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DRAFT NAPA/SONOMA REGIONAL FAIR HOUSING PLAN

PETALUMA & SONOMA COUNTY



November 2022

I. Executive Summary

The City of Petaluma and Sonoma County Regional Fair Housing Plan was a planning process for local governments and public housing agencies (PHAs) to help jurisdictions meet their fair housing requirements in a meaningful way and take actions necessary to overcome historic and current patterns of segregation, promote fair housing choice, and foster more inclusive communities. The regional approach undertaken here, a first for the region, also helps to ensure that the goals are applied consistently and collaboratively across the region and fosters a more inclusive community for everyone that calls the region home.

The Regional Fair Housing Plan follows the template for the Assessment of Fair Housing that was created by the US Department of Housing and Urban Development's (HUD's) 2015 Affirmatively Furthering Fair Housing rule. While following the HUD template was not required at the time this report was written, the Project Team chose to follow this approach to reflect their commitment to collaborative, regional approaches to identifying and addressing the regional impediments to fair housing.

This Regional Fair Housing Plan is a five-year plan (2022 to 2026) that includes objectives, goals, and concrete actions to be taken at the jurisdictional and regional level to increase access to neighborhoods of opportunity and reverse patterns of segregation. Once approved by each participating local government, the final regional plan will be submitted to the U.S. Department of Housing and Urban Development.

This plan represents a commitment by all participating jurisdictions to a set of strategies to affirmatively further fair housing across the entirety of the region. It is designed to both increase access to opportunity to high opportunity areas by members of protected classes as well as increase investment and resources to communities that have suffered disinvestment.

Patterns of segregation and disparities in access to opportunity in housing and other areas are apparent and persistent throughout the region. The same characteristics that make the region an ideal place to live for many—environmentally healthy neighborhoods, proficient schools, and high home ownership rates, to name a few—are not at all equally experienced by the region's communities of color, low-income communities, and persons with disabilities. Neighborhoods with higher concentrations of Black, Indigenous and People of Color (BIPOC) residents have less access to good schools, are less environmentally healthy, have less access to transportation and jobs, and have higher rates of poverty.

Many jurisdictions within the region have taken significant steps to improve access to safe and affordable housing, including providing additional funding, making zoning changes, and establishing affordability requirements for new developments. At the same time, however, the region continues to attract new residential development that fuels displacement concerns due to increases in local housing prices and rents. Additionally, the high cost to acquire land for development and build in the region means that most new housing produced is unaffordable for many residents. These market forces are often compounded by community pushback, or a Not in My Backyard (NIMBY) sentiment from residents in response to attempts to develop more affordable housing or allow for increased density, all of which present a challenging landscape in the region.

The City of Petaluma's most recent data shows that approximately 68% of residents are non-Hispanic white, 22% are Hispanic or Latino, 5% of residents are Asian Americans or Pacific Islanders, 1% of residents were non-Hispanic Black, and 0.1% of residents were non-Hispanic Native Americans. Over time, Petaluma has become somewhat more diverse, but white residents still make up the clear

majority of residents in the city. However, there have been significant increases in the population of Hispanic and Asian American residents. Additionally, the proportion of seniors has grown to almost 18% and seniors are likely to become a larger part of the city's population in coming years. Overall, Petaluma experiences low levels of segregation across all racial and ethnic categories, although segregation has increased over the past ten years.

In consultation with numerous stakeholders, the City of Petaluma has identified the following contributing factors as a high priority:

- ❖ Lack of Fair Housing Testing, Education, and Outreach
 - Lack of fair housing testing
 - Lack of monitoring
 - Lack of targeted outreach
- ❖ Substandard Housing Conditions
 - Age of housing stock
 - Cost of repairs or rehabilitation
- ❖ Discrimination in Home Sales Market and Disparities in Homeownership Rates
 - Lack of fair housing testing/monitoring
 - Availability of affordable housing
 - Lack of opportunities for residents to obtain housing in higher opportunity areas
- ❖ Concentration of Protected Populations
 - Location and type of affordable housing
 - Lack of private investment
 - Lack of public investments in specific neighborhoods, including services
- ❖ Inequities in Access to Opportunities
 - Lack of private investment
 - Lack of public investments in specific neighborhoods, including services or amenities

To address the contributing factors described above as well as the additional contributing factors listed in the appendix, the AFH plan proposes the following goals and strategies, which are detailed in Section V of this report.

Regional Goals:

- I. **Increase the Supply of Affordable Housing in Higher Opportunity Areas and Areas with Ongoing or Threatened Displacement.**
 - a. *Promote affordable housing bond issues at multiple levels of government.*
 - b. *Adopt or modernize inclusionary housing and commercial linkage fee ordinances.*
 - c. *Provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 100% AMI to develop accessory dwelling units (ADUs) with affordability restrictions on their property.*
 - d. *Prioritize publicly owned land and reduce permit fees for affordable housing.*

II. Meet the Housing and Services Needs of Migrant and Year-Round Farmworkers.

- a. Reform zoning and land use laws to permit safe farmworker housing in areas where agricultural uses predominate.*
- b. Target through preferences or affirmative marketing farmworkers for affordable housing opportunities in towns and cities.*
- c. Study means of increasing access to supportive services in rural parts of Napa and Sonoma Counties.*

III. Reduce Zoning and Land Use Barriers to the Development of Housing That Is Affordable to Low-Income Households, Including Low-Income People of Color and Low-Income Persons with Disabilities.

- a. Create affordable housing overlay districts to enable multifamily housing with a significant affordable component in higher opportunity areas.*
- b. For qualifying jurisdictions, as per California SB10, adopt an ordinance to allow up to ten dwelling units on any parcel that is within a transit-rich area or urban infill site.*
- c. Update the zoning codes across the region to reflect recent changes to California laws that are designed to increase affordable housing.*

IV. Increase Access to Opportunity for Housing Choice Voucher Families

- a. Advocate for housing authorities to adopt small area fair market rents or exception payment standards for regional sub-markets.*
- b. Engage municipal attorneys in enforcing prohibitions against source of income discrimination.*

V. Prevent Displacement by Preserving Affordable Housing and Protecting Tenants' Rights.

- a. Expand funding for tenants in landlord-tenant proceedings.*
- b. Study the viability of rent stabilization.*
- c. Track and collaborate to preserve affordable housing developments with expiring subsidy contracts countywide.*
- d. Create a right of first refusal for manufactured home park residents to purchase their communities when owners seek to sell or redevelop their properties.*

VI. Reduce Homelessness by Expanding the Supply of Permanent Supportive Housing

- a. Prioritize HOME and CDBG Funds for Developments That Include Permanent Supportive Housing Units.*
- b. Advocate for Public Housing Authorities to Adopt Preferences in their Housing Choice Voucher Program for Individuals with Disabilities Who Are Institutionalized or at Risk of Institutionalization.*

VII. Increase Support for Fair Housing Enforcement, Education, and OutreachCity of Petaluma Goals:

- I. Conduct more robust affirmative marketing for all publicly supported housing units, including units created under the Low-Income Housing Tax Credit (LIHTC) program.
- II. Reexamine land use and zoning measures to ensure that the City of Petaluma will be able to meet its Regional Housing Needs Allocation (RHNA) requirements.

The AFH lays out a series of achievable action steps that will help the City of Petaluma and Sonoma County to not only meet its obligation to affirmatively fair housing but to be a model for equity and inclusion.

II. Community Participation Process

To be completed by the jurisdiction.

III. Assessment of Past Goals and Actions

Below is a list of goals from the combined 2019 AI for the City of Petaluma, the City of Santa Rosa, and Sonoma County.

- Provide and ensure **housing protections** for tenants, build a safety net, streamline processes, create sliding-scale housing options, train managers, and provide adequate, well-coordinated, and culturally responsive support in conjunction with existing, trusted community partners.
- **Meet people where they are** literally and figuratively, by designing culturally relevant, anti-Racist, wrap-around services with a single point of entry, and resource embedded community partners to implement them during flexible hours and on-site when possible.
- **Support communities** to build neighborhood level engagement and connection with law enforcement agencies, train and encourage law enforcement to build culturally responsive, anti-racist, community policing protocol, and prioritize services to individuals experiencing homelessness who reside in these neighborhoods so that they too are able to live in healthy and thriving communities.
- Direct appropriate departments to **work in partnership** with appropriate jurisdictions and agencies to prioritize infrastructure projects in these communities, and to collaborate with the community to bring their vision to life.
- **Fund health** in these communities, advocate for state and federal funds for health-related projects, provide a safety net for uninsured and underinsured individuals and increase mental health support.
- Create a program that supports **living wages** to reflect the cost of living and **provide** support to **small businesses** to be able to afford paying dignified wages to their employees.

2.a. Discuss what progress has been made toward their achievement.

The City has a longstanding partnership with Petaluma People Services Center (PPSC) to provide Fair Housing Services. The City also recently started a SAFE Program to support the community in building a level of engagement and connection with law enforcement agencies.

2.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

Housing Protections

The City of Petaluma works in partnership with Petaluma People Services Center (PPSC) who administered the City-wide Fair Housing Program. The PPSC program works to eliminate housing discrimination and to ensure equal housing opportunity for all people through leadership, education, conciliation, outreach, advocacy and engaging with enforcement agencies if necessary. PPSC has been providing Fair Housing Services in Petaluma since the early 1970's. The goal is to promote equal access to housing, and to provide support services and referrals that aid in the prevention of homelessness and promote permanent housing conditions. There has been a a substantial increase for these services over the past few years due to the epidemic. For the Fiscal Year 21-22 , to date the following services have been provided: Discrimination claims 6, landlord trainings 130, training with non-profits 5, number of community education events 21, total consultations with tenants 790. 80 of these calls requiring a case being opened or training provided to landlords.

Meet People Where They Are

Like most cities across the Country, some in our community experience homelessness. There are complex reasons that lead to homelessness and the City of Petaluma is committed to helping our most vulnerable and protecting our community. This effort involves a team of community players including local non-profits Committee on the Shelterless (COTS), Petaluma People Services (PPSC), and Downtown Streets Team (DST), working alongside Petaluma city staff. Combined, this group offers housing options, counseling, employment, and support services. The goal of these combined efforts is to identify and address the many issues that lead to homelessness. We work together, one person at a time, to build trust, find services, and help each individual experiencing homelessness in our community regain health, dignity, and a path into housing.

The variety of services available to our community is made possible through the incredible work and efforts of our non-profit service providers who work tirelessly to serve the underserved in Petaluma, including Rebuilding Together, Redwood Empire Food Bank, PEP Housing, Veterans Resource Centers of America, Boys and Girls Club of Sonoma-Marin, Petaluma Health Center, Salvation Army and many more.

To ensure the needed services are available in Petaluma, the City provides funding and other resources to our partners to ensure our most vulnerable receive the aid and care that they need. Prior to the pandemic, The City invested resources to ensure that at least 12 beds at the Mary Isaac Center were always reserved for Petaluma residents experiencing homelessness, dedicated \$450,000 (CDBG) for rental assistance for low income Petalumans, and invested \$550,000 to continue DST providing our unhoused residents with job training, employment readiness skills, and access to services, as well as a new mobile shower program. Additionally, the City increased our investment in our partnership with COTS in the amount of \$300,000 and launched the new SAFE Team program, a mobile crisis intervention unit which received \$1 million in seed funding from the community-supported Measure U sales tax. City investments are leveraged with local fundraising and funds from the County, State and Federal governments to run these important and innovative programs.

Support Communities

The City of Petaluma Police Department recently implemented a SAFE program in partnership with Petaluma Peoples Services (PPSC). The Petaluma Police Department and the City of Petaluma are proud to announce our partnership with PPSC to bring our community the SAFE (Specialized Assistance for Everyone) program - a mobile crisis response team modeled after the successful and nationally recognized Crisis Assistance Helping Out on the Streets (CAHOOTS) program in Eugene, Oregon.

The SAFE team focuses on 3 main services to the community:

1. Emergency response for community members in crisis related to mental health, substance abuse/addiction, and homelessness.
2. Non-emergency response for community members in need.
3. Proactive community outreach, support, and resource referrals.

The SAFE team is a new program, so no data is currently available.

Work in Partnership

The City is working toward this goal through the Community Vision element of the City General Plan and Housing Element Update. General Plan update and workshops are in process.

The General Plan update process is designed to coordinate the renewal of Petaluma's General Plan and Housing Element concurrently in order to meet the Housing Element update deadline of December

2022. The update process also includes ongoing long-range planning efforts including updating planning documents that support the implementation of the General Plan. Following the adoption of the General Plan, updates to the City's Zoning Ordinance, Station Area Master Plan, Central Petaluma Specific Plan, and Urban Growth Boundary (UGB) may move forward to implement the directions in the newly adopted General Plan. A timeline of the process is included below, followed by a detailed schedule.

Climate action is an integral part of the General Plan update process. Petaluma adopted a Climate Emergency Resolution in May 2019, becoming the first city in Sonoma County to adopt such a resolution. Petaluma's Climate Action Commission held its first meeting on November 14, 2019 and worked on the [Climate Emergency Action Framework](#), which was adopted by City Council on January 11, 2021.

This hard work sets the stage for how climate change is addressed in the General Plan update, which will include a Climate Action and Adaptation Plan (CAAP) – an action called for in the Climate Emergency Action Framework. This Climate Action and Adaptation Plan will be both a technical document used to guide city decision-making and a visionary document used by the public to understand the direction of the community. This plan will include a greenhouse gas inventory, a greenhouse gas reduction analysis, and a climate equity assessment that will serve as a foundation for the plan alongside community engagement and visioning. By incorporating both quantitative goals and policy language, the Climate Action and Adaptation Plan will work in connection with the broader General Plan to reach towards Petaluma's climate vision.

Fund Health

The City has not provided information about progress toward this goal.

Support living wages and small business

On August 5, 2019, the Petaluma City Council unanimously approved the adoption of a local minimum wage ordinance. Click [here](#) to read the ordinance.

This ordinance:

- Requires employers to pay a Petaluma minimum wage, rather than the state wage, for employee hours worked within the Petaluma City limits.
- Establishes a two-tiered wage during the first year of implementation (2020), then a single wage starting in the second year of implementation (2021).
- Adds an annual cost of living adjustment (COLA) based on regional consumer price index
- This ordinance covers all employees who work at least 2 hours per week in the City limits and who qualify for the minimum wage according to the California Labor Code. Tips and benefits cannot be included when calculating the Petaluma minimum wage.

Petaluma's business community is most known for its dedication to values such as: philanthropy, sustainability, innovation, family, remaining active and growth. Companies range from high tech, specialty food and beverage processing, advanced manufacturing, consumer products, green technology, and life sciences.

The Economic Development (ED) Division helps local businesses start, connect, and grow. Startup businesses can get advice, find real estate and navigate the City's permitting process with ED staff. Growing businesses can get help finding employees, expanding their spaces and meeting other business leaders. ED organizes industry groups to help similar businesses connect and support each other. Finally, ED promotes Petaluma as an ideal business and career destination.

The City Economic Development Division in particular, provides:

- Insight into city processes, fees and regulations
- Opportunities to learn about and network with other business leaders
- Information about and assistance with economic development incentives
- Each year Petaluma's Economic Development Division assists hundreds of businesses start, expand or relocate in Petaluma. This Toolkit represents the sum of that experience, and the department's desire to facilitate the experience for other businesses.

More information is still needed to assess the implementation and efficacy of the living wage and economic development programs

2.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

The City has been working hard on policy and programs and now needs the resource to implement the programs. The city recently passed a successful sale tax initiative that is providing the funding to increase staff level and implement project and program. The increased need in the community and case load has been overwhelming for our partner agencies, and additional funding is needed to support partner agencies programs.

2.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Based on organizational experience. PPSC is well positioned to work with the City in the future to fulfill the requirements of the Affirmative Fair Housing Act (AFHA), because of our existing partnerships and collaborations with housing providers and the community. PPSC recognizes that a strong community is a springboard to help families build prosperous futures, and that where a person lives matters. PPSC has a mission that is aligned with AFHA, and they are committed to giving every person an equal chance, no matter who they are, what they look like, how they worship or where they are from. Ensuring every resident can live where they choose is fundamental to the principle of the Fair Housing Act of 1968.

Sonoma County¹

Below is a list of goals from the combined 2019 AI for the City of Petaluma, the City of Santa Rosa, and Sonoma County.

- Provide and ensure **housing protections** for tenants, build a safety net, streamline processes, create sliding-scale housing options, train managers, and provide adequate, well-coordinated, and culturally responsive support in conjunction with existing, trusted community partners.
- **Meet people where they are** literally and figuratively, by designing culturally relevant, anti-Racist, wrap-around services with a single point of entry, and resource embedded community partners to implement them during flexible hours and on-site when possible.
- **Support communities** to build neighborhood level engagement and connection with law enforcement agencies, train and encourage law enforcement to build culturally responsive, anti-racist, community policing protocol, and prioritize services to individuals experiencing homelessness who reside in these neighborhoods so that they too are able to live in healthy and thriving communities.

¹ 2019 Countywide Assessment of Fair Housing: Analysis of Impediments to Healthy and Thriving Communities; Final Report January 5, 2021.

- Direct appropriate departments to **work in partnership** with appropriate jurisdictions and agencies to prioritize infrastructure projects in these communities, and to collaborate with the community to bring their vision to life.
- **Fund health** in these communities, advocate for state and federal funds for health-related projects, provide a safety net for uninsured and underinsured individuals and increase mental health support.
- Create a program that supports **living wages** to reflect the cost of living and **provide** support to **small businesses** to be able to afford paying dignified wages to their employees.

5.a. Discuss what progress has been made toward their achievement.

While many of the goals identified in the Analysis of Impediments to Fair Housing Choice were achieved, some continue to be a work-in-progress. To support the development of affordable housing throughout the county and help mitigate the effects of housing segregation, the City and County continue to financially support new affordable housing and/or rehab projects with federal, state, and local funds. Additionally, both the City and County funds fair housing services annually. These services are provided by non-profit organizations, who advocate for and provide education to the public of tenant's rights, landlord rights, and also assist residents with disabilities attain/retain housing.

To address discrimination in County operations and decision making process, the County joined the Government Alliance on Race and Equity and participants from 12 county departments created Sonoma County Racial Equity Alliance and Leadership. Subsequently, county employees formed the County Latinx Employee Resource Network and the Board of Supervisors created the Office of Equity in the Summer of 2020. In January of 2021 the Board of Supervisors approved a five year strategic plan supporting racial equity and promoting social justice. The goals contained in the strategic plan are to foster a county organizational culture that supports the commitment to achieving racial equity; implement strategies to make the County workforce reflect County demographic across all levels; ensure racial equity throughout all County policy decisions and service delivery; and engage community members and stakeholder groups to develop priorities and to advance racial equity. These efforts impact all county operations and decisions and help the County further fair housing choice by promoting balanced communities where people of all races, ethnicities, genders, age and persons with and without disabilities can live together.

5.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

There are a number of factors that impeded additional progress to meeting the City and County's goals. In the past five years alone the catastrophic 2017 Tubbs/Nuns Fire, the 2019 Kincade Fire, and 2020 Glass Fire destroyed thousands of units of county housing stock and public infrastructure, and took a toll on public services. These events were followed by a series of recovery and reconstruction efforts that continue today and will for many years to come. The outbreak of the Coronavirus in early 2020 caused wide disruption in the delivery of public services, including fair housing services. The City of Santa Rosa, Sonoma County, and other organizations temporarily suspended services and some transitioned to limited or remote only, with offices closed to the public, and many organizations experienced capacity issues such as staff shortages.

One of many impacts caused by the Coronavirus pandemic to the construction industry was a supply chain disruption that created a substantial increase in the cost of materials and delay of material

delivery. As a result of this disruption, the completion of housing projects was delayed due to budget shortfalls and limited access to building materials. Currently, the country as a whole is being economically burdened by high inflation, which has impacted many facets of City and County services, housing production, and housing costs.

5.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

In addition to having already deployed significant state and federal supplemental funds to mitigate the effects caused by the wildfire disasters and the pandemic, the County is now in the process of determining the use of monies from the American Rescue Plan Act (ARPA). One of the uses being considered for these funds includes creating a homebuyer program targeting specifically for minorities. Additionally, the County is a recipient of the HOME- Investment Partnership Program American Rescue Plan Program (HOME-ARP) grant, which is also a supplemental federal fund. The use of these funds is restricted to specific low income populations and the City and County will comply with all United States Department of Housing and Urban Development (HUD) requirements to fund qualified projects.

Something new that the County is doing in fiscal year 2022-23 is to fund a new public service provider who will provide financial and debt counseling services to expand the range of services other fair housing advocacy organizations are providing to Urban County residents. These services are geared to residents who are experiencing a financial hardship caused by the pandemic, which could jeopardize their housing situation. The goal of the program is to help residents stay in their home (or depending on the situation attain housing) by assisting them to manage their debt and ease the economic hardship. In accordance with the County's federal funding policies, the County will continue to financially support projects that create or preserve affordable housing, including infrastructure or public facilities projects that support affordable housing, and infrastructure or public facilities projects that support low- or moderate-income populations.

In March of 2022 the County transitioned to a new website platform to make it easier for the public to locate information and enhance public engagement. The Community Development Commission (CDC) is the County agency that administers housing grant funds on behalf of the County and works closely with the two housing authorities in the region. CDC will add fair housing information to the website in a prominent location in English and Spanish. This information will be readily accessible to the public.

The County will continue to collaborate with other transportation program providers and support changes to existing transit programs and/or adopt new programs to improve the County's transit system.

5.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The community engagement report prepared for this analysis identifies "high rents/cost of living/condition of housing" as the number one concern by those members of the public who participated in the public input process in 2019-20. This concern is followed by "community infrastructure", "homelessness" and "safety." The proposed current goals and respective actions reflect ways the County will work to address these concerns. The proposed goals show the County's commitment to continue to financially support non-profit organizations that offer fair housing services to mitigate discrimination in housing, including housing for the disabled; continue to financially support infrastructure projects for the creation and/or preservation of affordable housing, including meeting the housing needs of special populations such as seniors, farmworkers, and the homeless.

IV. Fair Housing Analysis

A. Demographic Summary

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. The data included reflects the composition of the region.

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Table 1a: Demographics, City of Petaluma and Sonoma County

	City of Petaluma			Sonoma County		
Race/Ethnicity	#	%		#	%	
White, Non-Hispanic.	41,357	68.1%		316,022	63.2%	
Black, Non-Hispanic	646	1.1%		7,399	1.5%	
Hispanic	13,305	21.9%		133,569	26.7%	
Asian/Pacific Island, Non-Hispanic	2,714	4.5%		21,565	4.3%	
Native American, Non-Hispanic	72	0.1%		2,343	0.5%	
National Origin						
#1 country of origin	Mexico	4,425	7.9%	Mexico	46,768	10.0%
#2 country of origin	Other Central America	705	1.3%	China excl. Taiwan	2,383	0.5%
#3 country of origin	El Salvador	595	1.1%	Philippines	2,361	0.5%
#4 country of origin	China excl. Taiwan	475	0.9%	El Salvador	2,295	0.5%
#5 country of origin	India	425	0.8%	Other South Eastern Asia	2,222	0.5%
#6 country of origin	Philippines	330	0.6%	Canada	1,823	0.4%
#7 country of origin	Canada	270	0.5%	Other Central America	1,632	0.4%
#8 country of origin	Korea	270	0.5%	Germany	1,528	0.3%
#9 country of origin	Iran	240	0.4%	Eastern Africa	1,446	0.3%
#10 country of origin	Germany	200	0.4%	India	1,390	0.3%

Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	9,615	23.6%	Spanish	42,419	9.1%
#2 LEP Language	Other Indo-European Language	1,685	1.8%	Other Indo-European Language	2,432	0.5%
#3 LEP Language	Chinese	645	1.6%	Other Asian & Pacific Language	1,793	0.4%
#4 LEP Language	Other Asian & Pacific Language	430	1.0%	Chinese	1,628	0.4%
#5 LEP Language	Other & Unspecified Language	355	0.8%	Other & Unspecified Language	784	0.2%
#6 LEP Language	Tagalog	335	0.6%	Vietnamese	766	0.2%
#7 LEP Language	French	330	0.4%	Tagalog	667	0.1%
#8 LEP Language	West Germanic Language	320	0.4%	Slavic Language	542	0.1%
#9 LEP Language	Slavic Language	225	0.4%	West Germanic Language	287	0.1%
#10 LEP Language	Korean	190	0.4%	Korean	285	0.1%
Disability Type						
Hearing difficulty	1,825		3.0%	18,277		3.7%
Vision difficulty	837		1.4%	9,268		1.9%
Cognitive difficulty	1,832		3.2%	21,725		4.6%
Ambulatory difficulty	2,633		4.6%	28,256		6.0%
Self-care difficulty	1,031		1.8%	11,921		2.5%
Independent living difficulty	1,778		3.8%	21,018		5.3%
Sex						
Male	30,064		49.5%	244,045		48.8%
Female	30,703		50.5%	255,727		51.2%
Age						
Under 18	12,782		21.0%	99,290		19.8%
18-64	37,312		61.4%	305,669		61.2%
65+	10,673		17.5%	94,913		19.0%
Family Type						
Families with children	6,565		42.7%	47,477		39.4%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families. Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately. Note 3: Data Sources: Table DP05, 2019 ACS 5 year Estimate (Race, Sex, Age); Table S1810 (Disability); 2019 ACS 5 Year Estimate; Table B11003 (Family with Children) 2019 ACS 5 Year Estimate; HUD/AFFH Data Table based on 2011-2015 5-year ACS Data (LEP and National Origin). Note 4: China does not include Hong Kong and Taiwan.

Race is defined by the Census Bureau as a person's self-identification with one or more social groups. An individual can report as White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race. Survey respondents may report multiple races.

Ethnicity is categorized based on whether a person is of Hispanic origin. For this reason, ethnicity is broken up into two categories, Hispanic or Latino and Not Hispanic or Latino. Hispanics may report as any race.

In all of the tables used in this analysis, the Race groupings include only those who report that they are not of Hispanic origin. Those of Hispanic origin are reported under the Race groupings as Hispanic. Hispanic includes people of any of the races above.

City of Petaluma

Race and Ethnicity

The most recent data available is from the 2015-2019 American Community Survey 5-year estimates. As of 2019, 68.1% of residents were non-Hispanic white, 21.9% of residents were Hispanic or Latino, 4.5% of residents were non-Hispanic Asian Americans or Pacific Islanders, 1.1% of residents were non-Hispanic Black, and 0.1% of residents were non-Hispanic Native Americans.

Over time, Petaluma has become somewhat more diverse, but white residents still make up the overwhelming majority of residents in the City. The white population slightly dipped in 2010 but has rebounded since then to maintain a clear majority, from 85.7% in 1990, to 77.0% in 2000, to 69.3% in 2010 and to 68.1% currently. By contrast, the other racial and ethnic groups have undergone increased levels of growth, with the population of Hispanic residents rising from 9.5% in 1990 to 22% in the most recent estimates. The Black population has not seen similar growth and remains at 1.1%, the same percentage in 1990. But the Asian American or Pacific Islander population has nearly doubled, and the Hispanic population has more than tripled. But, as is the case in other jurisdictions in the assessment, the Native American population has declined.

National Origin

The ten most common national origins in the city are, from most populous to least populous, Mexico, Other Central America, El Salvador, China, India, the Philippines, Canada, Korea, Iran, and Germany. Foreign born individuals make up a moderate proportion of the population amounting to 18.3% of the total, more than the proportion in Napa, but consistent with the trend in Santa Rosa. The most represented country, Mexico, has 4,425 residents in the city, making up only 7.9% of the total population. The next most represented group, "Other Central America", makes up 1.3% of the population.

Limited English Proficiency

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in the city are, from most populous to least populous, Spanish, Other Indo-European, Chinese, Other Asian & Pacific Island Languages, Other & Unspecified Language, Tagalog, French, West Germanic Language, and Slavic Language. Spanish, with over 9,615 LEP speakers, is roughly nine times more likely to be spoken than the next spoken language, Other Indo-European.

Disability

Ambulatory difficulties (4.6%) and independent living difficulties (3.8%), have the highest rates of incidence in the city. After these, cognitive difficulties (3.2%) was the most common, followed by hearing (3.0 %), self-care (1.8%), and vision difficulties (1.4%).

Sex

In the city, 50.5% of residents are female while 49.5% are male. This trend correlates with the trends in other jurisdictions and the region.

Age

Throughout the city, the population is distributed with working age adults as the clear majority (61.4%), followed by minors under 18 (21.0%) and seniors aged 65+ (17.5%). These numbers are very similar to those of other counties and cities in the Napa Sonoma Area with the senior population increasing over time while the inverse occurs for the other two groups.

Familial Status

Citywide, 42.7% of families are families with children under 18. This percentage is comparable to the other jurisdictions in this analysis, but slightly lower than the proportion in the cities of Santa Rosa and Napa.

Sonoma County

Race and Ethnicity

The most recent data available is from the 2015-2019 American Community Survey 5-year. As of 2019, 63.2% of residents were non-Hispanic white, 26.7% of residents were Hispanic or Latino, 4.3% of residents were non-Hispanic Asian Americans or Pacific Islanders, 1.5% of residents were non-Hispanic Black, and 0.5% of residents were non-Hispanic Native Americans.

Over time, Sonoma County has become more diverse, but this in itself does not prove integration of the population. The white population's overall proportion of the population has consistently decreased, from 84.3% in 1990, to 74.5% in 2000, to 66.1% in 2010 and to 63.2% in current day. The other racial and ethnic groups, conversely, have seen consistently increasing levels of growth, with the population of Hispanic residents rising from 10.6% in 1990 to 26.7% in the most recent estimates.

National Origin

The ten most common national origins in the county are, from most populous to least populous, Mexico, China (excluding Taiwan and Hong Kong), the Philippines, El Salvador, Other South Eastern Asia, Canada, Other Central America, Germany, Eastern Africa, and India. Foreign born individuals do not make up a significant proportion of residents, constituting approximately 17% all together. The most represented country, Mexico, has 46,768 residents in the county, making up 10.0% of the total population. The next most represented country, China, makes up only 0.5% of the total population.

Limited English Proficiency

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in the county are, from most populous to least populous, Spanish, Other Indo-European, Other Asian & Pacific, Chinese, Other and Unspecified, Vietnamese, Tagalog, Slavic, West Germanic, and Korean. Spanish, with an estimated 42, 419 LEP speakers, is 17 times more likely to be spoken than the next most spoken language, Other Indo-European Languages. LEP individuals who speak Spanish make up 9.1% of the population.

Disability

Ambulatory difficulties (6.0%) and independent living difficulties (5.3%) have the highest rates of incidence in the county. After ambulatory and independent living difficulties, cognitive difficulties (4.6%) were the most common, followed by hearing (3.7%), self-care (2.5%), and vision difficulties (1.9%).

Sex

In the county, 51.2% of residents are female while 48.8% are male. Countywide, this has produced a slight change with the female population marginally increasing its representation.

Age

Throughout the county, the population is distributed with working age adults as the clear majority (61.2%), followed by minors under 18 (19.8%) and seniors aged 65+ (19.0%). As is the case in Napa County, one notable change has been that the aging population has slightly increased from 13.5% of the population in 1990 to 19% of the current population. This trend can be seen throughout other counties and cities in the Napa Sonoma Area.

Familial Status

Countywide, 39.4% of families are families with children under 18. Within the County, the cities of Petaluma and Santa Rosa have appreciably higher rates of families with children than Sonoma County does.

Table 2a: Demographic Trends, City of Petaluma

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		2020 Trend	
	#	%	#	%	#	%	%	%
White, Non-Hispanic	37,681	85.7%	42,335	77.0%	40,180	69.3%	41,357	68.1%
Black, Non-Hispanic	494	1.1%	816	1.5%	1,028	1.8%	646	1.1%
Hispanic	4,195	9.5%	8,114	14.8%	12,593	22.0%	13,305	22.0%
Asian or Pacific Islander, Non-Hispanic	1,339	3.0%	2,767	5.0%	3,429	5.9%	2,714	4.4%
Native American, Non-Hispanic	202	0.5%	533	1.0%	560	1.0%	72	0.1%
National Origin								
Foreign-born	3,723	8.5%	7,769	14.1%	11,052	19.1%	10,612	18.3%

LEP								
Limited English Proficiency	1,876	4.3%	4,512	8.2%	6,934	12.0%	5,310	9.2%
Sex								
Male	21,259	48.6%	26,947	49.0%	28,502	49.2%	30,064	49.5%
Female	22,446	51.4%	28,021	51.0%	29,439	50.8%	30,703	50.5%
Age								
Under 18	11,333	25.9%	14,686	26.7%	13,367	23.1%	12,782	21.1
18-64	27,328	62.5%	34,235	62.3%	36,978	63.8%	37,312	61.4%
65+	5,044	11.5%	6,046	11.0%	7,596	13.1%	10,673	17.5%
Family Type								
Families with children	5,889	51.2%	5,583	50.0%	6,939	47.3%	6,565	42.7%

Source: American Community Survey, 2015-2019.

Table 2b: Demographic Trends, Sonoma County

	1990 Trend		2000 Trend		2010 Trend		2020 Trend	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	327,378	84.3%	341,671	74.5%	320,027	66.1%	316,022	63.2%
Black, Non-Hispanic	5,218	1.3%	8,396	1.8%	9,979	2.1%	7,399	1.5%
Hispanic	41,176	10.6%	79,496	17.3%	120,430	24.9%	133,569	26.7%
Asian or Pacific Islander, Non-Hispanic	10,185	2.6%	18,892	4.1%	24,762	5.1%	21,568	4.3%
Native American, Non-Hispanic	3,613	0.9%	7,147	1.6%	7,434	1.5%	2,343	0.5%
National Origin								
Foreign-born	35,420	9.1%	65,726	14.3%	78,608	16.3%	82,200	17.0%
LEP								
Limited English Proficiency	19,983	5.2%	41,579	9.1%	50,236	10.4%	51,807	10.7%
Sex								
Male	190,290	49.0%	225,797	49.2%	237,902	49.2%	244,045	48.8%
Female	197,930	51.0%	232,817	50.7%	245,976	50.8%	255,727	51.2%
Age								
Under 18	95,447	24.6%	114,808	25.0%	106,471	22.0%	99,290	19.8%
18-64	240,425	61.9%	286,288	62.4%	310,043	64.1%	305,669	61.2%
65+	52,348	13.5%	57,518	12.5%	67,364	13.9%	94,913	19.0%
Family Type								
Families with children	48,764	48.4%	46,805	48.7%	52,266	44.6%	47,477	39.4%

Source: American Community Survey, 2015-2019

Although the white population continues to be in the majority throughout Sonoma County, the Hispanic and Asian American population have grown considerably as well. In the city of Petaluma, the Hispanic population now makes up one-fifth of total residents and over one-quarter of the population in Sonoma County. Asian American residents have also increased but not to the extent of Hispanic residents. While the Black population has increased in size, their total number continues to be statistically insignificant. The demographics for 2020 indicate that these jurisdictions are shifting from a white majority jurisdiction to a white plurality with increased representation of Hispanic and Asian American residents.

Since 1990, there has been a steady increase in the population of foreign-born residents in Sonoma County, although the percentage has dropped in the last five years in Petaluma. Foreign-born residents are fifteen percent of the city's population, and seventeen percent in Sonoma County. Sonoma County has experienced growth in the population of residents with limited English proficiency, doubling to almost eleven percent in Sonoma County, while Petaluma saw a decrease to less than ten percent,

While the demographics for sex remain constant, there have been population shifts in age and in families with children. The female and male population trends have remained constant with the female population having a slight majority in Sonoma County but not in Petaluma. In case of families with children, the proportion of families with children has declined in these jurisdictions. The age of the population also has seen changes that correlate with this downward trend. The proportion of seniors has risen to over eighteen percent in Petaluma and fourteen percent in Sonoma County while the population of children below the age of 18 has declined. The inverted growth trends for these two populations indicates that the population is aging in Sonoma County.

B. General Issues

i. Segregation/Integration

1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

1.b Explain how these segregation levels have changed over time (since 1990).

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low Segregation
	41-54	Moderate Segregation
	55-100	High Segregation

The Dissimilarity Index measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the extent of the segregation.

The Isolation Index measures the extent to which minority members are exposed only to one another and is computed as the minority-weighted average of the minority proportion in each area.

The Exposure Index measures a given group's exposure to all racial groups, including itself, in the form a weighted average depicting the racial composition of the neighborhood of the average person of a given race.

Table 1: Dissimilarity Index Values by Race and Ethnicity

Racial/Ethnic Dissimilarity Index				
City of Petaluma	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	6.69	11.32	18.43	24.94
Black/White	26.54	13.62	18.29	28.76
Hispanic/White	3.34	16.84	23.25	30.25
Asian or Pacific Islander/White	16.04	18.98	17.95	27.20
Sonoma County	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	18.57	26.17	27.32	32.60
Black/White	33.75	29.48	27.88	36.81
Hispanic/White	24.35	33.42	32.70	36.12
Asian or Pacific Islander/White	26.00	28.18	26.45	31.13
<i>Source: American Community Survey (ACS), 2015-2019.</i>				

City of Petaluma

Overall, Petaluma experiences low levels of segregation across all racial and ethnic categories. However, the Dissimilarity Index values across all racial and ethnic categories have increased since 2010. The highest increase being among Asian/white populations. Thus, while Petaluma still experiences low levels of segregation, it has increased over the past ten years.

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on average, by members of a particular racial or ethnic group within a City or metropolitan area. The Isolation Index measures what percentage of the census tract in which a person of a certain racial identity lives is comprised of other persons of that same racial/ethnic group. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from another group.

Overall, Sonoma County experiences low levels of segregation across all racial and ethnic categories. Asian/white populations experience the lowest levels of segregation in the county. However, the Dissimilarity Index values across all racial and ethnic categories have increased since 2010. The highest increase being among Black/white populations. Thus, while Sonoma County still experiences low levels of segregation, it has increased over the past 10 years.

Table 2a: Isolation Index Values by Race and Ethnicity, City of Petaluma

Isolation Index	1990	2000	2010	2020
White/White	85.9	77.4	70.7	65.6

Black/Black	1.5	1.7	2	2.2
Hispanic/Hispanic	9.4	16.5	25.1	25.7
Asian/Asian	3.5	6	7.2	8.1
<i>Source: Diversity and Disparities, Spatial Structures in the Social Sciences, Brown University</i>				

City of Petaluma

Isolation Index values vary among racial and ethnic groups in Petaluma. White residents experience high Isolation Index values. Black, Hispanic and Asian residents experience low Isolation Index values. Since 2010, Isolation Index values have decreased for white residents. The values have increased for Black, Hispanic, and Asian residents.

Table 2b: Isolation Index Values by Race and Ethnicity, Sonoma County

Isolation Index	1990	2000	2010	2020
White/White	85	77	70.2	63.3
Black/Black	2.2	2.7	2.7	2.9
Hispanic/Hispanic	13.9	25.7	34	37.5
Asian/Asian	3.4	5.3	6.3	8.8
<i>Source: Diversity and Disparities, Spatial Structures in the Social Sciences, Brown University</i>				

Sonoma County

Isolation Index values vary among racial and ethnic groups in Sonoma County. White residents experience high Isolation Index values. Hispanic residents experience moderate Isolation Index values. Black residents and Asian residents both experience very low Isolation Index values. Since 2010, Isolation Index values have decreased for white residents. The values have increased for Black, Hispanic, and Asian residents.

Table 3a: Exposure Index Values, City of Petaluma

Exposure Index	1990	2000	2010	2020
Black/White	85.2	76.2	67.2	62.8
Hispanic/White	85.7	75	65.8	61.5
Asian/White	85.4	76.3	68.8	64.2
White/Black	1.2	1.5	1.7	2
Hispanic/Black	1.2	1.6	1.9	2.2
Asian/Black	1.3	1.6	1.8	2.1
White/Hispanic	9.2	14.3	20.4	21.7
Black/Hispanic	9.4	15.1	23.4	24.3
Asian/Hispanic	9.2	14.5	21.1	22.4
White/Asian	3.1	5.2	6.1	7.3
Black/Asian	3.3	5.4	6.3	7.4
Hispanic/Asian	3.1	5.2	6	7.2
<i>Source: Diversity and Disparities, Spatial Structures in the Social Sciences, Brown University</i>				

City of Petaluma

In Petaluma, Exposure Index values are consistent with proportions of populations in the city. All minority groups in Petaluma have the highest Exposure Index values when grouped with white populations. Minority groups have the second highest Exposure Index values when grouped with Hispanic residents. On the other hand, white residents have low Exposure Index values when grouped with Black and Asian residents. The value is much higher when grouped with Hispanic residents. The actual population size of these groups certainly contributes, but the Exposure Index values illustrate that whites are more likely to live in census tracts with other whites.

Table 3b: Exposure Index Values, Sonoma County

Exposure Index	1990	2000	2010	2020
Black/White	80.7	68.7	60.9	54.1
Hispanic/White	80.5	65.3	56.4	49.7
Asian/White	82.4	72.4	63.9	55.6
White/Black	1.3	1.7	1.9	2.2
Hispanic/Black	1.6	2.2	2.4	2.5
Asian/Black	1.8	2.2	2.4	2.7
White/Hispanic	10.1	15.2	21.2	24.8
Black/Hispanic	12.3	21.1	28.5	31.6
Asian/Hispanic	11.3	17.9	25.7	29.3
White/Asian	2.8	4.1	5	6.4
Black/Asian	3.4	5.1	6	7.8
Hispanic/Asian	2.8	4.3	5.4	6.8

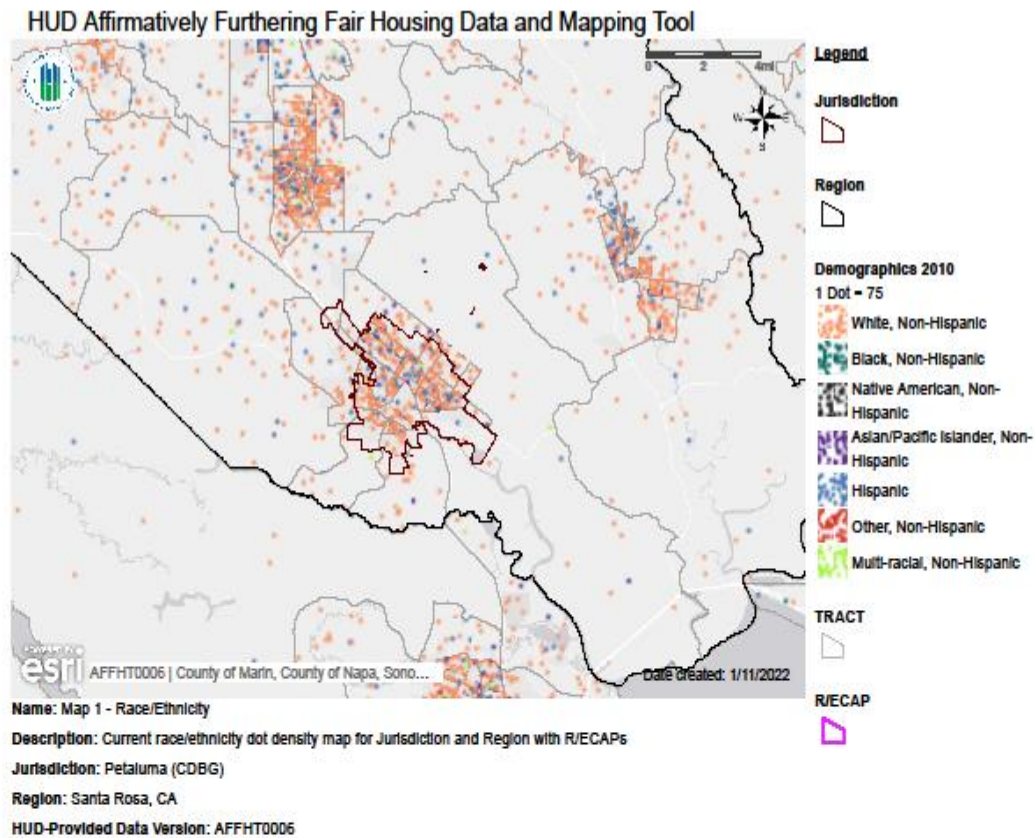
Source: Diversity and Disparities, Spatial Structures in the Social Sciences, Brown University.

Sonoma County

Isolation Index values vary among racial and ethnic groups in Sonoma County. White residents experience high Isolation Index values. Hispanic residents experience moderate Isolation Index values. Black residents and Asian residents both experience very low Isolation Index values. Since 2010, Isolation Index values have decreased for white residents. The values have increased for Black, Hispanic, and Asian residents.

1.c. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Map 1: City of Santa Petaluma/Ethnicity

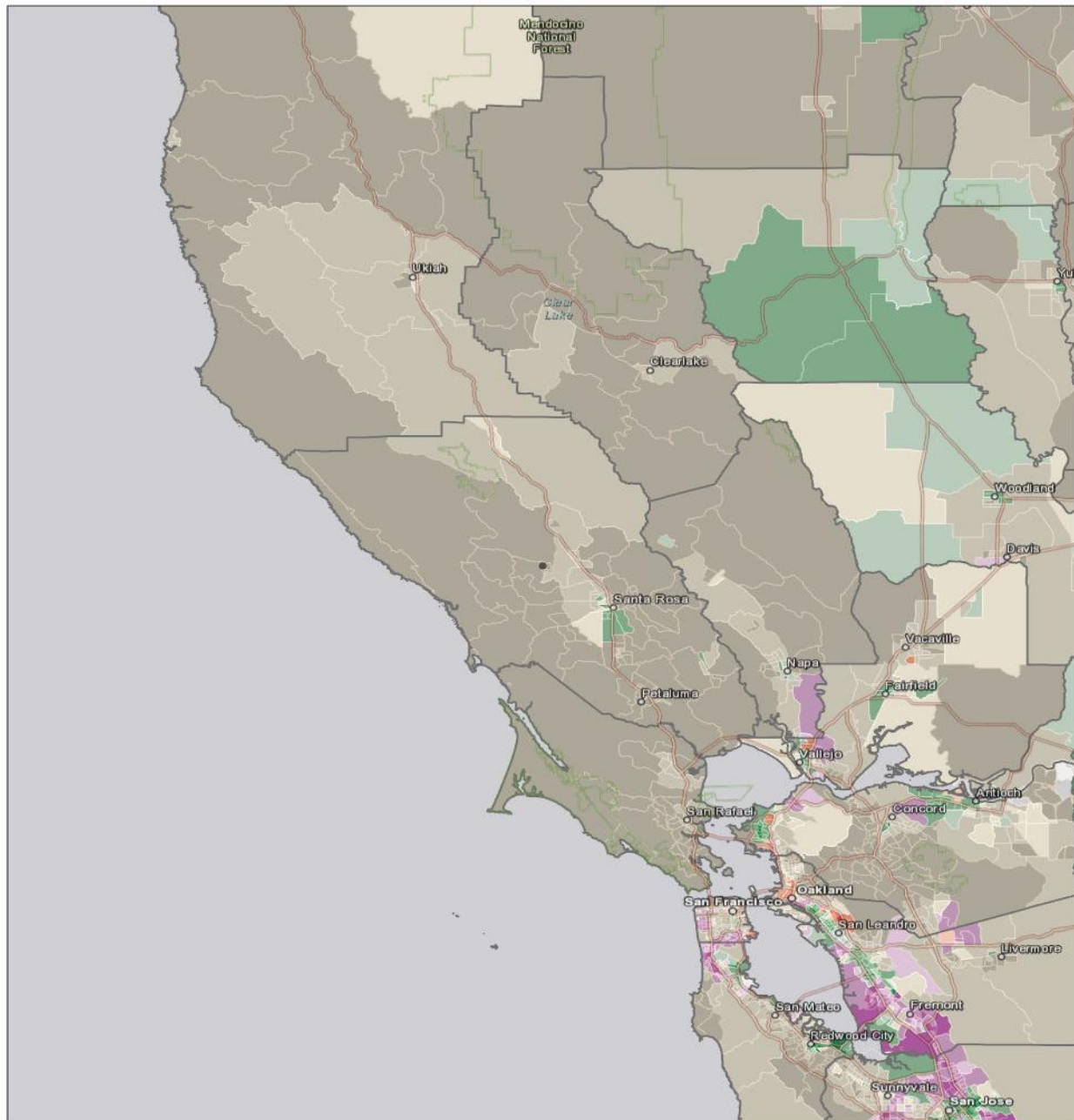


City of Petaluma

In Petaluma, majority of the residents are white, with Hispanic residents the next largest group. However, there are Hispanic residents interspersed in the central part of the city and the northern and eastern areas outside of the Petaluma boundaries.

Map 2: Sonoma County Predominant Population by Race

Sonoma County Predominant Population by Race



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County Boundaries

(R) Predominant Population - White Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

(R) Predominant Population - Hispanic Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

(R) Predominant Population - Asian Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

(R) Predominant Population - African American Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

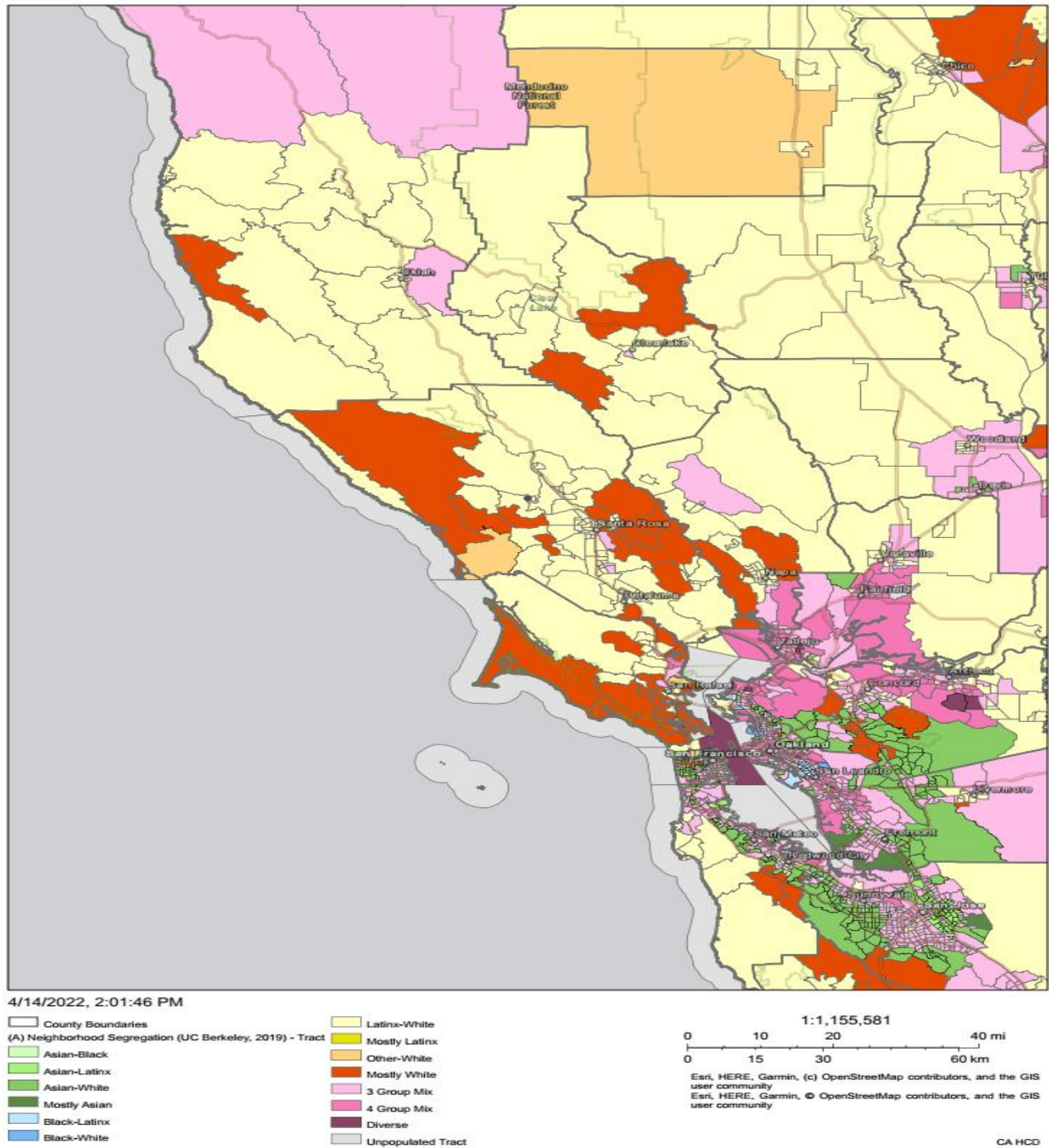
1:1,155,581

0 10 20 40 mi

0 15 30 60 km

Map 3: Sonoma County Neighborhood Segregation

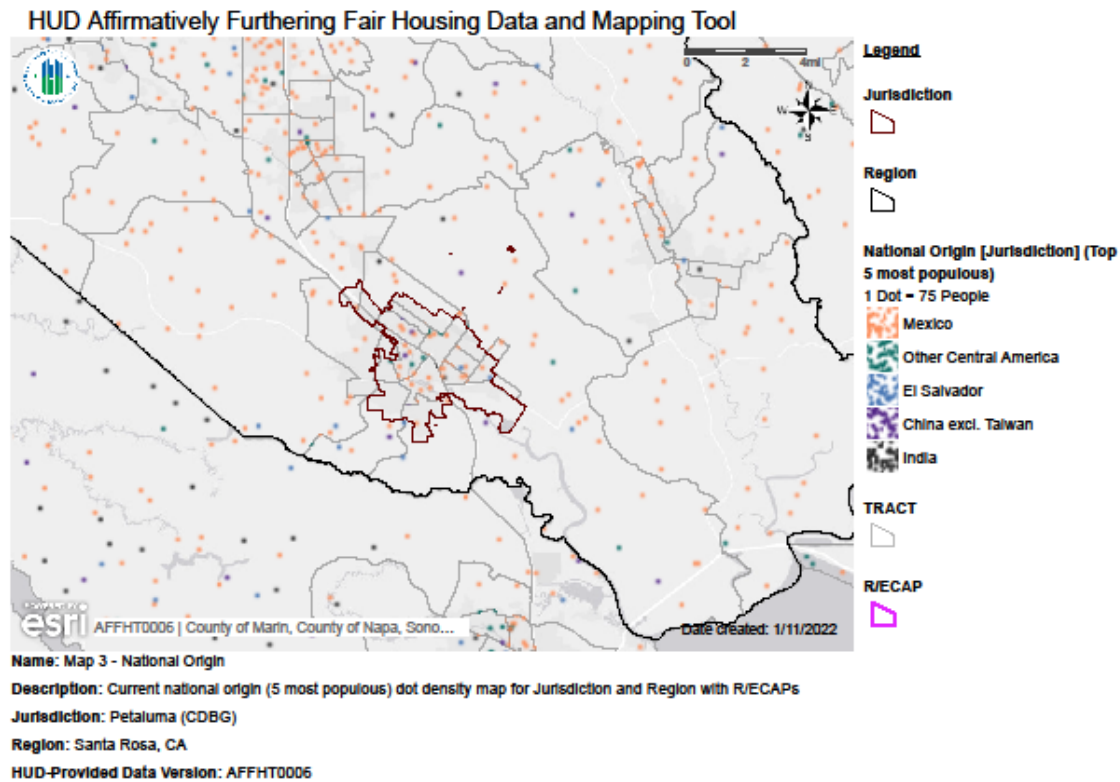
AFFH Analysis



Sonoma County

In Sonoma County, majority of the residents are white, with Hispanic residents the next largest group. Most of the county is majority white. However, there are Hispanic majority tracts near and directly south of the city of Santa Rosa.

