization (Figure I-7).

Compared to nearby Daly City, Brisbane, and parts of South San Francisco, the **Town of Colma appears accommodating to renters with housing vouchers** because the city has a greater share of voucher holders compared to the surrounding communities (Figure I-7). The presence of housing voucher users indicates available rental supply to house these residents and a lack of exclusionary behavior from landlords in the city.

SECTION II. Integration and Segregation

This section discusses the integration and segregation of the population by protected classes, including race and ethnicity, disability status, familial status, and income status. The section concludes with an analysis of racially and ethnically concentrated areas of poverty and affluence.

> **Integration and Segregation**
>
> "**Integration** generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.
>
> **Segregation** generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area compared to a broader geographic area."

Source: California Department of Housing and Community Development Guidance, 2021, page 31.

Race and ethnicity. Generally, the demographic characteristics of the Town of Colma are consistent with the overall characteristics of San Mateo County. However, **Colma has a much more significant proportion of Hispanic residents** (40% vs. 24% countywide) **and a much smaller proportion of non-Hispanic White residents** (24% vs. 39%) (Figure II-1).[10]

Over the past decade, the proportion of Asian/Asian Pacific Islander residents decreased (from 34% to 28%), Black or African American residents remained the same (3% to 3%), non-Hispanic White residents increased (20% to 25%), Hispanic or Latin X residents remained the same (40% to 40%) and other race or multiple races remained the same (4% to 4%) (Figure II-2). [11]

Utilizing local knowledge, the trends relating to race and ethnicity may be difficult to delineate solely by utilizing data alone because the Town consists of one census tract. The majority of the Town's existing residential units are concentrated in primarily three areas: Sterling Park neighborhood, Verano, and Veteran's Village. Since 2018, after the opening of Veteran's Village, the number of non-White residents may have increased slightly but maybe only marginal to the overall numbers as there are 65 units in this development. Based on local

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[10] There are no residents in Colma that identify as American Indian or Alaska Native.

[11] There are no residents in Colma that identify as American Indian or Alaska Native.

knowledge, and with supporting data from Census and ABAG, there is not an overwhelming majority ethnic group and the Town is fairly diverse, even in comparison to County figures.

There is less diversity among younger residents, with nearly 60% of residents between the ages of 0 and 17 identifying as White compared to only 48% of the population for residents aged 18-65 and 51% of the population over 65 years old (Figure II-3).

Overall, racial and ethnic minority populations and the non-Hispanic White population in Colma have relatively commensurate household incomes. However, **Black or African American residents have the lowest household income of any racial or ethnic group** (Figure II-4). Black or African American residents also experience the most significant rate of poverty in Colma (65%), followed by other/multiple races (14%), Hispanic (13%), and White (7.6%) residents (Figure II-5). While the poverty rate among Black or African American residents living in Colma is alarmingly high, they make up 3% of the total population of the Town (figure II-2). While this is a small percentage of the overall population, these figures may show that there is a concentration of Black or African American residents who are also living in poverty.

Geospatially, the Town of Colma's lone census tract has a slim Hispanic majority (Figures II-6, II-7, II-8, II-9, and II-10). [12] [13]

Dissimilarity and isolation indices

Segregation in Town of Colma

ABAG and UC Merced completed an analysis of segregation in Colma. Several indices were used to assess segregation in the city and determine how the city differs from patterns of segregation and integration in the region overall.

The primary findings from that analysis included:

- The isolation index measures the segregation of a single group, and the dissimilarity index measures segregation between two different groups. The Theil's H-Index can be used to measure segregation between all racial or income groups across the city at once.

- As of 2020, Latinx residents are the most segregated compared to other racial groups in Colma, as measured by the isolation index. Latinx residents live in neighborhoods where they are less likely to integrate other racial groups.

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[12] Majority census tracts show the predominant racial or ethnic group by tract compared to the next most populous.

[13] Redlining maps, otherwise known as Home Owners' Loan Corporation (HOLC) maps, are not available for San Mateo County.

- Among all racial groups, the white population's isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.

- According to the dissimilarity index, within Colma the highest level of racial segregation is between Asian and white residents.

- According to Theil's H-Index, neighborhood racial segregation in Colma increased between 2010 and 2020. Neighborhood income segregation stayed about the same between 2010 and 2015.

- Very Low-income residents are the most segregated compared to other income groups in Colma. Very Low-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.

- Among all income groups, the Very Low-income population's segregation measure has changed the most over time, becoming more segregated from other income groups between 2010 and 2015.

- According to the dissimilarity index, segregation between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. In 2015, the income segregation in Colma between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions.

Because of the size of Colma and the concentration of housing in certain areas in town segregation can be attributed to this. Also, Veterans Village is the only affordable housing development in Colma, which may also explain the segregation. Veterans Village is a 65-unit, deed-restricted, affordable housing development completed in 2019, which provides housing for a racially, ethnically diverse group of residents. These residents were formerly homeless, many of those with disabilities, and ranging from the mid- '30s to over 60 years old. We anticipate that adding 69 total units in the very low and low incomes, as shown in the site inventory, will provide housing for resident groups who are more racially and ethnically diverse than the town overall due to their disproportionate needs. As demonstrated in the site inventory, we are careful to disperse new housing throughout the town as such, we do not anticipate the new housing to increase segregation in the town.

The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 15 in Appendix 2), jurisdiction staff could focus on the isolation index or Theil's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

Segregation Between Town of Colma and Other jurisdictions in the Bay Area Region

- Colma has a lower share of white residents than other jurisdictions in the Bay Area as a whole, a higher share of Latinx residents, a lower share of Black residents, and a higher share of Asian/Pacific Islander residents.

- Regarding income groups, Colma has a higher share of very low-income residents than other jurisdictions in the Bay Area as a whole, a higher share of low-income residents, a lower share of moderate-income residents, and a lower share of above moderate-income residents.

The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. The DI is an index that measures the degree to which two distinct groups are evenly distributed across a geographic area. The DI represents the percentage of a group's population that would have to move for each area in the county to have the same percentage of that group as the county overall.

DI values range from 0 to 100—where 0 is perfect integration, and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

The isolation index is interpreted as the probability that a randomly drawn minority resident shares an area with a member of the same minority. It ranges from 0 to 100, and higher values of isolation tend to indicate higher levels of segregation. The Theil's H-Index can measure segregation between all racial or income groups across the city at once.

ABAG and UC Merced completed an analysis of segregation in Colma. Several indices were used to assess segregation in the city and determine how the City differs from patterns of segregation and integration in the region overall.

The primary findings from that analysis included:

- As of 2020, Latinx residents are the most segregated compared to other racial groups in Colma, as measured by the isolation index. Latinx residents live in neighborhoods where they are less likely to come into contact with other racial groups.

- Among all racial groups, the white population's isolation index value has changed the most over time, becoming less segregated from other racial groups between 2000 and 2020.

- According to the dissimilarity index, within Colma, the highest level of racial segregation is between Asian and white residents.[14]

- According to Theil's H-Index, neighborhood racial segregation in Colma increased between 2010 and 2020. Neighborhood income segregation stayed about the same between 2010 and 2015.

- Very Low-income residents are the most segregated compared to other income groups in Colma. Very Low-income residents live in neighborhoods where they are less likely to encounter residents of other income groups.

- Among all income groups, the Very Low-income population's segregation measure has changed the most over time, becoming more segregated from other income groups between 2010 and 2015.

- According to the dissimilarity index, segregation between lower-income residents and residents who are not lower-income decreased between 2010 and 2015. In 2015, the income segregation in Colma between lower-income residents and other residents was lower than the average value for Bay Area jurisdictions.

Disability status. The **share of the population living with at least one disability is 10% in the Town of Colma** compared to 8% in San Mateo County (Figure II-13 and Figure II-14). Analysis at the census tract level does not determine whether there is a spatial concentration of residents with disabilities in the Town of Colma. Geographic concentrations of people living with a disability may indicate **increased access to services, amenities, and transportation that support this population**.

TABLE II-1. AGE AND TYPE OF DISABILITY 5-YEAR ESTIMATE

	Numbers						Percentage	
	Colma (2020)	Colma (2019)	Colma (2018)	Colma (2017)	Colma (2016)	County (2020)	Colma (2020)	County (2020)
Under 18 with Disability	0	3	4	3	3	3,919	0.0%	2.5%
Age 18-64 with Disability	39	59	72	56	72	23,680	4.1%	4.9%
Age 65 + with Disability	94	62	51	34	28	34,818	45%	28.6%

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[14] The analysis conducted for this report suggests that dissimilarity index values are unreliable for a population group if that group represents approximately less than 5% of the jurisdiction's total population. ABAG/MTC recommends that when cities have population groups that are less than 5% of the jurisdiction's population (see Table 15 in Appendix 2), jurisdiction staff could focus on the isolation index or Thiel's H-Index to gain a more accurate understanding of neighborhood-level racial segregation in their jurisdiction.

Any Age with Any Disability	133	124	127	93	103	62,417	9.0%	8.2%
Any Age with Hearing Disability	19	19	42	34	27	19,065	1.3%	2.5%
With Vision Disability	14	21	23	33	25	10,500	0.9%	1.4%
With Cognitive Disability	65	48	36	25	40	22,911	4.8%	3.2%
With Ambulatory Disability	92	62	68	35	40	30,648	6.8%	4.3%
With Self Care Disability	25	23	29	10	18	14,141	1.8%	2.0%
With Independent Living Disability	74	51	64	39	47	26,339	6.4%	4.4%

Source: US Census, 2020 American Community Survey 5-Year Estimates, Table S1810.
Note: Some people may have multiple disabilities

Over the last 5 years, from 2016 to 2020, **the total number of people disabled living in Colma has increased slightly** (Table II-1). The largest increase over the last five years is the number of residents who are 65 and older that have disabilities. This is not uncommon in aging populations where cognition, hearing, and vision in individuals decrease over time. Compared to County numbers, the Town's numbers are relatively close based on the percentage. The one category that is **much higher in Colma than in the County is the percentage of individuals 65 and older who have a disability** (45% in Colma vs 28.6% in San Mateo County, Table II-1). This percentage might be higher in the Town compared to the County could be because of several factors.

One factor is individuals that are 65 and older choosing to age in place in their existing residences. For those with fixed incomes, the housing cost burden in town and countywide is relatively high. Individuals 65 and older may choose to stay in their current living situation because it may be more cost beneficial to stay in Colma compared to moving to another nearby jurisdiction.

Another factor is the residents of Veterans Village. In this 65-unit community, to qualify for a residence, an individual must be 60 years or older and a military Veteran. Based on local knowledge, many of the residents at Veterans Village also have disabilities. This housing development, along with the 13-unit Creekside Villas, and assisted living facility Peninsula Reflections would be considered **concentrations of individuals 65 and older living with disabilities**.

Familial Status. The Town of Colma is home to **more single-person households** than the county, with 26% of households compared to only 22% in the County (Figure II-16). Additionally, there are significantly **fewer married-couple families and families with children in the city** than in the county (44% vs. 55% countywide) (Figure II-17 and Figure II-18).

In 2019 compared to 2000, **children ages 14 have trended lower, while ages 45 and older have trended higher**. Residents between the ages of 15 and 44 have fluctuated over the last couple of decades. Comparatively to Census data (Table H-3), similar trends show that the median age of Colma residents has increased with a significant increase in ages 45 to 59.

Familial status can indicate specific housing needs and preferences. A larger number of nonfamily or single-person households indicates a higher share of seniors living alone, young adults living alone or with roommates, and unmarried partners. Higher shares of nonfamily households indicate an increased need for one- and two-bedroom units.

~~The majority of~~Most married couple households live in owner-occupied housing, while most residents living alone live in renter-occupied housing (Figure II-19). **The number of housing units available by number of bedrooms and tenure is generally consistent with the familial status of the households that live in the Town of Colma** (Figure II-16 and Figure II-20). However, housing options for smaller households looking to own appear limited. Compared to the county, the Town of Colma has a smaller proportion of family households and a greater proportion of single-person households—which is reflected in the number of bedrooms and tenure of the housing stock in the city (Figure II-19 and Figure II-20). The distribution of households by family type is mapped at the census tract level in Figures II-21, II-22, II-23, and II-24)

While there is a smaller proportion of family households in Colma, the percentage of children in married couple households (Figure II-21) is around 60% to 80% which is comparable to the surrounding region. These numbers show that **children who live in Colma are more likely to be in a dual parent household as opposed to single parent households** (Figure II-22). Housing options for these types of households would be two-bedroom units or larger.

The percentage of larger households (more than two residents) in Colma is lower than in the surrounding region, supporting the data that the Town has more single-person households which means a demand for one- and two-bedroom units (Figure II-16, II-23). For **adults living alone in Colma, that percentage is less than 20%, which is consistently reflected across the surrounding region** (Figure II-24). Reasons for the low percentages could be due to low inventory for studio and one-bedroom units, and an overall affordability issue for housing in general.