Map 4: City of Petaluma National Origin

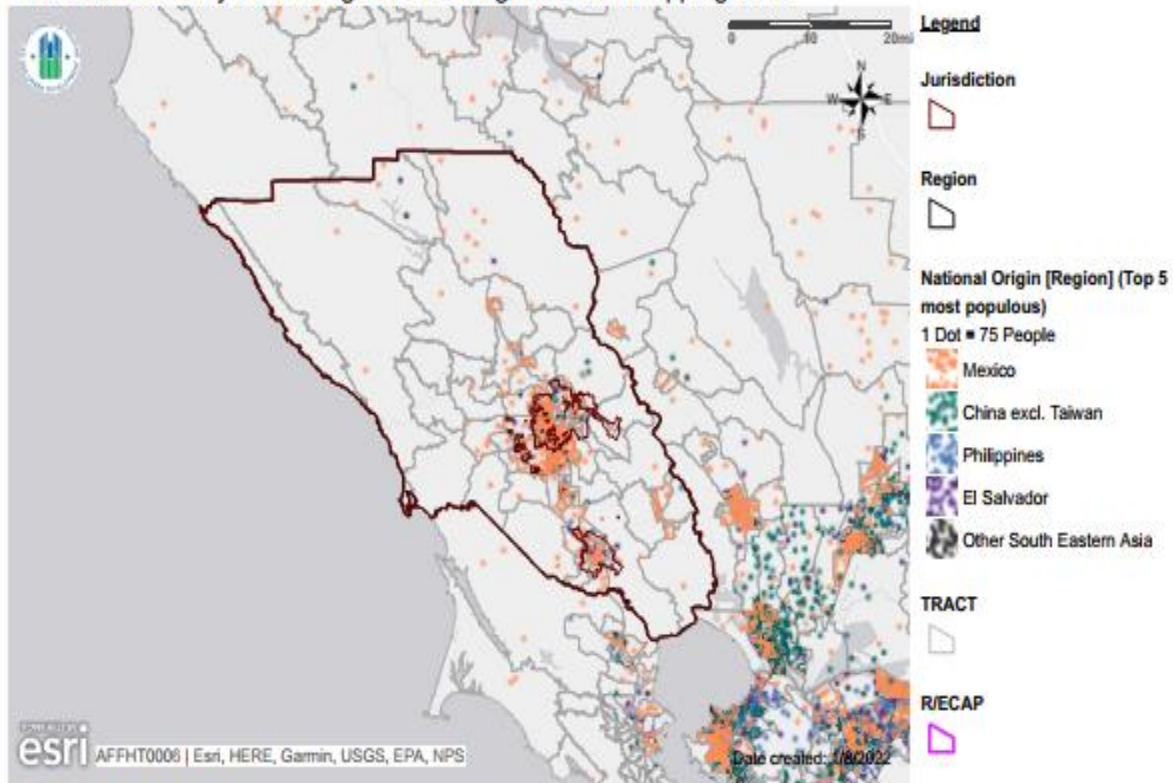


City of Petaluma

In Petaluma, Mexican-Americans are the largest national origin group, followed by people of Other Central American national origin. Specifically, there are clusters of Mexican residents in the center of the city and the northern and eastern areas outside of the Petaluma boundaries. Comparatively, there are fewer foreign-born residents in the eastern and southern portions of the city.

Map 5: Sonoma County National Origin

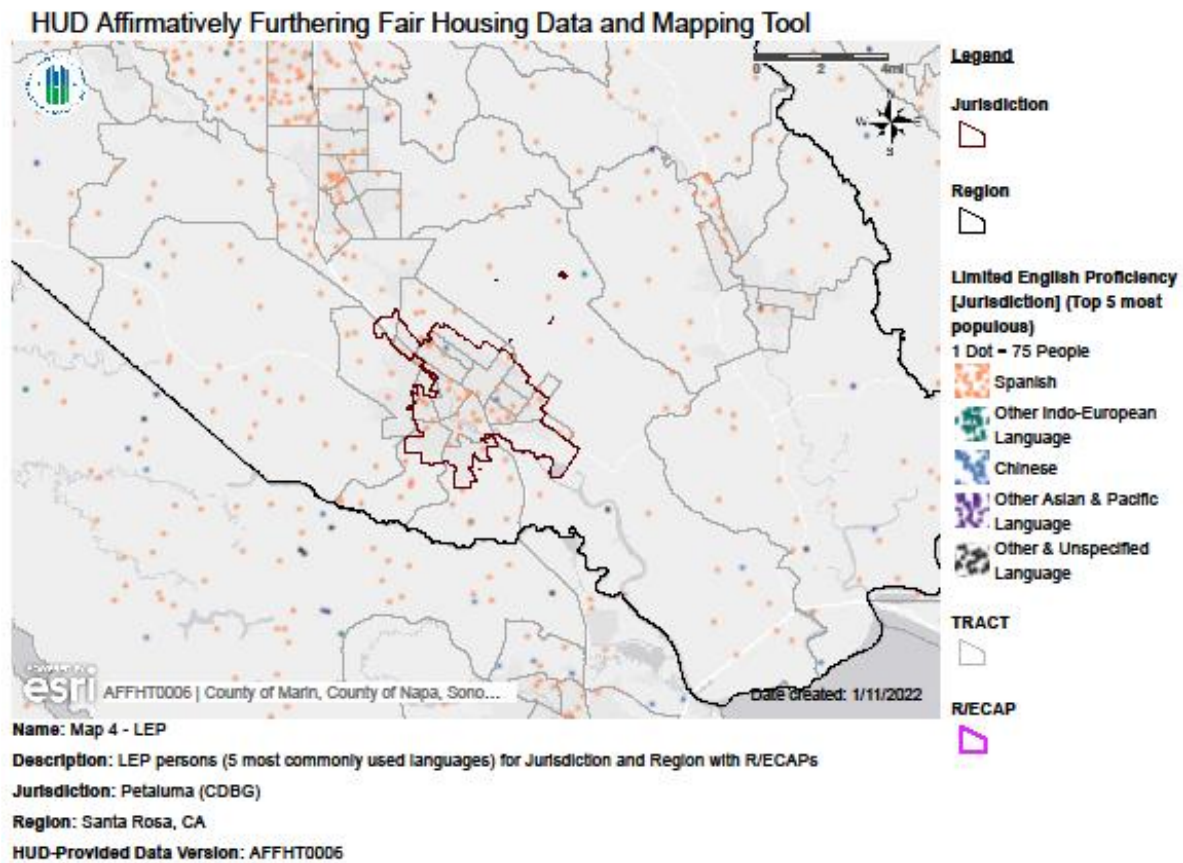
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Sonoma County

In Sonoma County, the majority of the residents are white, with Hispanic residents the next largest group. Most of the county is majority white. However, there are Hispanic majority tracts near and directly south of the city of Santa Rosa.

Map 6: City of Petaluma Limited English Proficiency

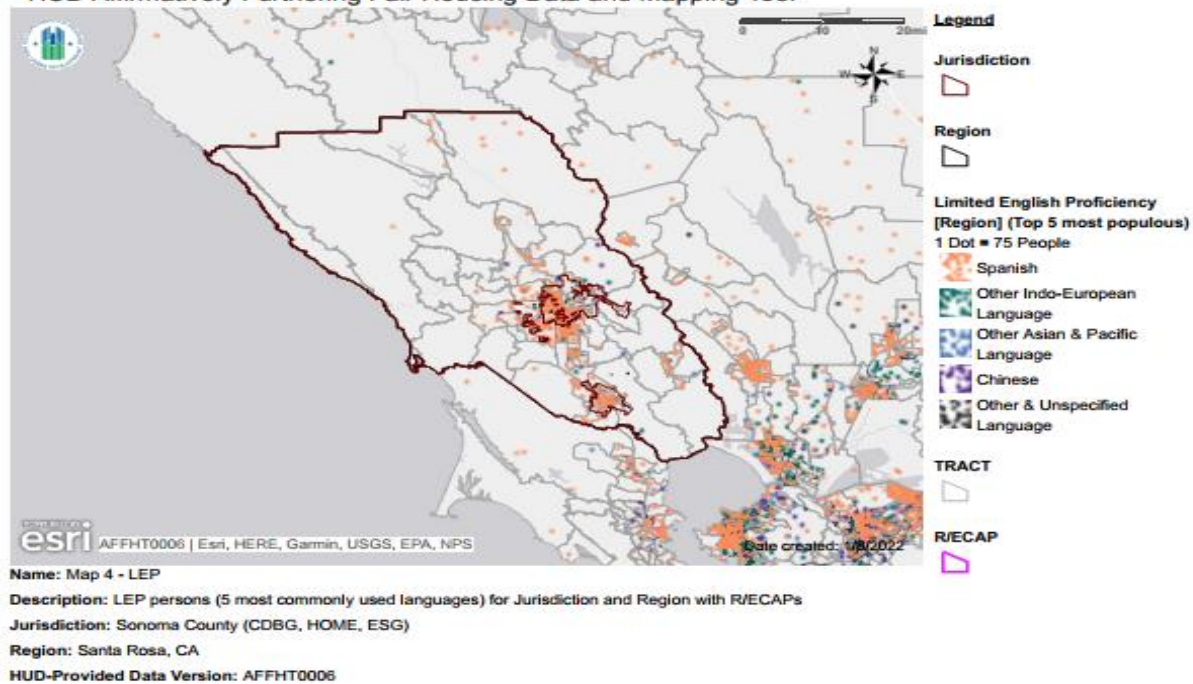


City of Petaluma

In Petaluma, the top foreign languages spoken by those with limited English proficiency (LEP) are Spanish, followed by Other Indo-European Language. LEP residents are most prevalent in the center portion of the city.

Map 7: Sonoma County Limited English Proficiency

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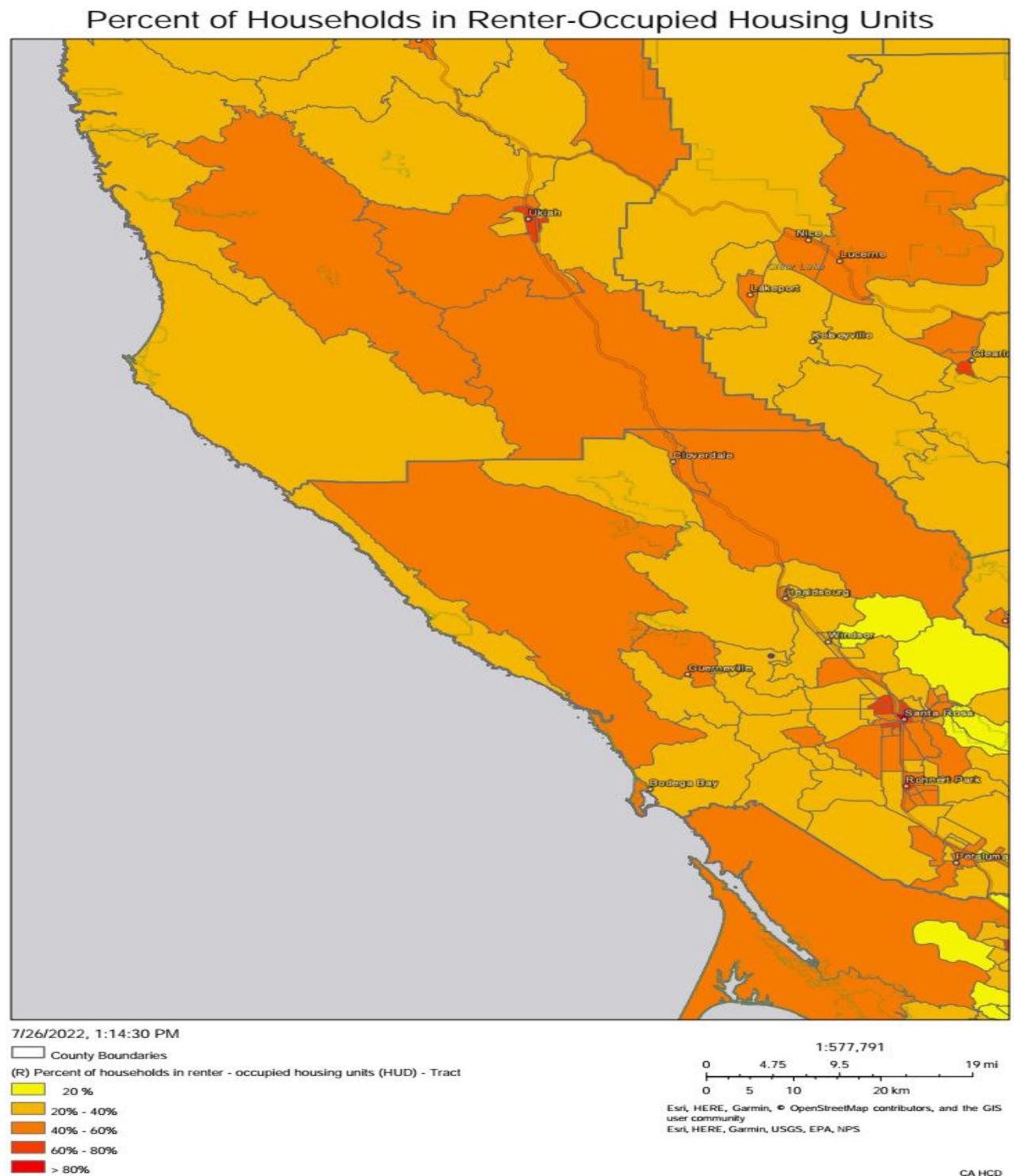


Sonoma County

In Sonoma County, the top foreign languages spoken by those with limited English proficiency (LEP) are Spanish, followed by Other Indo-European Language. LEP residents are most prevalent near the more urban areas of the county. Specifically, there are large clusters of Spanish speaking residents near the cities of Santa Rosa and Petaluma. Comparatively, there are fewer residents with limited English proficiency in the northern, more rural part of the county.

1.d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Map 8: Sonoma County Percent of Households in Renter-Occupied Housing Units

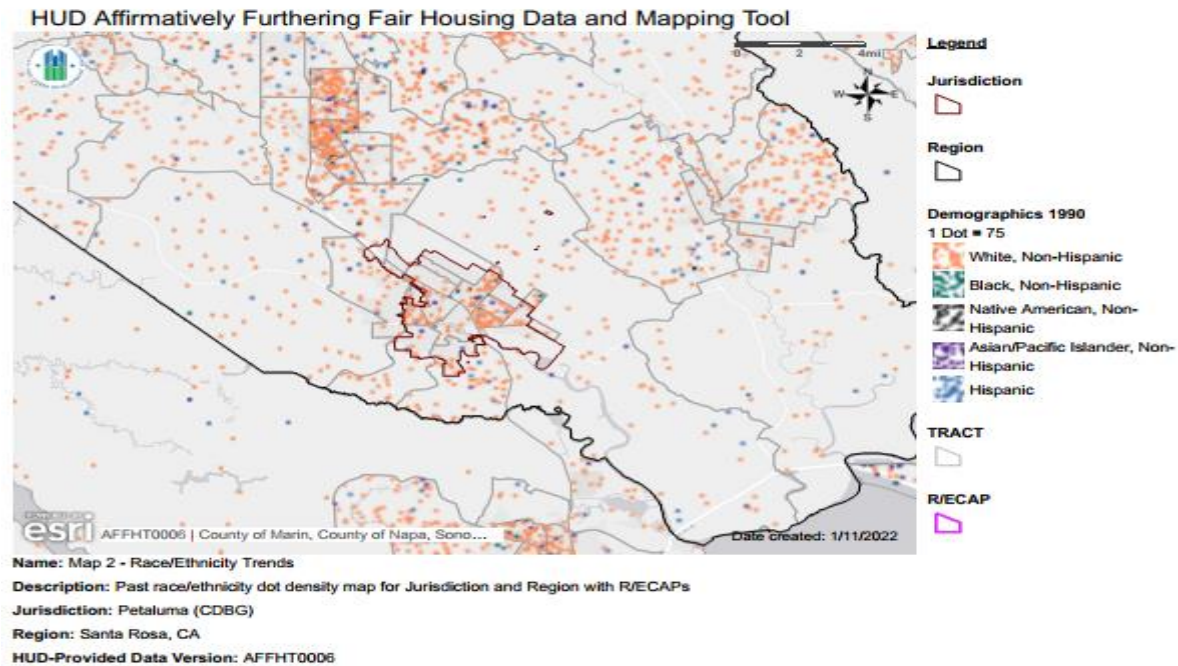


Sonoma County

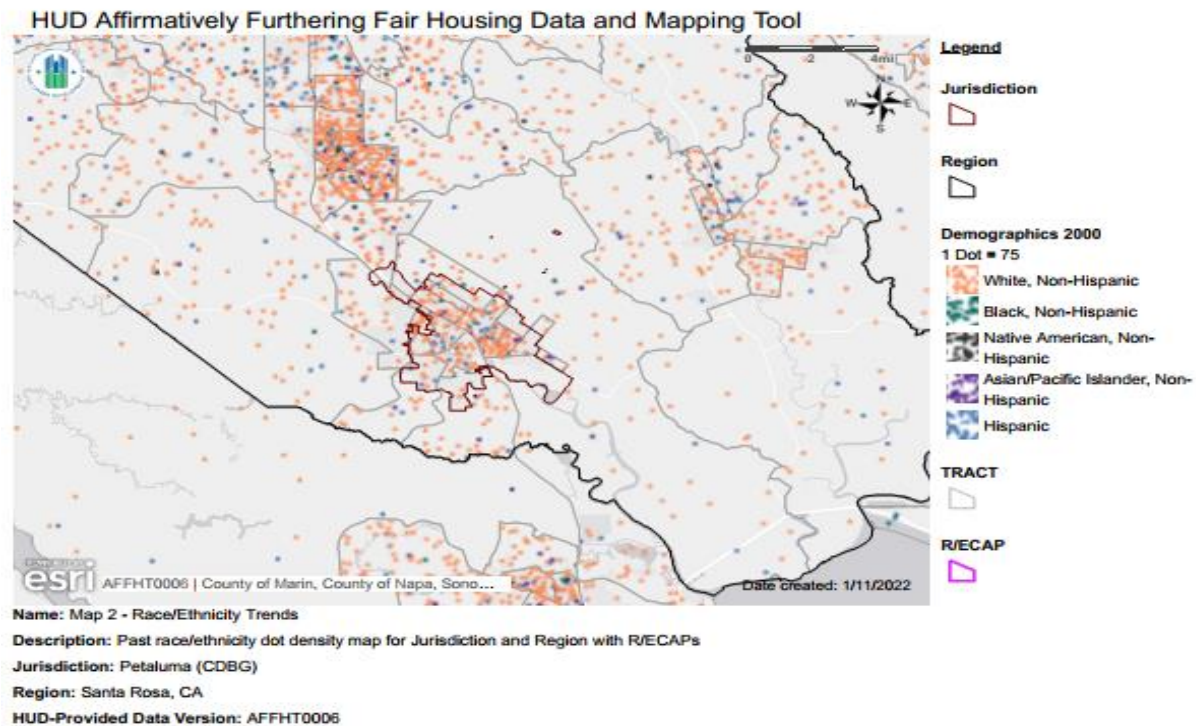
In Sonoma County, the location of renters largely correlates with aforementioned patterns of racial and ethnic segregation. There highest concentration of renters is near Santa Rosa and Petaluma. There are fewer renters in the northeast portion of the county.

1.e. Discuss how patterns of segregation have changed over time (since 1990).

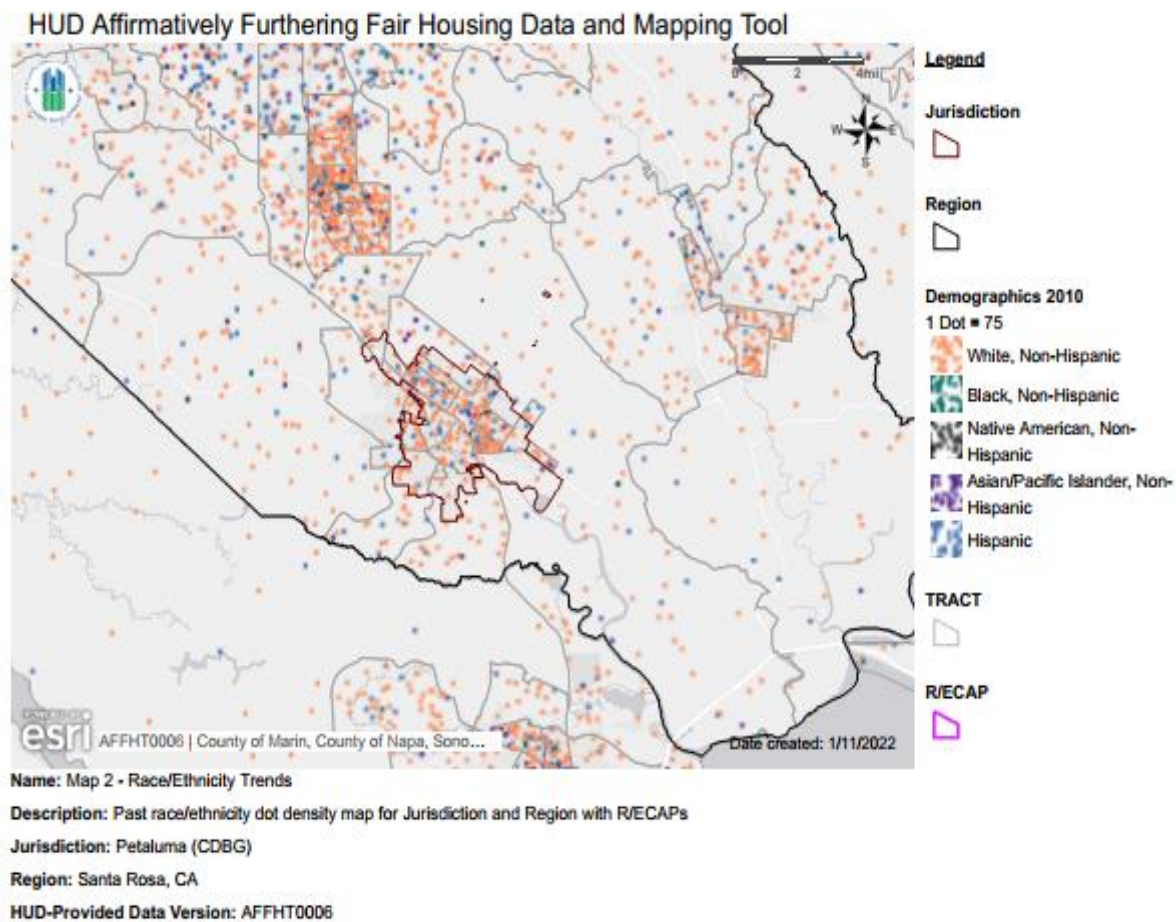
Map 9: City of Petaluma Racial Demographics in 1990



Map 10: City of Petaluma Racial Demographics in 2000



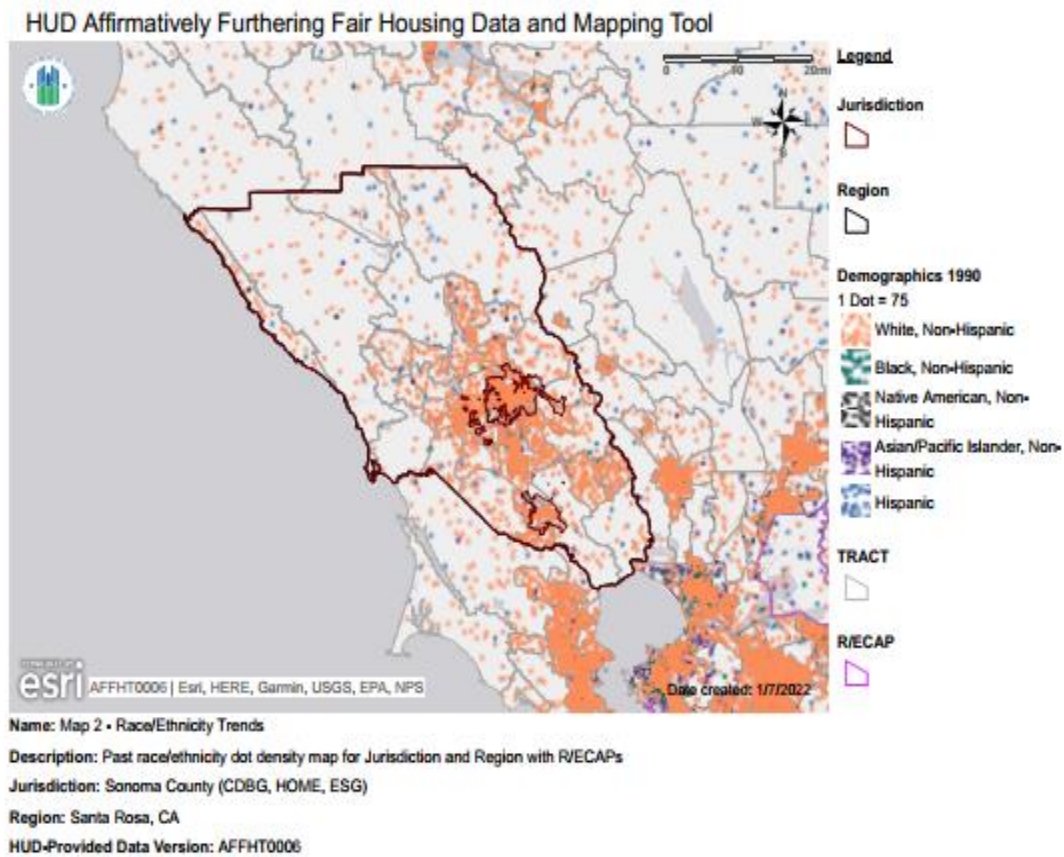
Map 11: City of Petaluma Racial Demographics in 2010



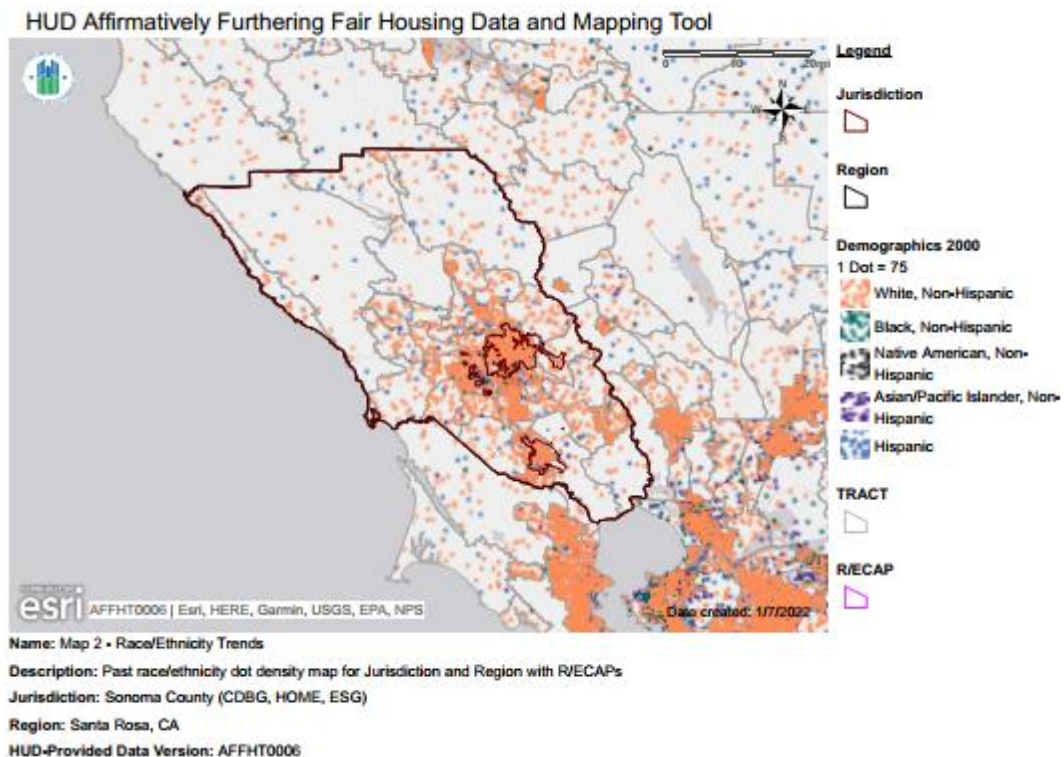
City of Petaluma

In Petaluma, since 2010, segregation is increasing. In the last 10 years Dissimilarity Index values have increased among non-white/white, Black/white, Hispanic/white, and Asian/white populations. The Exposure Index values across all ethnic groups in relation to white residents have also decreased since 1990. Exposure Index values among groups of people of color have increased since 1990. These values taken together with the Dissimilarity Index values indicate that while populations of people of color are becoming more segregated from white populations, while integration among groups of people of color has increased.

Map 12: Sonoma County Racial Demographics in 1990

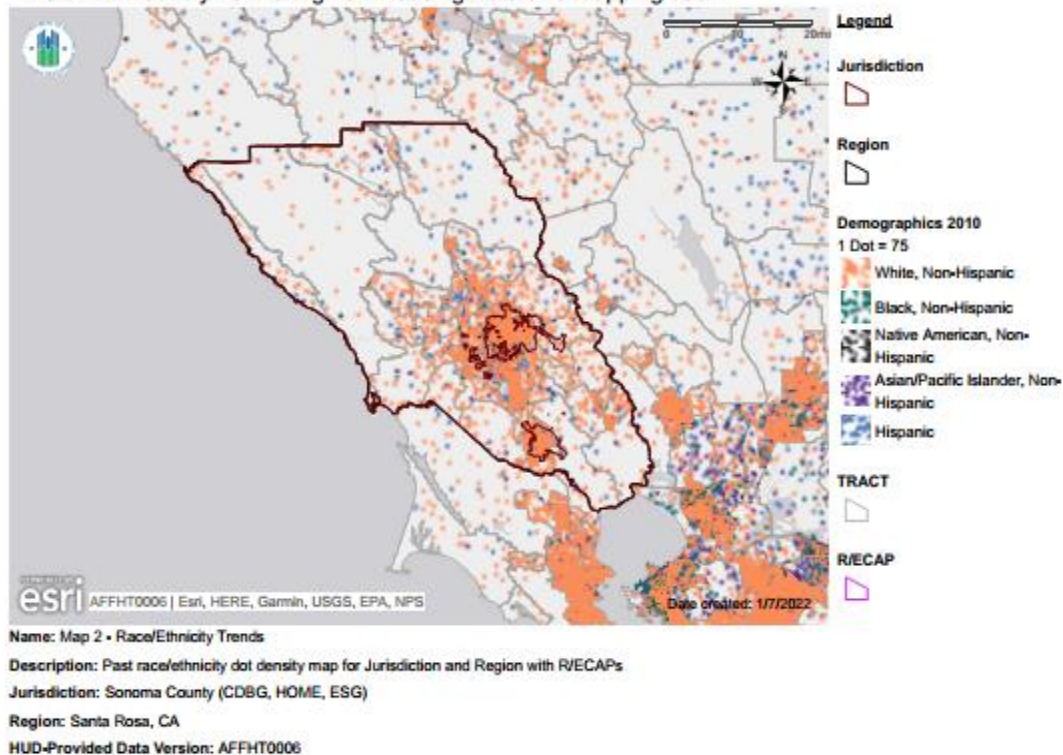


Map 13: Sonoma County Racial Demographics in 2000



Map 14: Sonoma County Racial Demographics in 2010

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Sonoma County

In Sonoma County, segregation is on the rise. Between 2000-2010 Dissimilarity Index values decreased among Black/white, Hispanic/white, and Asian/white populations. However, that trend has reversed, and since 2010 the Dissimilarity Index values have risen among those groups. The Dissimilarity Index values among those groups are at their highest point since 1990. The Exposure Index values across all ethnic groups in relation to white residents have decreased since 1990. Exposure Index values among groups of people of color have increased since 1990. These values taken together with the Dissimilarity Index values indicate that while populations of people of color are becoming more segregated from white populations, while integration among groups of people of color has increased.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are geographic areas with significant concentrations of poverty and populations of people of color. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-white population of fifty percent or more. With regards to poverty, R/ECAPs are census tracts in which forty percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower. In the region, which has a significantly lower rate of poverty than the nation as a whole, the latter of these two thresholds is used.

Where one lives has a substantial effect on mental and physical health, education, exposure to crime, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that

racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs facilitates understanding of entrenched patterns of segregation and poverty.

Data note: Some of the tables and maps in this section are sourced from the HUD tool which used 2011-2015 5-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest.

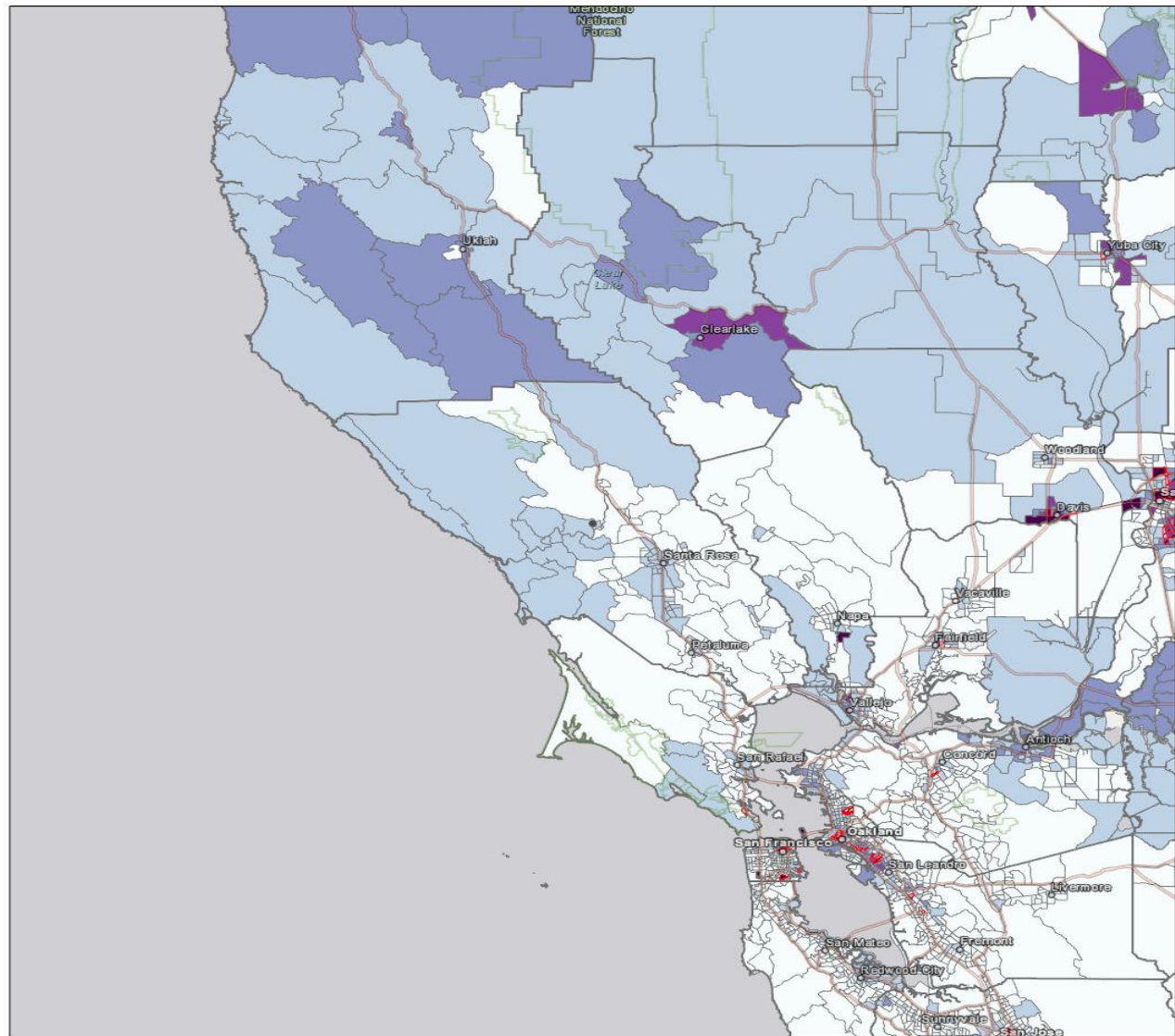
1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

There are no R/ECAPs in the City of Petaluma or Sonoma County.

Map 1: Sonoma County R/ECAPs with Poverty Rates

There are no R/ECAPs in Sonoma County,

Sonoma County R/ECAPs



3/17/2022, 1:56:42 PM

County Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAP'S" (HUD, 2009 - 2013) - Tract

0 - Not a R/ECAP

1 - R/ECAP

(R) Poverty Status (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

30% - 40%

> 40%

1:1,155,581

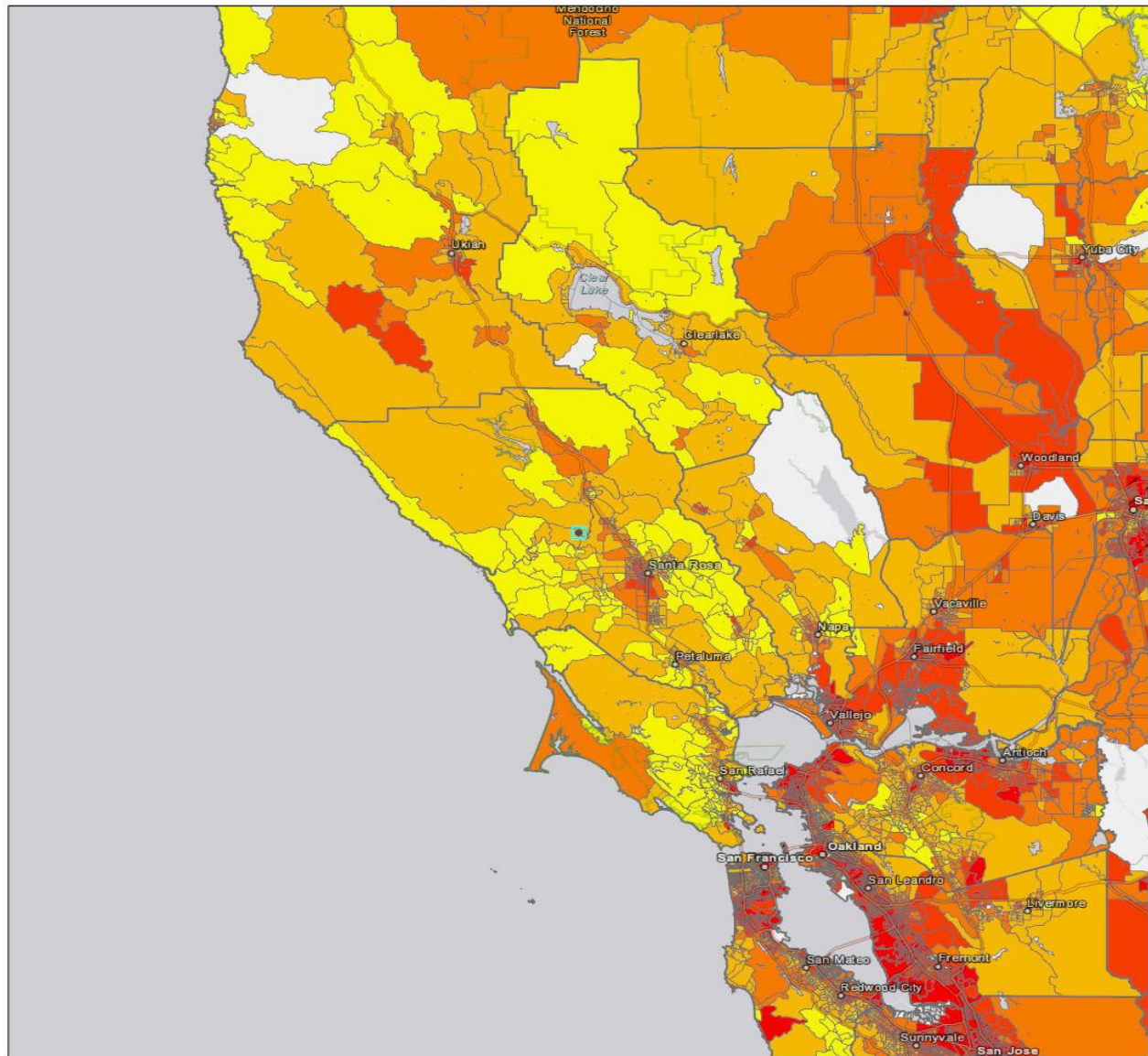
0 10 20 40 mi
0 15 30 60 km

Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community, Esri, HERE, Garmin, USGS, EPA, NPS

Map 2: Sonoma County R/ECAPs with Non-White Percentage of the Population

There are no R/ECAPs in Sonoma County.

Sonoma County R/ECAPs



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County Boundaries

(R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAP'S" (HUD, 2009 - 2013) - Tract

0 - Not a R/ECAP

1 - R/ECAP

(R) Racial Demographics (2018) - Block Group

≤ 20%

21 - 40%

41 - 60%

61 - 80%

> 81%

1:1,155,581

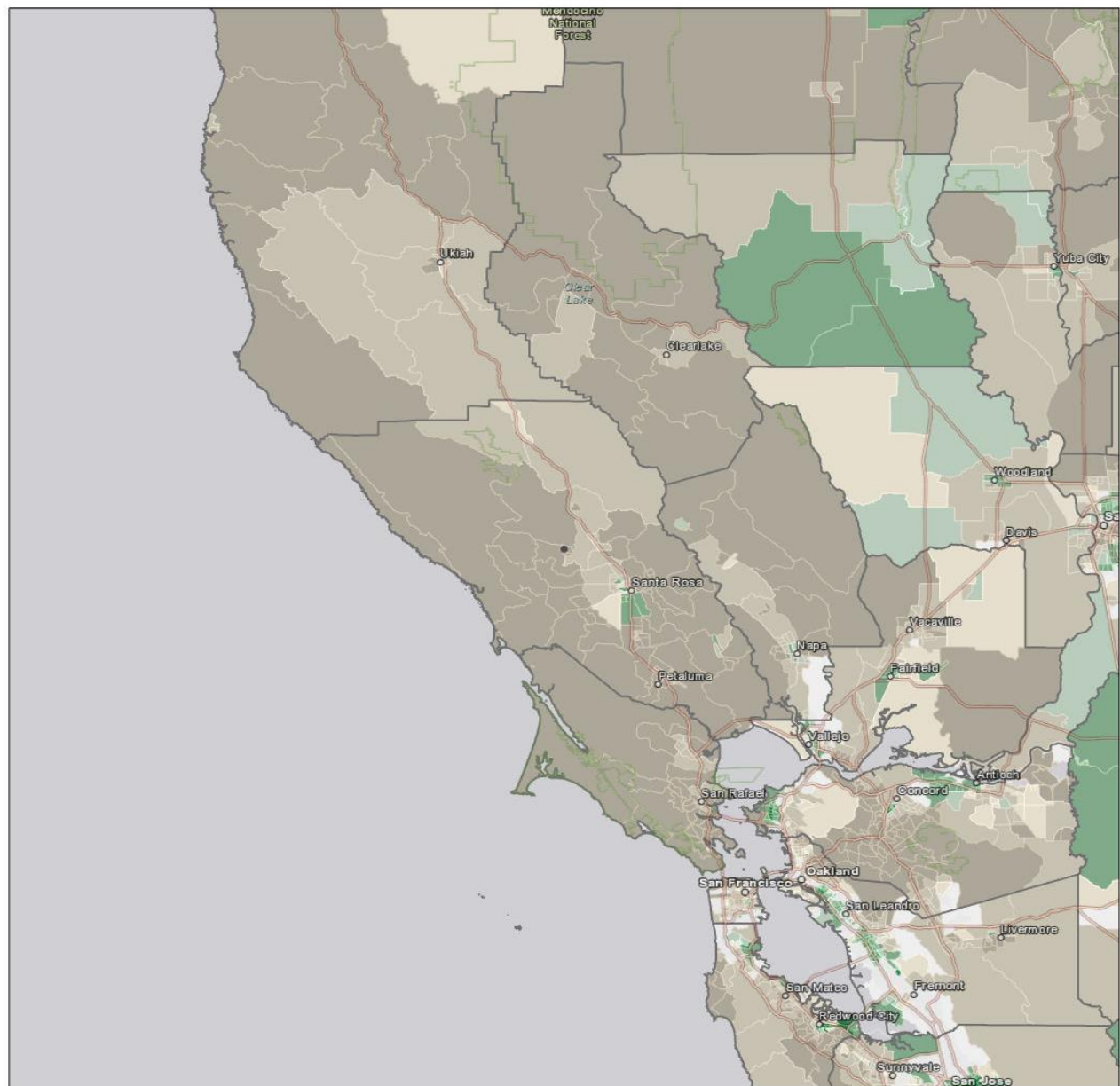
0 10 20 40 mi

0 15 30 60 km

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Map 3: Sonoma County Predominant Racial Group

Sonoma County Predominant Racial Group



3/17/2022, 5:04:43 PM

County Boundaries

(R) Predominant Population - White Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

(R) Predominant Population - Hispanic Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% – 50%)

Predominant (gap > 50%)

1:1,155,581

0 10 20 40 mi
0 15 30 60 km

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In Sonoma County, poverty rates are primarily 20% or lower, with some areas having poverty rates of less than 10% and others having rates between 10% and 20%. One tract in Santa Rosa has a poverty rate between 20% and 30%. Most of the county has a non-white population of under 20% or between 20% and 40%, with some areas in the Santa Rosa, Healdsburg, Windsor, Rohnert Park, and areas along Sonoma Highway between Glen Ellen and El Verano having higher percentages of non-white residents. Though most of the county is majority White, a few tracts in the county – primarily in and around the City of Santa Rosa – are majority Hispanic by a sizable dominance.

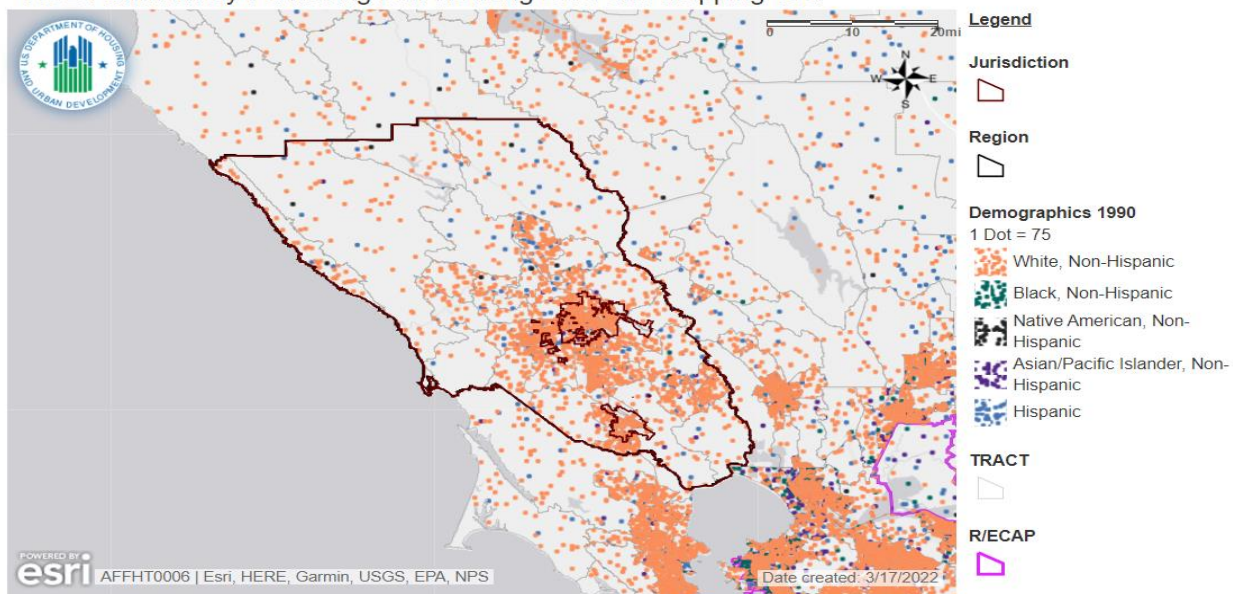
1.b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

Since there are no R/ECAPs in the City of Petaluma and Sonoma County, there are no protected classes represented in the R/ECAPs.