Familial households are most likely found in three areas of the Town, Verano, Villa Hoffman, and the largest concentration in the Sterling Park neighborhood. Verano and Villa Hoffman are

planned developments consisting of mostly townhomes and a couple of single-family homes built in the last 20 years. Sterling Park is Colma's largest neighborhood where the majority of residents live. This neighborhood consists mostly of single-family homes built prior to the

Income	2020	2019	2018	2017	2016
Under $25,000	41 (9%)	67 (14%)	61 (13%)	61 (13%)	74 (15%)
$25,000 to $34,999	15 (3%)	28 (6%)	34 (7%)	18 (4%)	48 (10%)
$35,000 to $49,999	16 (3%)	19 (4%)	16 (3%)	30 (6%)	17 (3%)
$50,000 to $74,999	56 (12%)	64 (14%)	63 (13%)	52 (11%)	64 (13%)
$75,000 to $99,999	69 (14%)	77 (16%)	79 (17%)	78 (17%)	71 (15%)
$100,000+	288 (59%)	215 (46%)	224 (47%)	225 (49%)	213 (44%)
Total (Estimated Households)	485	470	477	464	487
Median Income	$118,750	$95,357	$94,279	$97,500	$92,589

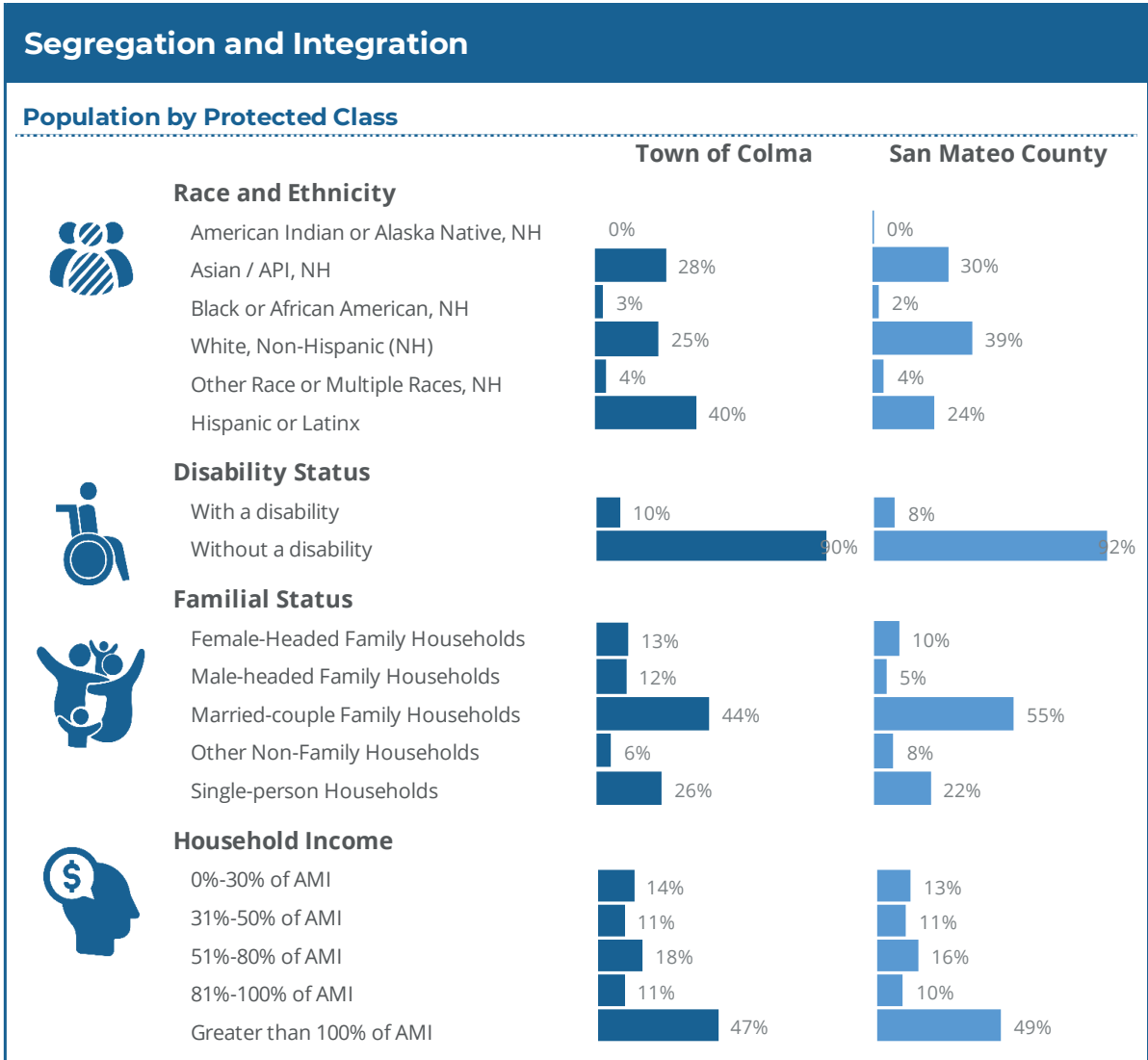Source: US Census, 2020 American Community Survey 5-Year Estimates Note: Adjusted for inflation to 2020 dollars

1950s, with some duplexes and multi-family developments scattered around the neighborhood.

TABLE II-2. COLMA HOUSEHOLD 5-YEAR ESTIMATE

Household income. The household income distribution by percent of area median income (AMI) in the Town of Colma is similar to the county (Figure II-25). The census block group east of Hillside Blvd. has a median income below the 2020 state median income of $87,100. A possible reason for a lower median income in comparison to the county is Franciscan Park, a 501 privately owned mobile home community that is located just beyond town limits. In this community, a requirement for household income levels at 140% of the area median income level or lower may be a reason for the concentration of incomes below the state level.

The block group to the west of Hillside Blvd. has a median income well above that (Figure II-26 and Figure II-27). In this block group, most of Colma's households are located here. Using HCD's State Median Income threshold, over the last five years, it is estimated that the number of households living above state median income in Colma has been trending upwards (Table II-2).   Also, it is estimated that the median income in the Town has also been trending upward over the last three years. This is further supported by the data showing poverty rates by census tracts where the census tract that Colma is in has a poverty rate below 10%. (Figure II-28)

, while the block group to the west of Hillside Blvd. has a median income well above that (Figure II-26 and Figure II-27). However, the census tract that Colma is located in has a poverty rate below 10%. (Figure II-28)

Segregation and Integration

Population by Protected Class

	Town of Colma	San Mateo County
Race and Ethnicity		
American Indian or Alaska Native, NH	0%	0%
Asian / API, NH	28%	30%
Black or African American, NH	3%	2%
White, Non-Hispanic (NH)	25%	39%
Other Race or Multiple Races, NH	4%	4%
Hispanic or Latinx	40%	24%
Disability Status		
With a disability	10%	8%
Without a disability	90%	92%
Familial Status		
Female-Headed Family Households	13%	10%
Male-headed Family Households	12%	5%
Married-couple Family Households	44%	55%
Other Non-Family Households	6%	8%
Single-person Households	26%	22%
Household Income		
0%-30% of AMI	14%	13%
31%-50% of AMI	11%	11%
51%-80% of AMI	18%	16%
81%-100% of AMI	11%	10%
Greater than 100% of AMI	47%	49%

Racially or ethnically concentrated areas of poverty and affluence. Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAAs) represent opposing ends of the segregation spectrum from racially or ethnically segregated areas with high poverty rates to affluent, predominantly White neighborhoods. Historically, HUD has paid particular attention to R/ECAPs, focusing on policy and obligations to AFFH. Recent research out of the University of Minnesota Humphrey School of Public Affairs argues for the inclusion of RCAAs to

acknowledge current and past policies that created and perpetuate these areas of high opportunity and exclusion.[15]

It is important to note that R/ECAPs and RCAAs are not areas of focus because of racial and ethnic concentrations alone. This study recognizes that racial and ethnic clusters can be a part of fair housing choices if they occur in a non-discriminatory market. Rather, R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity. Conversely, RCAAs are intended to identify areas of particular advantage and exclusion.

R/ECAPs

HCD and HUD's definition of a Racially/Ethnically Concentrated Area of Poverty is:

- A census tract that has a non-White population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR

- A census tract with a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

Source: California Department of Housing and Community Development Guidance, 2021.

For this study, the poverty threshold used to qualify a tract as a R/ECAP was three times the average census tract poverty rate countywide—or 19.1%. In addition to R/ECAPs that meet the HUD threshold, this study includes an edge or emerging R/ECAPs which hit two-thirds of the HUD-defined threshold for poverty—emerging R/ECAPs in San Mateo County have two times the average tract poverty rate for the county (12.8%).

In 2010 three Census tracts qualify as R/ECAPs (19.4% poverty rate) in the county, and 11 are eligible as edge R/ECAPs (13% poverty rate). None of the R/ECAPs were located in the Town of Colma in 2010. However, there was one edge R/ECAP just west of the city in Daly City (Figure II-29).

In 2019 two Census tracts qualify as R/ECAPs (19.1% poverty rate) in the county, and 14 are eligible as edge R/ECAPs (12.8% poverty rate). None of the R/ECAPs were located in the Town

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[15] Goetz, E. G., Damiano, A., & Williams, R. A. (2019). Racially Concentrated Areas of Affluence: A Preliminary Investigation. Cityscape: A Journal of Policy Development and Research, 21(1), 99–124

of Colma in 2019. However, there was one R/ECAP northwest of the city in Daly City and one edge R/ECAP southeast of the city in South San Francisco (Figure II-30).

Looking at the surrounding R/ECAPs in Daly City over the past decade, it appears that the census tracts that were identified in 2010 were no longer considered R/ECAPs in 2019. While Daly City and South San Francisco are bordering jurisdictions to Colma, the identified R/ECAPs do not affect the Town. However, the Town will remain vigilant of RECAP/s trends in the surrounding jurisdictions.

RCAAs.

Although HCD and HUD have not established standard definitions for Racially or Ethnically Concentrated Areas of Affluence (RCAAs), they are generally understood to be neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates. Comparing Colma to the surrounding county and region, it is safe to speculate that Colma has about the same RCAAs as other communities, the county, and the region.

HCD's definition of a Racially Concentrated Area of Affluence is:

- A census tract with a percentage of the total white population that is 1.25 times higher than the average percentage of the total white population in the given COG region and a median income that was two times higher than the COG AMI.
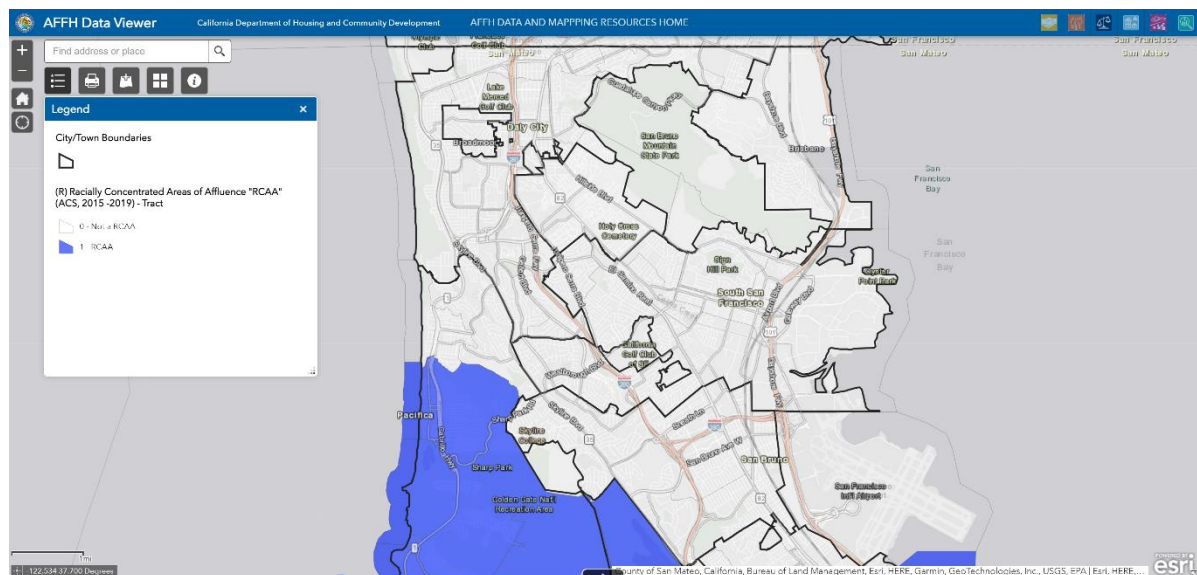
- When looking at 2015 to 2019 RCAA data locally and regionally (see figure above), the Town does not have any identifiable census tracts that could be considered RCAAs. The closest census tracts to Colma would be southwest in Pacifica and southeast in Burlingame.