1.c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Map 4: Sonoma County R/ECAPs Demographics 1990

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

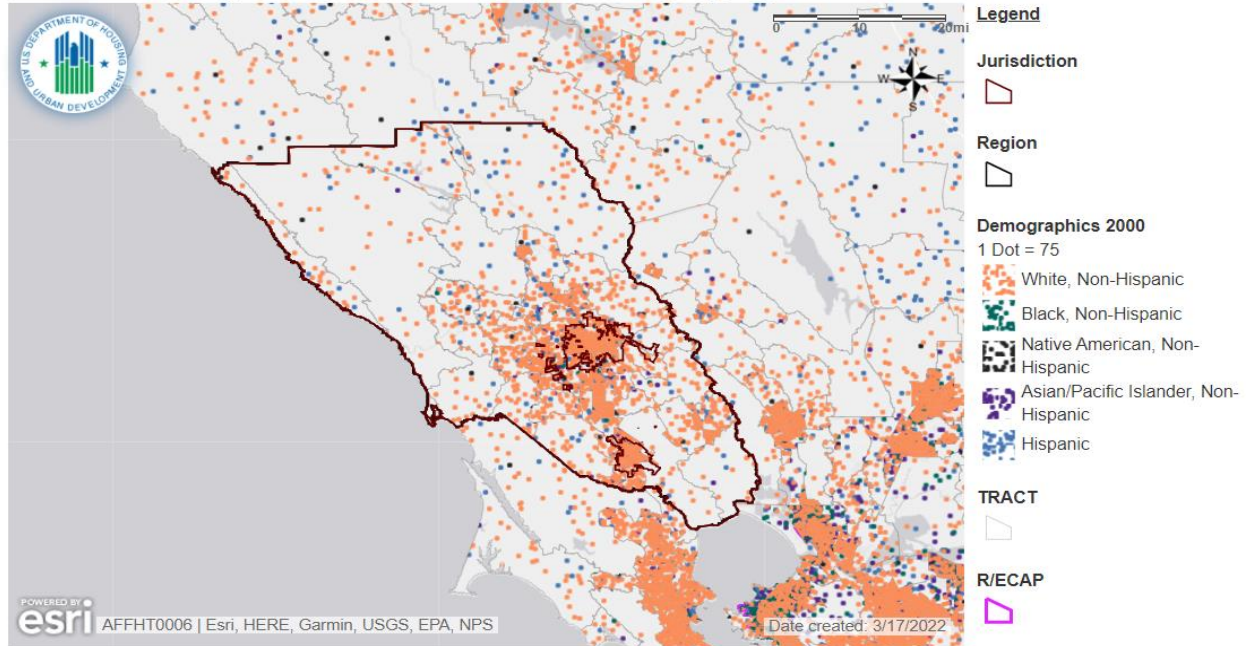
Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 5: Sonoma County R/ECAPs Demographics 2000

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

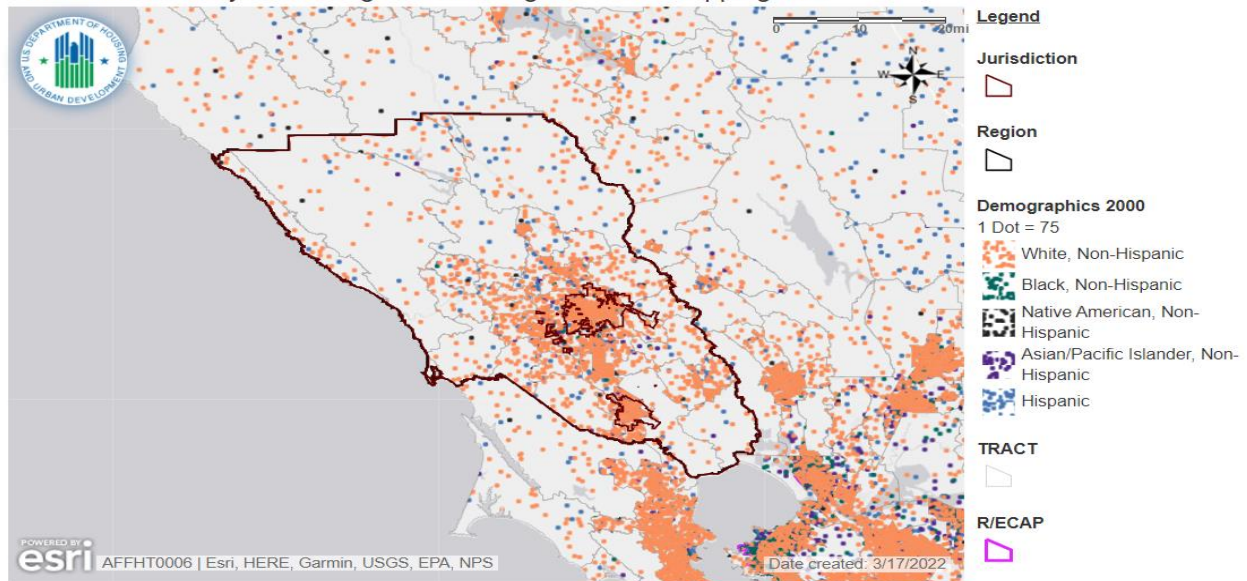
Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 6: Sonoma County R/ECAPs Demographics 2010

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

In Sonoma County, between 1990 and now, there have not been any R/ECAPs.

iii. Disparities in Access to Opportunity

a. Disparities in Access to Opportunity – Education

i. Describe any disparities in access to proficient schools in the jurisdiction and region.

Table 1: School Proficiency Index for the City of Petaluma and Sonoma County

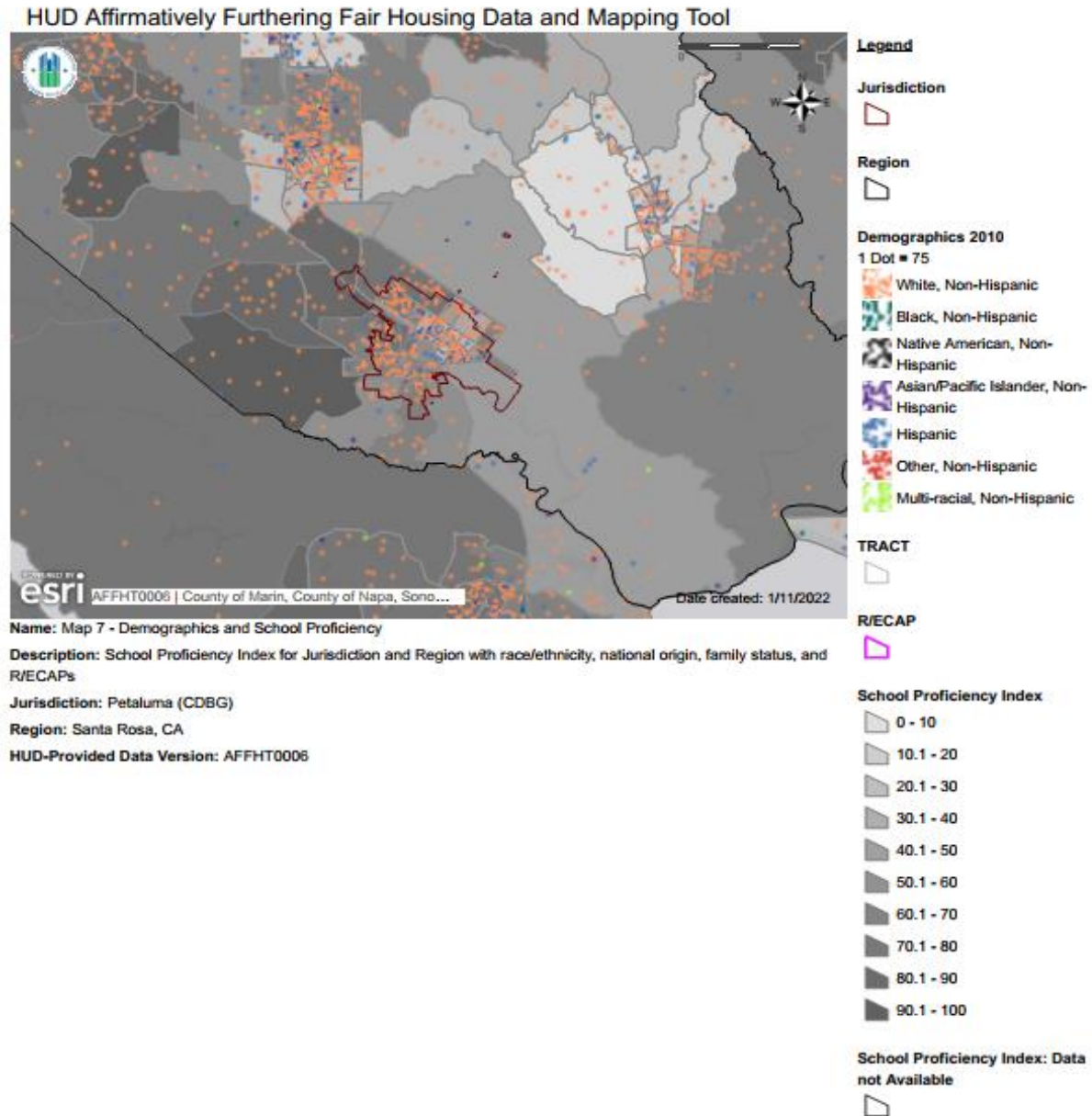
	City of Petaluma	Sonoma County
Total Population		
White, Non-Hispanic	56.84	47.64
Black, Non-Hispanic	55.58	40.88
Hispanic	50.86	36.48
Asian or Pacific Islander, Non-Hispanic	58.10	43.67
Native American, Non-Hispanic	53.58	42.10
Population below federal poverty line		
White, Non-Hispanic	49.60	42.55
Black, Non-Hispanic	47.87	30.75
Hispanic	51.99	35.89
Asian or Pacific Islander, Non-Hispanic	47.48	40.03
Native American, Non-Hispanic	62.12	37.37
<i>Source: Great Schools proficiency data), 2016-17.</i>		

There are significant disparities in access to proficient schools based on race and ethnicity throughout Sonoma County, with all racial groups having lower access when looking exclusively at the population living below the poverty line. White residents, by a substantial margin, have the highest access to proficient schools. Asian American and Native American residents, respectively, have the next highest levels of access. Black residents have slightly lower access, and Hispanic residents, by a substantial margin have the least access. This distribution holds when looking exclusively at the population living below the poverty line.

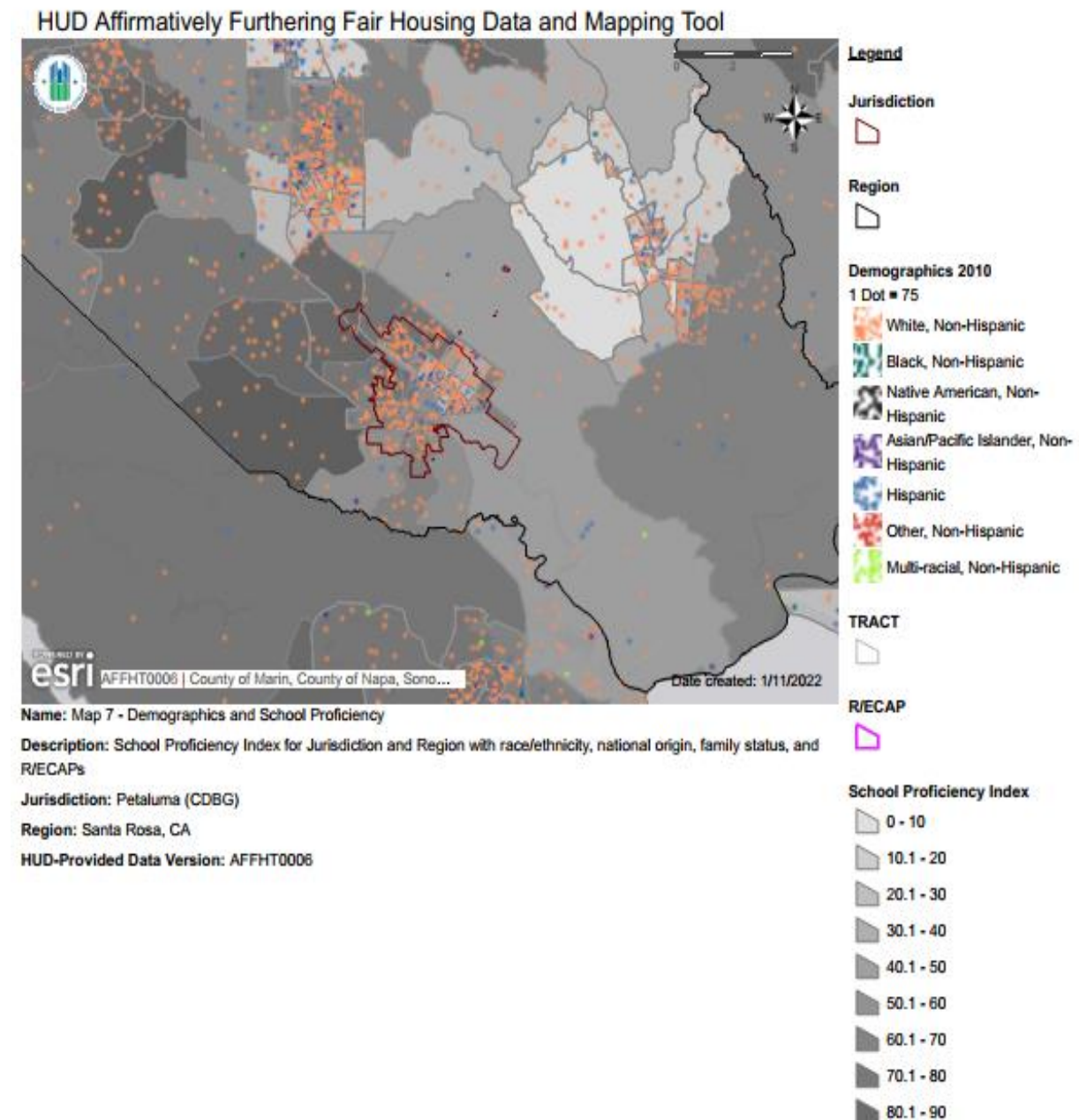
Access to proficient schools is higher in Petaluma than Sonoma County. All racial groups had similar access to proficient schools, with Asian residents having the highest rate and Hispanic residents the lowest rate.

ii. Describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

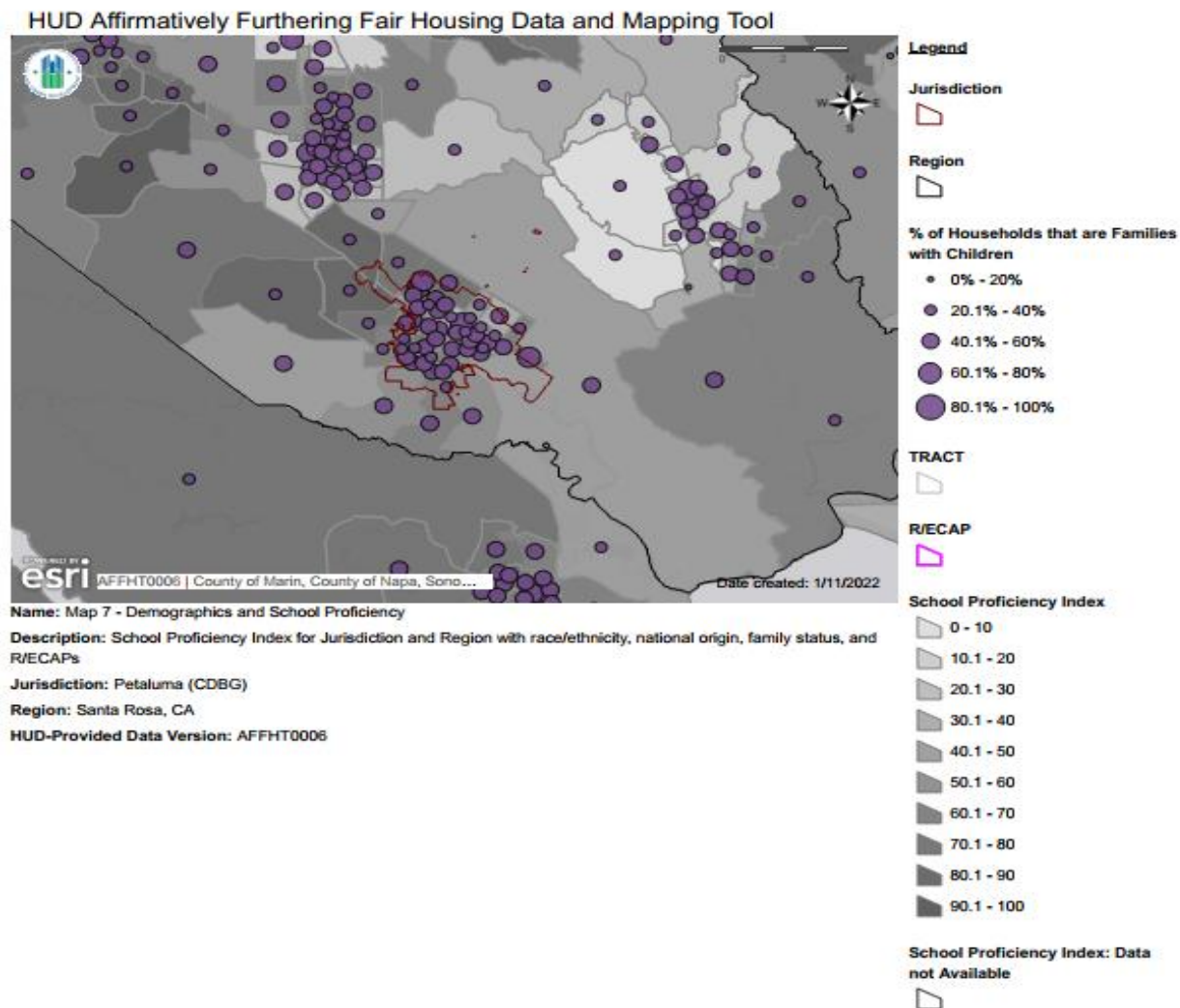
Map 1a: Race/Ethnicity and School Proficiency, City of Petaluma



Map 1b: National Origin and School Proficiency, City of Petaluma



Map 1c: Family Status and School Proficiency, City of Petaluma

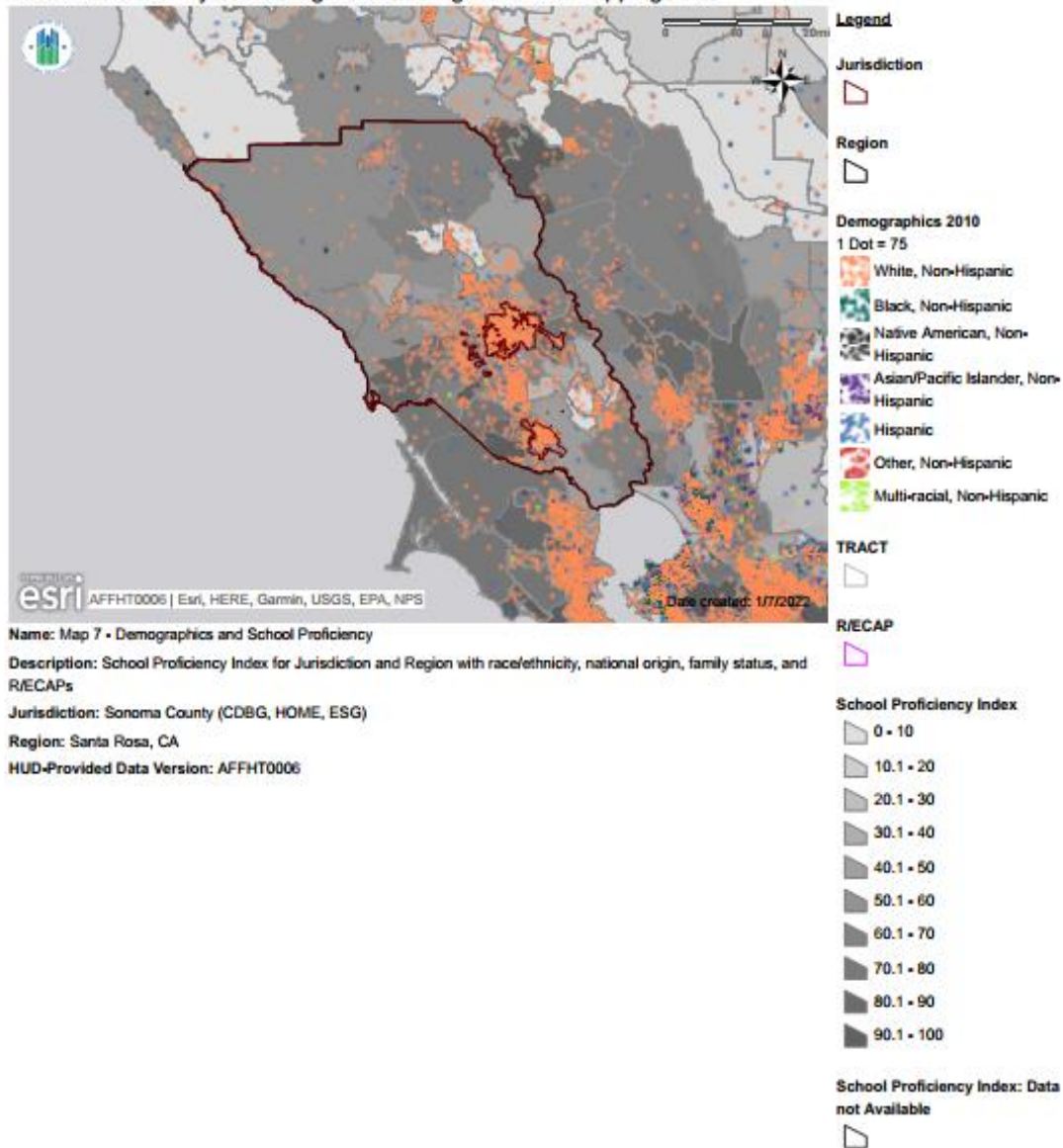


City of Petaluma

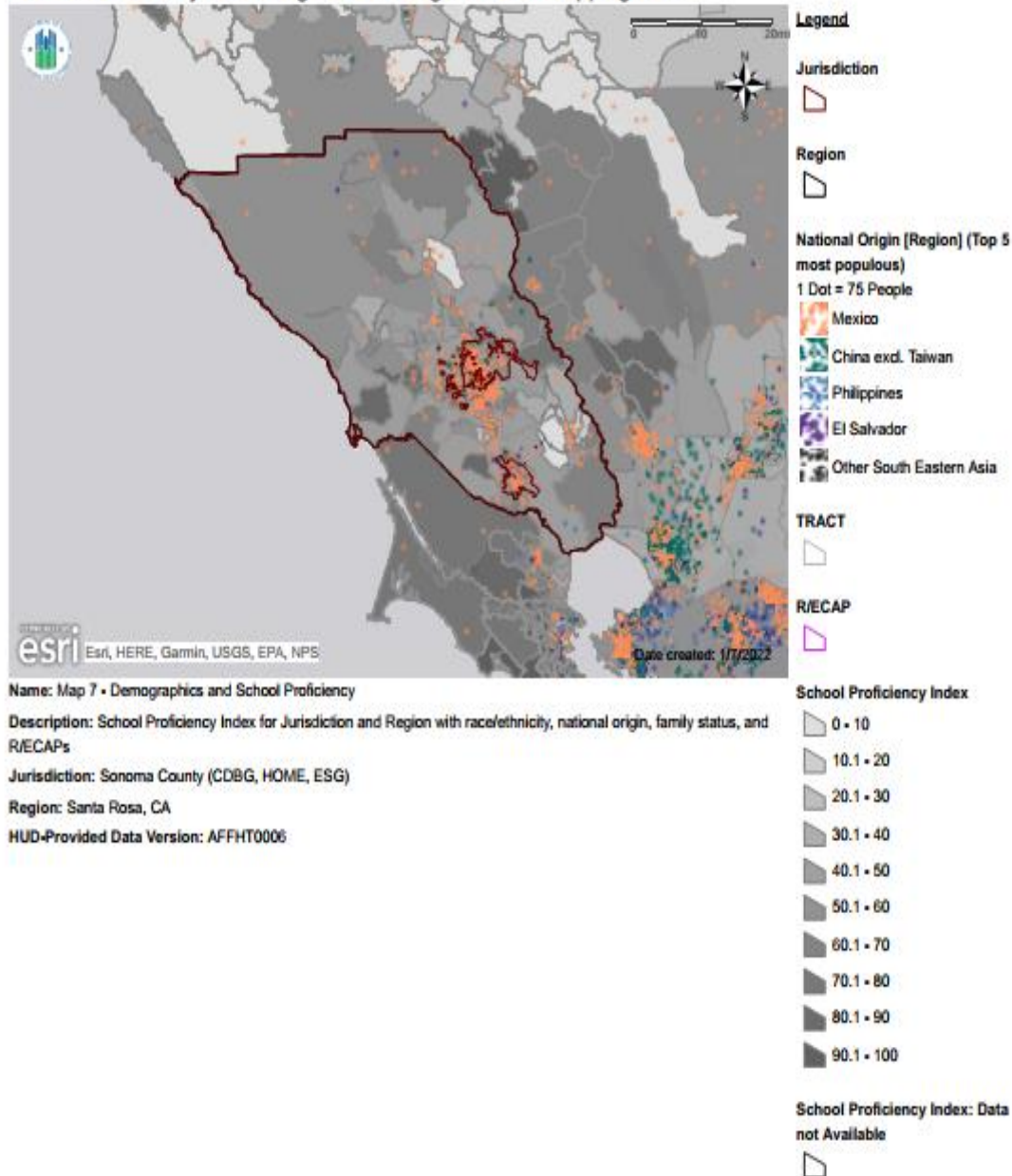
Petaluma is a predominantly white city, so race-based residential living patterns are less pronounced than elsewhere in the county. However, to the extent they exist, they correlate somewhat with access to proficient schools. School proficiency values are highest in the north and southwest part of city. Many of these tracts have populations that are disproportionately white. For example, the area northwest of Corona road has a population that is over 80% white. In contrast, school proficiency values decrease closer to the center of the city. In the areas between Petaluma Municipal Airport, Sonoma-Marín fairgrounds, and Lucchesi Park have the least access to proficient schools in Petaluma. These areas have a large number of the city's Hispanic residents, though the city is overwhelmingly white, so these tracts nonetheless have high numbers of white residents as well. The areas just west of Redwood highway have higher access to schools, however, and these areas also have high numbers of Hispanic residents, particularly Mexican immigrants. There do not appear to be any meaningful disparities based on family status.

Map 1d: Race/Ethnicity and School Proficiency, Sonoma County

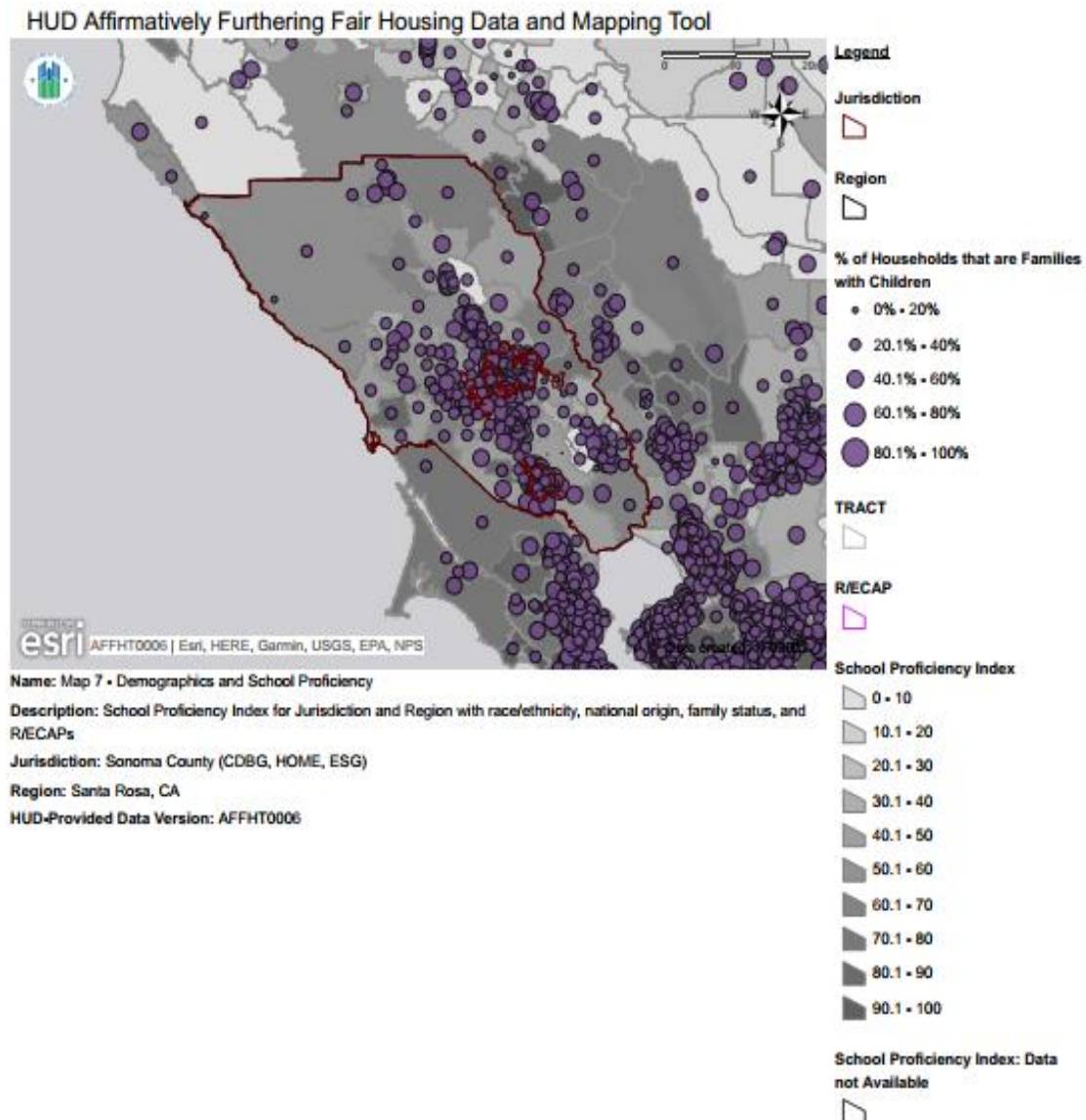
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 1e: National Origin and School Proficiency, Sonoma County
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 1f: Family Status and School Proficiency, Sonoma County



In Sonoma County, access to school proficiency tends to correlate with residential living patterns. For the most part, areas that have concentrated populations of Hispanic residents tend to have lower access to proficient schools. This includes parts of Healdsburg, the City of Sonoma, and Rohnert Park. There is also a large population of Hispanic residents in Windsor, which have more average levels of access to proficient schools, at least compared with the rest of the county. These areas also have larger immigrant populations. But even in these areas with more Hispanic residents, most tracts are predominantly white, as Sonoma County is disproportionately white, as compared to Santa Rosa and Petaluma. There do not appear to be any meaningful disparities based on family status.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.*

City of Petaluma

The Petaluma City Schools Board of Education has created an equity goal, which includes training for all staff in diversity, equity, and inclusion. Our District Equity Committee, which was comprised of students, parents, staff, administrators, and board members, selected Circle Up Education to work with us on this goal. Petaluma City Schools begins its work with equity, diversity, and inclusivity training with Circle Up Education in the Spring of 2020. These efforts do not appear to address the underlying inequality in access to proficient schools, however. For a more detailed discussion on that, see the Contributing Factors Section on Proficient School Location.

Sonoma County

The Sonoma County Office of Education is a partner of the County's 40 districts, but does not create or direct policy for the specific districts. It has published a report on "Building Equitable Schools," which analyzes demographics of the county's students, teachers, and outcomes. The report also highlights the importance of an inclusive curriculum, conversations centering race, and a diverse teacher workforce. This report does not direct the county's 40 districts to make any tangible improvements, however, so it is unlikely to have an impact. This analysis does not look at each county's individual approaches to equity, apart from those that comprise their own jurisdiction.

b. Disparities in Access to Opportunity – Employment

Access to employment at a livable wage is an integral component of broader access to opportunity. Where one lives can affect one's access and the quality of employment opportunities. This can happen both through proximity of residential areas to places with high concentrations (or low concentrations) of jobs and through barriers to residents of particular neighborhoods accessing jobs, even when they are close by. The analysis in this section is based on a review of two data indicators for each jurisdiction, the Labor Market Index and the Jobs Proximity Index. The Labor Market Index measures, by census tract in a jurisdiction, the level of engagement residents within that tract have in the labor force. Values range from 0 to 100. The higher the score, the higher the rates of employment in that particular area. The Jobs Proximity Index measures by census tract, the accessibility that tract's residents have to employment opportunities. Values range from 0 to 100. The higher the score, the more access residents from that area have to employment opportunities.

- i. Describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.*

Table 2: Labor Market and Jobs Proximity Indices, City of Petaluma and Sonoma County

City of Santa Petaluma	Labor Market Index	Jobs Proximity Index
Total Population		
White, Non-Hispanic	68.26	38.54
Black, Non-Hispanic	66.45	34.74
Hispanic	65.39	35.89
Asian or Pacific Islander, Non-Hispanic	67.10	31.99

Native American, Non-Hispanic	68.33	36.86
Population below federal poverty line		
White, Non-Hispanic	64.71	38.28
Black, Non-Hispanic	54.17	35.17
Hispanic	63.17	36.74
Asian or Pacific Islander, Non-Hispanic	57.48	33.39
Native American, Non-Hispanic	52.99	45.87
Sonoma County	Labor Market Index	Jobs Proximity Index
Total Population		
White, Non-Hispanic	59.91	47.34
Black, Non-Hispanic	51.20	51.27
Hispanic	49.55	51.41
Asian or Pacific Islander, Non-Hispanic	55.29	47.78
Native American, Non-Hispanic	51.40	52.82
Population below federal poverty line		
White, Non-Hispanics	59.91	50.02
Black, Non-Hispanic	51.20	59.11
Hispanic	49.55	53.29
Asian or Pacific Islander, Non-Hispanic	55.29	45.42
Native American, Non-Hispanic	51.40	63.53
<i>Sources: American Community Survey (ACS), 2011-2015, Longitudinal Employer-Household Dynamics (LEHD), 2017.</i>		

City of Petaluma

Overall, in Petaluma, Native American residents enjoy the highest Labor Market Engagement Index value among racial and ethnic categories. The value for white residents is just slightly lower than the Native American value. Black residents experience the lowest Labor Market Engagement Index value in the city. The Labor Market Engagement Index values across all racial and ethnic groups are also higher than their respective countywide values. When adjusted for income levels, Labor Market Index values for residents below the federal poverty line is lower across all racial and ethnic categories.

Native American residents experience the greatest decrease in Labor Market Index values when adjusted for income levels.

White and Hispanic residents enjoy the highest Jobs Proximity Index values in Petaluma. Asian or Pacific Islander residents experience the lowest Jobs Proximity Index value. When compared to the countywide values, the Jobs Proximity Index values is lower across all racial and ethnic categories. When adjusted for income levels, Jobs Proximity Index values for residents below the federal poverty line increase for Black, Hispanic, Asian or Pacific Islander and Native American residents. The value decreases for white residents.

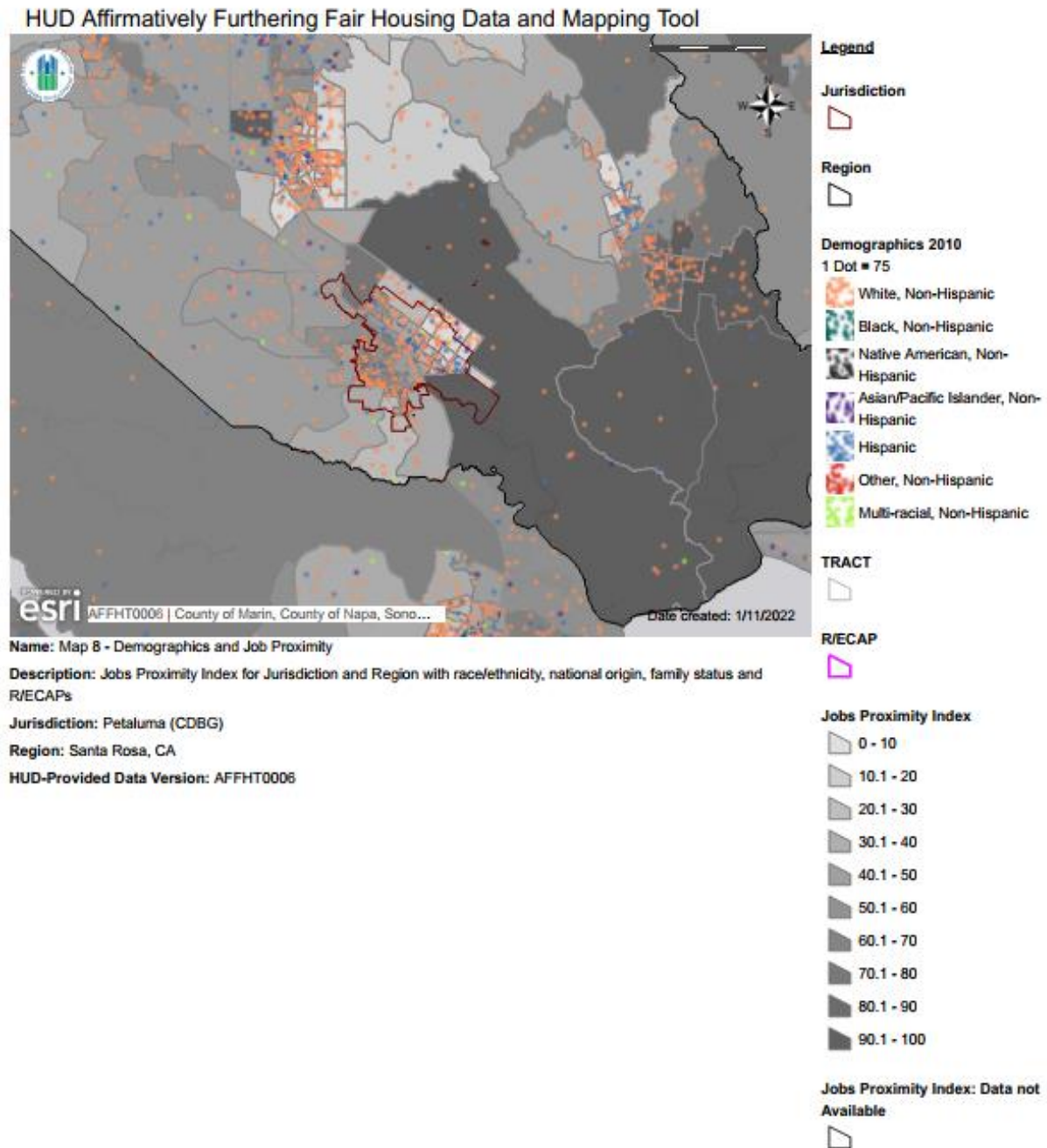
Sonoma County

Overall, in Sonoma County, white residents enjoy the highest Labor Market Engagement Index value. Black, Asian or Pacific Islander, and Native American residents all experience similar Labor Market Engagement Index values. Hispanic residents experience the lowest Labor Market Engagement value in the county. When adjusted for income levels, Labor Market Index values for residents below the federal poverty line, remain the same across all racial and ethnic categories.

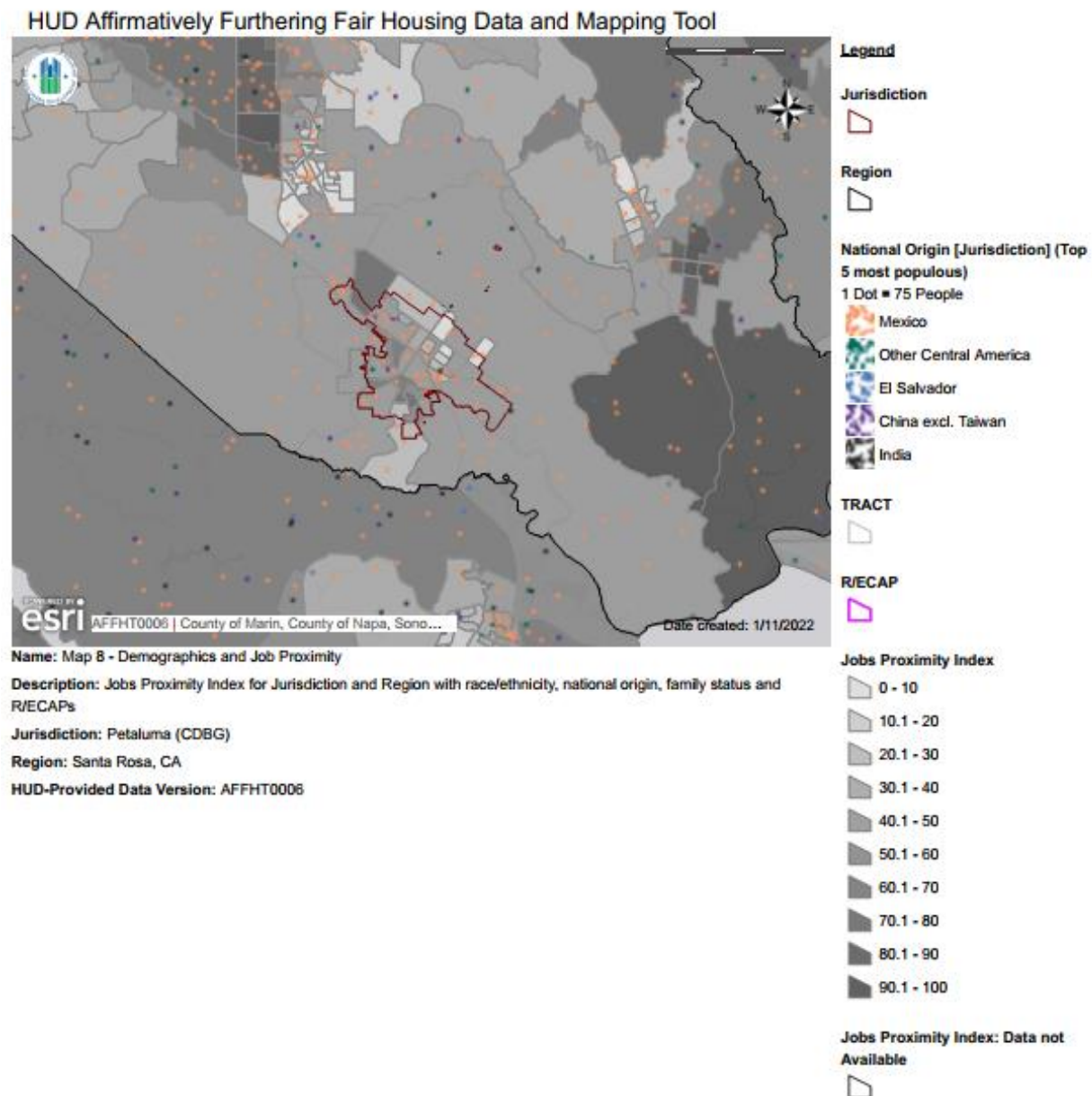
Native American residents enjoy the highest Jobs Proximity Index values in the county. Black and Hispanic residents experience similar Jobs Proximity Index values. White and Asian or Pacific Islander residents also experience similar Jobs Proximity Index values which are the lowest in the county. When adjusted for income levels, Jobs Proximity Index values for residents below the federal poverty line, increases for white, Black, Hispanic, and Native American residents. The value increases significantly for and Asian or Pacific Islander residents.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.***

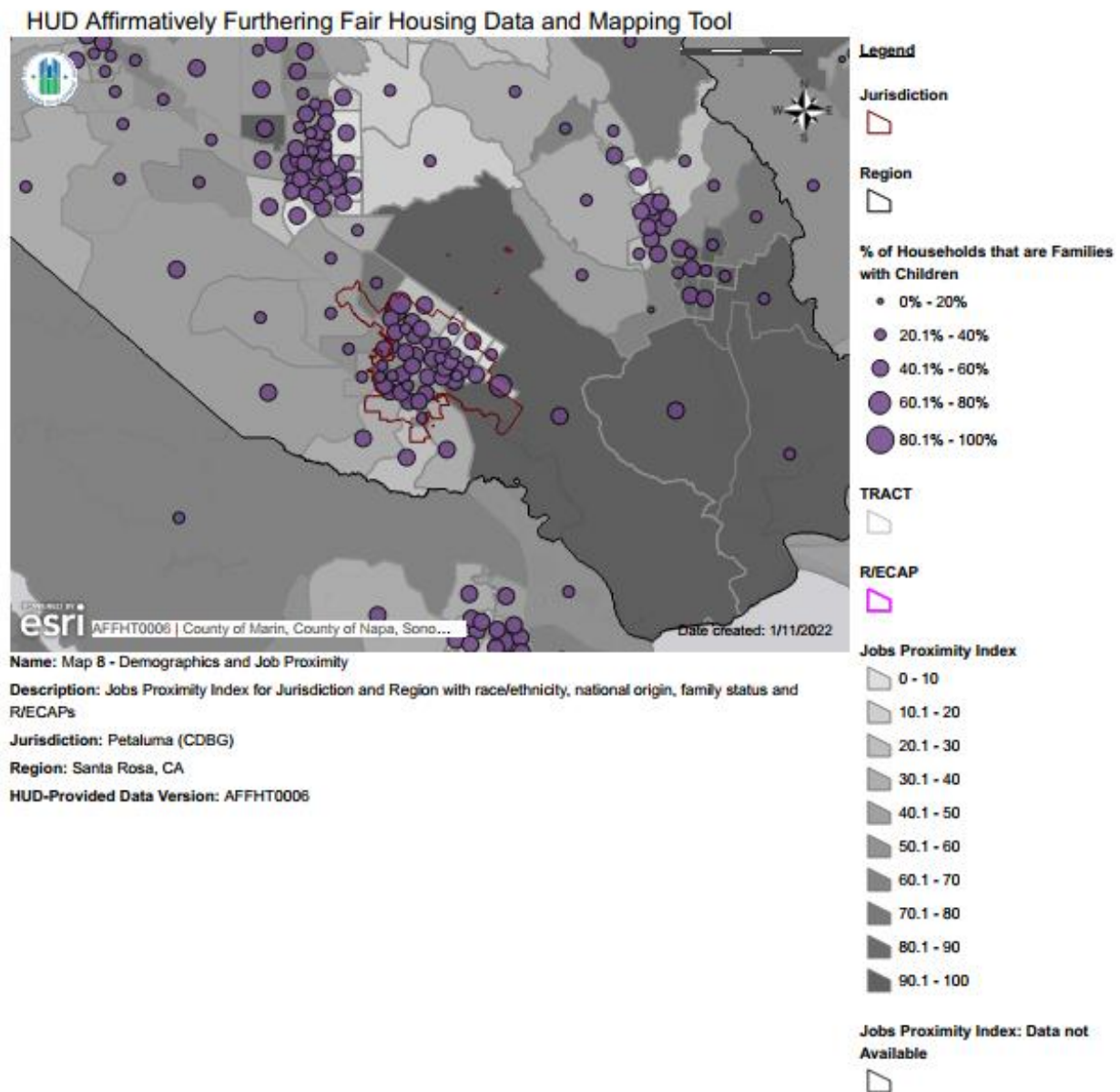
Map 2a: Demographics and Job Proximity (Race/Ethnicity), City of Petaluma



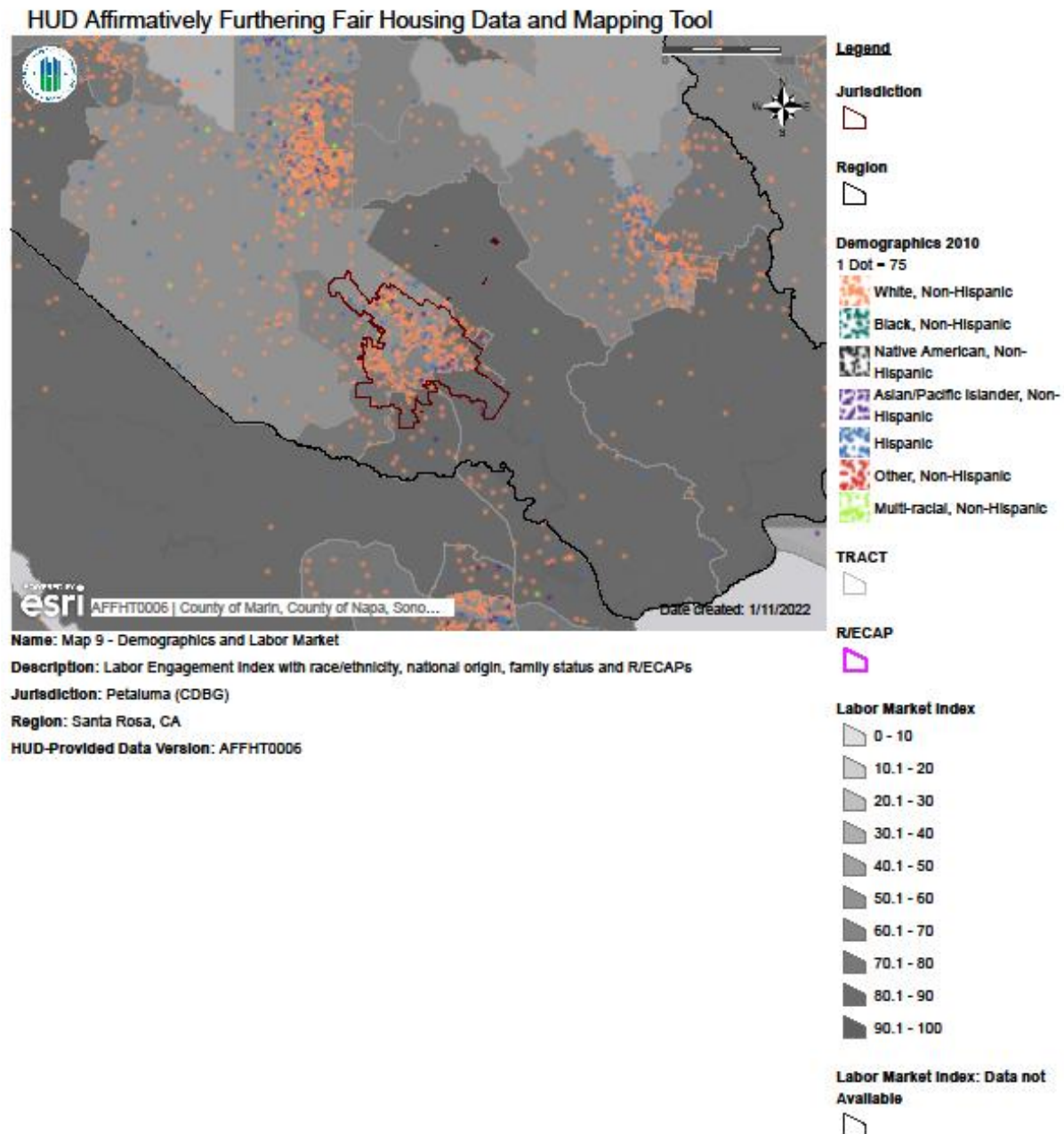
Map 2b: Demographics and Job Proximity (National Origin), City of Petaluma



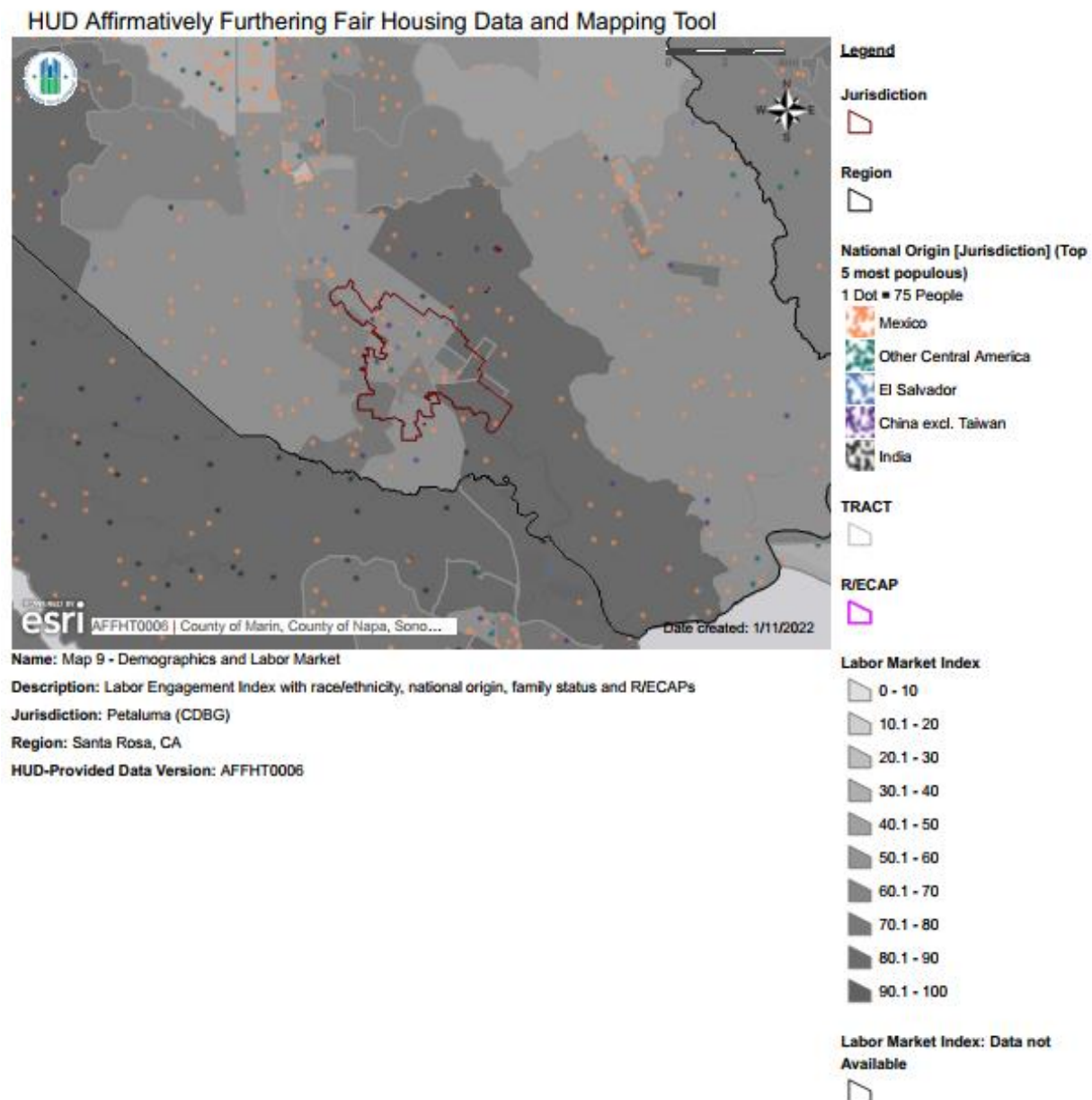
Map 2c: Demographics and Job Proximity (Family Status), City of Petaluma



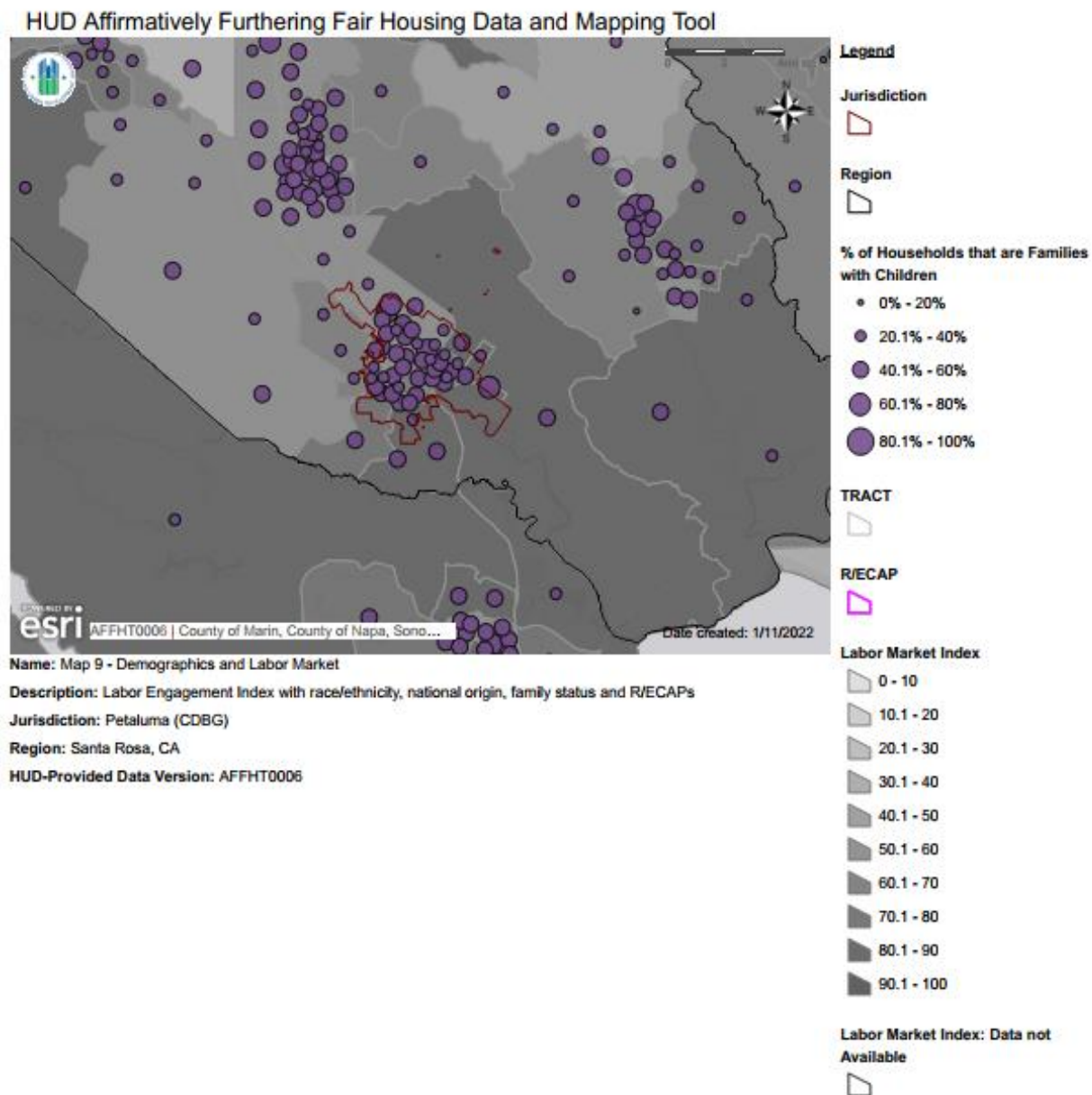
Map 2d: Demographics and Labor Market (Race/Ethnicity), City of Petaluma



Map 2e: Demographics and Labor Market (National Origin), City of Petaluma



Map 2f: Demographics and Labor Market (Family Status), City of Petaluma



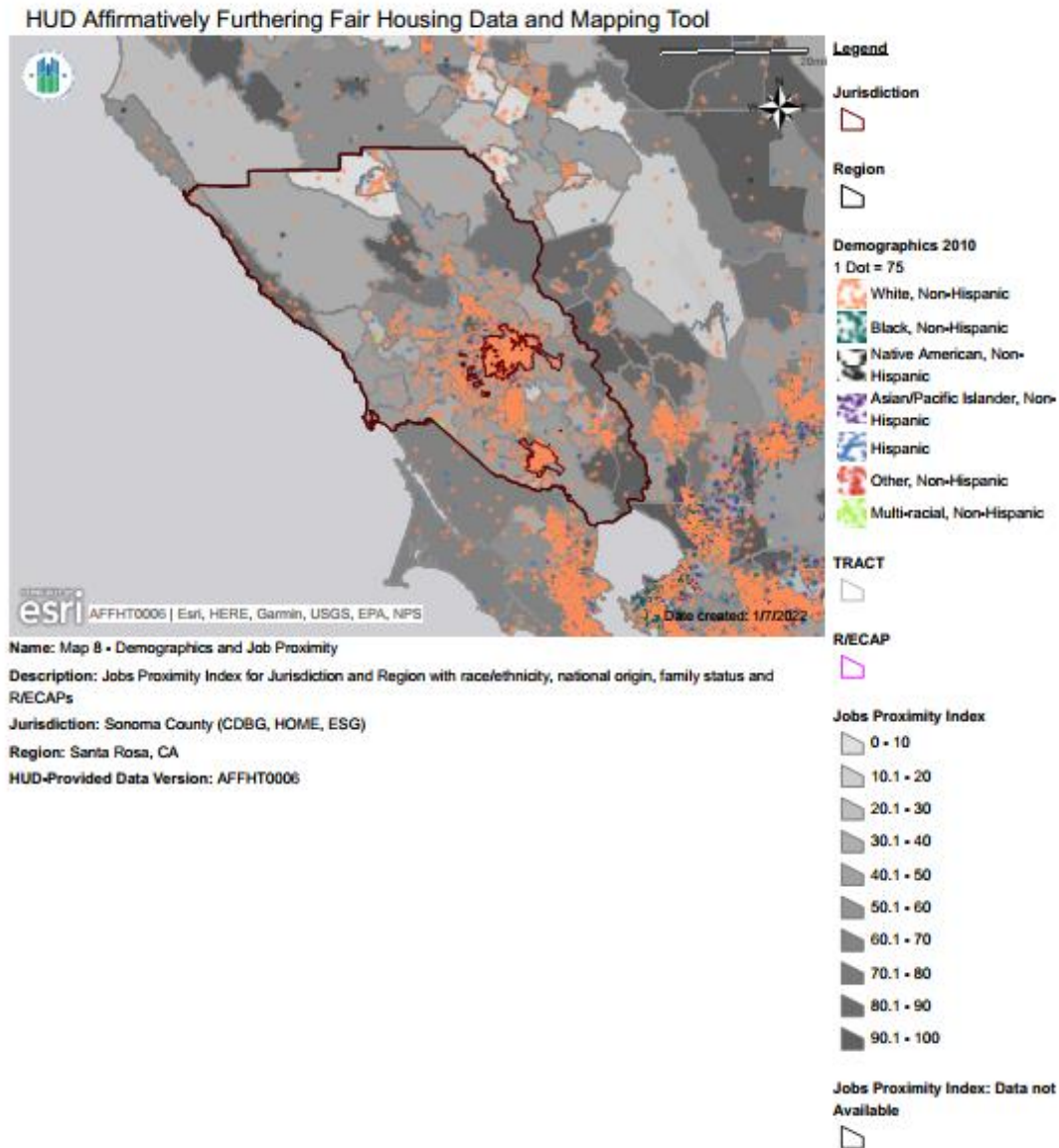
City of Petaluma

In Petaluma, Job Proximity Index values are lowest in the eastern portion of the city. The northeast portion of the city has the lowest Job Proximity Index values.