Because there are no RCAAs in the Town, this supports other **data that show there is not a predominant race or ethnic group in Colma**.

SECTION III. Access to Opportunity

This section discusses disparities in access to opportunity among protected classes, including access to quality education, employment, transportation, and environment.

> **Access to Opportunity**
>
> "Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity often means improving the quality of life for residents of low-income communities and supporting mobility and access to 'high resource' neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions)."

Source: California Department of Housing and Community Development Guidance, 2021, page 34.

The California Tax Credit Allocation Committee (TCAC) in collaboration with HCD, developed a series of opportunity maps that help identify areas of the community with good or poor access to opportunities for residents. These maps were developed to align funding allocations to improve outcomes for low-income residents—particularly children.

The opportunity maps highlight areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource, and high segregation and poverty. TCAC provides opportunity maps for access to opportunities in quality education, employment, transportation, and environment. Opportunity scores are presented on a scale from zero to one, and the higher the number, the more positive the outcomes.

Education. TCAC's education score is based on math proficiency, reading proficiency, high school graduation rates, and the student poverty rate. According to TCAC's educational opportunity map, the Census tract in the Town of Colma scores between 0.25 and 0.5—opportunity scores are presented on a scale from zero to one. The higher the number, the more positive the outcomes (Figure III-1). In the northern part of San Mateo County, almost all Census tracts east of Highway 280, including Colma, **have lower education scores (Less than 0.25 and between 0.25 and .5)** compared to those Census tracts west of Highway 280. Lower education scores in these areas could be related to language barriers where Jefferson Union has a higher share of English learners (36% compared to 20% countywide) and a concentration of lower income households where students qualify for reduced lunch (44% compared to 29% countywide) compared to the countywide proportion.

According to the Disparate Access to Educational Opportunities Appendix, the Town of Colma is served by the Jefferson Union High School District and the Jefferson Elementary School District. Both Jefferson Union and Jefferson Elementary experienced decreased enrollment by 5% from 2010 to 2020. Accordingly, **both districts lost students during the COVID pandemic**.

Jefferson Union and Jefferson Elementary school districts' enrollment by race and ethnicity are relatively similar to the countywide distribution. However, there are a higher proportion of Filipino students in Jefferson Union and Jefferson Elementary (29% and 25% compared to 8% countywide) and a smaller proportion of Hispanic (31% and 36% compared to 38% countywide) and White students (14% and 11% compared to 26% countywide).

Jefferson Union has a higher share of English learners (36% compared to 20% countywide) and students who qualify for reduced lunch (44% compared to 29% countywide) compared to the countywide proportion. Jefferson Elementary has a smaller share (14% and 27%, respectively). Jefferson Elementary also has 1% of students experiencing homelessness.

Many high schoolers in the county met admission standards for a University of California (UC) or California State University (CSU) school. While Jefferson Union had one of the lower rates of graduates who met such admission standards (48%) among high school districts in San Mateo County, the school has seen a significant increase in the percentage of students who meet these benchmarks over the last five years (21% in 2016-17). **Black and Hispanic students in Jefferson Union High School District were less likely to meet the admission standards with rates of 23% and 32%, respectively.**

Jefferson Elementary school district had a 17-percentage point gap between their overall chronic absenteeism rate (12%) and their chronic absenteeism rate among Black students (28%). **While Jefferson Union has the lowest dropout rates in the county — just 3% of students — the highest dropout rates were still found among Black (7%) and Hispanic students (6%).**

Employment. The top three industries by the number of jobs in the Town of Colma **include retail, arts and recreation services, and finance and leasing services** (Figure III-2 and Figure III-3). The Town of Colma has a much higher job-to-household ratio when compared to the county at 10.96 and 1.59, respectively—which means there are more employment opportunities per household in the Town of Colma.

TCAC's economic opportunity score comprises poverty, adult educational attainment, employment, job proximity, and median home value. **The Town of Colma scores relatively low (0.25-0.50) compared to surrounding jurisdictions** (Figure III-7). Possible reasons why the Town scores low compared to the rest of the region are the kinds of jobs available for residents, where they are located, and median home values. While home values in Colma show slightly lower numbers than compared to the County level and much lower than in the Bay

Area (Figure IV-5), the types of jobs most found in town are hourly retail jobs which are most likely to pay less than $3,333 per month (Figure III-5).

HUD's job proximity index shows **Colma to have relatively poor proximity to jobs** (Figure III-8). On a scale from zero to 100, where 100 is the closest proximity to jobs, block groups within the town score between 20 and 40.

While the Town has a high job-to-household ratio compared to the County, the proximity to jobs is low. A possible explanation for this is the type of jobs and where they are located within the Town. With retail, arts and recreation services, and finance and leasing services making up the top three industries in Colma, they are concentrated in certain areas of the Town, which may explain why proximity to jobs is showing lower compared to the region.   The low proximity to jobs may have an effect on protected classes as this demographic may have limited financial resources and may depend on obtainable employment.

Transportation. This section summarizes the transportation system that serves the broader region, including emerging trends and data relevant to transportation access throughout the county. The San Mateo County Transit District acts as the administrative body for transit and transportation programs in the county, including SamTrans and the Caltrain commuter rail. SamTrans provides bus services in San Mateo County, including Redi-Wheels paratransit service.

In 2018, the Metropolitan Transportation Commission (MTC), which covers the entire Bay Area, adopted a coordinated public transit and human services transportation plan. While developing the coordinated plan, the MTC conducted extensive community outreach about transportation within the area. That plan—which was developed by assessing the effectiveness of how well seniors, persons with disabilities, veterans, and people with low incomes are served—was reviewed to determine gaps in services in Colma and the county overall. Below is a summary of comments relevant to San Mateo County.

> "San Mateo's [Paratransit Coordinating Council] PCC and County Health System and the Peninsula Family Service Agency provided feedback. The most common themes expressed had to do with pedestrian and bicycle needs at specific locations throughout the county, though some covered more general comments such as parked cars blocking sidewalk right-of-way and a desire for bike lanes to accommodate motorized scooters and wheelchairs. Transportation information, emerging mobility providers, and transit fares were other common themes.
>
> While some comments related to the use of car share, transportation network companies (TNCs), or autonomous vehicles as potential solutions, other comments

called for the increased accessibility and affordability of these services in the meantime."[16]

A partnership between the World Institute on Disability and the MTC created the research and community engagement project TRACS Transportation Resilience, Accessibility & Climate Sustainability). The project's overall goal is to "stimulate connection and communication between the community of seniors and people with disabilities together with the transportation system– the agencies in the region local to the San Francisco Bay, served by MTC."[17]

As part of the TRACS outreach process, respondents were asked to share their compliments or good experiences with MTC transit. One respondent who had used multiple services said, "**it is my sense that SamTrans is the best Bay Area transit provider in terms of overall disability accommodation**."

The San Mateo County Transit District updated its Mobility Plan for Older Adults and People with Disabilities in 2018. According to the district, the **county's senior population is expected to grow more than 70% over the next 20 years, and the district is experiencing unprecedented increases in paratransit ridership**. The plan aims to develop effective mobility programs for residents with disabilities and older adults, including viable alternatives to paratransit, partnerships, and leveraging funding sources.[18]

MTC also launched Clipper START—an 18-month pilot project— in 2020, which provides fare discounts on single transit rides for riders whose household income is no more than double the federal poverty level.[19]

Within the Town, regional and local transit opportunities are served by BART and SamTrans. Colma is unique for a town its size as there are two BART stations located on opposite sides of the Town. The Colma BART station is in the north part of town, while the South San Francisco BART station is just outside of town limits to the south. SamTrans services the Town along El Camino Real and Junipero Serra Boulevard corridors. While BART and SamTrans are respectively high-quality transit providers, the corridors that they serve run north and south within Colma including the surrounding areas. This leaves east-to-west connectivity limited to other modes of transportation. Given Colma's small size, SamTrans, and ridership within the Town, it does not plan to expand its service routes to the underserved parts of the Town. To improve accessibility and connectivity, the Town has applied for a grant to fund a pilot rideshare program to address deficiencies in transit offering and direct resources to Veterans, seniors,

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[16] https://mtc.ca.gov/sites/default/files/MTC_Coordinated_Plan.pdf

[17] https://wid.org/transportation-accessibility/

[18] https://www.samtrans.com/Planning/Planning_and_Research/Mobility_Plan_for_Older_Adults_and_People_with_Disabilities.html

[19] https://mtc.ca.gov/planning/transportation/access-equity-mobility/clipperr-startsm

service industry employees – all groups that are likely to experience transportation affordability challenges.

Environment. TCAC's opportunity areas environmental scores are based on the CalEnviroScreen 3.0 indicators, which identify areas disproportionately vulnerable to pollution sources such as ozone, PM2.5, diesel PM, pesticides, toxic release, traffic, cleanup sites, groundwater threats, hazardous waste, impaired water bodies, and solid waste sites.

Generally, the Town of Colma **scores poorly to moderate on environmental outcomes** (Figure III-9 and Figure III-10). **The town scores moderately well on the California Healthy Places Index (HPI)** developed by the Public Health Alliance of Southern California (PHASC) (Figure III-11). The HPI includes 25 community characteristics in eight categories, including economic, social, education, transportation, neighborhood, housing, clean environment, and healthcare (Figure III-11).[20]

The Town does not have any active or former factories that negatively affect air quality and the overall environment. However, because the Town is bordered by a major freeway (Interstate 280), air quality, particularly diesel particulate matter may be higher in communities that border Interstate 280 and U.S. Route 101 in the surrounding region.

Another factor for low scores may be hazardous materials. Currently, there are two sites that have been identified as containing hazardous materials which include a no longer active landfill. There are several other identified sites that have been considered complete and no longer hazardous which is shown in the 2040 General Plan.

Disparities in access to opportunity. TCAC's composite opportunity score for the Town of Colma designates it as a moderate resource area — there are no designated high resource or low resources areas in Colma (Figure III-12). The share of the population with Limited English Proficiency (LEP) is the same as the county (7%) (Figure III-13).

The Social Vulnerability Index (SVI) provided by the CDC—ranks census tracts based on their ability to respond to a disaster—and includes four themes of socioeconomic status, household composition, race or ethnicity, and housing and transportation. According to the SVI, the town is moderately vulnerable (Figure III-15).

The Town of Colma does not have any disadvantaged communities as defined under SB 535 as "the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations."21 (Figure III-16)

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[20] https://healthyplacesindex.org/about/

[21] https://oehha.ca.gov/calenviroscreen/sb535

Disparities specific to the population living with a disability. Ten percent of the population in the Town of Colma are living with at least one disability, compared to 8% in the county (Figure III-17). The most common disabilities in the city are ambulatory (4.8%), independent living (3.9%), and cognitive (3.7%) (Figure III-18).

Disability

"Disability types include hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty."

Source: California Department of Housing and Community Development Guidance, 2021, page 36.

For the population 65 and over, the share of the population with an ambulatory or independent living difficulty increases (Figure III-19). As mentioned above, under access to transportation, San Mateo County is rapidly aging. Therefore, this population with a disability is likely to increase.

All residents living with a disability in the Town of Colma are employed, while the unemployment rate for residents without a disability is significantly low (1%) (Figure III-20). Countywide, the unemployment rate for residents with a disability is 4%, compared to 3% for residents without a disability.

Access to Opportunity

Regional Access

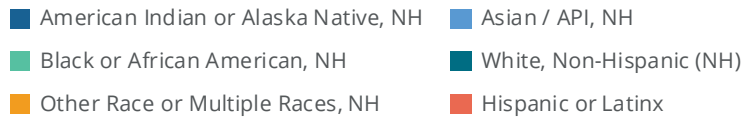|	Town of Colma	San Mateo County
Jobs to Household Ratio	10.96	1.59
LEP Population	7%	7%

Share of Population by Race in Resource Areas in the Town of Colma

High/Highest Resource Area

Moderate Resource Area

0%	40%	2%	20%	4%	34%

- American Indian or Alaska Native, NH
- Asian / API, NH
- Black or African American, NH
- White, Non-Hispanic (NH)
- Other Race or Multiple Races, NH
- Hispanic or Latinx

Employment by Disability Status

Town of Colma

With A Disability	100%	
No Disability	99%	1%

San Mateo County

With A Disability	96%	4%
No Disability	97%	3%

- Employed
- Unemployed

SECTION IV. Disparate Housing Needs

This section discusses disparate housing needs for protected classes including cost burden and severe cost burden, overcrowding, substandard housing conditions, homelessness, displacement, and other considerations.