Labor Market Engagement Index values are also highest in the eastern portion of the city.

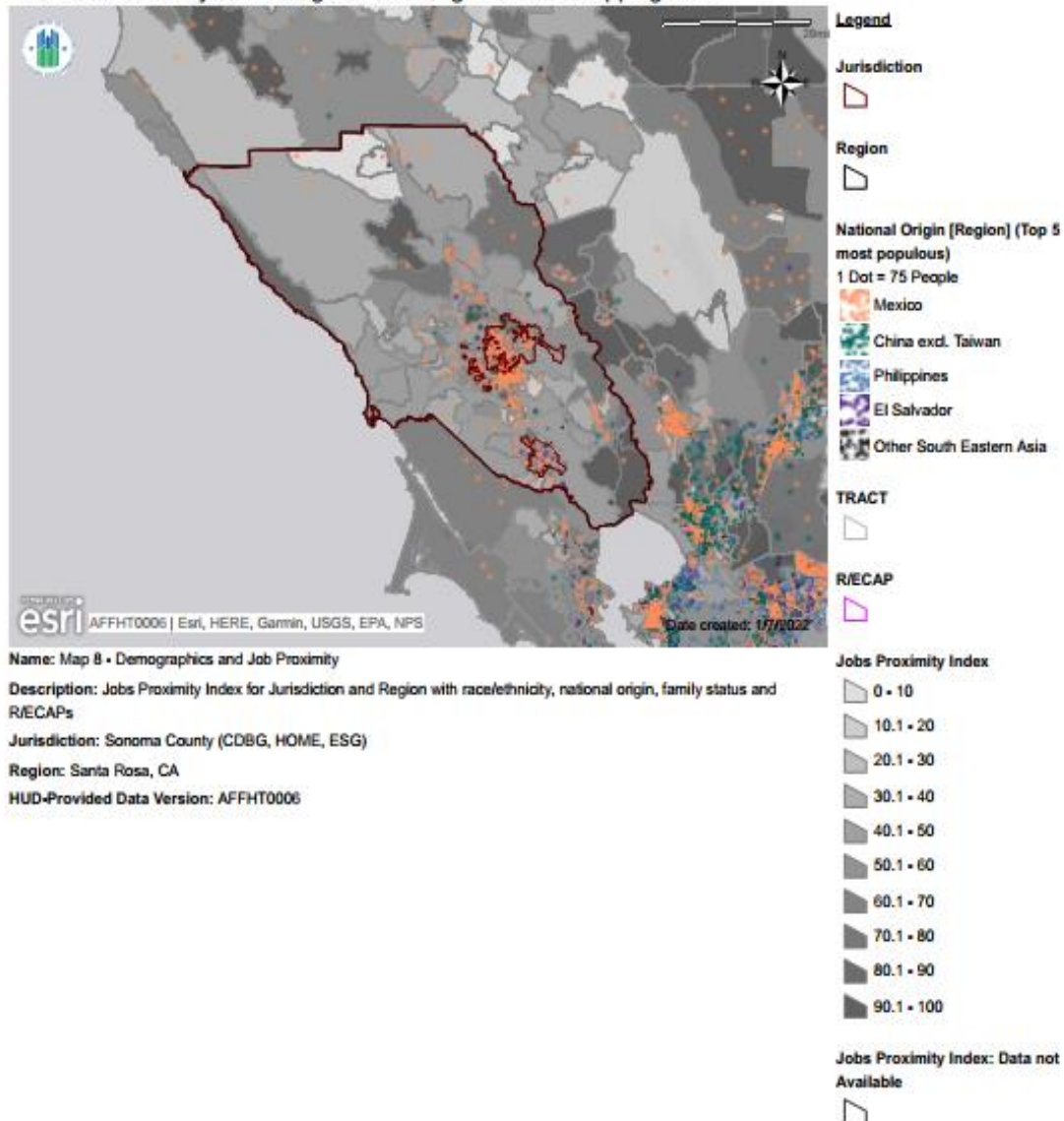
In Petaluma the immigrant population is dispersed throughout the city. The northeast portion of the city, which has the lowest Job Proximity Index values, also has the fewest number of immigrants.

Map 2g: Demographics and Job Proximity (Race/Ethnicity), Sonoma County



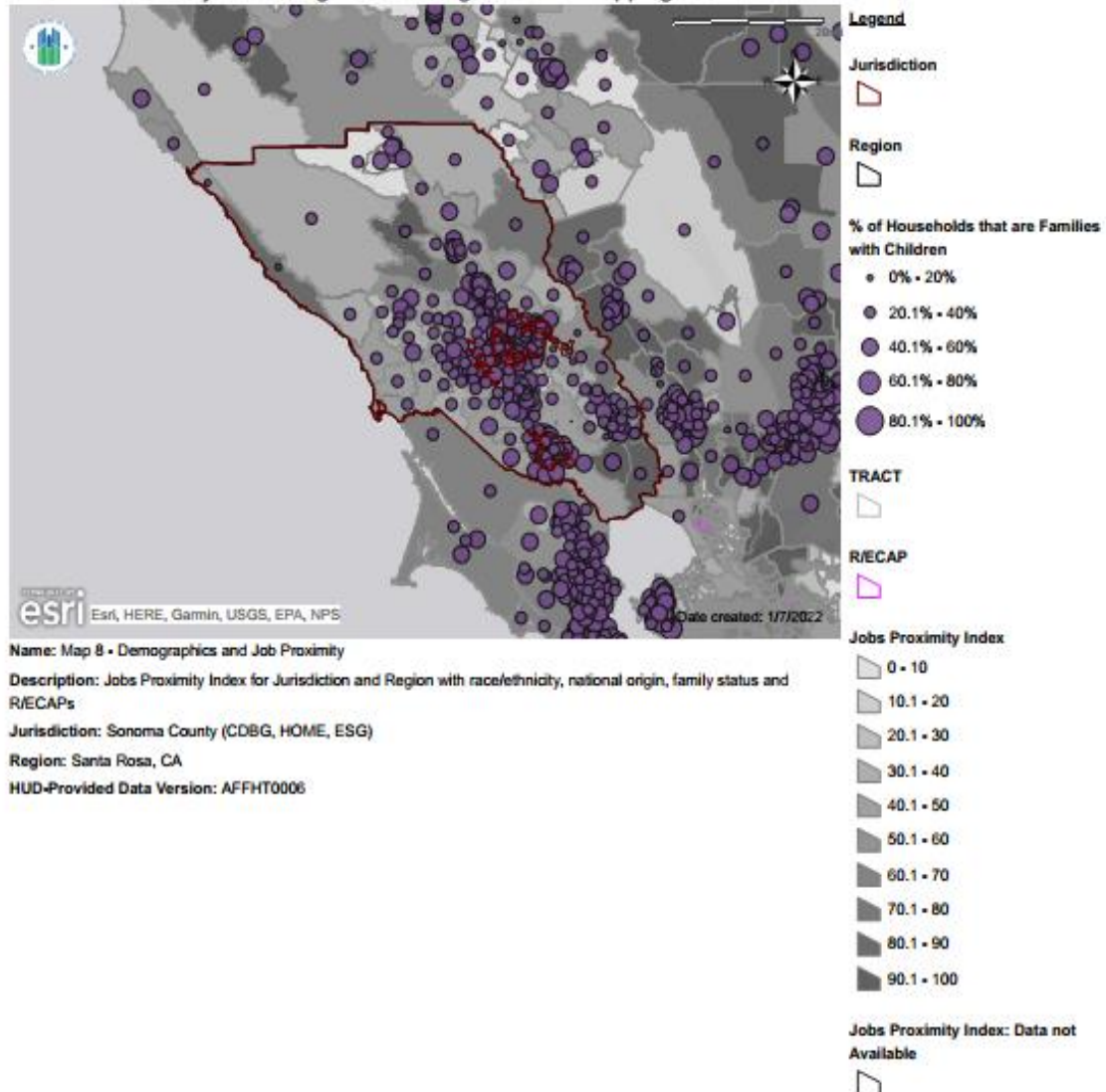
Map 2h: Demographics and Job Proximity (National Origin), Sonoma County

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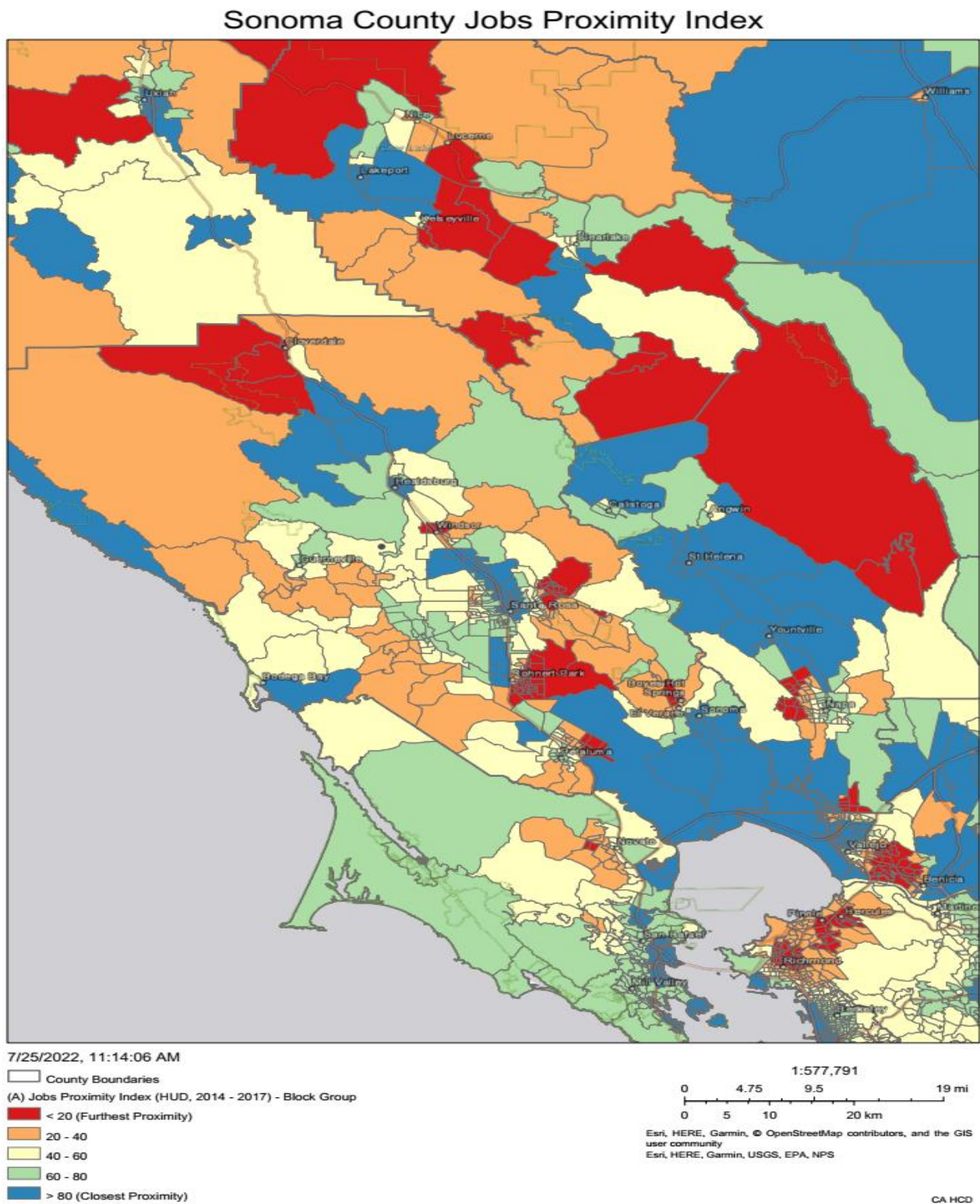


Map 2i: Demographics and Job Proximity (Family Status), Sonoma County

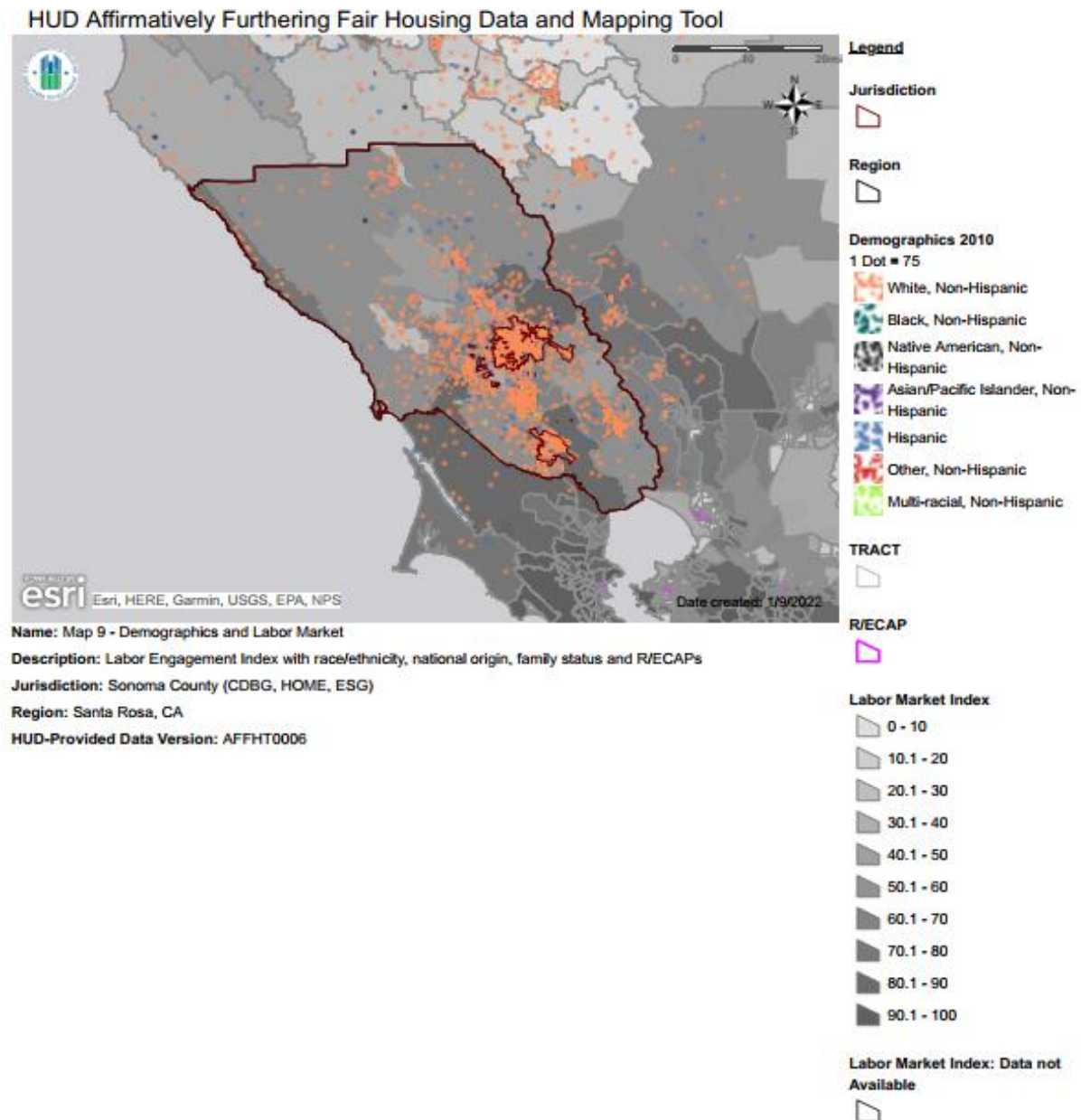
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



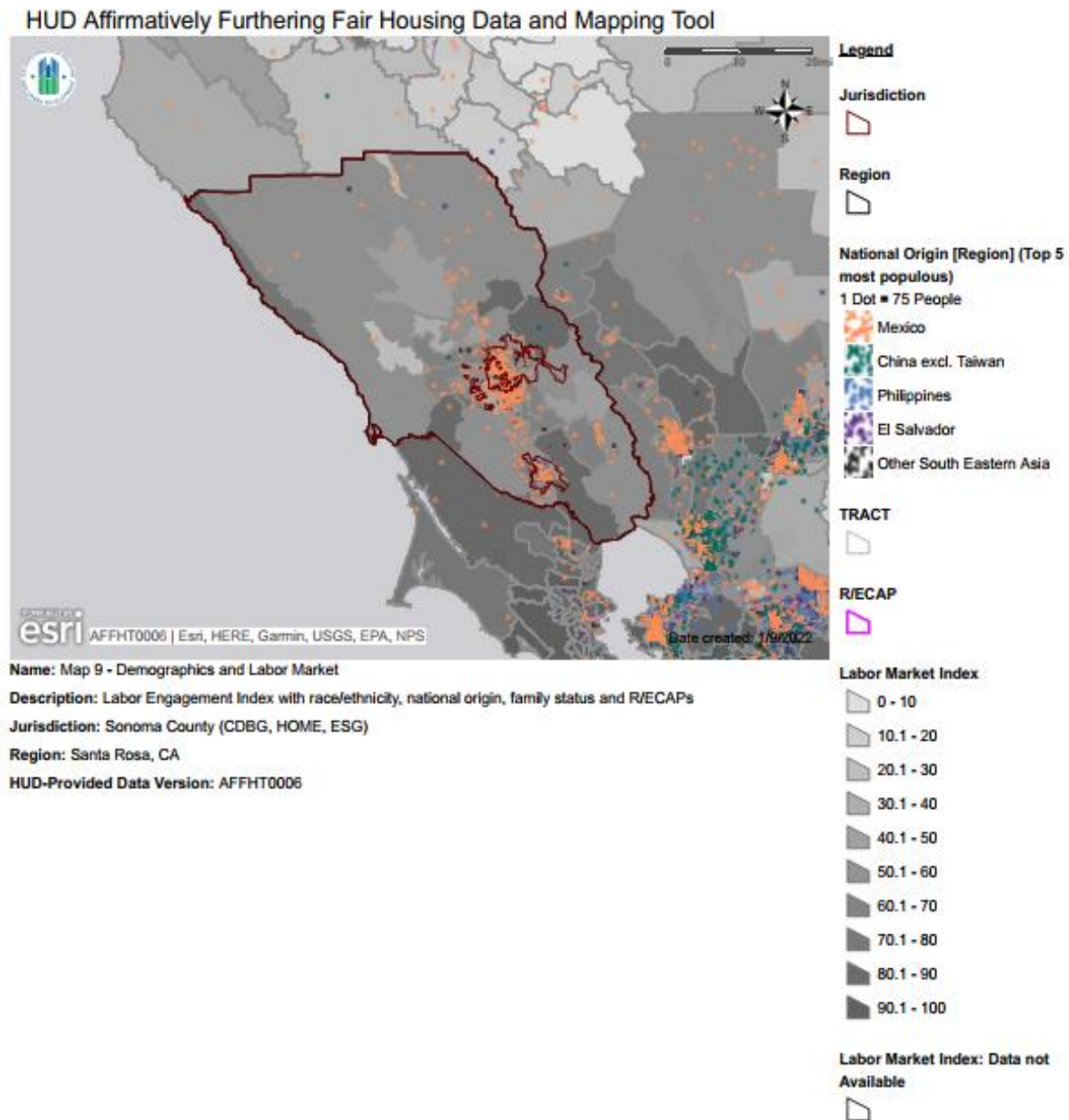
Map 3: Sonoma County Jobs Proximity Index



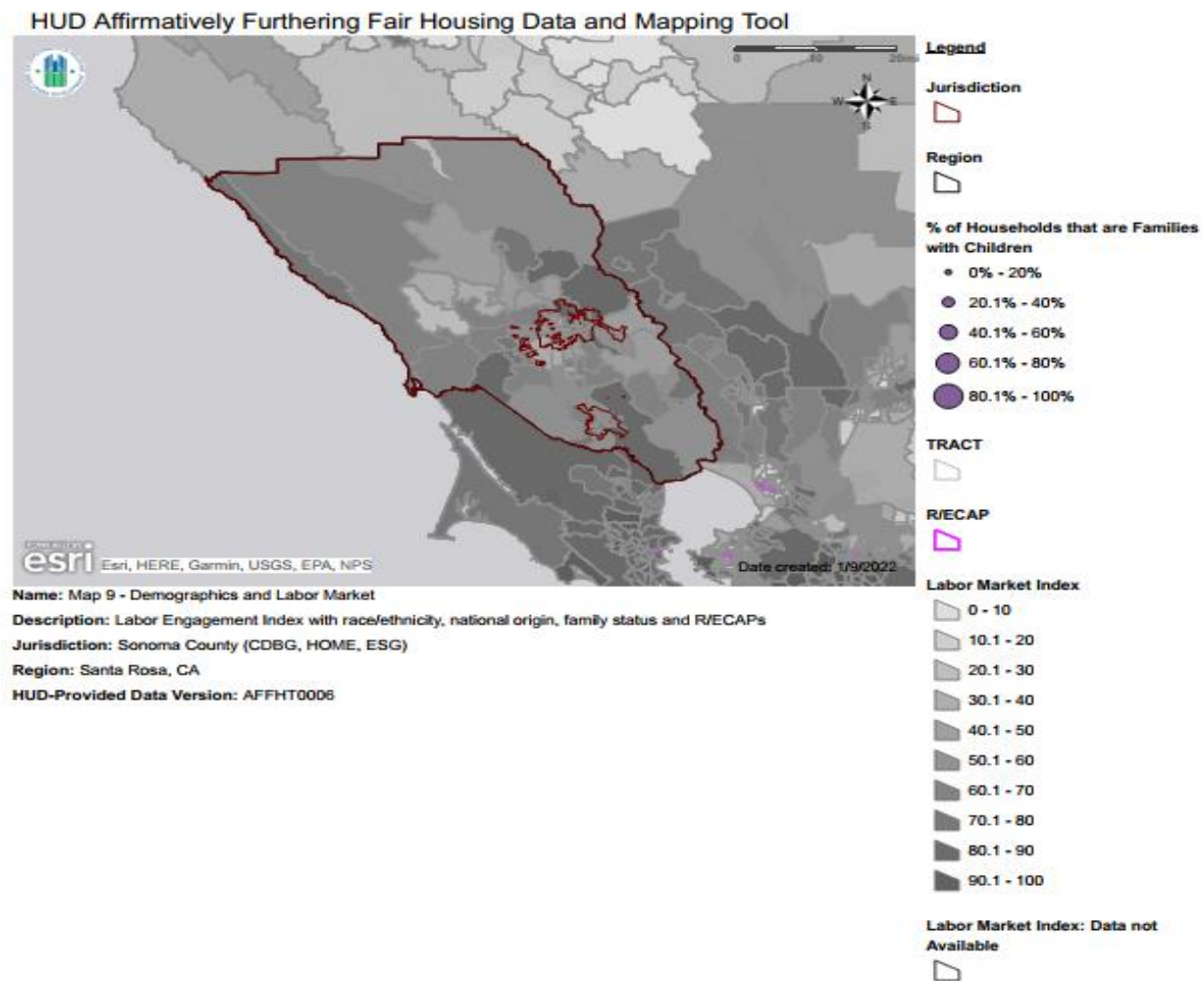
Map 4a: Demographics and Labor Market (Race/Ethnicity), Sonoma County



Map 4b: Demographics and Labor Market (National Origin), Sonoma County



Map 4c: Demographics and Labor Market (Family Status), Sonoma County



Sonoma County

In Sonoma County, Job Proximity Index values are highest in the southeastern portion of the county. There also clusters of high Job Proximity Index values surrounding the cities of Sonoma and Santa Rosa. The lowest Job Proximity Index values are in the northern portion of the county.

Labor Market Engagement Index values are highest in the central and southern portions of the county near the cities of Santa Rosa, Petaluma, and Sonoma.

Immigrant populations in Sonoma County are concentrated near the large urban areas. There are large clusters of Mexican immigrants near the cities of Petaluma and Sonoma. There is also a significant cluster of Filipino immigrants near Petaluma. Immigrant populations are most likely to live near areas of with high Job Proximity Index values and high Labor Market Engagement Index values.

Families with children are most likely to live near the urban areas of Sonoma County. The largest cluster of families with children is near the city of Santa Rosa, which has a high Job Proximity Index value.

Labor Market Engagement Index values are highest in the central and southern portions of the county near the cities of Santa Rosa, Petaluma, Sonoma.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.***

Sonoma County

Sonoma County has a strong local employment climate when compared to the rest of the state, with an unemployment rate of 4.2% according to the Bureau of Labor Statistics as of December 2021.² The state of California unemployment rate is 5.8%.³ Their unemployment rate is also in line with the unemployment rates of the neighboring counties of Napa (4.1%),⁴ Marin (4.2%),⁵ and Lake (4.2%).⁶ Subject to significant margins of error, the American Community Survey reports, as of 2015-2019 (and thus capturing worse employment conditions than those that are currently present), unemployment rates of 4.2% for white workers, 8.8% for Black workers, 2.7% for Asian alone workers, and 5.2% for Hispanic workers. The level of disproportionality is similar to current national data from the Bureau of Labor Statistics showing, as of December 2018, unemployment rates of 3.1% for white workers, 6.2% for Black workers, 3.2% for Asian American workers, and 5.1% for Hispanic workers.⁷

A variety of programs operating in Sonoma County seek to connect disproportionately Black and Hispanic low-income workers to opportunities for employment and professional advancement. The County's Department of Human Services operates the Sonoma County Job Link which seeks to connect residents with businesses looking for workers. Sonoma County also operates the SonomaWorks program which provides enhanced employment services to eligible residents.

c. Disparities in Access to Opportunity – Transportation

- i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.***

The Low Transportation Cost Index and Transit Trips Index are used to measure access to transportation within a location. The Low Transportation Cost Index (LTCI) measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. The Index scores range from 0-100. A higher score correlates to greater transportation access.

The Low Transportation Cost Index and Transit Trips Index are used to measure access to transportation within a location. The Low Transportation Cost Index measures access to low-cost transportation services, and the Transit Trips Index measures how often residents take transit trips. The index scores range from 0-100. A higher score correlates to greater transportation access.

Low income residents in Sonoma County experience significant disparities in transportation due to the counties' asymmetric investments in car-based infrastructure over public transportation. In these counties, there is a high dependency on automobiles as the primary transportation mode. This creates inequities in transportation access for low income residents because of the cost prohibitive nature of cars and the lack of sufficient transit infrastructure alternatives supplement this car centric transportation model. Residents who are low income are disproportionately burdened by the existing

² Bureau of Labor Statistics, Local Area Unemployment Statistics, March 2022..

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ ACS data table S2301, 2019 ACS 5-Year Estimates Subject Tables, <https://data.census.gov/cedsci/table?t=Employment%20and%20Labor%20Force%20Status&g=0500000US06097&y=2019&tid=ACSST5Y2019.S2301>

car dominant transportation system because the purchase, maintenance, and gasoline cost consume a disproportionate share of their income in comparison to higher income residents. As a recent study published by the Center for Neighborhood Technology, “low and moderate income households are hit the hardest by high transportation costs with current household travel costs at about \$1,300–1,400 per month.”⁸ It also found that the “average household in Sonoma County with the median household income of \$81,018 spent over 20 percent of its household budget on transportation in 2019.”⁹ Additionally, the lack of adequate public transportation infrastructure further contributes to these transportation inequities. Alternative forms of transportation i.e. public transit, are not reliable or extensive enough to support commuters, particularly low-income workers who are more likely to use this more affordable transportation option. As a result, low-income residents are forced to decide between two bad options: costly car ownership or unreliable public transportation. Irrespective of which mode of transportation low-income residents decided upon, they are denied equitable access to transportation.

The transit trip and low-cost transportation index value ranges do not run in parallel for the jurisdictions. Although residents in Sonoma County generally do not rely on public transit as their primary mode of transportation, many residents reside in areas near low-cost transportation services. The relatively high access to low-cost transportation strongly suggests that cost is not the main barrier to use of transit. Indeed, lack of consumer interest appears to be the more likely cause of limited usage. Poor operational services and limited transit infrastructure are likely to deter riders who can afford an alternative form of transportation i.e. personal vehicle. Thus, low-income individuals are more likely to make up the core ridership for public transit.

The data strongly suggests this. While the index values for transportation access display slight racial or ethnic disparities, and in some cases, favor residents of color over white residents, these figures alone do not accurately capture the transportation inequities in this environment. The reason why transit use and proximity are highest for people of color is because residents of color—many of which are low income in the two counties—rely on public transit as their primary mode of transportation due to their financial circumstances unlike white residents who can afford a car for personal use. The index values for transit trip use show that Hispanic residents and immigrant populations disproportionately rely on public transit in comparison to white residents. Additionally, the data shows that white residents in Sonoma have less access to transit, but this is most likely because transit access is less important to them since many white residents rely on personal vehicles as their primary mode of transportation, and as a result do not use nor need to live near public transit. Consequently, Hispanic residents and immigrant populations who rely on public transit have disparate access to transportation due to system-wide transit deficiencies. These jurisdictions must invest in improved transit operations and expanded infrastructure throughout the jurisdictions to prevent further harm to core riders, i.e. Hispanic, immigrant residents, and persons with disabilities.

⁸ Sonoma County Transportation Authority, *Transit Integration and Efficiency Study*, <https://scta.ca.gov/wp-content/uploads/2019/10/TIES-Draft-Final-Report.pdf>

⁹ *Id.*

Table 3: Transit and Low Transportation Cost Indices, City of Petaluma and Sonoma County

City of Santa Petaluma	Transit Index	Low Transportation Cost Index
Total Population		
White, Non-Hispanic	22.40	66.99
Black, Non-Hispanic	24.83	68.66
Hispanic	24.32	69.54
Asian or Pacific Islander, Non-Hispanic	23.41	66.59
Native American, Non-Hispanic	23.38	68.58
Population below federal poverty line		
White, Non-Hispanic	22.32	69.05
Black, Non-Hispanic	27.39	73.70
Hispanic	26.70	71.21
Asian or Pacific Islander, Non-Hispanic	26.37	71.68
Native American, Non-Hispanic	28.69	74.08
Sonoma County		
Total Population		
White, Non-Hispanic	42.18	66.17
Black, Non-Hispanic	51.27	71.40
Hispanic	48.18	70.28
Asian or Pacific Islander, Non-Hispanic	46.96	68.65
Native American, Non-Hispanic	47.88	68.93
Population below federal poverty line		
White, Non-Hispanic	46.59	69.09
Black, Non-Hispanic	61.61	77.20
Hispanic	50.04	72.06
Asian or Pacific Islander, Non-Hispanic	49.84	70.79
Native American, Non-Hispanic	53.92	73.62

Source: Location Affordability Index (LAI) data, 2012-2016.

City of Petaluma

Few residents in Petaluma rely on public transit as their primary mode of transportation. Transit trip index values in Petaluma are well below the mid-range of the transit trip index scale but no racial or ethnic disparities in transit trip index values are present. Transit trip index values here range from 24 to 22 and vary little among racial groups. Black and Hispanic residents have the highest transit trip index values at 24, but even this is a substandard index value when compared to other jurisdictions. For lower income residents, all racial groups except for white residents experience a slight increase in transit trip index values jumping 2 to 4 points. Index values for Native American residents undergo the highest increase in value from 23 to 28 when economic status is considered. LTCI values are substantially higher than transit trip index values hovering within a range of 66 to 69. Racial or ethnic disparities among the groups are marginal. Hispanic, Black, and Native American residents have the highest low transportation cost indices values. and for low income individuals these values trend slightly upward in comparison to the respective racial groups as a whole. White residents have a slightly lower low transportation cost indices value in comparison to other groups.

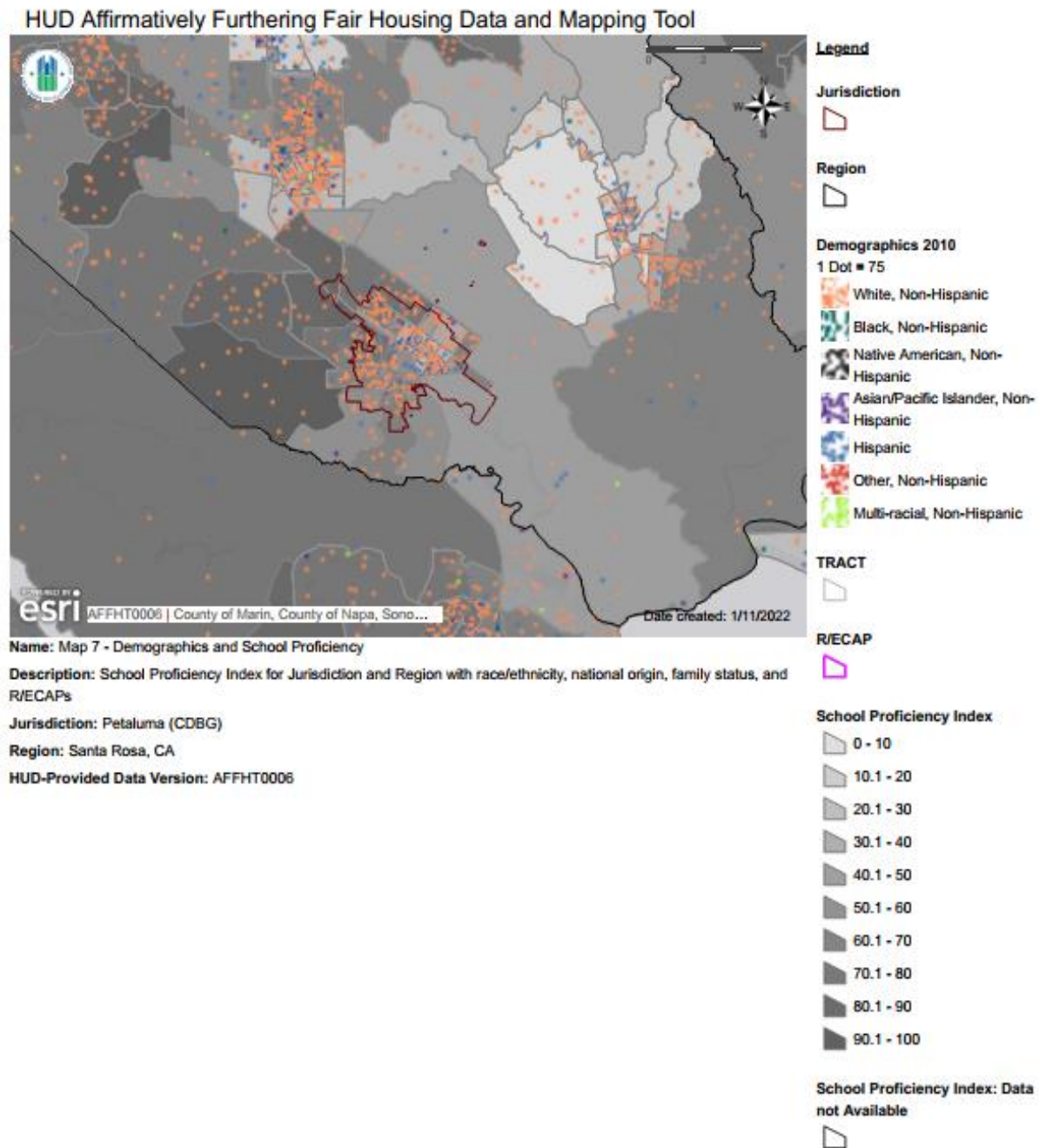
Sonoma County

Sonoma County lacks adequate public transportation infrastructure. Of the three examined jurisdictions, Santa Rosa has the highest access to transportation. Despite being a more urbanized area, Petaluma's residents use transit less than in Sonoma County, a mostly rural area. Transit trip index values for the County are middling at best spanning from 42 to 51. Most racial groups have transit trip index values slightly below the midpoint for the transit trip index range. Black residents have the highest transit trip index values, 51, with Hispanic residents slightly below this figure at 48. Conversely, white residents have the lowest transit trip index values of any group with a value of 42. This shows that Black and Hispanic residents are more likely to rely on public transportation than their white counterparts. The transit trip index value trends for low-income residents strongly correlates with the transit trips index trends for Santa Rosa and Petaluma with residents below the poverty line experiencing an increase in use of transit. This is especially so for Black residents who undergo a 10-point uptick in their transit trip index value rising from 51 to 61. However, this upward trend does not impact racial groups in the same way and in fact leads to greater disparities for white residents below the poverty line who have a transit trip index value 15 points lower than the transit trip index value for Black residents.

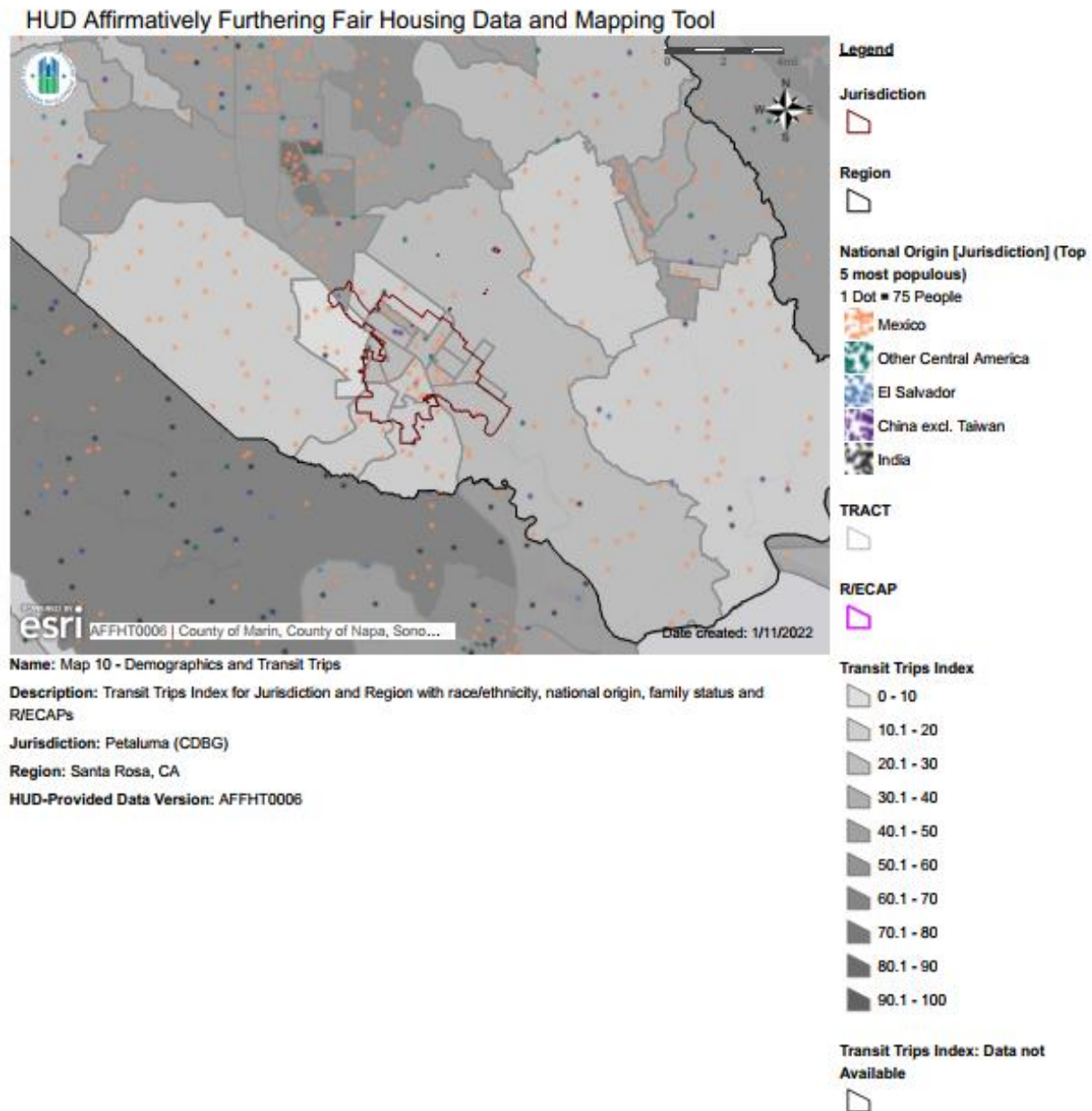
The County's LTCI values strongly correspond with the trend for the individual jurisdictions in Sonoma ranging from 62 to 67. As is the case throughout, Black residents have slightly higher LTCI values, 67, than other groups while white residents have the lowest, 62. The index value trend for low income residents also corresponds to the jurisdictional ones for LTCI values. All racial groups, besides Native American residents, undergo slight increases in LTCI values when economic status is considered and as these values increase, the racial disparity between white residents' index values and Black residents' index values widens.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.***

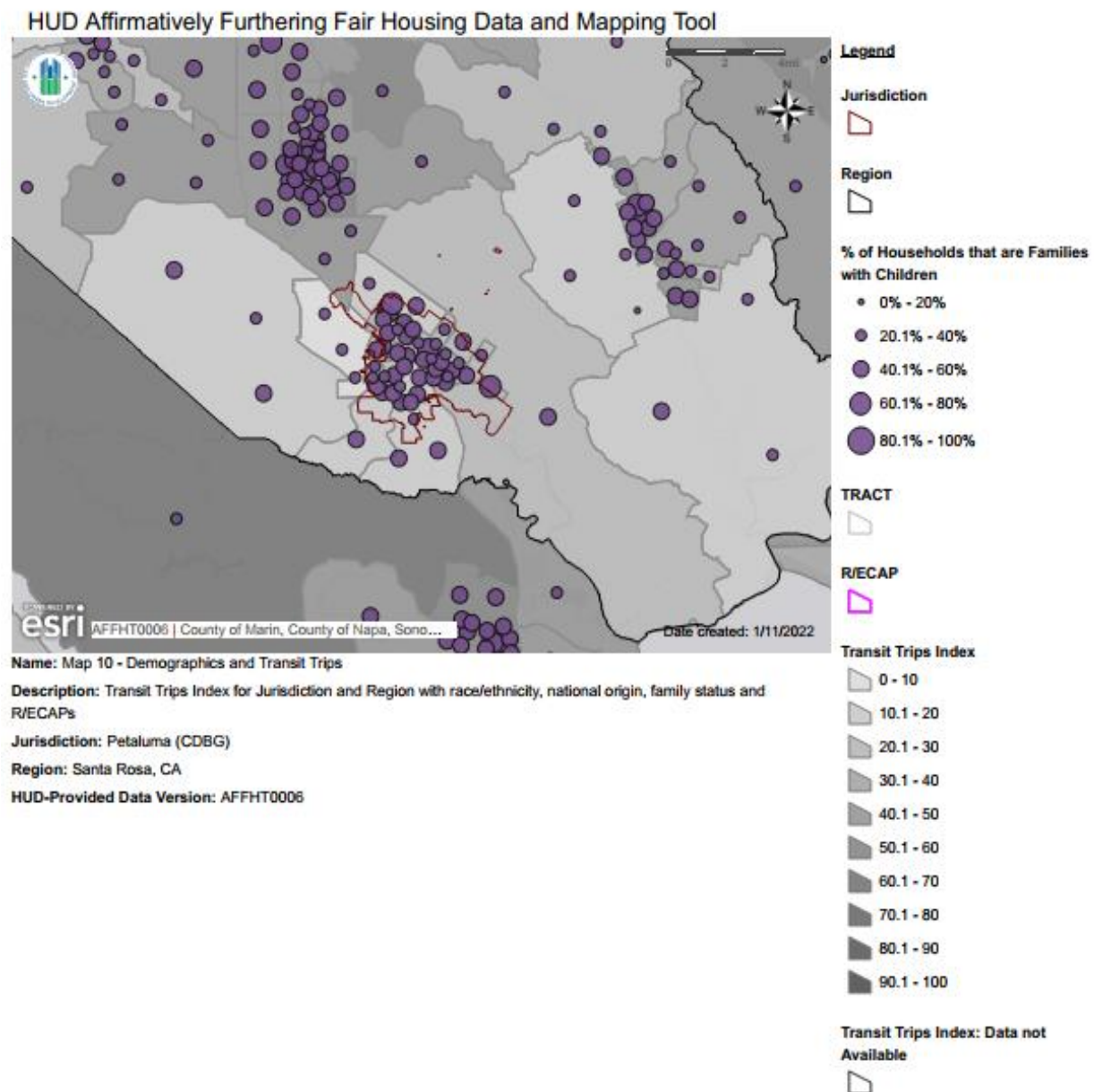
Map 5a: Demographics and Transit Trips (Race/Ethnicity), City of Petaluma



Map 5b: Demographics and Transit Trips (National Origin), City of Petaluma



Map 5c: Demographics and Transit Trips (Family Status), City of Petaluma

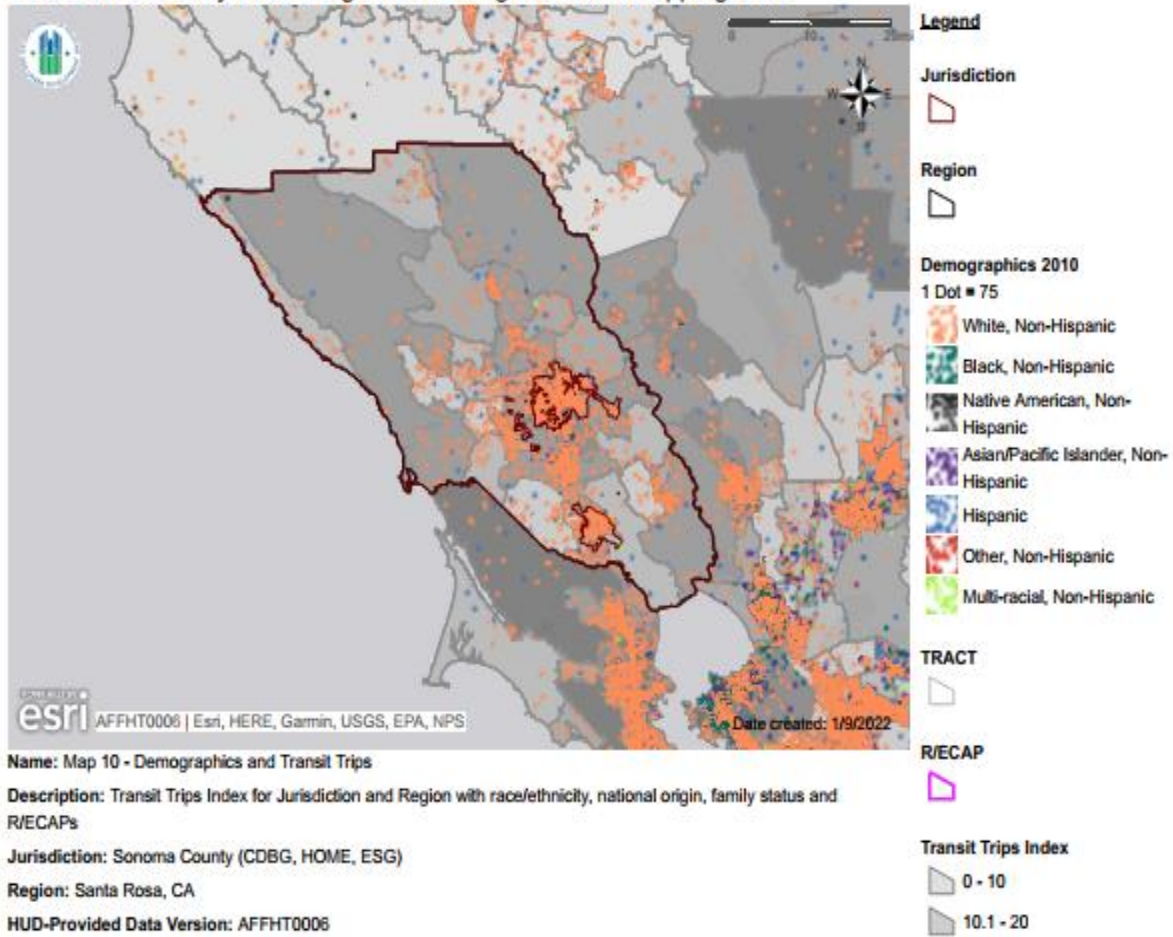


City of Petaluma

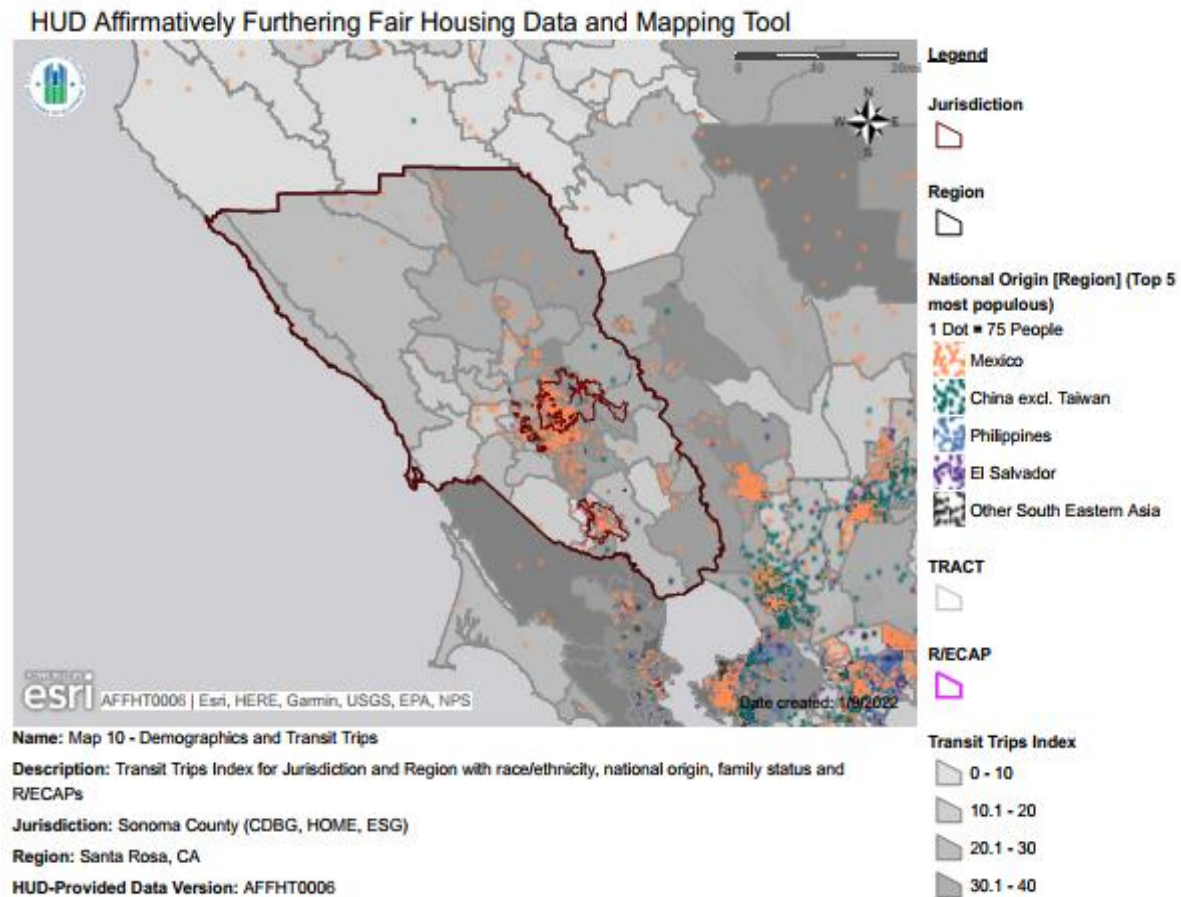
The City of Petaluma has moderate to low transit trip index values. The majority of tracts have transit trip index values below 50. This suggests that generally, many residents do not rely on public transit as their primary mode of transportation. White and Hispanic residents are concentrated in the center of Petaluma near tracts with the highest transit trip index values with slightly larger clusters of white residents present here. The residential patterns do not display racial or ethnic disparities in transit trips. In Petaluma, the predominant immigration populations include Mexican residents, the largest group, Filipino residents, El Salvadoran residents, and Chinese residents. The Mexican population is evenly distributed throughout the City and resides in areas of varying transit trip index values. In addition, there is also a scattered distribution of Filipino, Chinese, El Salvadoran residents; El Salvadoran residents live in tracts with lower transit trip index values in comparison to the other two immigrant populations. No residential pattern of disparity in transit use exists for families with children.