Disproportionate Housing Needs

"**Disproportionate housing needs** generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions."

Source: California Department of Housing and Community Development Guidance, 2021, page 39.

Housing needs. Due to its small population, growth in the Town of Colma has been somewhat sporadic, with sharp increases in population between 2002-2006 and 2019-2020 and more gradual periods of growth over the last thirty years. The town experienced a decrease in population during the Great Recession (Figure IV-1). **Compared to the county and the Bay Area, ABAG numbers show the Town gained population over the last year during the COVID pandemic**. The accuracy of this data could be questioned because there were no new housing developments in the past several years, with Veterans Village being the most recent in 2019. ~~Unlike the county and the Bay Area, the Town of Colma gained population over the last year during the COVID pandemic~~.

Since 2015**, the housing permitted to accommodate growth has largely been priced for low and very-income households**, with 34 units permitted for low-income families and 31 for very low-income households (Veterans Village), respectively. The town has issued ten permits for above moderate-income households and no permits for moderate-income households (Figure IV-2). The Housing Needs Data Report for the Town of Colma indicates new construction has not kept pace with demand throughout the Bay Area, "resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness." [22]

The variety of housing types available in the city in 2020 ~~are~~ is predominantly single-family (63%) and medium to large scale ~~multifamily~~ multi-family (19%). From 2010 to 2020, the

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[22] Housing Needs Data Report: Colma, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

multifamily inventory increased more than single-family, and the city has a greater share of multifamily housing compared to other communities in the region.[23]

The majority of the housing inventory in the Town of Colma was constructed before 1959 (Figure IV-3). As such, the city's units are older, lack energy efficiency, could be costly to adapt for disability accessibility, and may have deferred maintenance if households cannot afford to make improvements. Of note, only two new housing units have been built in the town since 2010 (Verano and Veterans Village).

Compared to San Mateo County, the city's owner-occupied housing market has a smaller share of units priced between $1 and $1.5 million—11% of units in the town fall within this price range compared to 23% in the county (Figure IV-4). Units priced above $2 million make up an even smaller proportion of the town's housing stock compared to the county, with 1% and 19%, respectively. According to the Zillow home value index, home prices have experienced remarkable growth in the town and county (Figure IV-5). However, the growth in Colma has been tempered since the Great Recession when compared to the county.

Rents have increased at a slower pace compared to the for-sale market—however, median rents increased more rapidly from 2017 to 2019 (Figure IV-7). Rent increases have likely been dampened by the COVID-19 pandemic. Compared to the county, the **Town of Colma has significantly fewer luxury rental units**—4% of units rent for more than $3,000 in the city compared to 22% in the county (Figure IV-6).

Cost burden and severe cost burden. **Nearly half of all renter households in the Town of Colma are cost-burdened**—spending more than 30% of their gross income on housing costs—and just over one in four are extremely cost-burdened—spending more than 50% of their gross income on housing costs (Figure IV-9). **Nearly 60% of all owner occupied households in the Town are cost-burdened**. Compared to renters, homeowners that spend more than 50% of their gross income come in lower at 19% (Figure IV-(9). Compared to the county, the percentage of housing cost burden for Colma residents is lower for those spending 30% or less, but higher in the 30%-50% and 50% and over cost burden categories (Figure IV-8). ~~Cost burdened~~Cost-burdened households have less money to spend on other essentials like groceries, transportation, education, healthcare, and childcare. Extremely cost-burdened households are considered at risk for homelessness.

A greater portion of households in the Town of Colma (43%) struggle with cost burden compared to the county (37%) (Figure IV-8). Lower-income households are more likely to experience a housing cost burden. Over half of households earning less than 30% AMI—considered extremely low-income households—are severely cost-burdened. No households earning 81% AMI or above are severely cost-burdened in Colma (Figure IV-10). The

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[23] Housing Needs Data Report: Colma, ABAG/MTC Staff and Baird + Driskell Community Planning, 2021.

concentration of cost burden areas in Colma are most likely in the Sterling Park neighborhood, Verano and Villa Hoffman developments.

Racial and ethnic minorities are more likely to experience housing cost burdens in the Town of Colma. Residents who identify as other or multiple races (44%) and Hispanic households (33%) experience the highest cost burden rates in the city. Asian (28%), non-Hispanic White (26%), and Black or African American (24% cost-burdened) households experience lower rates of housing cost burden (Figure IV-11).

Fifteen percent of large family households—considered households with five or more persons—experience less cost burden compared to 33% of all other households in Colma (Figure IV-12).

Overcrowding. Nearly all households (97%) in the Town of Colma do not experience overcrowding—indicated by more than one occupant per room (Figure IV-15). However, renter households are slightly more likely to be overcrowded, with 4% of households having more than one occupant per room compared to 3% of owner households (Figure IV-16). Concentrations of overcrowding are rare in Colma. For the 3% of households that do experience overcrowding, it is most likely in the Sterling Park neighborhood, Verano, or Villa Hoffman developments.

Compared to the region, **Colma is under the statewide average for overcrowded households** (Figure IV-19). Just north of the Town, in census tracts located in Daly City more than 20% and 15.01 to 20% respectively of households or more experience overcrowding.

Racial and ethnic minorities are more likely than non-Hispanic White households to experience overcrowding. Asian/API (6.6% of households), Hispanic (5.4%), and other/multiple race households (3.4%) experience the highest rates of overcrowding (Figure IV-17). Low and moderate-income households are also more likely to be overcrowded (Figure IV-18). Overall, the Town of Colma has a lower rate of overcrowded households compared to the statewide average (8.2%).

Substandard housing. Data on housing conditions are very limited, with the most consistent data available across jurisdictions found in the American Community Survey (ACS)—which captures units in substandard conditions as self-reported in Census surveys. In the Town of Colma, renter households are also more likely to have substandard kitchen and plumbing facilities compared to owner households. Generally, a low share of households lacks kitchens or plumbing. For renters, 2.5% lack kitchen facilities, and just over one percent lack plumbing. NNo owner households lack complete kitchen or plumbing facilities in Colma (Figure IV-20). Since substandard housing numbers are very low, most likely there is not a concentration of this type of housing. Data on housing conditions are very limited for the region. When comparing Colma's substandard housing with surrounding jurisdictions is limited to the City of San Bruno where incomplete kitchen facilities affect 0.4% of renters and incomplete plumbing facilities affect 0.1% of renters (City of San Bruno Fair Housing Assessment, 2022). Furthermore, 0.1% of homeowners experience incomplete plumbing (City of San Bruno Fair Housing Assessment,

2022). While Colma's numbers are higher than San Bruno, both percentages for renters and homeowners are very low.

Homelessness. In 2019, 1,512 people were experiencing homelessness in the county; 40% were in emergency or transitional shelters, while the remaining 60% were unsheltered. The majority of unsheltered people experiencing homelessness were in households without children. The majority of people in transitional housing were in households with children (Figure IV-21).

People who identify as American Indian or Alaskan Native (6% homeless, less than 1% general population), Black (13%, 2%), White (67%, 51%), and Hispanic (38%, 28%) are overrepresented in the homeless population compared to their share of the general population (Figure IV-22 and Figure IV-23). People struggling with chronic substance abuse (112 people), severe mental illness (305), and domestic violence (127) represent a substantial share of the homeless population in 2019 (Figure IV-24).

Displacement. Owner households generally enjoy a greater amount of housing stability, whereas renter households are more mobile (i.e., move more frequently). Households in the city were less likely to have moved in the past year compared to the households in the county (10% compared to 12% in the county) (Figure IV-25 and Figure IV-26) In Colma, 94% of residents have either lived in the same house or moved to another house within town limits (Figure IV-25). When looking at the data at the county level, both San Mateo County and Colma residents tend to stay in the same house or move within the same city or town.

Because renters are generally considered more vulnerable to displacement (Figure IV-28), Colma as a census tract is considered vulnerable. This is because 20% to 40% of the households are renter occupied (Figure IV-30). While 20% to 40% renter occupied households are common in the region, non-homeowners are more susceptible to displacement whereas homeowners are not.

While the **Town of Colma has 65 units of assisted housing units in its housing stock, they are all at low risk of conversion** (Veterans Village). Veterans Village is a Low-Income Housing Tax Credit property and will not expire until 2071. However, San Mateo County has 417 units at risk of conversion —8% of the total assisted housing units in the county (Figure IV-27). While there has not been any major housing development since 2019 (Veterans Village), the lack of activity in housing may have been a result of the pandemic and not disinvestment. There has not been any recent environmental displacement in Colma, however, it is important to note that the San Andreas Fault is just west of the Town and along El Camino Real has high liquefaction susceptibility.

Displacement Sensitive Communities

"According to the Urban Displacement Project, communities were designated "sensitive" if they met the following criteria:

- They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing costs. Vulnerability is defined as:

  - The share of very low-income residents is above 20%, 2017

  - AND

  - The tract meets two of the following criteria:

    - Share of renters is above 40%, 2017

    - Share of people of color is above 50%, 2017

    - Share of very low-income households (50% AMI or below) that are severely rent-burdened households is above the county median, 2017

    - They or areas nearby have been experiencing displacement pressures. Displacement pressure is defined as:

      - Percent change in rent above county median for rent increases, 2012-2017

OR

- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017"

- They currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing costs. Vulnerability is defined as:
  - The share of very low income residents is above 20%, 2017
  - AND
  - The tract meets two of the following criteria:
    - Share of renters is above 40%, 2017
    - Share of people of color is above 50%, 2017
    - Share of very low income households (50% AMI or below) that are severely rent-burdened households is above the county median, 2017
    - They or areas nearby have been experiencing displacement pressures. Displacement pressure is defined as:
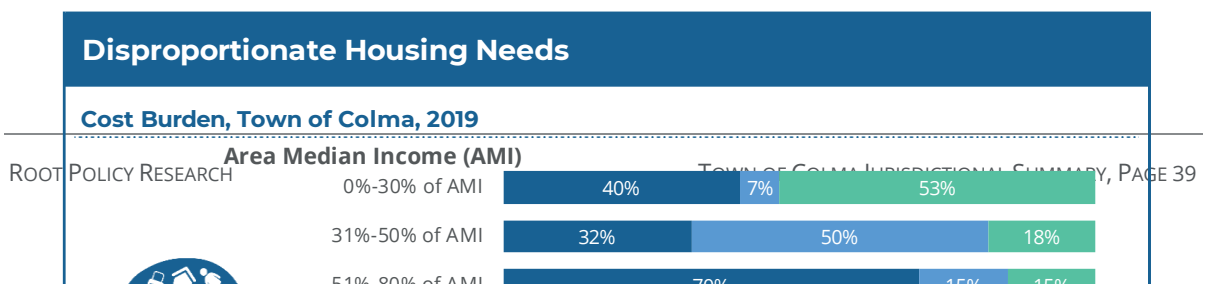   - Percent change in rent above county median for rent increases, 2012-2017

OR

- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap), 2017"

Source: https://www.sensitivecommunities.org/.

According to the Urban Displacement Project, the Town of Colma is vulnerable to displacement (Figure IV-28**). Additionally, there is a very minimal area in the northwest portion of the city included in the Special Flood Hazard Areas, which are determined by the Federal Emergency Management Agency (FEMA) as having a 1% chance of flooding annually** (Figure IV-29, IV-30, and IV-31).

Access to mortgage loans. Disparities by race and ethnicity are also prevalent in home mortgage applications, particularly in denial rates (Figure IV-32). **Hispanic (43% denial rate) and Asian/API households (33%) had the highest denial rates for mortgage loan** applications in 2018 and 2019. Conversely, non-Hispanic White households 17%) have the lowest denial rates during the same time (Figure IV-33).

Zoning and land use.

Disproportionate Housing Needs

Cost Burden, Town of Colma, 2019

Area Median Income (AMI)

0%-30% of AMI	40%	7%	53%
31%-50% of AMI	32%	50%	18%

Site Inventory Analysis

The Site Inventory Analysis is included in the Housing Element Draft section called Site Inventory.

AB 686 requires an analysis of sites identified to meet RHNA obligations for their ability to affirmatively further fair housing.

- Once sites are identified, the analysis will be placed here and will consist of:

- Map of identified sites by lower-income, moderate-income, and above moderate-income units;

- Identification of sites within or in proximity to R/ECAPs and edge R/ECAPs and/or low income/poverty concentrations;

- Proportion of low and very low-income units located in that area, as well as concentrations of Housing Choice Vouchers,

- How the distribution of lower, moderate, and above moderate-income units—and the share located in low, moderate, and high resourced areas—will change with proposed site inventory development;

- Proximity to:

  - High proficiency K-12 education institutions;

  - High-resourced areas/positive economic outcome areas;

  - Low social vulnerability;

  - Good jobs proximity;

  - Access to transportation;

  - Healthy places; and

  - Flood hazards.