Map 5d: Demographics and Transit Trips (Race/Ethnicity), Sonoma County

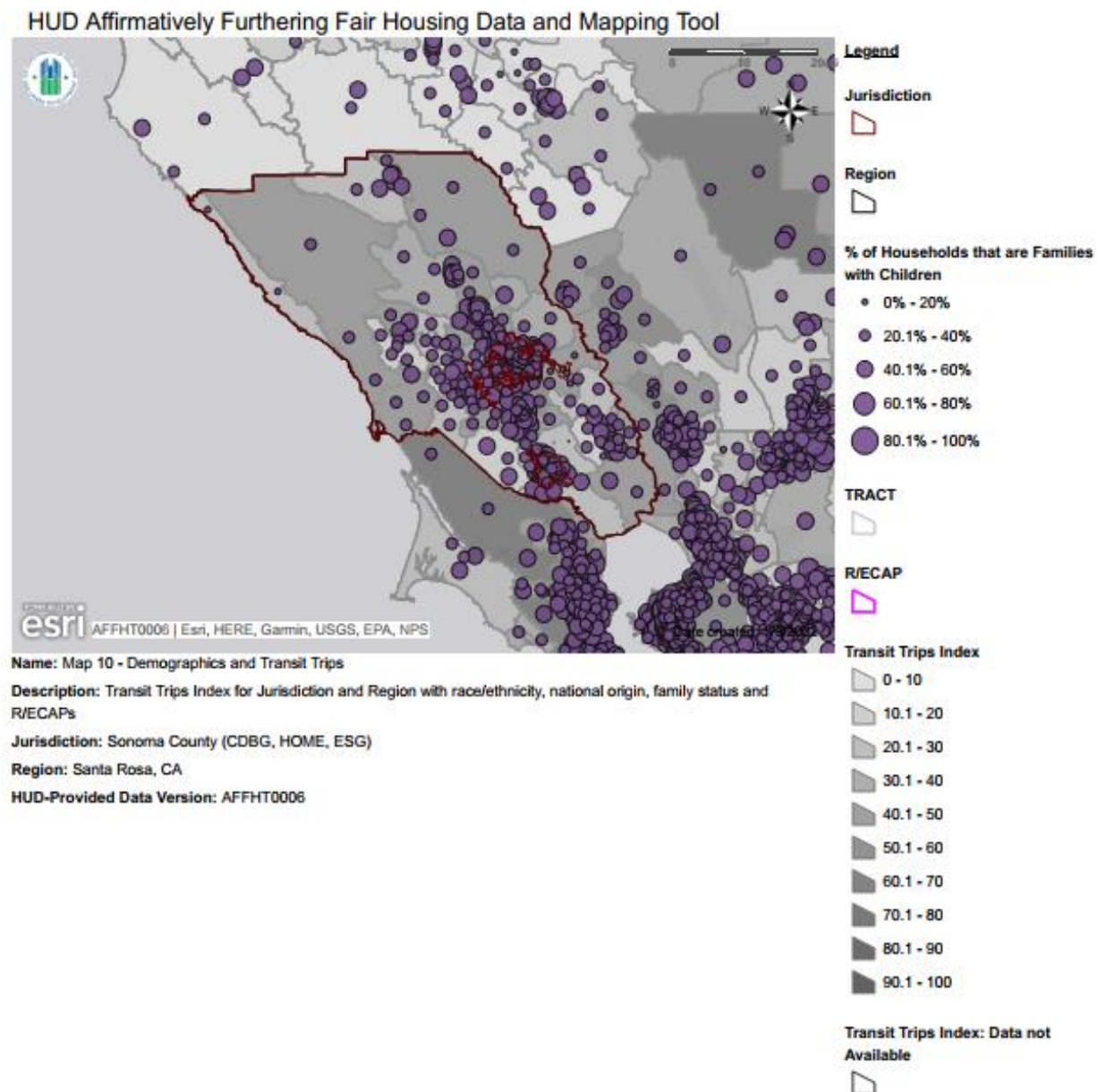
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 5e: Demographics and Transit Trips (National Origin), Sonoma County



Map 5f: Demographics and Transit Trips (Family Status), Sonoma County

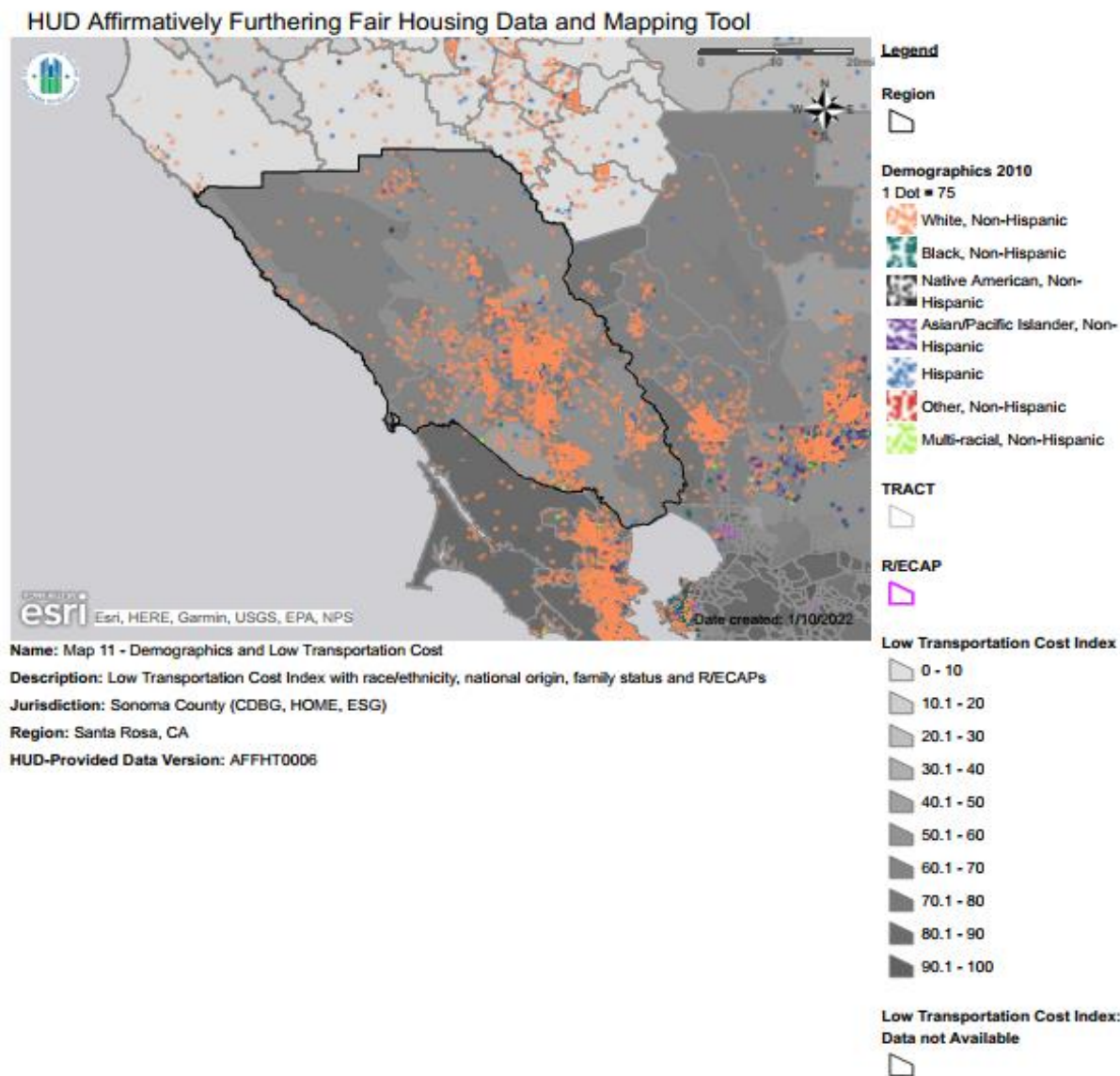


Sonoma County

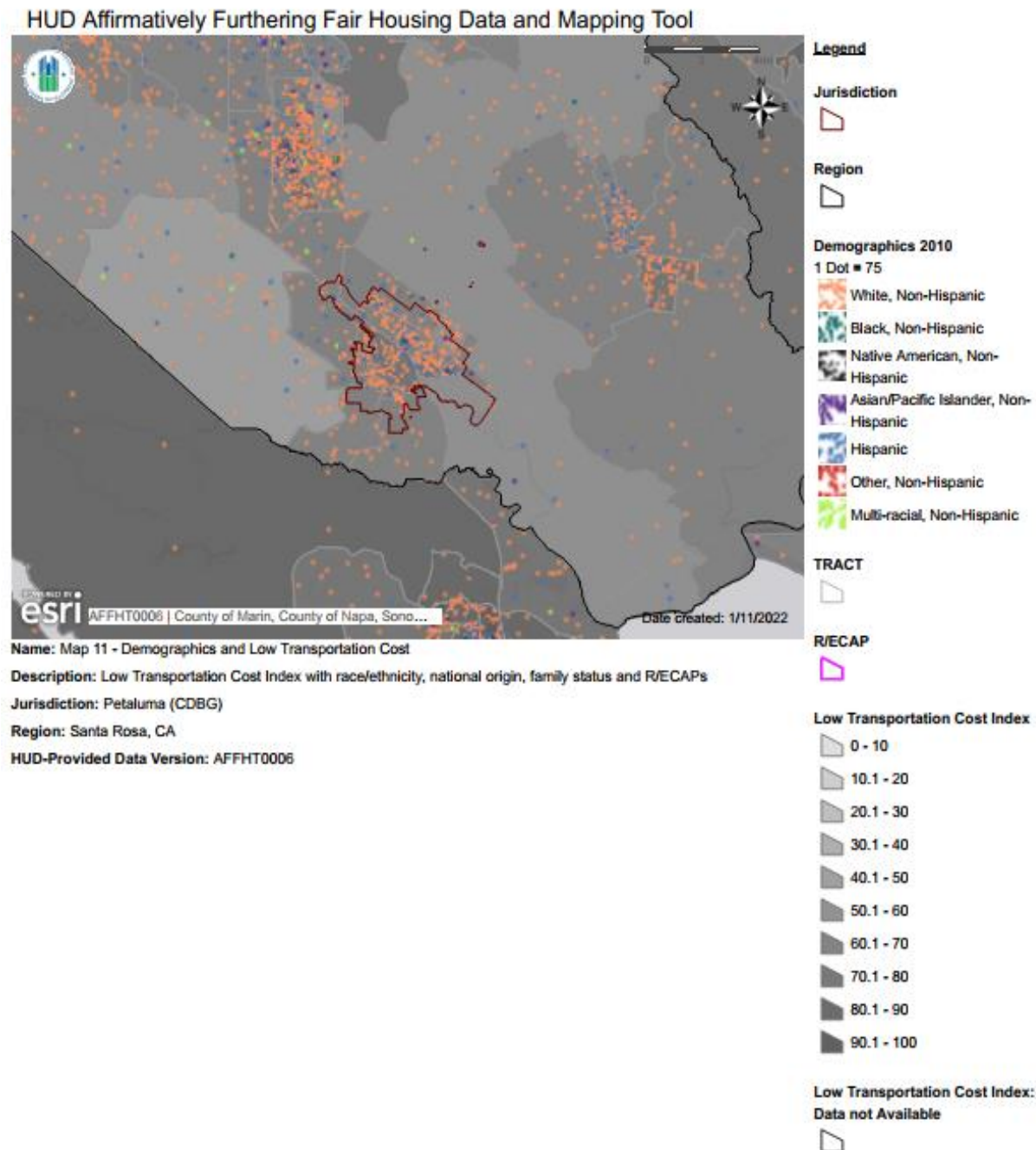
The transit trip index values in Sonoma County are highest in areas closest to urban centers like Santa Rosa and Petaluma. In these urban jurisdictions, there is a high concentration of white and Hispanic residents with a lower concentration of Asian American households presently. Racial and ethnic disparities are not present in the County. White residents in particular are highly represented in areas with higher transit trip index values, and like Hispanic residents, white residents are also distributed in the County's more remote areas, i.e. parts of the County with significantly lower transit index values. The two most predominant immigrant populations in Sonoma are Mexican and Filipino residents and are most concentrated near Santa Rosa where index values are notably higher than for the rest of the County. Mexican residents are also dispersed in the northern part of the County residing in census tract 153801, but by contrast to the transit trip index value of Mexican residents near Santa Rosa, this

area's transit trip index value of 26 is much lower. When family status is considered, no discernible pattern of disparities arises. The residential patterns based on LTCI values closely correspond to the transit trip index pattern. As is the case for transit trip index values, no racial or ethnic disparities exist in access to low-cost transportation, nor do ones based on family composition exist.

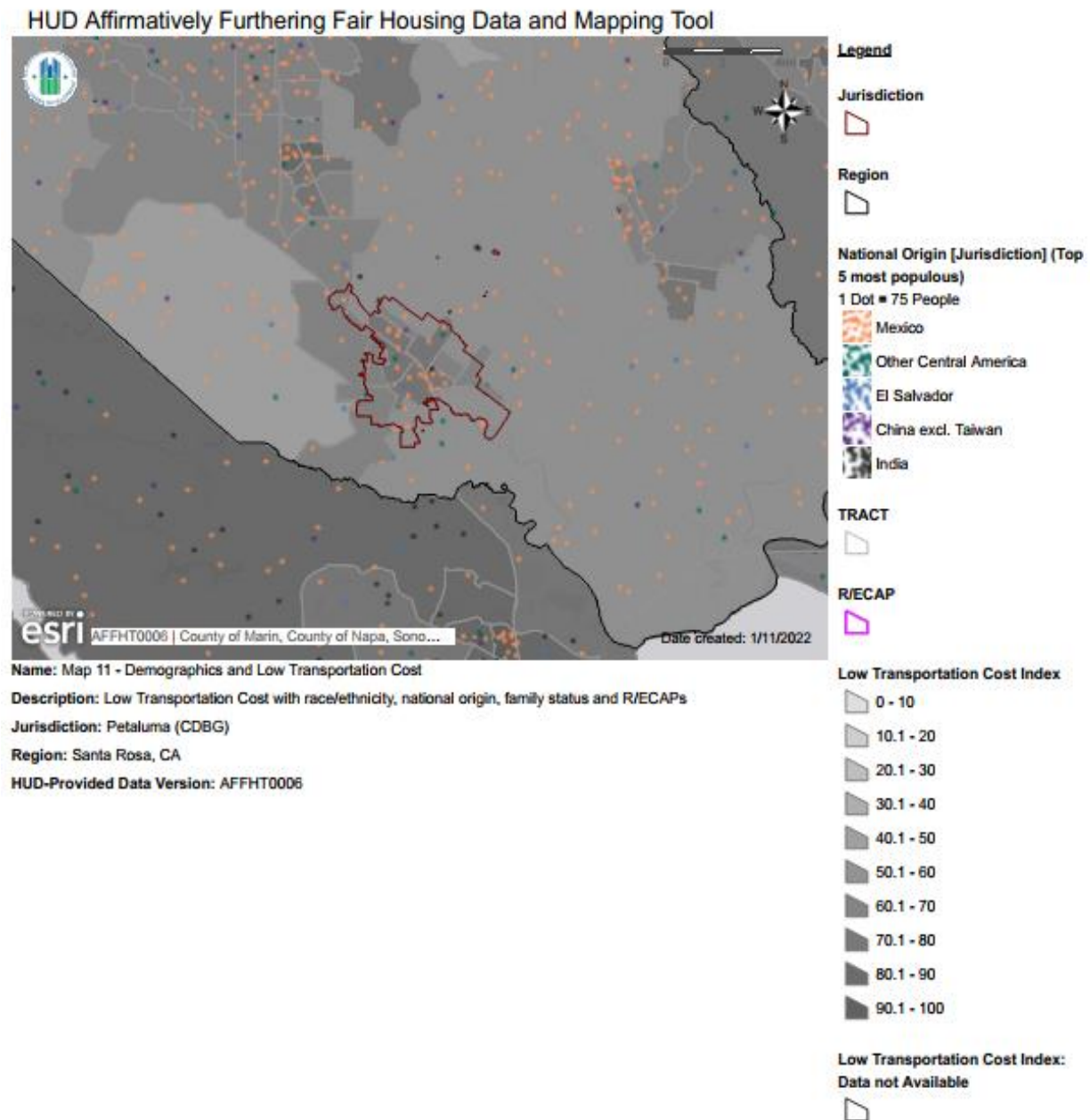
Map 5j: Demographics and Low Transportation Cost (Race/Ethnicity), Sonoma County



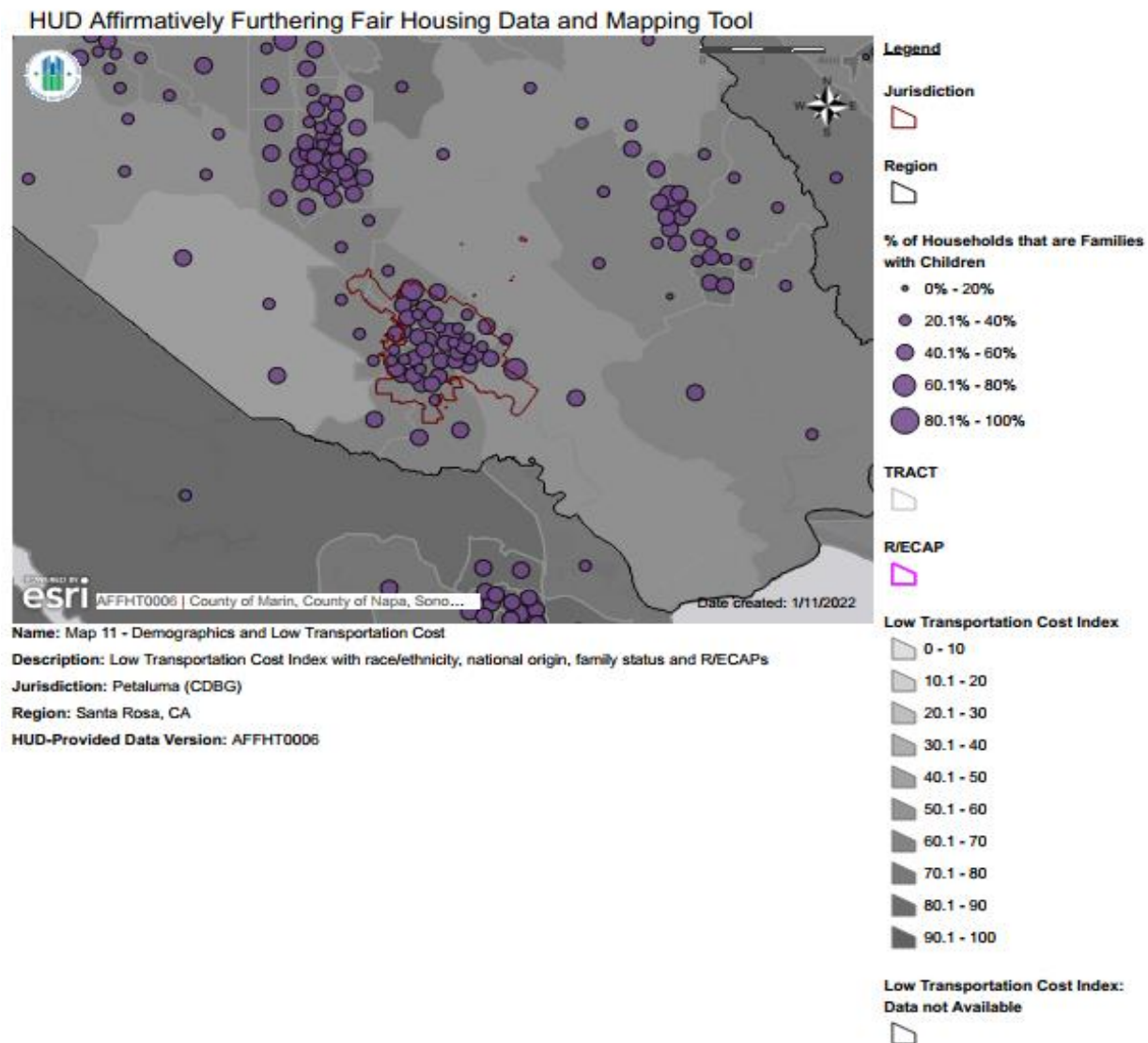
Map 5g: Demographics and Low Transportation Cost (Race/Ethnicity), City of Petaluma



Map 5h: Demographics and Low Transportation Cost (National Origin), City of Petaluma



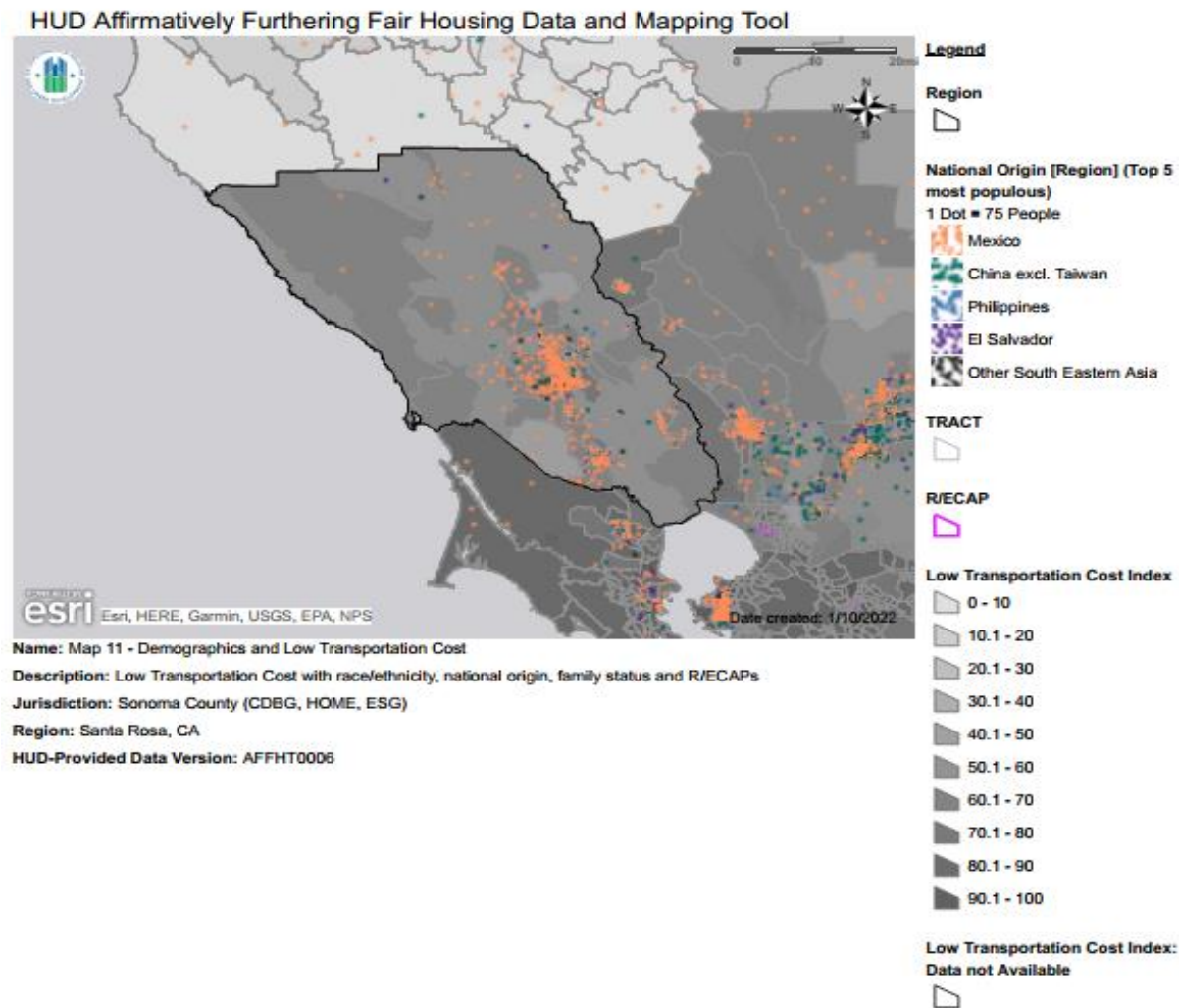
Map 5i: Demographics and Low Transportation Cost (Family Status), City of Petaluma



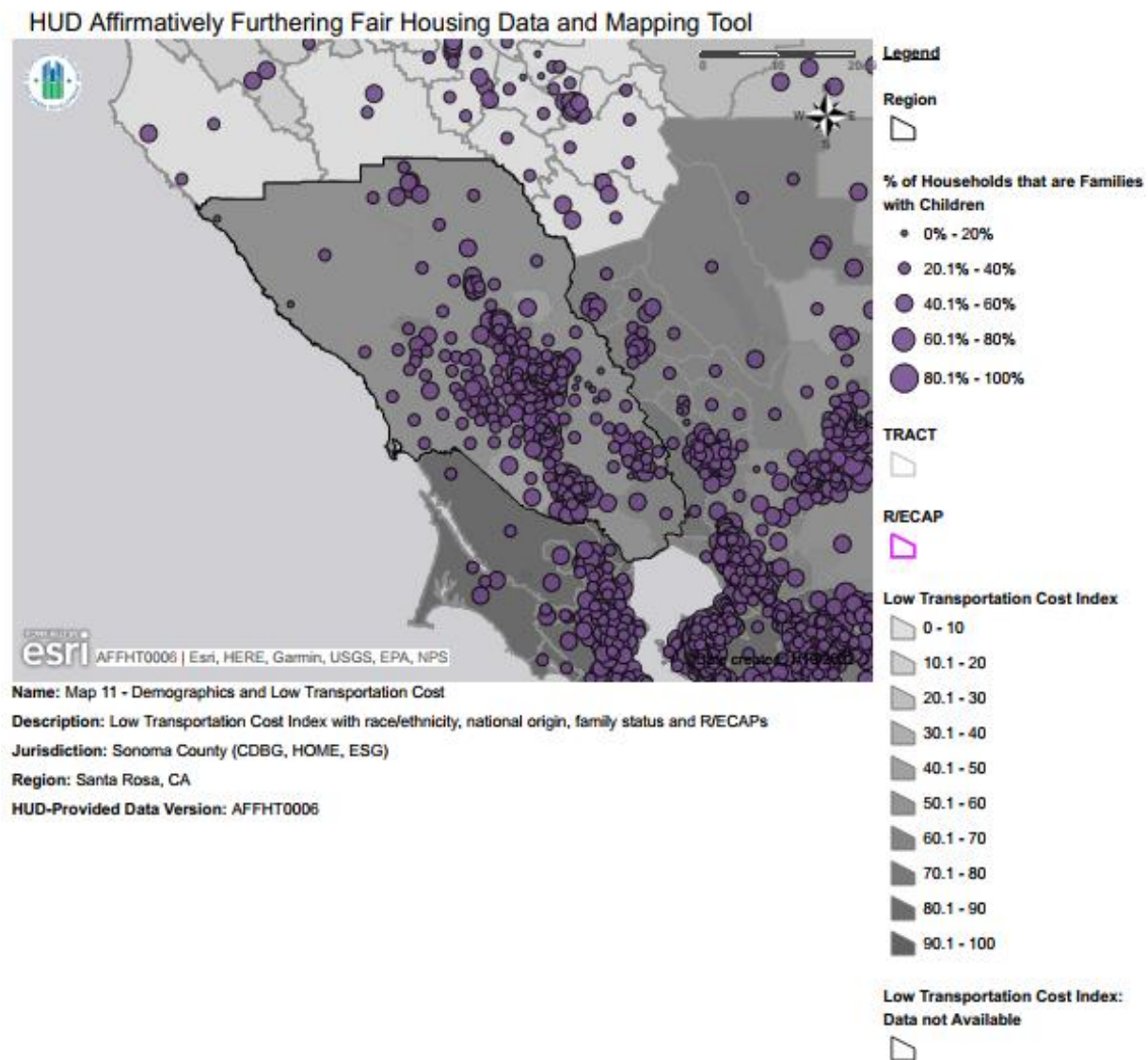
City of Petaluma

Most residents are clustered in the central corridor of the City near areas with greater access to low-cost transportation. Hispanic and white residents are fairly evenly distributed throughout this corridor, but on the fringes of the City, more white residents are present than other racial groups. These areas have less access to low-cost transportation than do residents in the central corridor which suggests white residents have disparately less access than Hispanic residents do. Mexican, El Salvadoran, Other Central American, and Chinese residents comprise the majority immigrant populations in Petaluma and predominantly reside in neighborhoods with greater access to low-cost transportation. Mexican residents, El Salvadoran, and Other Central Americans live in a scattered residential pattern in areas with varying degrees of access to low-cost transportation services. Chinese residents, on the other hand, are concentrated in the northern part of Petaluma in areas where LTCI are high. There does not appear to be a distinguishable ethnic disparity in access to low-cost transportation for immigrant populations. No disparity in access to low-cost transportation is discernible based on familial status.

Map 5k: Demographics and Low Transportation Cost (National Origin), Sonoma County



Map 5I: Demographics and Low Transportation Cost (Family Status), Sonoma County



Sonoma County

In Sonoma County, the northern part of the County has moderate LTCI values, roughly averaging 50; the same is true for the southern part of the County. No racial or ethnic disparity in proximity to low cost transportation exists in the County because Hispanic and white residents have similar residential patterns in relation to access to low-cost transportation. Low cost-transportation is primarily concentrated in urban areas including Santa Rosa and Petaluma. Hispanic, Asian American and white residents tend to cluster towards these areas with high LTCI values, however, there are some scattered clusters of white and Hispanic residents in areas with lower LTCI values. No racial or ethnic disparity in residential patterns and proximity to low cost transportation is present. Mexican, Filipino, and German residents are the predominant immigrant populations in the County and mostly reside in areas with high LTCI values near urban centers. Mexican residents, and to a lesser extent, German and Canadian residents are also sparsely distributed in more rural areas with lower access to low-cost transportation. No residential pattern of disparity in transit use exists for families with children.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

1. Lack of adequate transit evacuation infrastructure for natural disasters disproportionately harms low-income residents and individuals with disabilities.

In Sonoma County, wild fire disasters have become a constant challenge to the health and safety of residents. All residents here are concerned with the lack of adequate and speedy access to evacuation routes. For low-income individuals without cars, this challenge is especially pronounced. Santa Rosa and Sonoma County have emergency plans related to deploy public transit in case of fire-related emergencies available on their websites.¹⁰

2. Inadequate access to affordable and efficient transportation disproportionately harms low income people and individuals with disabilities.

Golden Gate Transit and SMART provide regional transit that connect Sonoma County to the larger Bay Area, Sonoma County is connected to the regional transportation system. SMART transit hubs are located in Santa Rosa and Petaluma as well as other towns within the jurisdiction. Despite access to these regional connections, the cost of travel is high because cost is measured by distance travelled. Consequently, travel costs increase depending on the length of travel and unfairly burden residents with longer commutes.

Based on-board transit surveys conducted in 2018, over 70 percent of bus transit riders and 26 percent of train riders in Sonoma County are very low-income and a large percentage do not have access to a vehicle.¹¹ Sonoma County offers bus transit services through three local entities who each manage their own program and then coordinate with regional transit service providers to connect neighboring jurisdictions and the region. The three local transit programs are the Sonoma County Transit, the Santa Rosa City Bus, and the Petaluma Transit. The first transit operator, Sonoma County, has a bus fleet of 80 and offers county-wide services and local service in smaller cities and the unincorporated areas of Sonoma County.¹² Petaluma Transit, by contrast, only has 11 buses to provide transit services in Santa Rosa.¹³ Santa Rosa CityBus has 28 vehicles and provides the largest urban network of bus transit amongst the three transit providers.¹⁴ To accommodate riders with disabilities, Sonoma contracts with the Volunteer Center of Sonoma County to provide paratransit services. The County also requires all of its bus systems to offer paratransit service within at least a ¾ mile radius of an active bus route.¹⁵ In Santa Rosa, the City contracts with MV Transportation to provide services individuals with disabilities and the elderly.

Recently, transit providers have made more efforts to reduce transit costs. In 2018, Sonoma County Transit began to offer a “fare free” local routes in many cities within the County but these services are not currently available in Petaluma or Santa Rosa. In 2020, the three transit authorities joined the regional Clipper Start pilot program to provide fare discounts to low-income riders: 50 percent on regional transit and 20 percent for local routes.

¹⁰ *Santa Rosa Evacuation Zone Map*, <https://www.srcity.org/3368/Evacuation-Zones>

Sonoma County Evacuation Zones Map, <https://socoemergency.org/get-ready/evacuation-map/>

¹¹ Sonoma County Transportation Authority, *Transit Integration and Efficiency Study*. <https://scta.ca.gov/wp-content/uploads/2019/10/TIES-Draft-Final-Report.pdf>

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

Despite these advances in reducing financial barriers to transit access, the operational deficits in these systems continue to discourage ridership, particularly in Petaluma where transit service is severely limited. In the Sonoma County Connected Communities Transportation Study, survey respondents were most critical of transit due to the existing routes lack of coverage interjurisdictionally, the lack of connections to the bus's fixed route, the need to expand paratransit services beyond curb to curb, and confusion generated by inconsistencies in cost of fares. While Sonoma County Transit has had some success in increasing ridership on local routes due to its fare free program, Petaluma has not seen similar increases. This is likely because Petaluma has a limited bus transit system that entails 6 routes with few stops along them. These routes also operate for limited hours: 6:30 AM to 8 PM meaning individuals who work off hours cannot rely on the system for transportation to work.¹⁶ By contrast, Santa Rosa's existing system transports an estimated 1.7 million passengers per a year providing both local service and connection to regional transit operators. The CityBus system operates 15 routes and provides service seven days a week, however, its transit service for individuals with disabilities has been less successful due to the contractor's recurring staff shortages which resulted in infrequent and unreliable service. But the City has made amendments to its contract for paratransit services to reduce these concerns and improve service. Sonoma has been slightly more on target than Napa to meet the needs of those who rely on transit most by reducing transit costs, but until operational changes make transit a more attractive and accessible transportation mode, ridership is unlikely to increase.

3. The environmental burdens associated with the location of roadway infrastructure disproportionately harm communities of color.

Throughout the counties, residents of color are more likely to confront environmental justice due to their residential proximity to major roadway infrastructure. "Transportation is the largest end-use sector emitting CO₂, and the largest source of GHG emissions in the San Francisco Bay Area (about 45 percent)." Although many low-income individuals lack access to cars, they live in areas with high rates of car centric infrastructure. The counties have primarily relied on populous Cities to comply with their RHNA goals. The primary means of doing so has been to zone multi-family housing in areas near transportation corridors. Although access to transit is an important aspect of housing equity, these dwellings are also in close proximity to car-based infrastructure—mainly Highway 101. As a result, populations more likely to live in multi-dwelling housing are disproportionately exposed to environmental contaminants generated by car emissions. For example, there are environmental justice concerns implicated by Napa's existing transportation system. As a result, these residents experience disproportionate exposure to environmental risks associated with car pollutants risking increased adverse impacts on their health.

d. Disparities in Access to Opportunity – Access to Low Poverty Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

Disparities in access to low poverty neighborhoods is measured by the Low Poverty Index. The Low Poverty Index is a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

¹⁶ https://transit.cityofpetaluma.net/wp-content/uploads/2019/12/2019_12_04_FINAL_V3_Rider_guide_WEB-1.pdf

Data note: Some of the tables and maps in this section are sourced from the HUD tool which used 2011-2015 5-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest.

Table 4: Low Poverty Index, City of Petaluma and Sonoma County

City of Petaluma	Low Poverty Index
Total Population	
White, Non-Hispanic	65.23
Black, Non-Hispanic	63.06
Hispanic	61.73
Asian or Pacific Islander, Non-Hispanic	66.87
Native American, Non-Hispanic	61.94
Population below federal poverty line	
White, Non-Hispanic	59.76
Black, Non-Hispanic	67.92
Hispanic	64.13
Asian or Pacific Islander, Non-Hispanic	64.52
Native American, Non-Hispanic	73.47
Sonoma County	Low Poverty Index
Total Population	
White, Non-Hispanic	62.07
Black, Non-Hispanic	54.57
Hispanic	52.54
Asian or Pacific Islander, Non-Hispanic	59.02
Native American, Non-Hispanic	55.79
Population below federal poverty line	
White, Non-Hispanic	55.14
Black, Non-Hispanic	42.70

Hispanic	50.03
Asian or Pacific Islander, Non-Hispanic	51.83
Native American, Non-Hispanic	46.77
Source: American Community Survey (ACS), 2011-2015.	

City of Petaluma

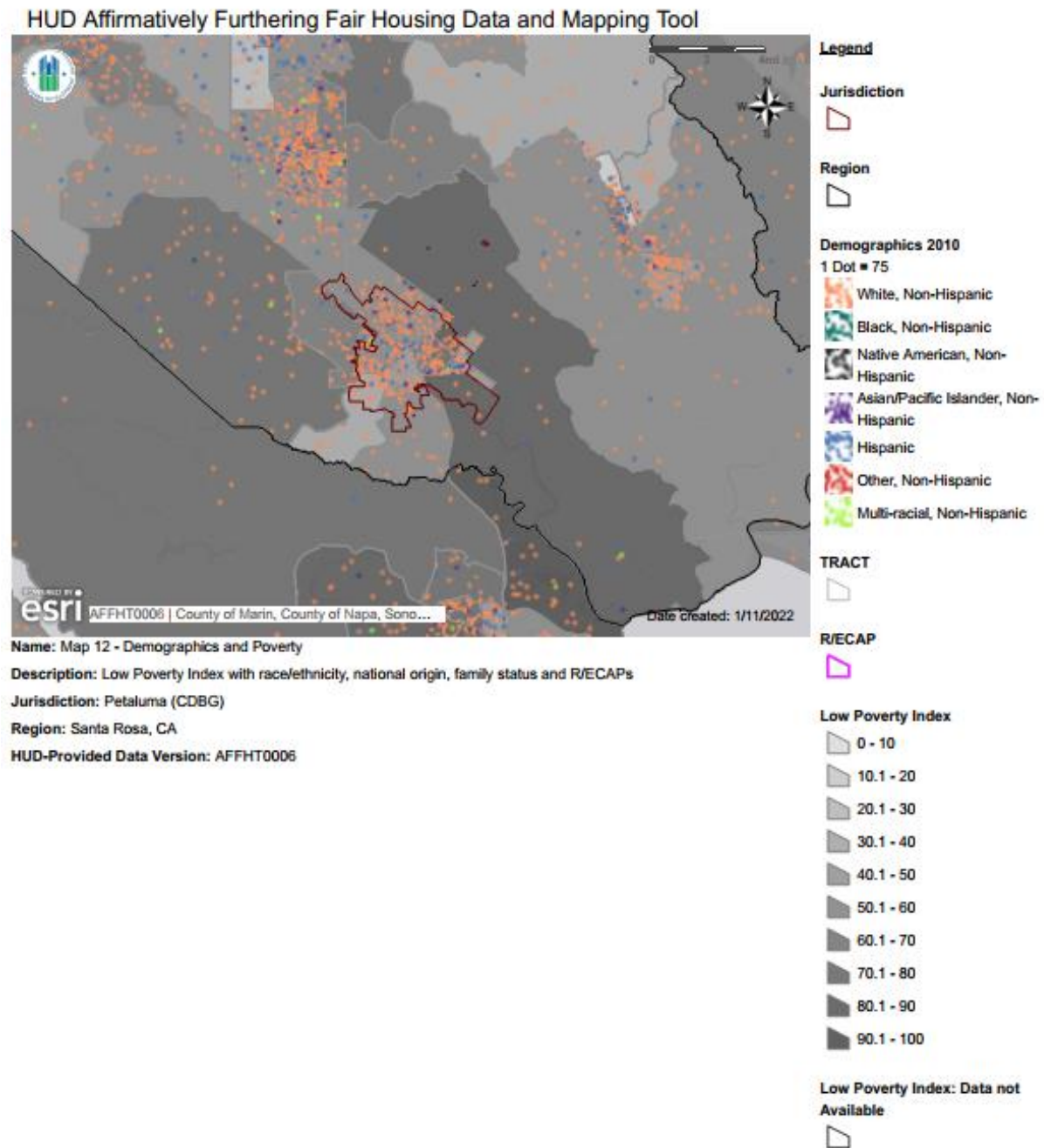
Residents of Petaluma have somewhat high poverty index values ranging from 61 to 66. Only slight racial and ethnic disparities in access to low poverty neighborhoods are present– within a margin of 4 points. Asian American and white residents have the highest low-poverty index values while Hispanic and Native Americans have the lowest. When economic status is considered, white residents fare worse than other racial groups experiencing a slight decline in index value, while other groups undergo the inverse with slightly increased index values for those below the poverty line. This is especially true for Native American residents who experience an 11-point increase in their low-poverty index value. Unlike in other jurisdictions, white residents below the poverty line in Petaluma have the least access to low poverty neighborhoods among the groups

Sonoma County

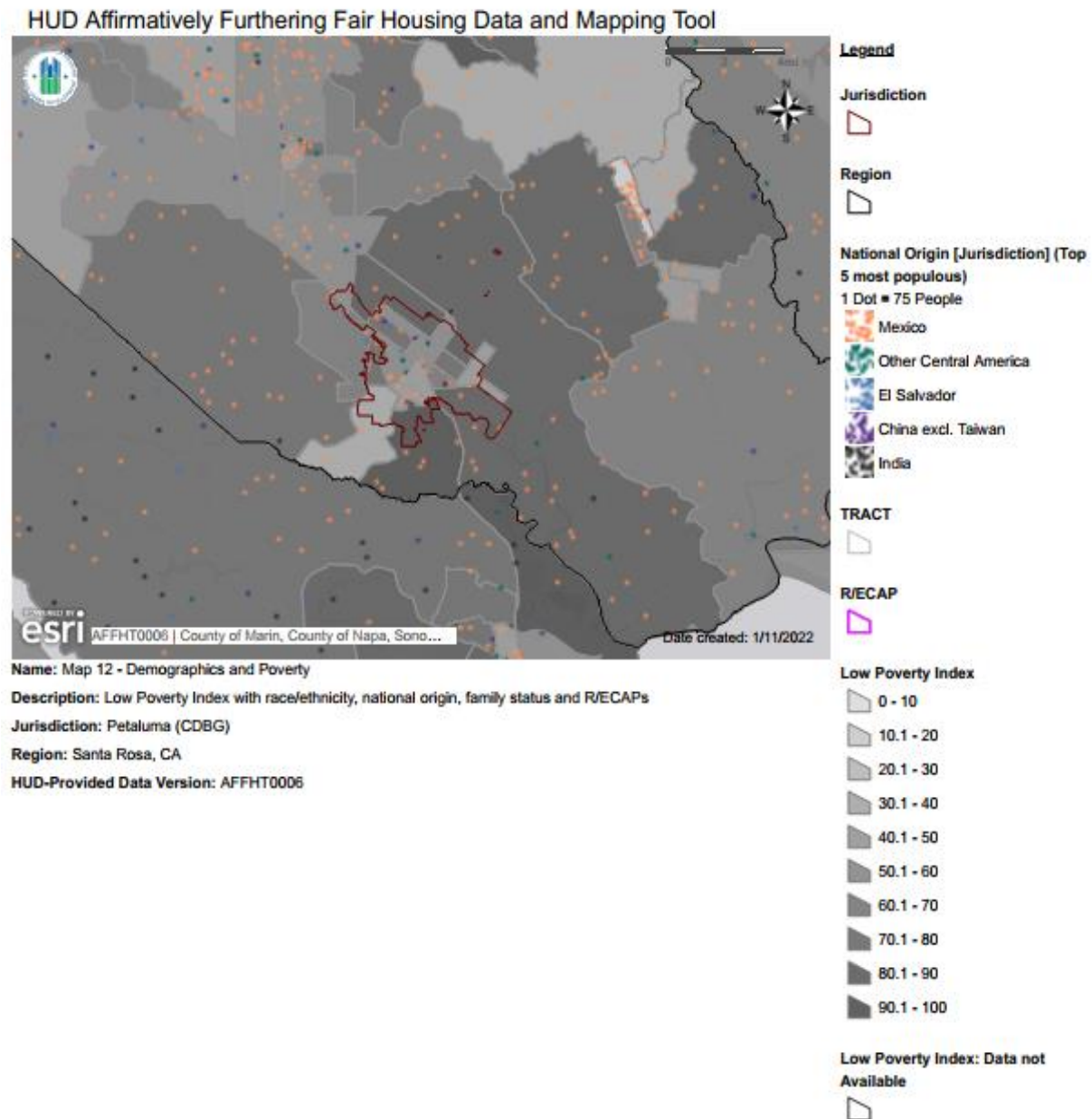
The low poverty index value range for Sonoma County are also mid-range, hovering at a range of 52 to 62 with notable racial and ethnic disparities in access to low poverty neighborhoods between white residents and residents of color, specifically Hispanic, Black, and Native American residents. White residents have a low poverty index value of 62 while Hispanic residents have a value of 52, Black residents have a value of 54, and Native American residents have a value of 55. When income is accounted for, racial and economic disparities in access to low poverty neighborhoods between white residents and Black and Native Americans continue at a slightly wider margin.

- ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.*

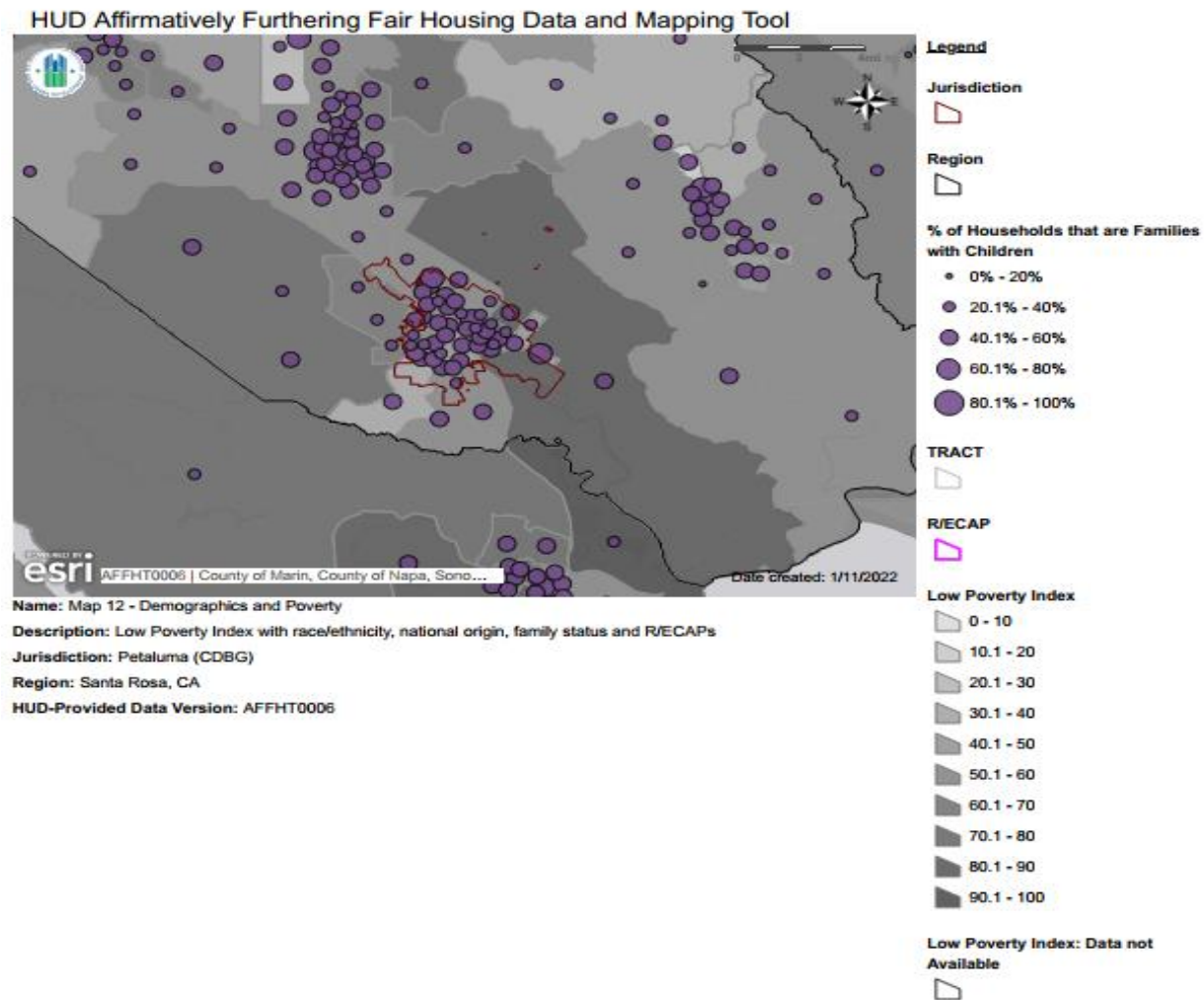
Map 6a: Demographics and Low Poverty Neighborhoods (Race), City of Petaluma



Map 6b: Demographics and Low Poverty Neighborhoods (National Origin), City of Petaluma



Map 6c: Demographics and Low Poverty Neighborhoods (Family Status), City of Petaluma

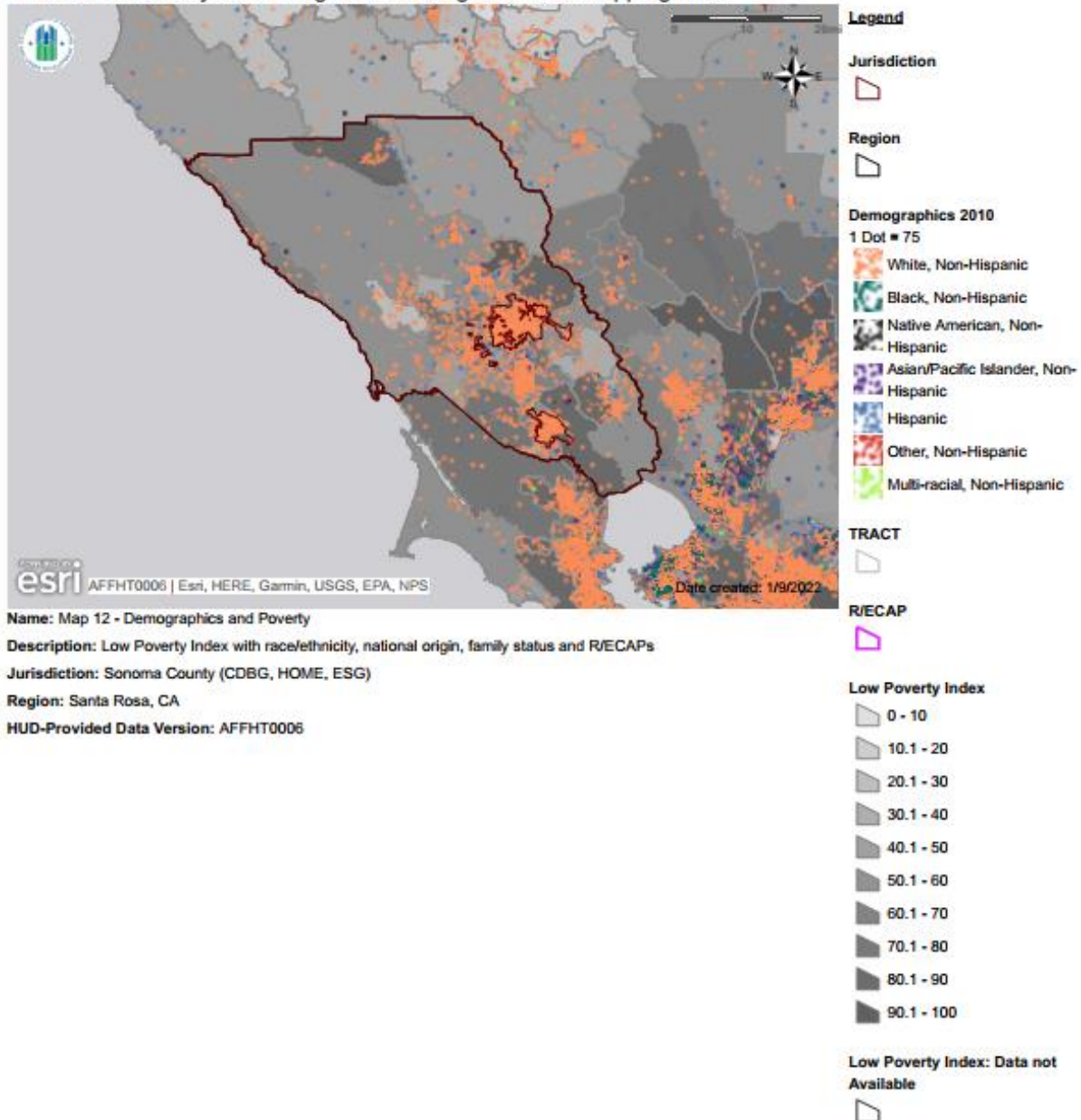


City of Petaluma

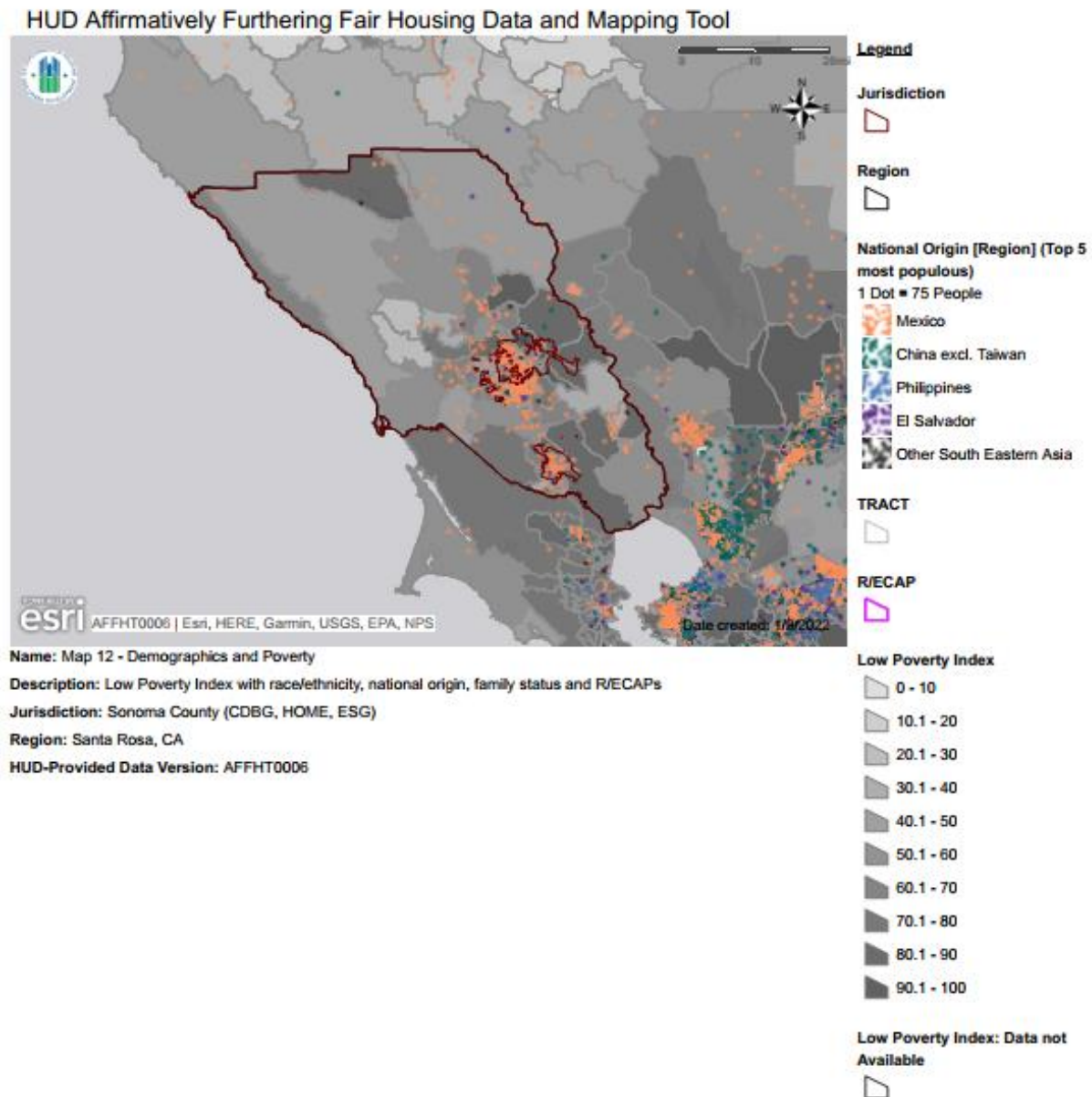
The City has higher access to low poverty neighborhoods on the edges of Petaluma than in the central part of it. White and Hispanic residents are evenly distributed through Petaluma in tracts with varying access low poverty index values. Still, white residents appear to have higher representation on the edges of the City where access to low poverty neighborhoods is higher so there is some disparity between the relative access of white and Hispanic residents. In Petaluma, the predominant immigration populations include Mexican residents, the largest group, Other Central American, El Salvadoran residents, and Chinese residents. The Mexican population is scattered throughout neighborhoods with limited access to low-poverty neighborhoods. Chinese residents tend to live in areas with higher low poverty index values while El Salvadoran and Other Central American residents are more distributed in areas with less access to low-poverty neighborhoods. No residential pattern of disparity in access to low poverty neighborhoods exists for families with children.

Map 6e: Demographics and Low Poverty Neighborhoods (Race/Ethnicity), Sonoma County

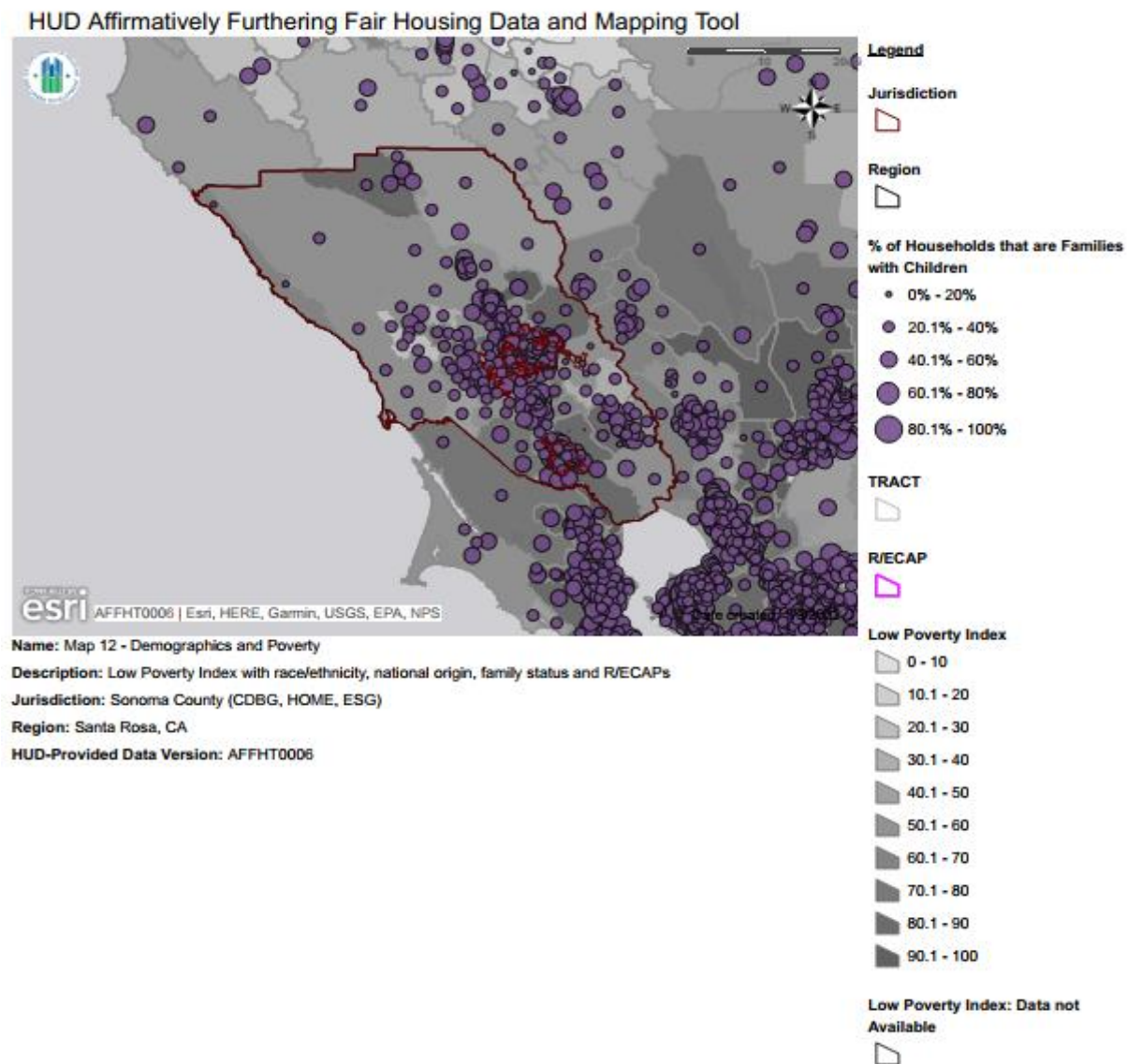
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 6f: Demographics and Low Poverty Neighborhoods (National Origin), Sonoma County



Map 6g: Demographics and Low Poverty Neighborhoods (Family Status), Sonoma County



Sonoma County

Sonoma County has an uneven distribution of low poverty neighborhoods. In the extreme northern part of the County, the low poverty index value is high. Similarly, in the eastern border near Santa Rosa and in the southern tip adjacent to Petaluma, access to low poverty neighborhoods is significantly higher than other parts of the County. Residential patterns display a racial and ethnic disparity between white and Hispanic residents. Although both populations are highly concentrated near the counties' urban areas, Hispanic residents reside in the tracts with less access to low poverty neighborhoods surrounding higher index value neighborhoods that white residents live in. Throughout the County Hispanic residents are also scattered through the more peripheral areas with diminished low poverty index values. Mexican residents—the largest immigrant population—are disproportionately located in areas with limited access to low poverty neighborhoods that border lower poverty neighborhoods. There does seem to be a slight correlation between access to low poverty neighborhoods and family size in Santa Rosa in the western side of the City where two areas with large proportions of households, tract 153103, 153104 in the southeast and tract 152802 towards the northeast, have a larger percentage of families and relatively lower low poverty scores.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods

Income inequality based on racial and ethnic divisions in Sonoma County is the primary source of disparities in access to low poverty neighborhoods. Because of this economic stratification, much of the housing stock in low poverty neighborhoods is out of reach for most low-income residents.

Moreover, there are few affordable housing options in Sonoma County and in even less of these housing options in neighborhoods with low poverty.¹⁷ These counties prioritize residential zoning for single family homes over multi-family dwellings and these single homes tend to be less affordable to rent or purchase than the latter housing type. Areas with single family homes also tend to be located in places with low-poverty index values. And in these areas, there is strong opposition to the permitting of multi-family dwellings, particularly for naturally or subsidized affordable housing and group home facilities. This leads to disparate negative outcomes for low-income people and individuals with disabilities who are economically barred from living in these neighborhoods.

e. Disparities in Access to Opportunity – Access to Environmentally Healthy Neighborhoods

i. For the protected class groups for which HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

The Environmental Health Index provided by HUD measures exposure to harmful airborne toxins. The Index is based on standardized EPA (Environmental Protection Agency) estimates of carcinogenic, respiratory, and neurological hazards in air. The Index does not look at other environmental issues such as water quality or soil contamination, meaning it is a limited measure of overall environmental health. However, the Index can still provide useful insight into environmental conditions in jurisdictions. Values on the Index range from 0 to 100, with higher values indicating better conditions and less exposure to environmental hazards that can harm human health. Generally, urban areas tend to have lower air quality as these areas have more emission sources and thus more exposure to hazards.

Table 1: Environmental Health Index, City of Petaluma and Sonoma County

City of Petaluma	Environmental Health Index
Total Population	
White, Non-Hispanic	84.19
Black, Non-Hispanic	83.86
Hispanic	83.75
Asian or Pacific Islander, Non-Hispanic	83.86
Native American, Non-Hispanic	83.86

¹⁷ See, e.g., Generation Housing, *State of Housing in Sonoma County*, January 2022, https://generationhousing.org/wp-content/uploads/2022/02/2022_Feb_SOH_Sonoma-County.pdf f

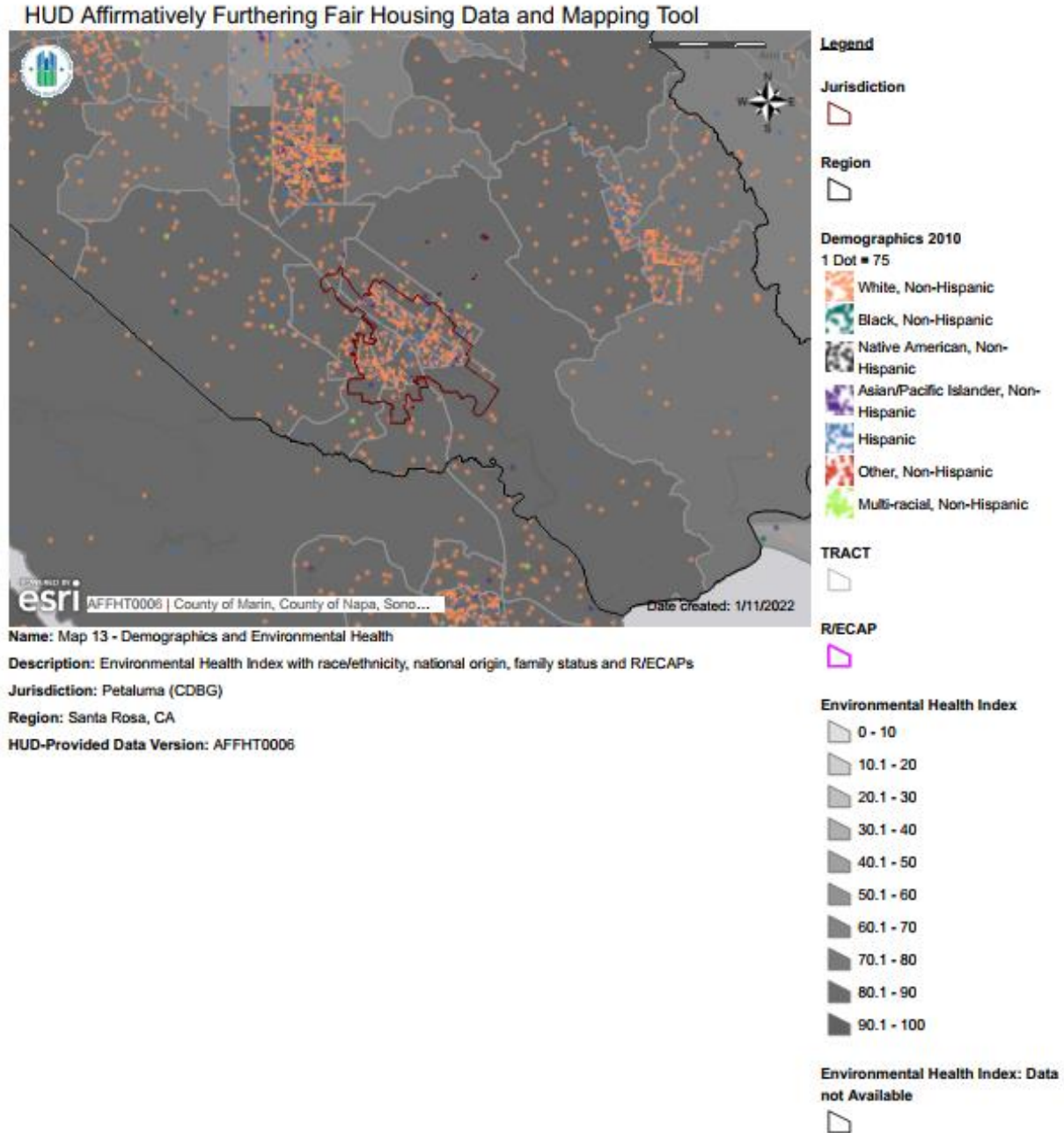
Population below federal poverty line	
White, Non-Hispanic	84.02
Black, Non-Hispanic	83.57
Hispanic	83.55
Asian or Pacific Islander, Non-Hispanic	83.58
Native American, Non-Hispanic	84.07
Sonoma County	Environmental Health Index
Total Population	
White, Non-Hispanic	70.22
Black, Non-Hispanic	65.20
Hispanic	65.40
Asian or Pacific Islander, Non-Hispanic	67.03
Native American, Non-Hispanic	64.58
Population below federal poverty line	
White, Non-Hispanics	68.40
Black, Non-Hispanic	63.43
Hispanic	64.91
Asian or Pacific Islander, Non-Hispanic	67.97
Native American, Non-Hispanic	62.25
Source: National Air Toxics Assessment (NATA) data, 2014	

Access to environmentally healthy neighborhoods is relatively high throughout Petaluma, and there are effectively no disparities based on race or ethnicity. This is true when looking at the population as a whole or exclusively at the population below the poverty line.

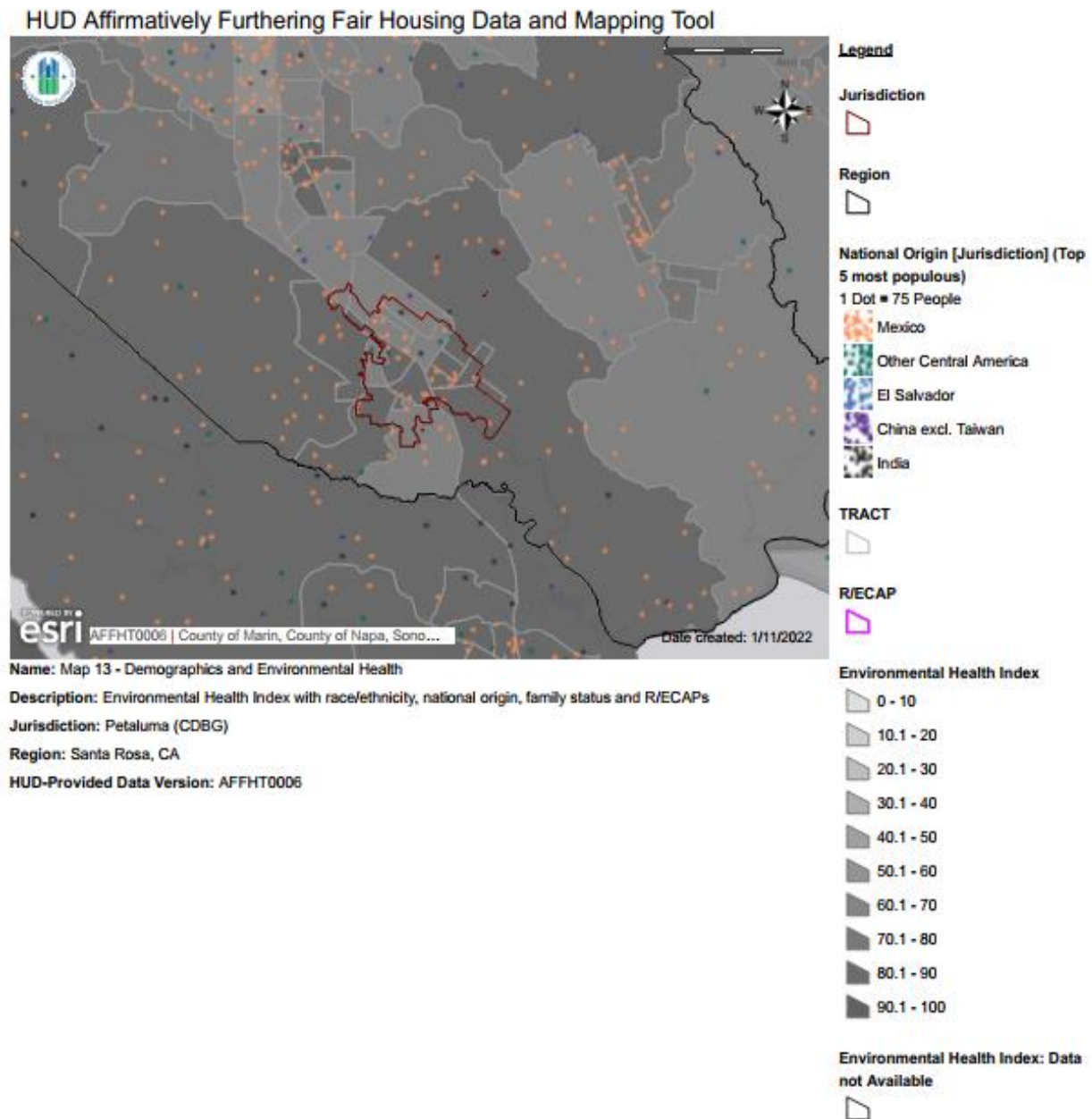
In looking at the entirety of Sonoma County, there are some slight discrepancies in access to environmentally healthy neighborhoods based on race and ethnicity. Generally, white residents have the most access, followed by Asian American residents. Hispanic, Black, and Native American residents have the least access, respectively. This distribution is consistent in looking exclusively at the population below the poverty line, albeit with slightly lower scores for almost all racial and ethnic groups.

- ii. For the protected class groups for which HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

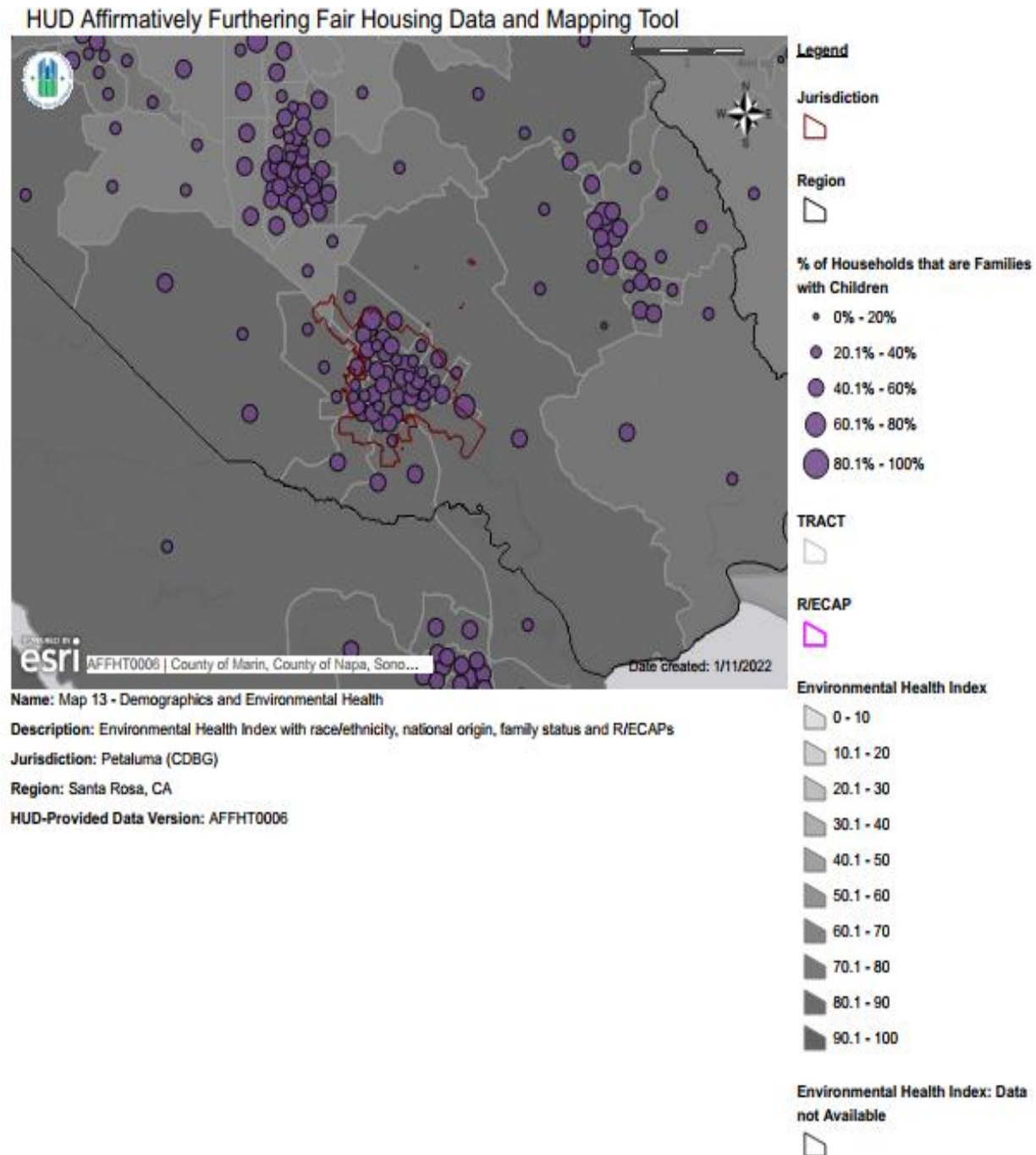
Map 7a: Demographics and Environmental Health (Race/Ethnicity), City of Petaluma



Map 7b: Demographics and Environmental Health (National Origin), City of Petaluma



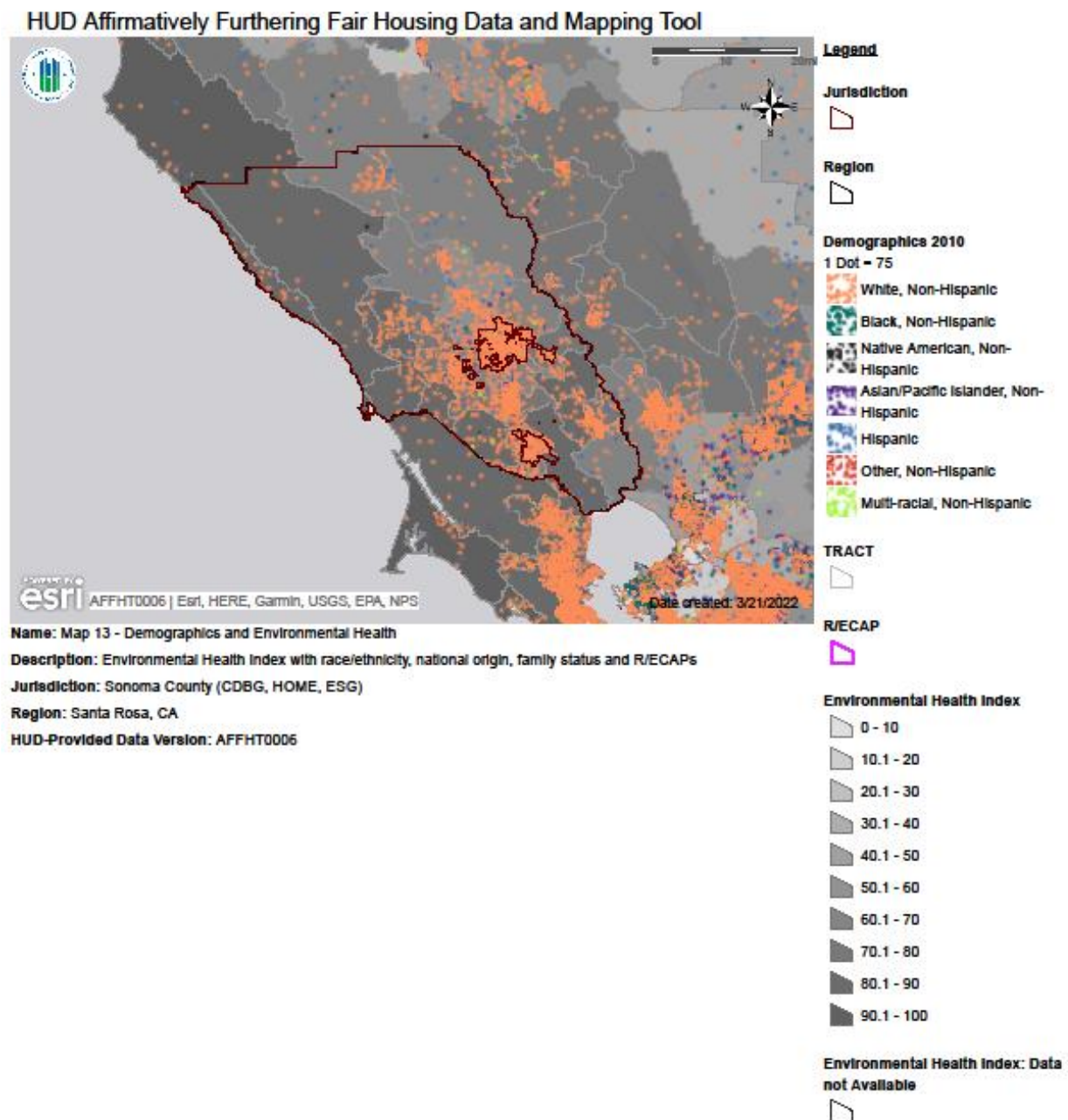
Map 7c: Demographics and Environmental Health (Family Status), City of Petaluma



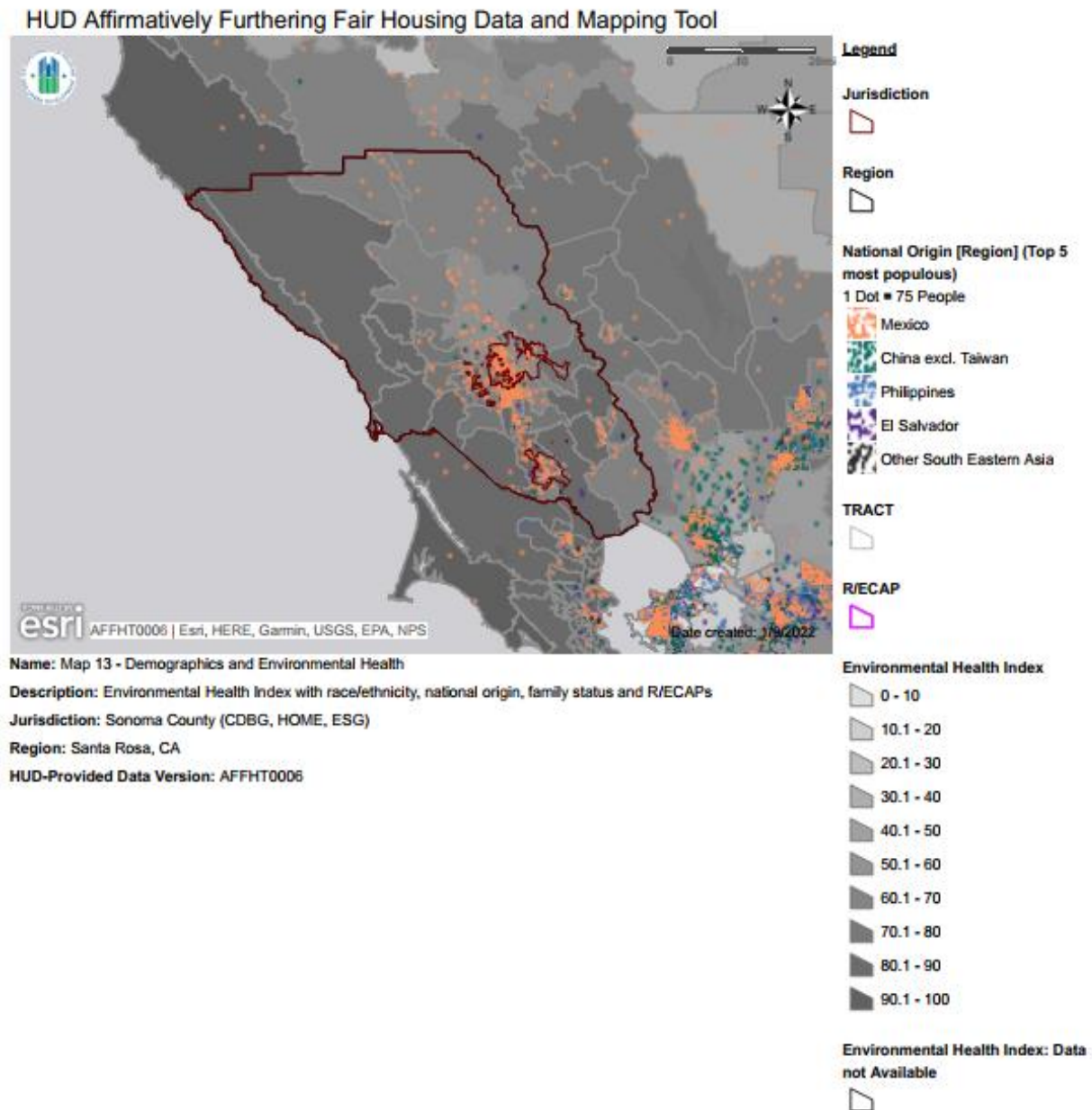
City of Petaluma

Access to environmentally healthy neighborhoods is remarkably consistent throughout the entire city. To the extent there are residential patterns based on race, national origin, or family status, they do not correlate with the environmental health index.

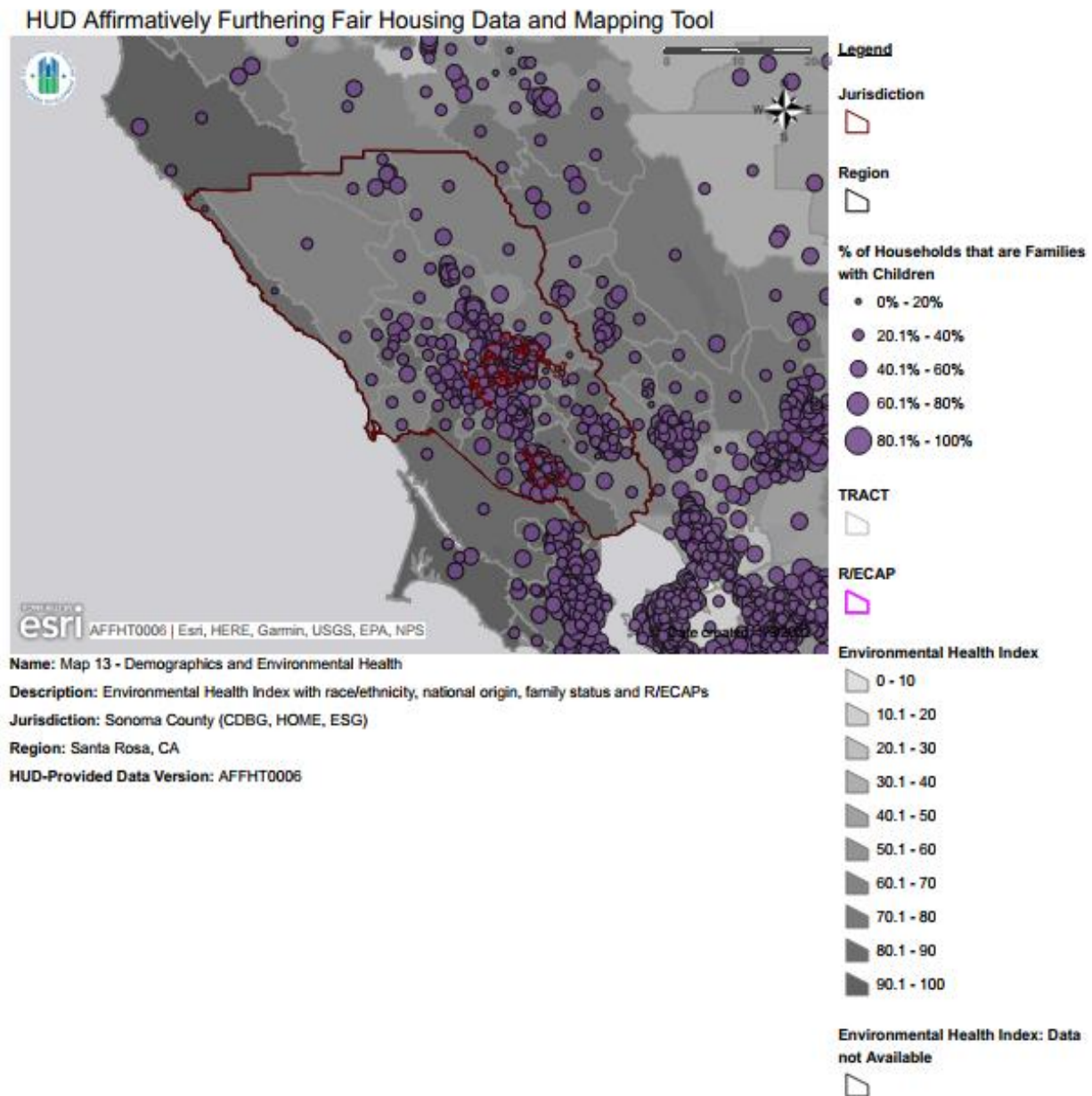
Map 7d: Demographics and Environmental Health (Race/Ethnicity), Sonoma County



Map 7e: Demographics and Environmental Health (National Origin), Sonoma County



Map 7f: Demographics and Environmental Health (Family Status), Sonoma County



Environmental Score

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County Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

< .25 (Less Positive Environmental Outcomes)

.25 - .50

.50 - .75

.75 - 1 (More Positive Environmental Outcomes)

No Data

0 4.75 9.5 19 mi

0 5 10 20 km

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CA HCD

Esri, HERE, Garmin, USGS, EPA, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, HUD 2020 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S.

In looking at residential racial patterns in Sonoma County outside of Santa Rosa and Petaluma, it does appear that they correlate with disparities in access to environmentally healthy neighborhoods. Access is lowest in the area just south of Santa Rosa, between Petaluma Hills Road and Story Point Road, and north of Santa Rosa along Highway 101. As compared with the rest of the county, these areas have concentrated populations of Hispanic residents and immigrants. In contrast, the entire western half of the county has the highest access to environmentally healthy neighborhoods, and these areas are disproportionately rural and white. There do not appear to be any meaningful disparities based on family status.

- iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.***

City of Petaluma

Petaluma has a Climate Action Commission that set forth a framework for achieving the city's goal of carbon neutrality by 2030. Included in this framework is a specific focus on "equity and climate justice," which is the "the ethical imperative to solve the climate crisis simultaneously with the crisis of inequity. This involves divesting from systems that harm public health, the economy, and the environment and invest in community-based solutions that create community stability, greater public health, and economic well-being for all community members."¹⁸ The city is also in the process of fulfilling its requirement to include environmental justice in its general plan, though the specifics of this do not appear to be available yet.

Sonoma County

Sonoma County intends to create and implement policies and programs aimed focusing on environmental justice. However, this will not be adopted until June 2023, so it is not yet clear if this will include actual policies aimed at reducing disparities in access to environmentally friendly neighborhoods.

f. Disparities in Access to Opportunity – Patterns in Disparities in Access to Opportunity

- i. For the protected class groups for which HUD has provided data, identify and discuss any overarching patterns of access to exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.***

Throughout Sonoma County, there are marked disparities in access to opportunities based on race and ethnicity. For almost all indices, regional values are lower for Black and Hispanic residents than they are for white residents, and to a lesser extent, Asian American residents Native American residents. And these disparities are only exacerbated when looking at the population living below the poverty line. This is particularly true for Black and Asian American residents who experience significant declines in opportunity index values when poverty is considered.

In looking at access to education, jobs, and low poverty neighborhoods, for the most part, Hispanic residents, and in some cases Native American and Black residents have the lowest scores throughout the region. In regards to educational opportunities, particularly, Hispanic residents fare worse than any other group. By contrast, transit access scores for residents of color are generally higher scores in many jurisdictions than for white residents. But this, of course, is a function of needing transit to reach

¹⁸ City of Petaluma, *Climate Ready Petaluma 2030*, <https://cityofpetaluma.org/departments/climate-ready-2030/>

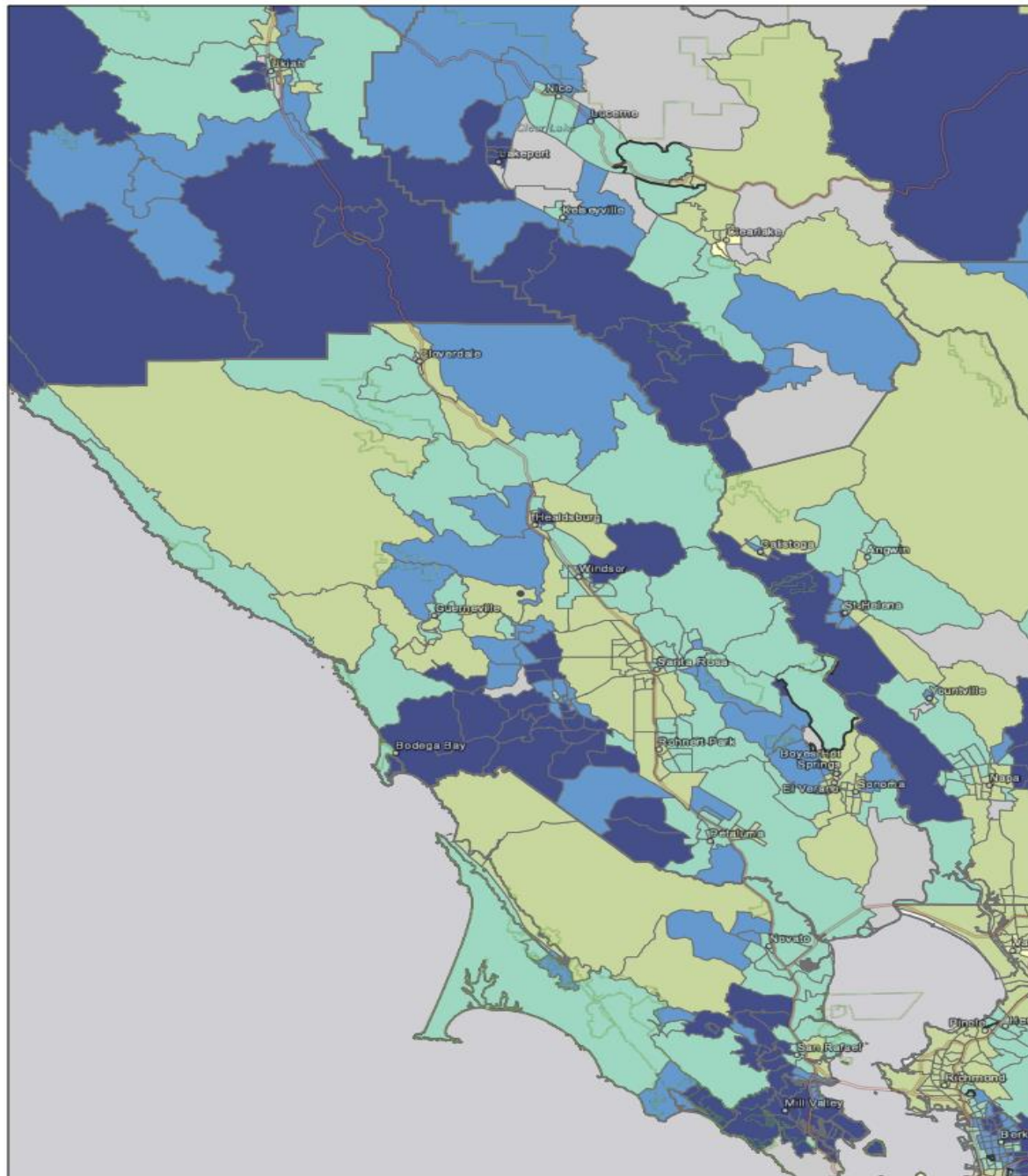
school and work. Additionally, few disparities in access to environmentally healthy neighborhoods are present, but when they are, the disparities in access correlate with segregated living patterns. Mexican,

White residents tended to score higher on most metrics except for transportation access. White residents were more likely to have access to proficient schools, job engagement, and low poverty neighborhoods. In the case of access to environmentally healthy neighborhoods, few disparities in scores based on race were present. And as noted above, transportation access scores favored residents of color—mainly because they use public transit more than their wealthier white counterparts. Based on city-wide data, racial and ethnic disparities in access to education, jobs, and environmentally healthy neighborhoods were greatest in Santa Rosa while less disparities arose in Petaluma. Within the cities examined, residential patterns displayed higher access to low poverty neighborhoods in the less dense parts of the Cities—near the perimeter—where white residents live in higher concentrations than other groups.

- ii. Based on the opportunity indicators assessed above, identify areas that experience (A) high access; and (b) low access across multiple indicators.***

Map 9: Sonoma County TCAC Opportunity Areas

Opportunity Areas - Composite Score



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County Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

 Highest Resource

 High Resource

 Moderate Resource (Rapidly Changing)

 Moderate Resource

 Low Resource

☐ High Segregation & Poverty

Missing/Insufficient Data

1:577,791

0	4.75	9.5	19 mi
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Sonoma County

The geographic patterns of resource access display a range of degrees to access. For the most part, the county has a larger number of low and moderately resourced tracts versus High or highest resource-based tracts. The distribution of these areas is imbalanced with higher resource areas on the western edge of the County bordering the Cities of Santa Rosa and Petaluma. Those cities, however, are identified as low or moderately resourced areas. There are also two highly resourced areas in the extreme southern part of the county near Sebastopol and in the northern part towards Marin.

iv. Disproportionate Housing Needs

1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Across Sonoma County, many residents face high rates of housing problems, severe housing problems, and severe housing cost burden. The four HUD-designated housing problems include 1) lacking complete kitchen facilities; 2) lacking complete plumbing facilities; 3) a household is overcrowded; and 4) a household is cost burdened.¹⁹ Households are considered to have a housing problem if they experience at least one of the above. This analysis also considers what HUD designates as severe housing problems, which are a lack of kitchen or plumbing, more than 1.5 occupants per room, or cost burden of greater than fifty percent.

Table 1a: Demographics of Households with Disproportionate Housing Needs, City of Petaluma

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	5,940	17,495	33.95%
Black, Non-Hispanic	100	149	67.11%
Hispanic	1,595	2,985	53.43%
Asian American or Pacific Islander, Non-Hispanic	369	949	38.88%
Native American, Non-Hispanic	14	28	50.00%
Other, Non-Hispanic	169	489	34.56%
Total	8,185	22,095	37.04%
Household Type and Size			
Family households, <5 people	4,280	13,120	32.62%

¹⁹ U.S. Department of Housing and Urban Development, *CHAS Background*, https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

Family households, 5+ people	1,025	1,870	54.81%
Non-family households	2,885	7,110	40.58%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	2,860	17,495	16.35%
Black, Non-Hispanic	35	149	23.49%
Hispanic	1,080	2,985	36.18%
Asian American or Pacific Islander, Non-Hispanic	189	949	19.92%
Native American, Non-Hispanic	14	28	50.00%
Other, Non-Hispanic	65	489	13.29%
Total	4,240	22,095	19.19%
Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.			

Black, Hispanic and Native American households are disproportionately affected by housing problems in Petaluma. Over two-thirds black households and over fifty percent of Hispanic and Native American households have housing problems. Similarly, almost 55% of households of five or more members experience housing problems, along with 41% of non-family households. Severe housing problems most commonly affect Native American households with fifty percent of these households living with a severe housing problem, followed by 36% of Hispanic families.

Table 1b: Demographics of Households with Severe Housing Cost Burden, City of Petaluma

Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	2,710	17,495	15.49%
Black, Non-Hispanic	35	149	23.49%
Hispanic	670	2,985	22.45%
Asian American or Pacific Islander, Non-Hispanic	165	949	17.39%
Native American, Non-Hispanic	4	28	14.29%

Other, Non-Hispanic	65	489	13.29%
Total	3,649	22,095	16.52%
Household Type and Size			
Family households, <5 people	1,800	13,120	13.72%
Family households, 5+ people	395	1,870	21.12%
Non-family households	1,460	7,110	20.53%
Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.			

Black and Hispanic households in Petaluma are most likely to have severe housing cost burdens, with slightly fewer than one-quarter paying more than half of their income towards housing costs. Larger families and non-family households have disparately higher housing cost burdens at 21% than smaller family households at 14%.

Table 1c: Demographics of Households with Disproportionate Housing Needs, Sonoma County

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	55,075	143,925	38.27%
Black, Non-Hispanic	1,180	2,089	56.49%
Hispanic	18,505	31,445	58.85%
Asian American or Pacific Islander, Non-Hispanic	2,780	6,375	43.61%
Native American, Non-Hispanic	314	714	43.98%
Other, Non-Hispanic	2,270	4,500	50.44%
Total	80,125	189,045	42.38%
Household Type and Size			
Family households, <5 people	36,720	103,275	35.56%
Family households, 5+ people	10,485	16,595	63.18%
Non-family households	32,920	69,170	47.59%

Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	28,325	143,925	19.68%
Black, Non-Hispanic	604	2,089	28.91%
Hispanic	12,080	31,445	38.42%
Asian American or Pacific Islander, Non-Hispanic	1,785	6,375	28.00%
Native American, Non-Hispanic	229	714	32.07%
Other, Non-Hispanic	1,250	4,500	27.78%
Total	44,280	189,045	23.42%
Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.			

Almost 59% of Hispanic households and almost 57% of Black households in Sonoma County have housing problems, a disproportionately higher rate than that of white households. Additionally, family households of five or more are far more likely than smaller families to experience housing problems; 63% of large families have housing problems versus 36% of small families. Over 38% of Hispanic households are most likely to have severe housing problems, followed by 32% of Native American households. Fewer than 20% of white households have such problems.

Table 1d: Demographics of Households with Severe Housing Cost Burden, Sonoma County

Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	25,405	143,925	17.65%
Black, Non-Hispanic	550	2,089	26.33%
Hispanic	7,100	31,445	22.58%
Asian American or Pacific Islander, Non-Hispanic	1,305	6,375	20.47%
Native American, Non-Hispanic	175	714	24.51%
Other, Non-Hispanic	1,140	4,500	25.33%
Total	35,675	189,045	18.87%

Household Type and Size			
Family households, <5 people	15,324	103,275	14.84%
Family households, 5+ people	2,389	16,595	14.40%
Non-family households	17,950	69,170	25.95%
Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.			

There is a more equal distribution in Sonoma County of households experiencing severe housing cost burden. One-quarter of Black and Native American households have severe housing cost burden, compared to 18% of white households. Likewise, both Hispanic and Asian American or Pacific Islander households also have higher rates of severe cost burdens than their white counterparts. Non-family households have the highest rate of severe housing cost burden, with 26% paying at least fifty percent of their income towards housing costs compared to 14% of families.

Overcrowding

Table 2: Percentage of Overcrowded Households by Race or Ethnicity

	Non-Hispanic White Households		Black Households		Native American Households		Asian American or Pacific Islander		Hispanic	
	#	%	#	%	#	%	#	%	#	%
City of Petaluma	237	1.2%	6	2.3%	0	0%	46	5.1%	673	20.8%
Sonoma County	5,208	3.3%	126	5.3%	87	5.4%	291	4.7%	6,767	19.2%
Source: American Community Survey (ACS), 2015-2019.										

City of Petaluma

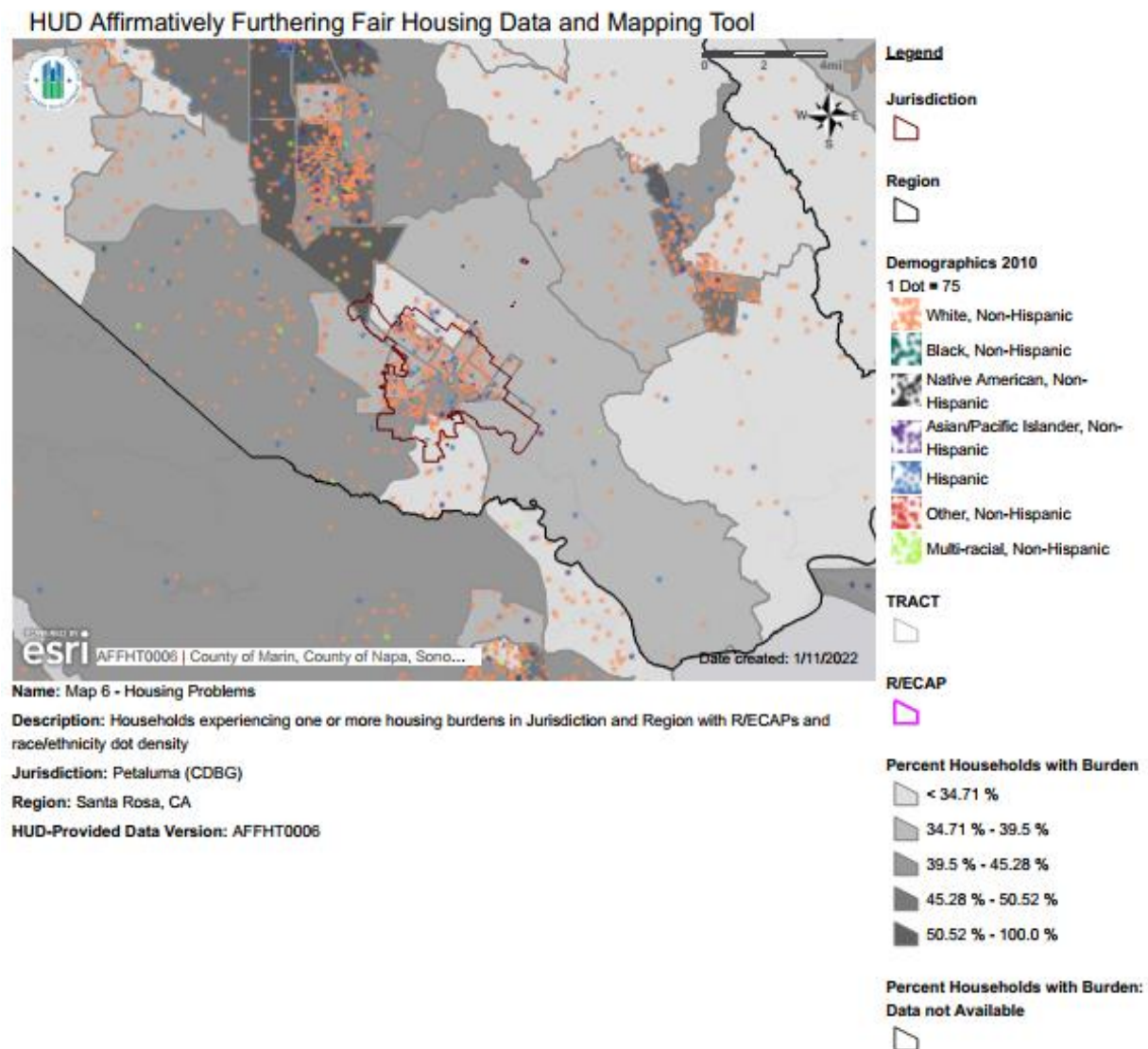
Rates of overcrowding are racially disproportionate in Petaluma. Hispanic households, in particular, have a much higher rate of overcrowding with over 20% living in overcrowded conditions. The rate of overcrowding among other racial and ethnic groups is well below this figure.

Sonoma County

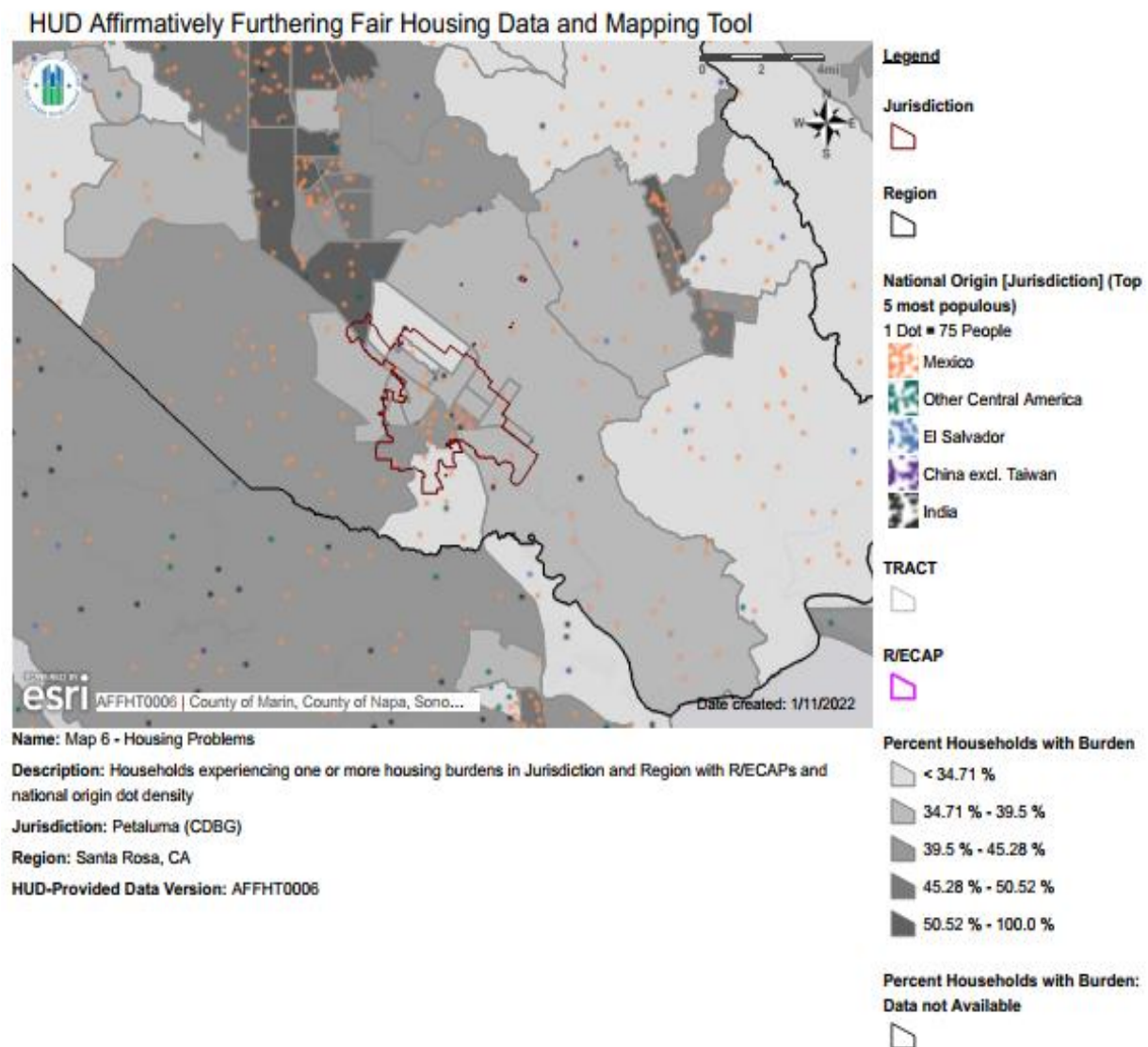
Once again, Hispanic households are four times as likely to live in overcrowded housing conditions when compared to white households.

1.b. Which areas in the jurisdiction and Region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

Map 1a: Households with Any of the Four Housing Problems by Race/Ethnicity, City of Petaluma



Map 1b: Households with Any of the Four Housing Problems by National Origin, City of Petaluma

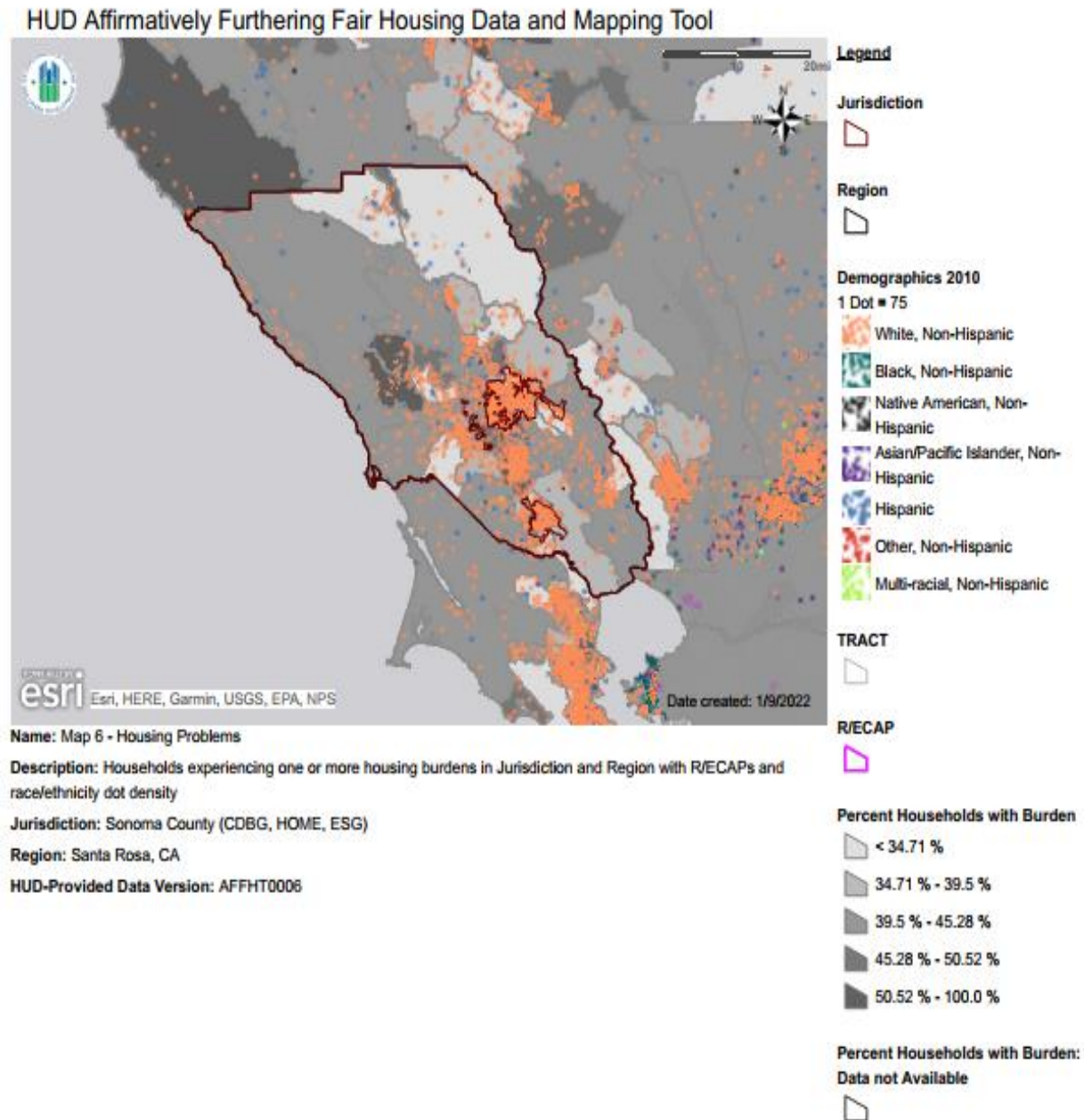


In Petaluma, there are slightly higher rates of housing problems in the southern part of the city, but the demographics of that area mirror those of the city as a whole.

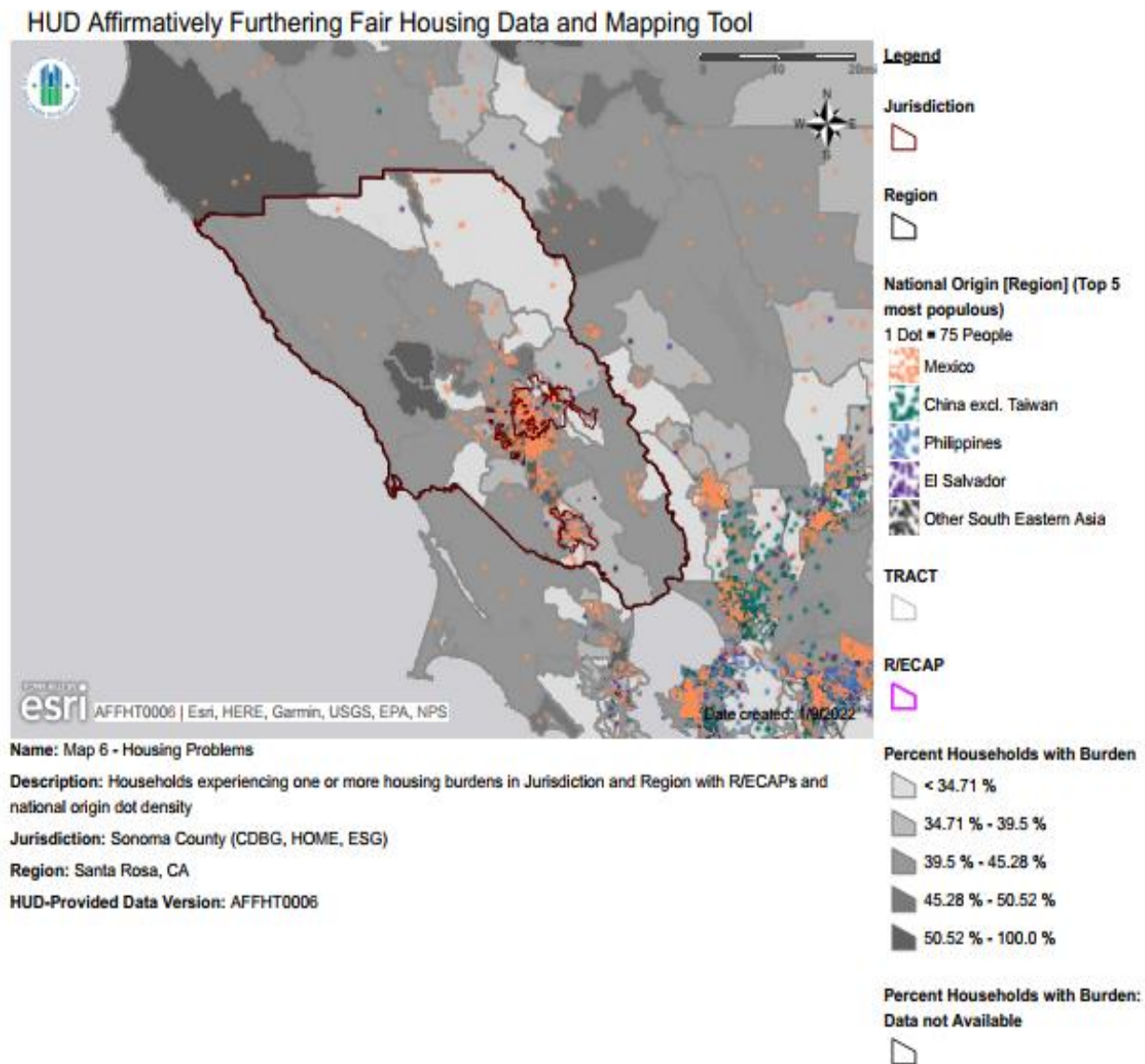
Percent of Households with Any of the Four Housing Problems, Sonoma County



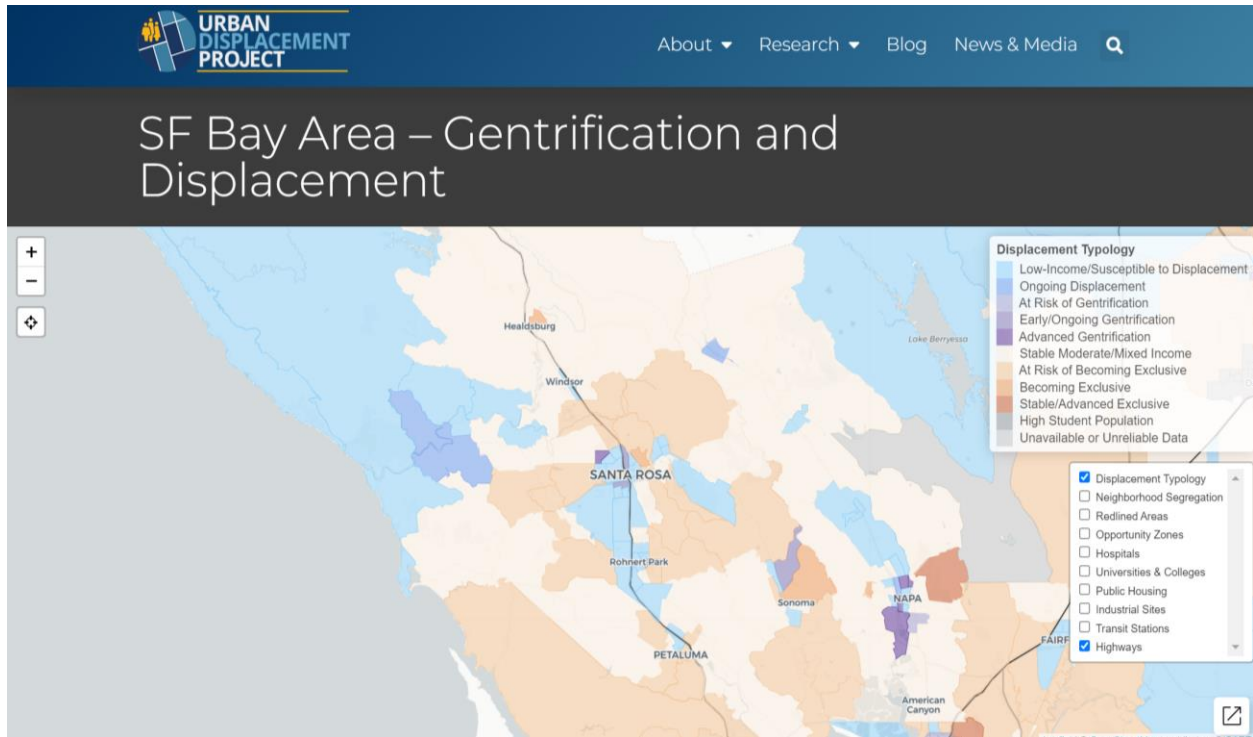
Map 1d: Households with Any of the Four Housing Problems by Race/Ethnicity, Sonoma County



Map 1e: Households with Any of the Four Housing Problems by National Origin, Sonoma County



Map 2: Sonoma County Gentrification and Displacement



Housing problems are concentrated in and around Santa Rosa and Rohnert Park and overlap the areas with high cost burdens. Both Santa Rosa and Rohnert Park are more racially diverse than the county as a whole, with Santa Rosa having a higher concentration of Hispanic residents.

According to the Urban Displacement Project, many communities in the northern region of Sonoma County are susceptible to displacement of low-income residents. Also vulnerable is Santa Rosa, Rohnert Park through the areas north of Petaluma.

1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Table 3: Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

City of Petaluma	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/a	N/a

Project-Based Section 8	102	75.00%	34	25.00%	0	0.00%	24	17.65%
Other Multifamily	156	100.00 %	0	0.00%	0	0.00%	1	0.64%
HCV Program	235	59.34%	114	28.89%	47	11.77%	52	13.17%
Sonoma County	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
Project-Based Section 8	196	76.56%	43	16.80%	17	6.64%	36	14.06%
Other Multifamily	127	100.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	1,030	49.67%	690	33.31%	353	17.03%	469	22.61%
Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.								

City of Petaluma

The city of Petaluma has no public housing units. There are 24 Project-Based Section 8 units and one Other Multifamily unit for families with children. Families with children generally rely on Housing Choice Vouchers, although fewer than twelve percent of families live in units with three or more bedrooms.

Sonoma County

Sonoma County has no public housing units and only 36 Project-Based Section 8 units for families, limiting housing choices for families to Housing Choice Vouchers. There are no Other Multifamily units for families. Only seventeen percent of Housing Choice Voucher households live in units with three or more bedrooms

1.d. Describe the differences in rates of renter and owner-occupied housing by race/ethnicity in the jurisdiction and Region.

Table 4: Housing Tenure by Race

			City of Petaluma	Sonoma County
White, Non-Hispanic	Owner-Occupied	#	58,603	187,405
		%	81.7	76.9
	Renter-Occupied	#	13,107	56,261
		%	18.3	23.1
Hispanic	Owner-Occupied	#	4,875	21,970
		%	52	50.9
	Renter-Occupied	#	4,494	21,200
		%	48	49.1
Black	Owner-Occupied	#	5,090	16,268
		%	63.2	46.3
	Renter-Occupied	#	2,968	18,892
		%	36.8	53.7
Native American	Owner-Occupied	#	357	624
		%	73.2	58.8
	Renter-Occupied	#	131	438
		%	26.8	41.2
Asian American and Pacific Islander	Owner-Occupied	#	11,545	40,728
		%	85.9	68.9
	Renter-Occupied	#	1,890	18,420
		%	14.1	31.1
Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.				

Table 5: Population Growth by Housing Type

Jurisdiction	Owner-Occupied Percentage	Renter-Occupied Percentage
City of Petaluma	30%	54%
Sonoma County	-3%	16%
Source: American Community Survey (ACS), 2011-2015.		

City of Petaluma

The city of Petaluma has the highest homeownership rate in the region, with 86% of Asian American households and 82% of white households owning their own home. 73% of Native American households, 63% of Black households, and 52% of Hispanic households own their own homes. More than one-half of all groups in the city of Petaluma own their own homes, unlike all other jurisdictions in the region.

Sonoma County

Sonoma County has an equal split of homeowner and rental occupancy among white households, and all other groups are more likely to rent than own. The second highest rate of homeownership is among Asian American or Pacific Islander and Black households at almost forty percent. Fewer than thirty percent of Hispanic households own their own homes.

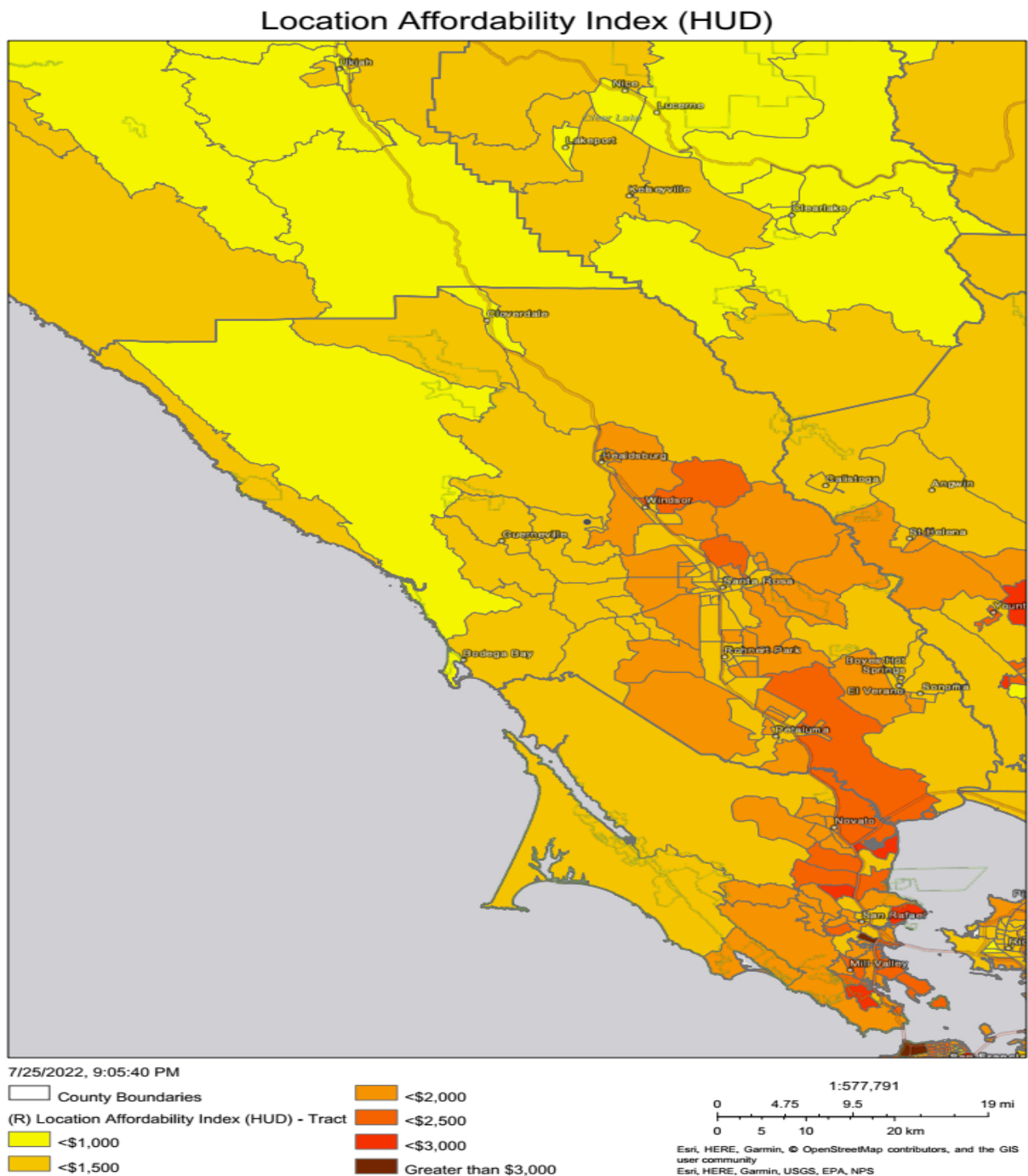
Additional Information

2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and Region affecting groups with other protected characteristics.

Spatial Distribution and Availability of Affordable Housing

Affordable Housing is defined as rental units renting at or less than 30% of household income for a household with income at 50% of AMI.

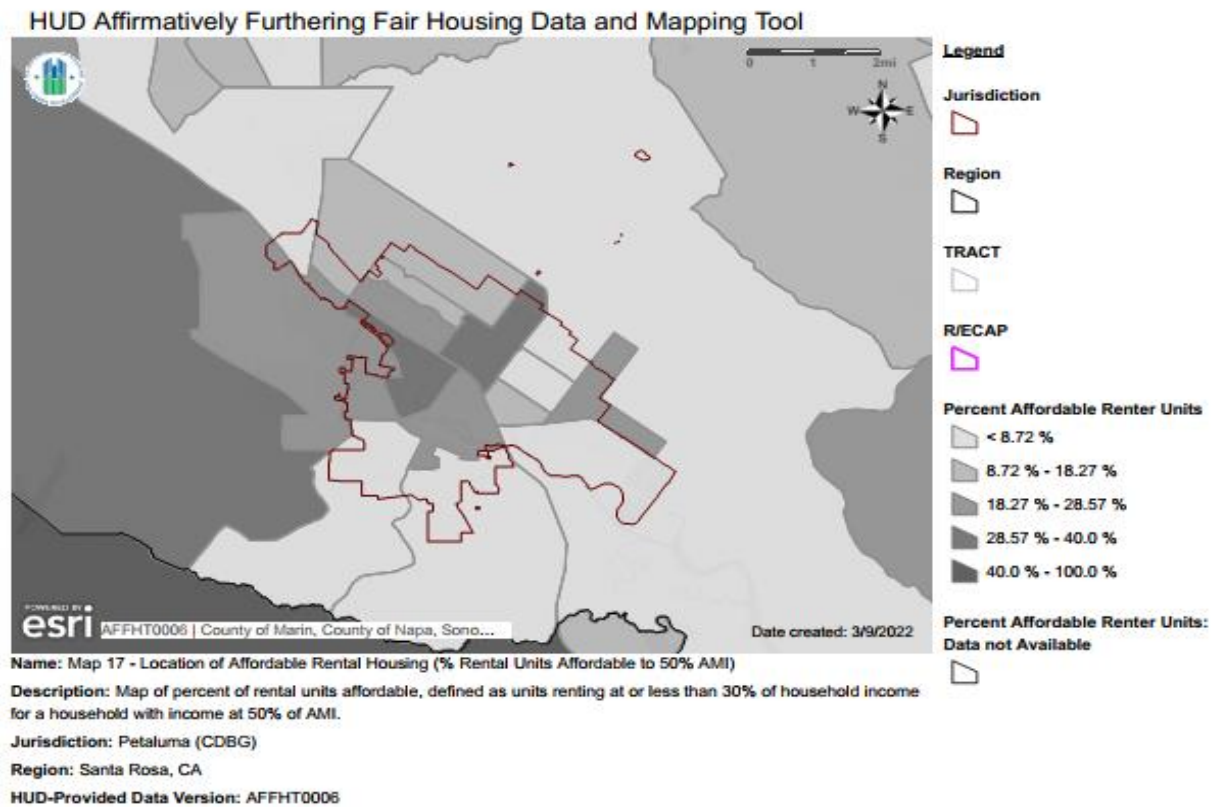
Map 3: Location of Affordable Rental Housing, Sonoma County



CA HCD

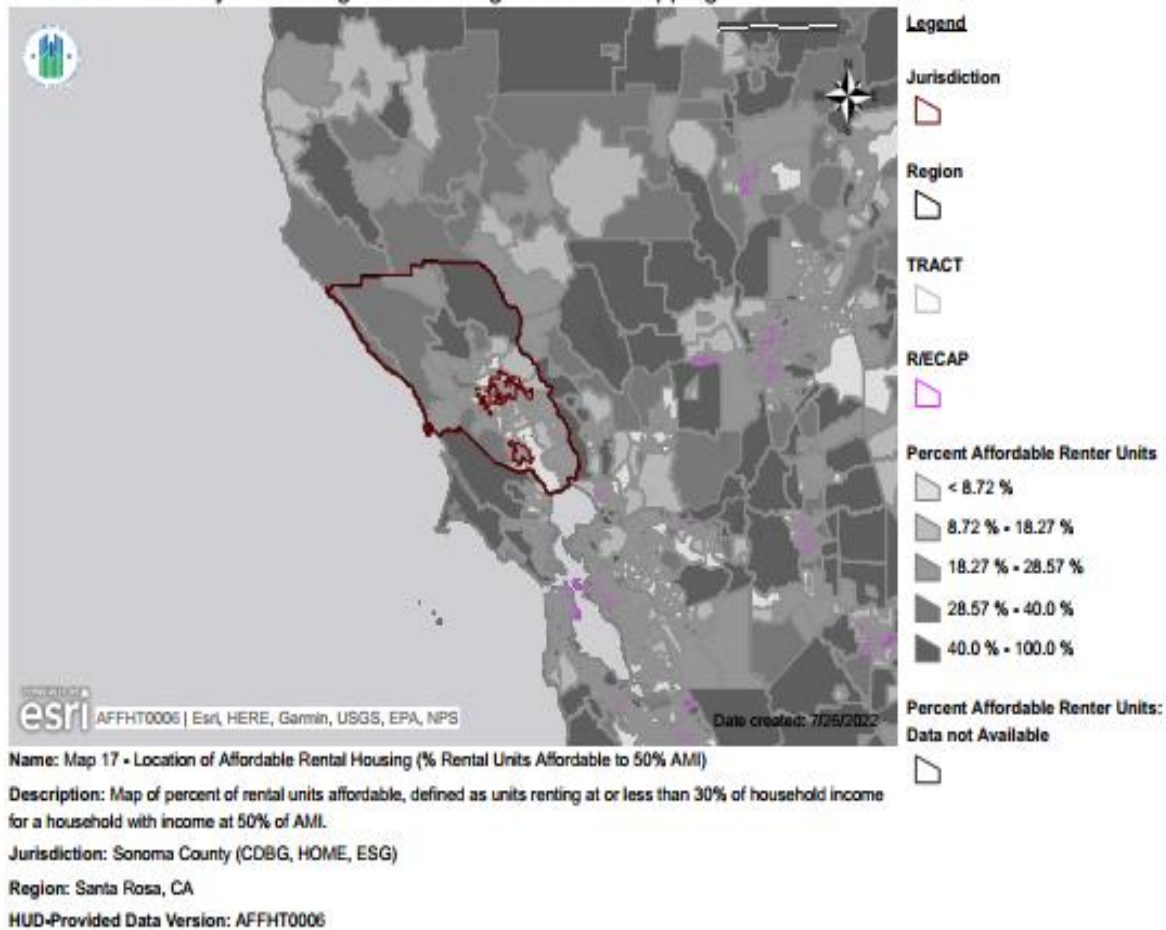
The proportion of the housing stock that is affordable in Sonoma County is higher in the northern, more rural part of the county bordering Mendocino County and away from job centers. The areas to the north of Santa Rosa and the east of Petaluma have the least amount of affordability in Sonoma County,

Map 5: Location of Affordable Rental Housing, City of Petaluma



The majority of the city of Petaluma's affordable housing stock can be found west of the city, while there is very little affordable housing south and east of the city. is concentrated in the northeastern quadrant of the city. There are two tracts in the center of the city with higher affordability.

Map 6: Location of Affordable Rental Housing, Sonoma County
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



There is also an uneven distribution of affordable housing in Sonoma County, with the majority of affordable housing located in the northeast part of the county and the least affordable housing located near the middle and southern part of the county.

C. Publicly Supported Housing Analysis

Data note: Some of the tables and maps in this section are sourced from the HUD tool which used 2011-2015 5-year ACS data. These maps and tables are accessible to all and can be used by anyone to numerically and spatially analyze their jurisdictions or communities of interest.

1. Publicly supported housing demographics

Table 1a: Publicly Supported Housing Units by Program Category

City of Petaluma		
Housing Units	#	%
Total housing units	22,751	-
Public Housing	N/a	N/a
Project-based Section 8	144	0.63%
Other Multifamily	156	0.69%
HCV Program	450	1.98%
Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.		

Table 1b: Publicly Supported Housing Units by Program Category, Sonoma County

Housing Units	#	%
Total housing units	207,713	-
Public Housing	N/a	N/a
Project-based Section 8	1,244	0.23%
Other Multifamily	130	0.11%
HCV Program	2,325	2.04%
Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.		

1.a. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, Project-Based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV) in the jurisdiction?

Table 2a: Publicly Supported Housing Demographics, City of Santa Petaluma

Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	446	74.26%	5	3.68%	19	13.97%	9	6.62%
Other Multifamily	74	76.92%	4	2.56%	18	11.54%	7	4.49%
HCV Program	1,278	81.40%	14	3.57%	45	11.28%	12	2.99%
Total Households	44,895	79.18%	149	0.67%	2,985	13.51%	949	4.30%
0-30% of AMI	4,640	71.15%	0	0.00%	475	22.84%	90	4.33%
0-50% of AMI	9,220	71.03%	70	1.68%	810	19.47%	240	5.77%
0-80% of AMI	16,355	71.02%	90	1.31%	1,395	20.36%	355	5.18%
Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.								

In Petaluma, white households predominate across all categories of publicly supported housing that are present. Asian or Pacific Islander households make up a slightly larger share of Project-Based Section 8 tenants than they do of occupants of other types of publicly supported housing.

Table 2b: Publicly Supported Housing Demographics, Sonoma County

Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-Based Section 8	212	82.81%	14	5.47%	27	10.55%	1	0.39%
Other Multifamily	103	81.10%	4	3.15%	14	11.02%	5	3.94%
HCV Program	1,518	73.24%	118	5.71%	329	15.87%	64	3.09%
Total Households	81,475	79.45%	627	0.61%	15,603	15.22%	2,338	2.28%
0-30% of AMI	8,462	73.07%	72	0.62%	2,147	18.54%	350	3.02%
0-50% of AMI	16,350	70.76%	131	0.57%	5,128	22.19%	625	2.70%
0-80% of AMI	29,085	72.37%	275	0.68%	8,637	21.49%	945	2.35%
Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.								

In Sonoma County, white households predominate across Project-Based Section 8 housing, Other Multifamily housing, and the Housing Choice Voucher program. The degree of overrepresentation is less pronounced for the Housing Choice Voucher program than it is for the two sources of hard units for which data is available. That may suggest that Project-Based Section 8 and Other Multifamily housing in Sonoma County tend to be age-restricted. Across most of the United States, residents of senior affordable housing are more likely to be white than residents of family-occupancy affordable housing.

1.b. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

In Sonoma County, Project-Based Section residents and households with Housing Choice Vouchers in Santa Rosa are less likely to be white and more likely to be Black, Hispanic, and Asian or Pacific Islander than are households in those two categories of publicly supported housing regionally (and in Sonoma County and in Petaluma). There is less variation by jurisdiction in the occupancy of Other Multifamily housing.

1.c. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

City of Petaluma

In Petaluma, white households reside in all categories of publicly supported housing at rates slightly higher their share of the income-eligible households. Black households comprise a higher share of households residing in all categories of publicly supported housing than their share of the income-

eligible households. Hispanic households are underrepresented in all categories of publicly supported housing in relation to their share of income-eligible households. Asian or Pacific Islander households reside in all categories of publicly supported housing at rates commensurate with their share of income-eligible households.

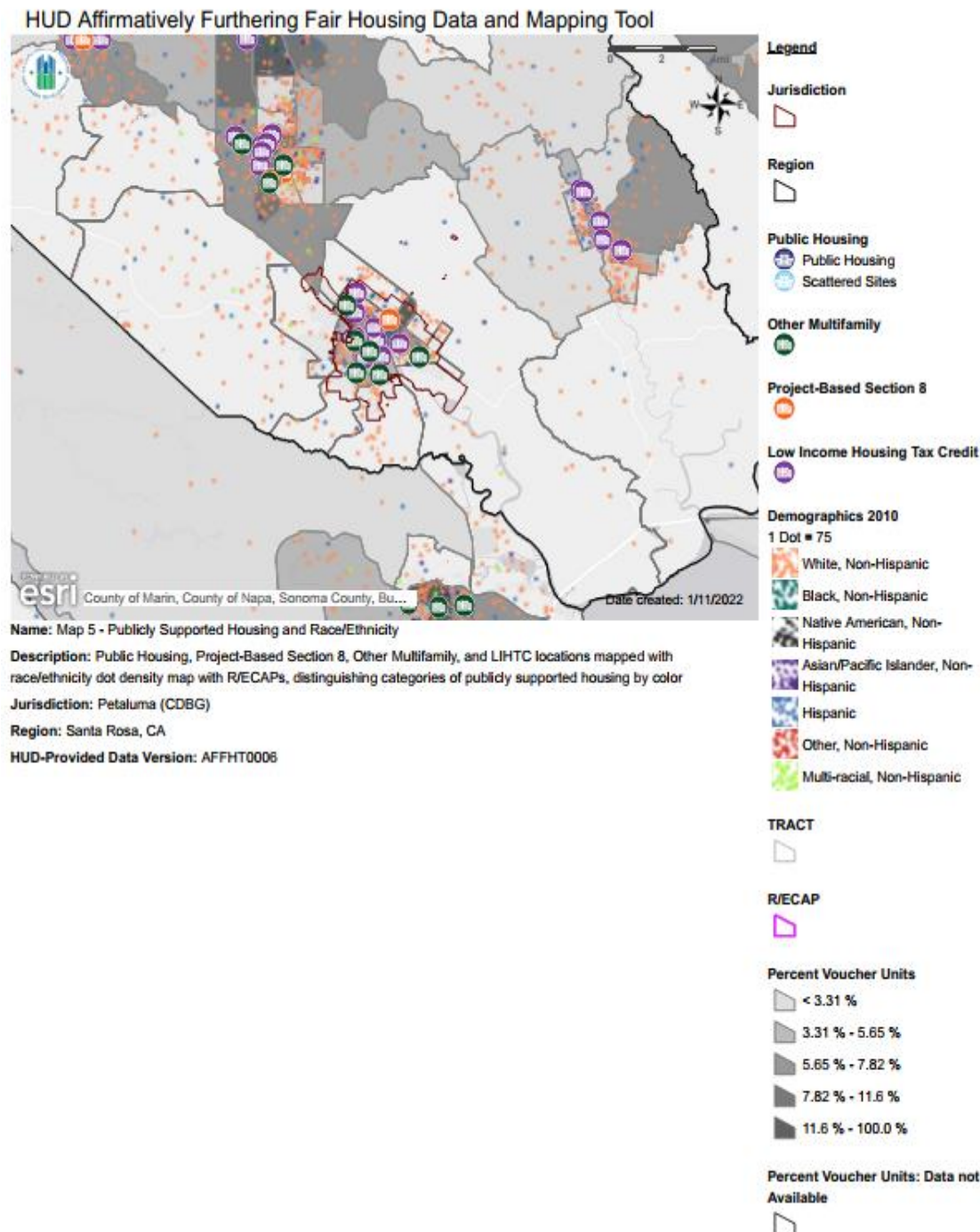
Sonoma County

In Sonoma County, white households comprise a greater share of households residing in Project-Based Section 8 and Other Multifamily housing than their share of income-eligible households and a similar share of Housing Choice Voucher holders to their share of income-eligible households. Black households comprise a higher share of households in all categories of publicly supported housing than their share of income-eligible households. Hispanic households are underrepresented in all categories of publicly supported housing in comparison to their share of income-eligible households. Asian or Pacific Islander households are underrepresented in Project-Based Section 8 in relation to their share of income-eligible households and reside in Other Multifamily housing and utilize Housing Choice Vouchers at rates commensurate with their share of income-eligible households.

2. Publicly Supported Housing Location and Occupancy

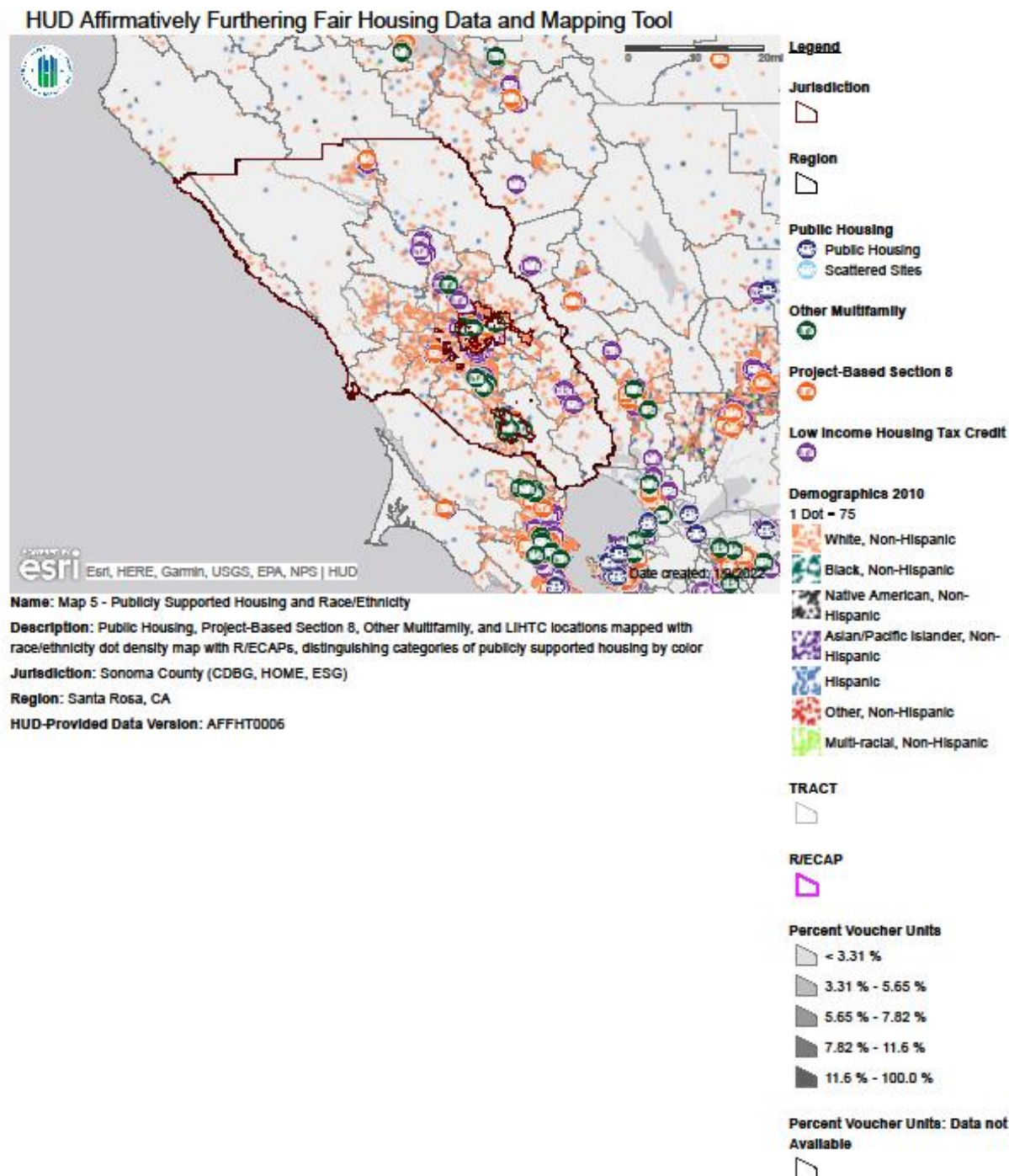
2.a. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Map 1a: Publicly Supported Housing and Race/Ethnicity, City of Petaluma



In Petaluma, all categories of publicly supported housing are concentrated on the south side of the city, which is more heavily Hispanic than the city as a whole. Housing Choice Voucher utilization is concentrated in the northernmost portion of that area, which has a Hispanic majority. There is effectively no publicly supported housing in predominantly white northeastern parts of Petaluma.

Map 1b: Publicly Supported Housing and Race/Ethnicity, Sonoma County



In Sonoma County, publicly supported housing is concentrated in Rohnert Park, Windsor, and Healdsburg. All publicly supported housing in Healdsburg is LIHTC, but Rohnert Park also has concentrations of Other Multifamily housing. Rohnert Park is more heavily Asian or Pacific Islander than Sonoma County as a whole while Healdsburg is demographically similar to the Urban County. Windsor is more heavily Hispanic and Native American than Sonoma County. There is also one area of concentrated rural Housing Choice Voucher utilization in the vicinity of Duncan's Mills, which is predominantly white.

2.b. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

Within Sonoma County, Santa Rosa has the greatest concentration of housing that primarily serves families with children, with Project-Based Section 8 a major source of such housing despite that program primarily providing senior housing in other jurisdictions.

2.c. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

There are no R/ECAPS in the city of Petaluma or Sonoma County.

2.d. Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class than other developments of the same category for the jurisdiction? Describe how these developments differ.

Table 3a: Publicly Supported Housing Demographics, City of Petaluma

Type	Development Name	# Units	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Households with children
Project-Based Section 8	PETALUMA SENIOR APARTMENTS	57	77.19	5.26	5.26	10.53	N/a
Project-Based Section 8	PARK LANE APARTMENTS	87	72.15	2.53	20.25	3.8	30.38
Other Multifamily Housing	KELLGREN SENIOR APARTMENTS	42	78.57	2.38	14.29	2.38	N/a
Other Multifamily Housing	EDITH STREET APARTMENTS	22	63.64	N/a	9.09	9.09	N/a
Other Multifamily Housing	BOULEVARD APARTMENTS	14	78.57	7.14	14.29	N/a	N/a
Other Multifamily Housing	CASA GRANDE	44	72.73	2.27	13.64	9.09	N/a

Other Multifamily Housing	SALISHAN APARTMENTS	12	66.67	8.33	16.67	N/a	8.33
Other Multifamily Housing	RICHARD LIEB SR. APARTMENTS	22	100	N/a	0	N/a	N/a

Richard Lieb Sr. Apartments, an Other Multifamily Housing development in Petaluma, is all white. Petaluma Senior Apartments, a Project-Based Section 8 development, has a population of only five percent Hispanic while the white population is over 77%.

Table 3b: Publicly Supported Housing Demographics, Sonoma County

Type	Development Name	# Units	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Households with children
Project-Based Section 8	MARVIN'S GARDENS	37	48.57	22.86	25.71	N/a	57.14
Project-Based Section 8	WINDWOOD APARTMENTS	28	69.23	11.54	19.23	N/a	57.69
Project-Based Section 8	KINGS VALLEY APARTMENTS	75	83.1	1.41	12.68	1.41	1.41
Project-Based Section 8	BURBANK HEIGHTS	67	95.38	1.54	3.08	N/a	N/a
Project-Based Section 8	BURBANK ORCHARDS	60	94.92	1.69	3.39	N/a	N/a
Other Multifamily Housing	MUIRFIELD APARTMENTS	24	69.57	13.04	8.7	8.7	N/a
Other Multifamily Housing	CHARLES STREET	47	80.85	N/a	17.02	2.13	N/a
Other Multifamily Housing	VINECREST SENIOR	59	85.96	1.75	7.02	3.51	N/a

Burbank Heights and Burbank Orchards, Project-Based Section 8 developments, has a population of 95% white and only 3% Hispanic whereas Marvin Gardens, another Project-Based Section 8 development, is more proportional with a population that is over one-quarter Hispanic..

2.e. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

Demographic information about LIHTC housing in Sonoma County is not available though it is likely that a greater proportion of such housing is available to families with children than is true for Project-Based Section 8 and Other Multifamily housing.

2.f. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, Project-Based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Neither the city of Petaluma nor Sonoma County has experienced RAD conversions of public housing. In general, across jurisdictions, the demographics of most publicly supported housing developments mirror those of the immediate surrounding areas. Publicly supported housing developments in more heavily white smaller towns and rural areas, in particular, tend to have residents who are more heavily white. Developments in more heavily Hispanic areas either have demographics that mirror those of the broader region or that are somewhat more heavily Hispanic than the region as a whole. The few developments with disproportionate concentrations of Black and/or Asian or Pacific Islander households identified above clearly do not precisely reflect the demographics of surrounding neighborhoods as there are no neighborhoods with significant concentrations of Black and/or Asian or Pacific Islander residents in the region. Where there are senior developments in racially and ethnically diverse or predominantly Hispanic areas, those developments still tend to have significant concentrations of white residents.

3. Disparities in Access to Opportunity

3.a. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

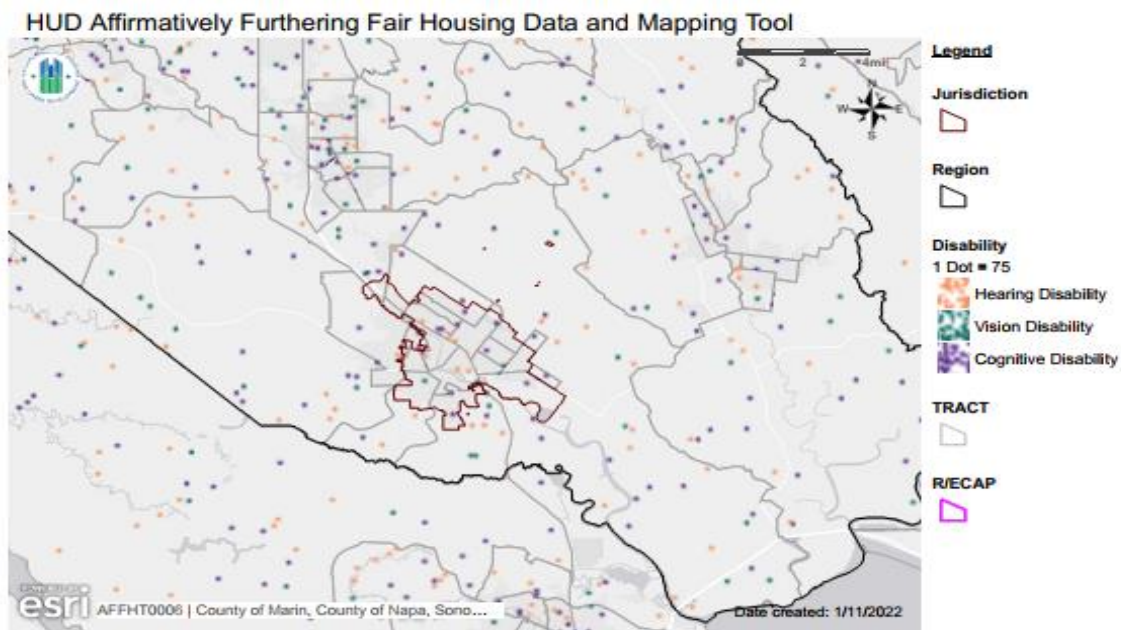
Overall, publicly supported housing, across categories, is concentrated in Santa Rosa, although there are developments located in Petaluma and Rohnert Park. In general, these areas have lower composite access to opportunity than other parts of the county; however, they also have higher job proximity and transit access. Of the publicly supported housing that exists in higher opportunity parts of Sonoma County, like Sebastopol, senior housing tends to predominate over family-occupancy housing. This means that the limited publicly supported housing available in those areas is not a vehicle for increasing access to proficient schools.

D. Disability and Access Analysis

In 1988, Congress extended the Fair Housing Act's protections against housing discrimination to people with disabilities. In addition to protection against intentional discrimination and unjustified policies that have disproportionate effects, the Fair Housing Act includes three provisions that are unique to persons with disabilities. First, the Fair Housing Act prohibits the denial of requests for reasonable accommodations for persons with disabilities if said accommodations are necessary to afford an individual equal opportunity to use and enjoy a dwelling. Reasonable accommodations are departures from facially neutral policies and are generally available, so long as granting the accommodation request would not place an undue burden on the party providing the accommodation or result in a direct threat to the health or safety of others. Permitting an individual with an anxiety disorder to have a dog in their rental unit as an emotional support animal despite a broad "no pets" policy is an example of a reasonable accommodation. Second, the Act also prohibits the denial of reasonable modification requests. Modifications involve physical alterations to a unit, such as the construction of a ramp or the widening of a door frame, and must be paid for by the person requesting the accommodation unless the unit receives federal financial assistance and is subject to Section 504 of the Rehabilitation Act. Lastly, the design and construction provision of the Fair Housing Act requires most multi-family housing constructed since 1991 to have certain accessibility features. This section of the Assessment looks at the housing barriers faced by persons with disabilities, including those that result in the segregation of persons with disabilities in institutions and other congregate settings.

Population Profile

Map 1: Petaluma Disability by Type (Hearing, Vision, Cognitive)



Name: Map 14 - Disability by Type

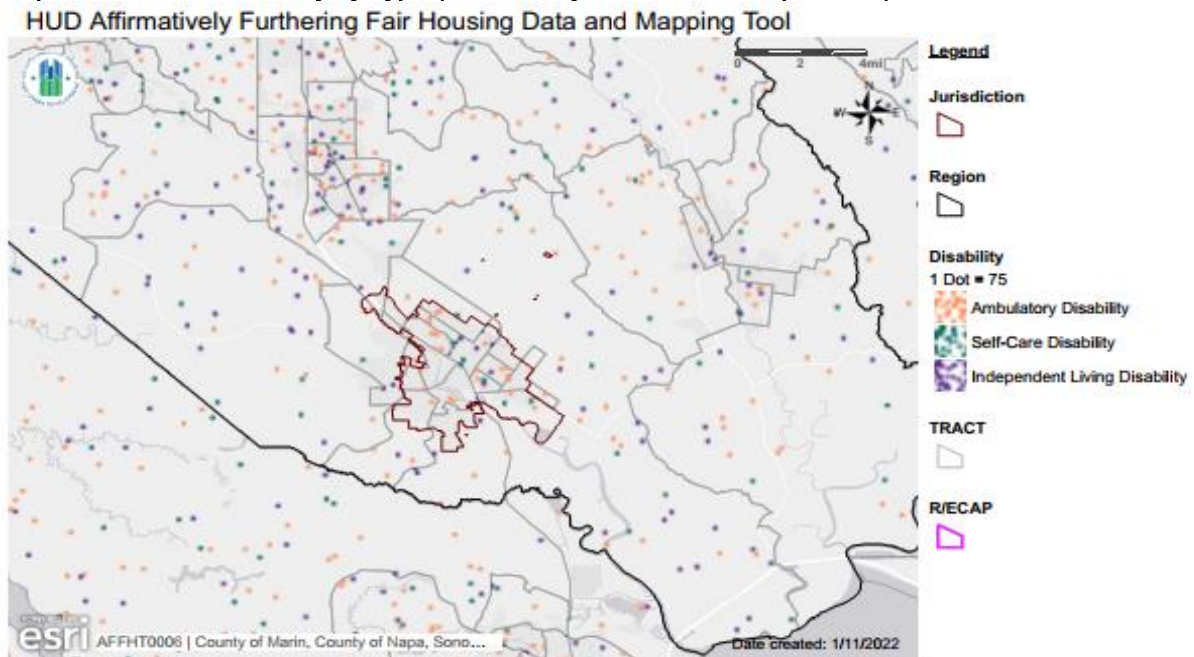
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Petaluma (CDBG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 2: Petaluma Disability by Type (Ambulatory, Self-Care, Independent)



Name: Map 14 - Disability by Type

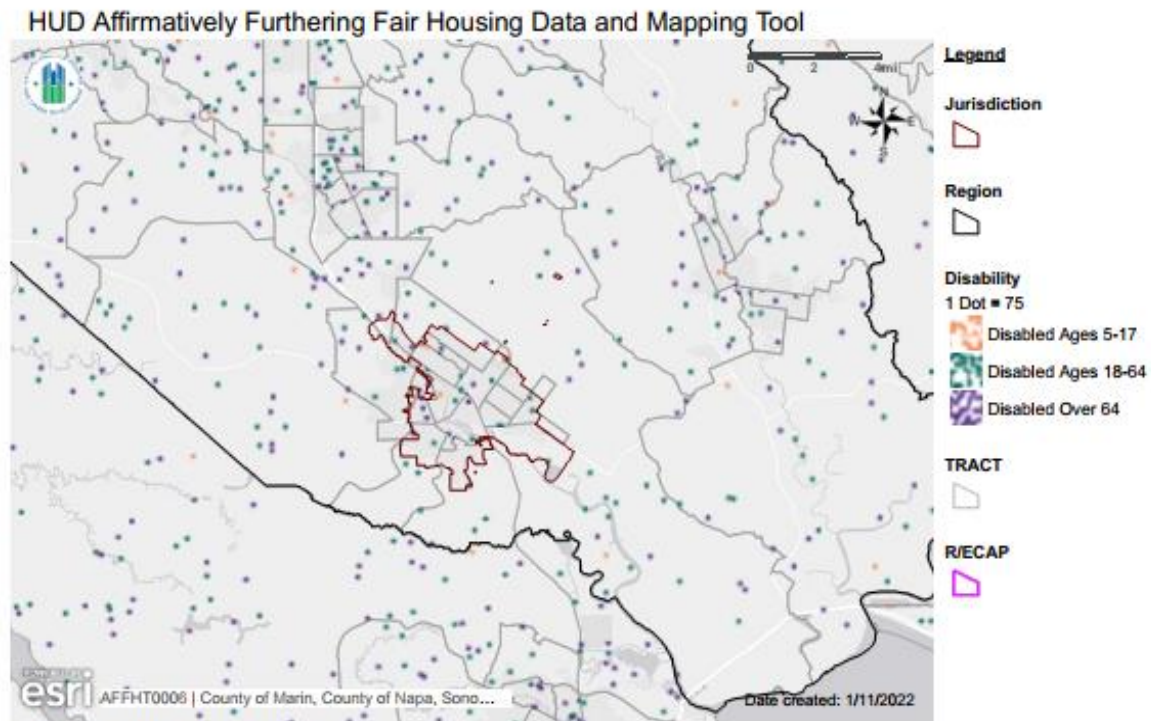
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Petaluma (CDBG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 3: Petaluma Disability by Age



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Petaluma (CDBG)

Region: Santa Rosa, CA

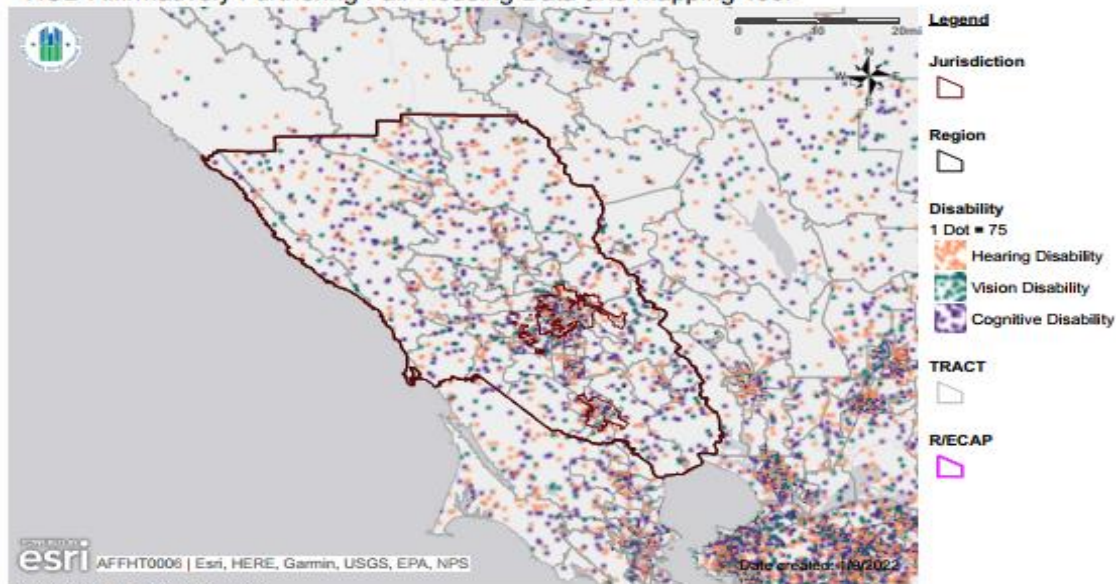
HUD-Provided Data Version: AFFHT0006

Table 1a: Disability by Type, Petaluma

Disability Type	#	%
Hearing Difficulty	1,748	3.16%
Vision Difficulty	820	1.48%
Cognitive Difficulty	1,970	3.56%
Ambulatory Difficulty	2,890	5.23%
Self-Care Difficulty	1,244	2.25%
Independent Living Difficulty	1,865	3.37%
Source: American Community Survey (ACS), 2011-2015		

Map 4: Sonoma County Disability by Type (Hearing, Vision, Cognitive)

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

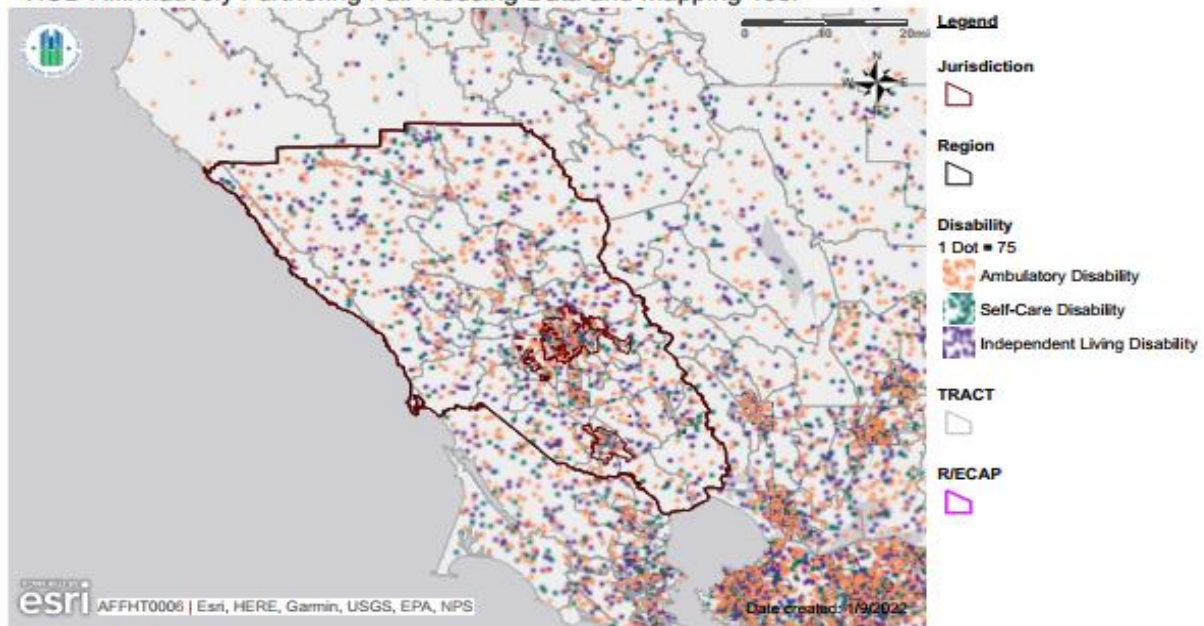
Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 5: Sonoma County Disability by Type (Ambulatory, Self-Care, Independent)

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 6: Sonoma County Disability by Age

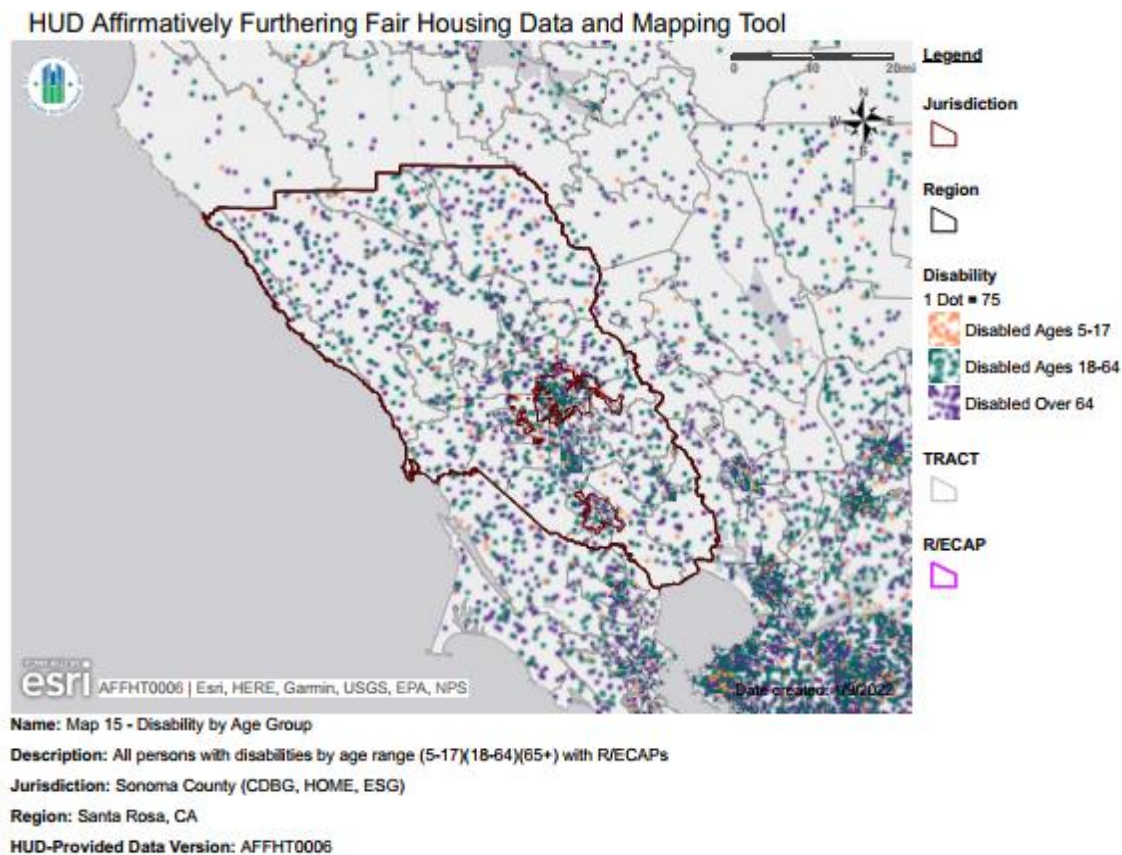


Table 1b: Disability by Type, Sonoma County

Disability Type	#	%
Hearing Difficulty	10,289	4.14%
Vision Difficulty	4,523	1.82%
Cognitive Difficulty	11,796	4.74%
Ambulatory Difficulty	14,810	5.95%
Self-Care Difficulty	6,253	2.51%
Independent Living Difficulty	10,998	4.42%
Source: American Community Survey (ACS), 2011-2015		

1.a. How are people with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Persons with disabilities are relatively evenly distributed across the Sonoma County. None of the jurisdictions have significantly higher proportions of persons with disabilities than the others. There are no R/ECAPs in the region, and, moreover, areas with higher concentrations of Hispanic residents, who are disproportionately low-income, like the city of Santa Rosa, actually have lower concentrations of persons with disabilities than their more heavily white surrounding counties.

Petaluma

Petaluma has no areas of concentration of persons with disabilities, but the proportion of residents with disabilities is slightly higher on the more heavily Hispanic south side of the city than it is on the predominantly white north side of the city.

Sonoma County

In the Sonoma County, persons with disabilities are concentrated in the southern portion of the city of Sonoma, in predominantly rural areas to the east of Santa Rosa, and in and near Monte Rio. These areas are all predominantly white.

1.b. Describe whether these geographic patterns vary for people with each type of disability or for people with disabilities in different age ranges for the jurisdiction and region.

Hearing Disabilities

Concentrations of persons with hearing disabilities generally mirror patterns of concentrations of persons with disabilities generally with the exception of an additional area of concentration of persons with hearing disabilities along the predominantly white far northern coast of Sonoma County.

Vision Disabilities

People with vision disabilities are more dispersed throughout the region than are persons with disabilities, overall. Most areas of relative concentration of persons with vision disabilities are the same as those for persons with disabilities generally with the addition of one tract in the northern portion of Santa Rosa and another in Rohnert Park.

Cognitive Disabilities

Patterns of concentration of persons with cognitive disabilities diverge more significantly from overall trends. There are additional areas of concentration near the center of Santa Rosa along with in rural areas to the west of Santa Rosa including Graton. The parts of Santa Rosa with concentrations of persons with cognitive disabilities are more heavily Hispanic than the broader region.

Ambulatory Disabilities

There are additional areas of concentration of persons with ambulatory disabilities in the central portions of Santa Rosa, in Rohnert Park, on the west side of the city of Sonoma, and in Guerneville. These areas include a mix of predominantly white and more heavily Hispanic areas.

Self-Care Disabilities

There are additional areas of concentration of persons with self-care disabilities in the central portions of Santa Rosa, in the northern portion of the city of Sonoma and Windsor. These areas include a mix of predominantly white and more heavily Hispanic areas.

Independent Living Disabilities

There are additional areas of concentration of persons with independent living disabilities in the central portions of Santa Rosa, in Windsor, and in Forestville. These areas include a mix of predominantly white and more heavily Hispanic areas.

Disability by Age

Children with disabilities are concentrated on the south side of Santa Rosa, which is disproportionately Hispanic. Working age adults with disabilities are concentrated in Santa Rosa. Elderly adults with disabilities are concentrated in rural areas, primarily in Sonoma County and mostly to both the east and west of Santa Rosa.

1. Housing Accessibility

2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Accessibility Requirement for Federally-Funded Housing

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that housing developments that receive federal financial assistance make 1) five percent (5%) of total units accessible to individuals with mobility disabilities and 2) an additional two percent (2%) of total units accessible to individuals with sensory disabilities. It requires that each property, including site and common areas, meet the Federal Uniform Accessibility Standards (UFAS) or HUD's Alternative Accessibility Standard. Project-Based Section 8 units as well as many types of Other Multifamily units, including those produced through Section 202 and Section 811 programs, are both subject to Section 504. Public housing, which is absent in Sonoma County, is also subject to Section 504.

The Publicly Supported Housing section of this assessment provides a detailed overview of the publicly supported housing stock in the region. In general, there is a relatively limited supply of housing subject to Section 504, and that supply is relatively concentrated in a small handful of larger cities including Petaluma, Rohnert Park, and Santa Rosa. There is comparatively little housing that is subject to Section 504 in the region's rural areas and smaller towns. Project-Based Section and Other Multifamily housing contribute to the effort to meet accessibility needs in the region but are not sufficient to do so on their own.

Low Income Housing Tax Credit (LIHTC) Units

By contrast, there is much more LIHTC housing in the region than there is housing that is explicitly subject to Section 504. Although the legal question of whether the LIHTC program is subject to Section 504 is unsettled, most LIHTC housing is at least subject to the design and construction requirements of the Fair Housing Act, discussed below, because those requirements for multifamily dwellings have been in effect for the vast majority of the LIHTC program's existence. Additionally, in more recent years, the California Tax Credit Allocation Committee has imposed accessibility requirements for LIHTC housing that actually exceed those of Section 504. Although most existing LIHTC housing was not subject to those enhanced requirements when it was constructed, newer LIHTC housing is, and, as mentioned, older LIHTC units are usually subject to the Fair Housing Act's design and construction standards. In Sonoma County, there are 5,645 low-income LIHTC units across 83 developments, all but two of which were placed in service after the 1991 effective date of the Fair Housing Act's design and construction standards. These developments are more likely to be in larger cities like Petaluma, Rohnert Park, and Santa Rosa than they are to be in smaller towns or rural areas, but there is still comparatively more LIHTC housing in smaller communities than there is Project-Based Section 8 or Other Multifamily housing.

Fair Housing Amendments Act Units

As mentioned above, the Fair Housing Act requires that multifamily housing built for occupancy since March 1991 meet certain accessibility requirements. The American Community Survey does not disaggregate multifamily units built from January 1980 to March 1991 from units built between then and the end of 1999 in reporting data on units in structure by year structure built for the period of 1980 through 1999. Additionally, the American Community survey combines units in structures with four units in a category with duplexes and triplexes despite the fact that the Fair Housing Act's cut-off for being considered "covered multifamily" is five units. Still, American Community Survey data is useful. For Sonoma County, there have been 5,314 units built in structures with five or more units from 2000 to the present. An additional 10,004 were built from 1980 through 1999 – an unknown fraction of which had to meet accessibility requirements. For Santa Rosa, there have been 2,852 units

built in structures with five or more units from 2000 to the present. An additional 4,846 were built from 1980 through 1999 – an unknown fraction of which had to meet accessibility requirements.

Accessible Units for Families with Children

As discussed in the Publicly Supported Housing section of this assessment, a large share of the Project-Based Section 8 and Other Multifamily developments in the region are restricted to seniors and/or are predominantly comprised of one-bedroom units. Across jurisdictions, there is a significant shortage of affordable accessible units with two or more bedrooms. Such units may be necessary not only for families with children that include persons with disability-related accessibility needs but also to individuals with disabilities who need the services of live-in aides.

2.b. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

The location of affordable, accessible housing largely mirrors to the distribution of all affordable housing across jurisdictions. As noted in the Publicly Supported Housing section, affordable housing is disproportionately located in areas that are more heavily Hispanic than the broader region though it is also true that there are no R/ECAPs in the region. It is also noteworthy that affordable housing that is most likely to be located in predominantly white areas with low Hispanic population concentration consists primarily of senior housing, which disproportionately serves persons with disability-related accessibility needs.

2.c. To what extent are people with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 2a: Disability by Publicly Supported Housing Program Category, City of Petaluma

	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	36	26.15%
Other Multifamily	29	18.74%
HCV Program	197	49.84%
<i>Source: American Community Survey (ACS), 2011-2015</i>		

In the city of Petaluma, persons with disabilities are either proportionally represented or have greater access to publicly supported housing across program categories.

Table 2b: Disability by Publicly Supported Housing Program Category, Sonoma County

	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	15	5.76%
Other Multifamily	30	23.51%
HCV Program	907	43.77%
<i>Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.</i>		

In Sonoma County, persons with disabilities are underrepresented in Project-Based Section 8 but are able to obtain Housing Choice Vouchers at rates that exceed their share of the income-eligible population. Access to Other Multifamily housing may slightly exceed the proportion of the income eligible population comprised of persons with disabilities.

2. Integration of People with Disabilities Living in Institutions and Other Segregated Settings

3.a. To what extent do people with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, states and jurisdictions, including California, primarily housed people with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. Within these institutions, people with disabilities have had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing people with disabilities in institutional settings and toward providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's landmark decision in *Olmstead v. L.C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government's programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts of what comprises a home and community-based setting have evolved over time. Although it is clear that developmental centers and state hospitals are segregated settings and that an individual's own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are clearly segregated though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and such segregated settings, and the degree of integration present in group homes often corresponds to their size.

Below, this assessment includes detailed information about the degree to which people with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that people with other types of disabilities are never subject to segregation.

Intellectual and Developmental Disabilities

Napa and Sonoma Counties, along with neighboring Solano County, are both served by the North Bay Regional Center. Regional Centers are California state agencies that exist to provide and coordinate supportive services for persons with intellectual and developmental disabilities living in the community. As Table 3 below shows, settings for persons with intellectual and developmental disabilities largely resemble those experienced by persons with intellectual and developmental disabilities statewide. The one caveat to that is that adults are less than half as likely as adults statewide to live in large facilities. Although the overall percentage statewide is relatively small so proportional differences are magnified, this is still a noteworthy finding. As reflected in Table 4, the

vast majority of individuals live either in a family home or in independent living settings while Residential settings are the category of congregate settings with a significant number of individuals in the service area of the North Bay Regional Center. Hispanic households are much more likely to receive services at home and less likely to have access to independent living settings, which are also likely to be integrated, and institutional settings, which are not. Reliance on familial homes can be precarious if, for example, parents who have acted as caregivers for their adult children become elderly. In California, there is no waiting list for Medicaid-funded Home and Community-Based Services, so, accordingly, access to the kinds of intensive services and supports that can prevent unnecessary institutionalization is better than in most other states. With that said, the fact that supportive services are generally Medicaid-funded creates a significant access barrier for undocumented individuals with disabilities.

Table 3: Intellectual and Developmental Disabilities, North Bay Regional Center²⁰

Geography	Fewer consumers live in developmental centers	More children live with families	More adults live in home settings	Fewer children live in large facilities (more than 6 people)	Fewer adults live in large facilities (more than 6 people)
North Bay Regional Center	0.11%	99.63%	81.71%	0.04%	1.92%
State Average	0.07%	99.51%	80.48%	0.00%	0.95%

Table 4: Type of Setting by Race or Ethnicity, North Bay Regional Center²¹

Type of Setting	Total Served	% White	% Black	% Asian	% Hispanic	% Other or Multi-Racial
Home	8,462	36.2%	7.6%	6.2%	32.3%	17.7%
ILS/SLS	1,344	70.4%	12.0%	2.2%	8.6%	6.9%
Institutions	11	45.5%	45.5%	0%	9.1%	0%
Med/Rehab/Psych	68	76.5%	9.6%	2.9%	5.9%	9.6%
Other	46	54.3%	17.4%	2.2%	6.5%	19.6%
Residential	1,001	72.0%	9.5%	5.4%	6.9%	6.2%

Psychiatric Disabilities

Mental health services in California are primarily provided at the county level. Full Service Partnerships are the primary vehicle for the provision of services for individuals with intensive services and supports needs. Assertive community treatment (ACT), the most intensive community-based services for stabilizing community living, are available in Sonoma County.

3.b. Describe the range of options for people with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Supportive services options in Sonoma County is described above. With respect to access to affordable housing, voucher programs operating locally have waiting list preferences for persons with disabilities and, in one instance, specifically for persons with disabilities are living in institutions or are at risk of institutionalization. Additionally, some of the Other Multifamily housing in the region is Section 811 housing for persons with disabilities. Additionally, permanent supportive housing programs, described

²⁰ <https://nbrc.net/wp-content/uploads/NBRC-2020-PC-Year-End-Report.pdf>

²¹ <https://nbrc.net/wp-content/uploads/NBRC-2021-Expenditure-Report-1.pdf>

in greater detail in the Contributing Factors Appendix, operate in both counties. California's Mental Health Services Act provides some dedicated funding for supportive housing, and county governments administer those funds.

3. Disparities in Access to Opportunity

4.a. To what extent are people with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

16.8% of Sonoma County residents have a disability and may require accessible housing,²² and these residents need ADA-compliant government services in order to ensure that they can access stable housing.

Sonoma County conducted an ADA Self-Evaluation and Transition Plan Update in December 2009 and set forth a 12-year preliminary schedule for barrier removal. Now, in 2022 and after the 12-year preliminary schedule has sunset, a number of improvements appear to have been made. For example, the County website is routinely tested using "Wave," a web accessibility evaluation tool provided by Web AIM, and the County monitors its own compliance with Siteimprove's ADA compliance checker. In addition, there is a designated ADA Coordinator, grievance procedure, website accessibility policy and additional policies that appear to mirror the objectives laid out in the transition plan. This progress is particularly promising given that Sonoma County has its own community development commission, Sonoma County Community Development Commission (SCCDC), which administers affordable housing programs in the area.²³ Accordingly, any cities within the County are governed by the transition plan.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Sonoma County provides ADA Self-Evaluation and Transition Plan documents. These reports outline the accessibility for public and private facilities, deem facilities inaccessible based on defined criteria, and provide specific guidelines to modify spaces under Title II of the Americans with Disabilities Act. These plans also ensure that public right-of-way spaces, such as roads and sidewalks, do not impose undue burdens on residents with disabilities. Additionally, Sonoma County's Commission appoints an ADA Coordinator to monitor and enforce accessibility standards.

iii. Transportation

Sonoma County

Sonoma County Transit offers bus zones that connect the county's regions to Santa Rosa. The bus system is wheelchair-accessible, as it offers lifts for standard buses and select buses have the ability to be lowered.²⁴ Sonoma County Transit also offers paratransit services for people with disabilities, allowing for additional accessible options for the county's residents, and the program connects to regional transit networks. Sonoma County Transit maintains coordination with regional and city transportation services.

²² Association of Bay Area Governments, *Housing Needs Data Report: Sonoma*, April 2021, https://storage.googleapis.com/proudcity/sonomaca/uploads/2021/04/ABAG_MTC_Housing_Needs_Data_Report_Sonoma.pdf

²³ *Id.* at 72.

²⁴ Sonoma County Transit, *Accessibility*, <https://sctransit.com/accessibility/>

One general concern relates to the lack of transportation access in the county's rural areas, particularly those in western Sonoma County along the coast. Reduced transit in these areas has raised accessibility concerns, especially when coordinating a regional natural disaster response. Expanding access to transportation networks throughout Sonoma County would support adults with disabilities who live in the county's rural regions.

iv. Proficient schools and educational programs

Sonoma County experiences large proficiency disparities within their public-school system, and this affects the county's students with disabilities. The county's highest performing schools do not correlate with where children with disabilities reside.

In Sonoma County, as the highest concentrations of students with disabilities do not correspond with the county's highest-performing public schools. While students with disabilities reside around the city, there are very few students in the county's southwest region. This area correlates with the highest school proficiency index, and this may suggest inaccessibility for students with disabilities. Furthermore, Sonoma County schools experience a much wider discipline gap than the state's average. 8.1% of Sonoma County students with disabilities faced suspension in the 2018-19 school year, compared to just 3.6% of students without disabilities.²⁵ Not only did the suspension rate double for students with disabilities, but Sonoma County's suspension rate fell 1.5% above the statewide average.²⁶ This limits the ability for many students with disabilities to receive consistent educational interactions, and correlates with indicators that hinder future educational performance, economic mobility, and self-esteem.

v. Jobs

As the tables below reflect, persons with disabilities have significantly lower access to gainful employment than do people who do not have disabilities.

Table 5: 2019 ACS 1-year Estimates, civilian noninstitutionalized population with disabilities aged 16-64, employment and disability, Napa and Sonoma Counties

County	% in Labor Force	% Employed
Napa	52.8%	44.2%
Sonoma	49.9%	48.0%

Table 6: 2016 Employment Metrics for Adults with Intellectual and Developmental Disabilities, North Bay Regional Center

Regional Center	Average Annual Wages	Percentage of Consumers with Earned Income	Percentage of Adults with Integrated Employment As a Goal in Their Individual Program Plan
North Bay Regional Center	\$10,855	27%	36%

²⁵ KidsData, *Students Suspended from School, by Disability Status*, May 2021, <https://www.kidsdata.org/topic/2197/suspensions-disability/trend#fmt=2712&loc=2,338&tf=126,128&ch=1417&pdist=24>

²⁶ *Id.*

4.b. Describe the processes that exist in the jurisdiction and region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

i. Government services and facilities

Sonoma County and the city of Petaluma all have accessibility tabs on the main pages of their local government websites. Sonoma County links to pages that have both information on website accessibility and broader ADA compliance while those for the city of Petaluma focus narrowly on website accessibility. Petaluma has some information about reasonable accommodations elsewhere on their website, but that information is not necessarily intuitive to find.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Sonoma County and the city of Petaluma have clear information on their websites about how to request sidewalk accessibility modifications. Some of these request processes have a broader ambit than just sidewalk accessibility.

iii. Transportation

The Sonoma County Transportation Authority has robust accessibility information on its website, but those dedicated pages are buried and not easy to find from each site's home page.

iv. Proficient schools and educational programs

School districts within the region are inconsistent in the amount and type of information provided about how to request reasonable accommodations.

v. Jobs

Information about reasonable accommodations in the employment context in Sonoma County is highly fragmented due to the decentralized tourism and agricultural-based economy of the region. Information about reasonable accommodations in public sector employment can largely be found through the same means as information about reasonable accommodations policies for government services and facilities discussed above.

4.c. Describe any difficulties in achieving homeownership experienced by people with disabilities and by people with different types of disabilities in the jurisdiction and region.

Data regarding housing tenure by disability status in the region is not available. Two countervailing trends suggest different conclusions regarding access to homeownership. First, persons with disabilities are more likely to be elderly than people who do not have disabilities, and elderly people are more likely to be homeowners than are younger people. Second, persons with disabilities are disproportionately low income, and low-income people are more likely to be renters than are higher income people. With that said, in terms of barriers to initial access to homeownership, it is likely that the second factor is more significant, as older people, in most instances, likely achieved homeownership prior to having a disability.

5. Disproportionate Housing Needs

5.a. Describe any disproportionate housing needs experienced by people with disabilities and by people with certain types of disabilities in the jurisdiction and region.

Data on cost burden and other housing problems for people with disabilities is not available, but it is likely that, due to their disproportionately low incomes, persons with disabilities are disproportionately likely to experience cost burden, in particular.

Disability and Access Issues Contributing Factors

Please see the Appendix for the following Contributing Factors to Fair Housing Enforcement, Outreach Capacity, and Resources:

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

- *A charge or letter of finding from HUD concerning a violation of a civil rights-related law;*
- *A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;*
- *Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;*
- *A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;*
- *A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing;*
- *Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.*

There were no unresolved findings, compliance/conciliation/settlement agreements, claims, complaints, or lawsuits regarding fair housing and civil rights laws in Santa Rosa or Sonoma County.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex, including Gender, Gender Identity, and Gender Expression
- Marital status
- Source of income
- Sexual orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age
- Genetic information

In addition, FEHA contains similar reasonable accommodations, reasonable modifications, and accessibility provisions as the Federal Fair Housing Amendments Act. FEHA explicitly provides that violations can be proven through evidence of the unjustified disparate impact of challenged actions and inactions and establishes the burden-shifting framework that courts and the Department of Fair Employment and Housing must use in evaluating disparate impact claims.

The Unruh Civil Rights Act provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, and medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. In practice, this has meant that the law protects against arbitrary discrimination, including discrimination on the basis of personal appearance.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person’s race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can include: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act may not be imposed for speech alone unless that speech itself threatened violence.

California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.

The California Tenant Protection Act (AB 1482; California Civil Code 1946.2, 1947.12 and 1946.13)²⁷ prohibits tenants from being evicted without “just cause,” which means that tenants who have lived in a unit for at least a year may only be evicted for enumerated reasons, such as failure to pay rent, criminal activity or breach of a material term of the lease. The law also caps rent increases at 5% for a period of 10 years.

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
- Housing for extremely low income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

²⁷ California Legislative Information, *AB-1482 Tenant Protection Act of 2019: tenancy: rent caps*, October 2019, https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1482

Although the FEHA purports to protect against source of income discrimination, the provision has been largely toothless. In October of 2019, the governor of California signed into law SB 329, prohibiting discrimination in housing based on source of income statewide.

Jurisdiction Ordinances

Petaluma

The Petaluma AIDS Nondiscrimination Ordinance (Petaluma Mun. Code §8-32-010) prohibits discrimination and harassment in housing practices because a person has AIDS or a related condition, or HIV infection.

Sonoma County

The Sonoma County Code of Ordinances (Sonoma County Mun. Code § 23-90-010, et seq.) provides for specific procedures for requesting reasonable accommodations under the FHA and FEHA.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Department of Fair Employment and Housing (DFEH)

The California DFEH is a state agency dedicated to enforcing California's civil rights laws. Its mission targets unlawful discrimination in employment, housing and public accommodations, hate violence, and human trafficking. Victims of discrimination can submit complaints directly to the department. DFEH is also a HUD Fair Housing Assistance Program (FHAP) agency and receives funding from HUD to enforce fair housing laws.

Fair Housing Advocates of Northern California (FHANC)

Fair Housing Advocates of Northern California is a private 501(c)(3) nonprofit organization with a stated mission of ensuring equal housing opportunity and educating communities on the value of diversity in their neighborhoods. FHANC is also a grantee under HUD's Fair Housing Initiatives Program (FHIP), which means that it receives funding from HUD to assist victims of housing discrimination. FHANC provides fair housing counseling services, fair housing complaint investigation, and assistance in filing fair housing administrative complaints to residents of Sonoma, Solano, and Marin counties. FHANC also offers counseling and education programs on foreclosure prevention and pre-purchase homebuying.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Please see the Appendix for the following Contributing Factors to Fair Housing Enforcement, Outreach Capacity, and Resources:

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law

V. Fair Housing Goals and Priorities

A. Regional Goals

VIII. Increase the Supply of Affordable Housing in Higher Opportunity Areas and Areas with Ongoing or Threatened Displacement.

As reflected in data in this Assessment showing high rates of housing cost burden and in jurisdictional Regional Housing Needs Allocations (RHNAs) identifying significant unmet needs among extremely low- and very low-income households, increasing the supply of affordable housing throughout and Sonoma Counties is a top priority. By strategically targeting efforts at higher opportunity areas and places with ongoing or threatened displacement, the collaborating jurisdictions can also work to redress patterns of segregation in the region.

e. Promote affordable housing bond issues at multiple levels of government.

Affordable housing bonds are one of the primary means that local governments have at their disposal to obtain funds that can be used to promote affordable housing development. Although approval of bond issues ultimately rests with the voters, local government can still proactively to educate voters about the urgent need for more affordable housing and the costs of inaction.

f. Adopt or modernize inclusionary housing and commercial linkage fee ordinances.

Inclusionary housing can be an effective tool to increase affordable housing supply while also ensuring that new affordable housing units are located where other private sector development is occurring, i.e., in areas that are typically either existing higher opportunity areas or in gentrifying areas. But inclusionary housing can fail to live up to its potential when set-aside requirements and developer incentives are out of balance (thus deterring all private development), when income targeting for units is so high that the households that are most in need do not benefit, and when large categories of development are exempt from the coverage of ordinances. Jurisdictions in Napa and Sonoma Counties should assess and update their inclusionary housing ordinances to ensure that they are not subject to any of these pitfalls. Additionally, commercial linkage fees, which are less commonly in use, can also be an effective way of leveraging private investment to support affordable housing. Jurisdictions that do not have commercial linkage fees should adopt such fees and provide that a significant portion of the proceeds are dedicated to affordable housing.

g. Provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 100% AMI to develop accessory dwelling units (ADUs) with affordability restrictions on their property.

ADUs are now allowed in all participating jurisdictions, with varying restrictions. Local governments should consider providing financial assistance or tax incentives in order to incentivize homeowners to make their ADUs affordable to lower income tenants at or below 60% of the area median income and maintain the affordability through an affordable housing covenant. Because it can be difficult for homeowners to access bank financing to build ADUs, there may be a need for such incentives among homeowners. As a condition of receiving assistance, jurisdictions should also require homeowners to attend fair housing training and to maintain records that facilitate audits of their compliance with non-discrimination laws. The need to educate individual homeowners, who do not have experience as landlords and knowledge of the law, may prevent unintentional and intentional violations of fair housing laws.

- h. Prioritize publicly owned land and reduce permit fees for affordable housing.*

High land costs in the region, coupled with ambitious RHNA goals, will require jurisdictions to identify public land that is suitable for affordable housing development. Land donation and reduced permit fees will reduce the cost of developing affordable housing.

IX. Meet the Housing and Services Needs of Migrant and Year-Round Farmworkers.

Farmworkers are among the most vulnerable populations in Napa and Sonoma Counties, and highly disproportionate shares of farmworkers are people of color and have limited English proficiency. Targeted efforts to meet the housing and services needs of farmworkers are critical fair housing initiatives.

- d. Reform zoning and land use laws to permit safe farmworker housing in areas where agricultural uses predominate.*

In some instances, the legal status of existing farmworker housing may be ambiguous. Zoning and land use laws should clarify that farmworker housing is allowed where agricultural uses predominate. Doing so could both help increase the supply of farmworker housing and make it easier to enforce basic safety standards with respect to existing farmworker housing.

- e. Target through preferences or affirmative marketing farmworkers for affordable housing opportunities in towns and cities.*

Some farmworkers may prefer to reside in towns and cities throughout Napa and Sonoma Counties rather than living in dedicated farmworker housing in rural areas. Living in nearby cities may increase educational opportunities for their children and employment opportunities for both themselves and their partners. Tenant selection preferences for and affirmative marketing of affordable housing opportunities to farmworkers may help increase access to opportunity for farmworkers.

- f. Study means of increasing access to supportive services in rural parts of Napa and Sonoma Counties.*

The farmworker population of the region disproportionately resides in rural, unincorporated areas that are isolated from the physical office locations of both government and nonprofit service providers. Interventions like mobile outreach and the creation of satellite offices may help to bridge that gap.

X. Reduce Zoning and Land Use Barriers to the Development of Housing That Is Affordable to Low-Income Households, Including Low-Income People of Color and Low-Income Persons with Disabilities.

Zoning and land use laws help shape the built environment, and there is a long history of zoning and land use laws to restrict access to housing for people of color and persons with disabilities in the United States. Targeted reforms can leverage the changing landscape of state law to reduce housing cost burden, decrease segregation, and help jurisdictions meet their RHNA goals.

- a. Create affordable housing overlay districts to enable multifamily housing with a significant affordable component in higher opportunity areas.*

In order to meet RHNA goals and take effective action to reduce segregation, it will be critical for local governments to reduce zoning barriers to mixed-income and 100% affordable development. Overlay tools are an option for doing so that helps avoid the “opportunity cost” of scarce sites being dedicated to market-rate development. The geographic coverage of overlay districts should target higher opportunity areas while also keeping environmental concerns, like fire risk, in mind. The appropriate level of density for overlay districts may vary from municipality to municipality with lower-density multifamily housing being a viable option for affordable housing development in smaller towns while medium-density or high-density multifamily housing may be necessary in cities.

- b. For qualifying jurisdictions, as per California SB10, adopt an ordinance to allow up to ten dwelling units on any parcel that is within a transit-rich area or urban infill site.*

Under SB 10, jurisdictions can approve an ordinance to allow the development of up to 10 units on any qualifying site and the development would be exempt from the California Environmental Quality Act (CEQA). This would enable upzoning without the delays common to the CEQA process.

- c. Update the zoning codes across the region to reflect recent changes to California laws that are designed to increase affordable housing.*

Recent California legislation now allows as-of-right duplexes and accessory dwelling units (ADUs) to be built in most neighborhoods across the state. Zoning codes across the region should be amended to reflect new state laws designed to increase the supply of affordable housing.

XI. Increase Access to Opportunity for Housing Choice Voucher Families

Housing Choice Vouchers can be a tool for reducing homelessness, reducing housing cost burden, and dismantling segregation. However, strategic policy interventions are necessary for that to be the case in practice.

- a. Advocate for housing authorities to adopt small area fair market rents or exception payment standards for regional sub-markets.*

Housing authorities in Napa and Sonoma Counties generally rely upon region-wide payment standards in their administration of the Housing Choice Voucher program. Region-wide payment standards are typically inadequate to enable households to rent in higher opportunity neighborhoods while also enabling price gouging by landlords in low-income neighborhoods. Local governments in the region should advocate for their housing authorities to choose from among multiple good options for increasing the purchasing power of vouchers in higher opportunity areas. These include both small area fair market rents and exception payment standards for regional sub-markets.

- b. Engage municipal attorneys in enforcing prohibitions against source of income discrimination.*

Discrimination against voucher holders violates state laws, but noncompliance remains common. City and county attorney offices can play a role in increasing compliance by either enforcing state law against landlords that violate the rights of voucher holders or, if jurisdictions adopt source of income discrimination protections of their own, enforcing local ordinances.

XII. Prevent Displacement by Preserving Affordable Housing and Protecting Tenants' Rights.

Rising housing costs in the broader Bay Area have fueled displacement with members of protected classes, including people of color, persons with disabilities, and large families in need of units with three or more bedrooms bearing the brunt of the crisis. Local government has a role to play in intervening to stop the cycle of displacement.

a. Expand funding for tenants in landlord-tenant proceedings.

Tenant protections are more effective in preventing displacement when tenants have access to legal services. Jurisdictions in the region should explore collaborating to expand funding for tenant representation and the capacity of legal services organizations to meet the full need in landlord-tenant proceedings. An important first step in advancing this strategy would be to assess the current levels of legal services provided to vulnerable tenants and how jurisdictions may better coordinate their programs to avoid duplication of services to meet community needs. This strategy will require upfront study, but this investment may improve existing programs and help avoid unnecessary evictions and reduce displacement, and a variety of social costs and strain on other public services. The potential for mass evictions, displacement, and homelessness caused by the COVID-19 pandemic, and immediate efforts to supplement existing legal services and other assistance to prevent these outcomes, has elevated the need to explore making existing program improvements and exploring expanding funding for these legal services beyond the pandemic. A future source to explore funding strategies may include the Bay Area Housing Finance Authority.

b. Study the viability of rent stabilization.

High rent increases can be massively destabilizing for low-income families. Although A.B. 1482 provides some protection against large rent increases, the increases that it allows – particularly when repeated year after year – can quickly render housing unaffordable to long-time tenants. High inflation compounds the problem as 10% may now be the effective cap on rent increases under A.B. 1482 rather than 5% plus inflation. Local governments should study whether rent control would work in their community, particularly in light of the ways in which California's Costa-Hawkins Act would limit the scope of rent control. Ultimately, the policy may be more helpful in communities that have a significant supply of pre-1995 multifamily housing than it would be in other areas.

c. Track and collaborate to preserve affordable housing developments with expiring subsidy contracts countywide.

Owners of affordable housing developments located in higher opportunity areas or in areas that are experiencing rapid gentrification often have the greatest incentive not to renew subsidy contracts. This is because rents in these areas may exceed payment standards for affordable housing developments, which are based on the regional fair market rent. At the same time, it is generally more cost-effective to preserve existing affordable housing than it is to build new affordable housing, particularly in areas with high land costs. Jurisdictions and housing authorities should track the expiration dates of affordable housing subsidy contracts with an emphasis on developments that are located in higher opportunity or rapidly gentrifying areas. When developments with expiring subsidies are identified, jurisdictions should collaborate with these partners to engage in early outreach to and work with owners to encourage preservation of these units.

- d. *Create a right of first refusal for manufactured home park residents to purchase their communities when owners seek to sell or redevelop their properties.*

Manufactured home parks are one of the most important sources of unsubsidized affordable housing in the region, particularly in its more rural areas. By providing homeowners with an opportunity to purchase their communities with technical assistance from nonprofit organizations such as ROC USA,²⁸ jurisdictions can help preserve these community assets for the long term.

XIII. Reduce Homelessness by Expanding the Supply of Permanent Supportive Housing

- a. *Prioritize HOME and CDBG Funds for Developments That Include Permanent Supportive Housing Units.*

Local government contributions of HOME and CDBG funds are often essential for the viability of LIHTC applications from affordable housing developers to state housing finance agencies. By prioritizing those funds for proposals that would include permanent supportive housing, local governments can help increase the supply of such housing. Permanent supportive housing set-asides targeting 10-25% of units would strike an appropriate balance between meeting the volume of need for permanent supportive housing while avoiding the segregation of persons with disabilities in what would amount to congregate settings.

- b. *Advocate for Public Housing Authorities to Adopt Preferences in their Housing Choice Voucher Program for Individuals with Disabilities Who Are Institutionalized or at Risk of Institutionalization.*

Admissions preferences, both for the Housing Choice Voucher program and for public housing, can be a powerful way of creating access to affordable, integrated housing for persons with disabilities. Crafting Olmstead preferences, which target persons with disabilities who are institutionalized or are at risk of institutionalization, can maximize the benefits of preferences by serving those who are at the greatest risk of not living in integrated housing.

XIV. Increase Support for Fair Housing Enforcement, Education, and Outreach.

Nonprofit fair housing organizations and legal services providers play a critical role in fair housing enforcement, education, and outreach, and the County's support is essential to ensuring that they are able to meet the needs of victims of discrimination. By helping these organizations support their operations, jurisdictions can ensure that groups can address critical emerging issues, like those that have stemmed from the COVID-19 pandemic. If additional resources are identified, increasing the level of support for fair housing enforcement, education, and outreach could help nonprofit partners adopt more proactive strategies that more effectively reduce housing discrimination over the long term.

B. Petaluma Goals

- J. **Conduct more robust affirmative marketing for all publicly supported housing units, including units created under the Low-Income Housing Tax Credit (LIHTC) program.**

In Petaluma, white households reside in all categories of publicly supported housing at rates higher their share of the income-eligible households. Hispanic households are underrepresented in all categories of publicly supported housing in relation to their share of income-eligible households. An affirmative marketing plan with better outreach to Hispanic residents will ensure that there is more equitable representation in publicly supported housing units.

²⁸ Information on ROC USA can be found here: <https://www.rocusa.org/>

II. Reexamine land use and zoning measures to ensure that the City of Petaluma will be able to meet its Regional Housing Needs Allocation (RHNA) requirements.

There are few areas in Petaluma that permit medium or high-density development. Those areas that permit multifamily housing are unevenly distributed on the southside of Highway 1010 while single-family zoning predominates in the northern side. Additionally, R-3 districts, the predominant zoning district for multi-family housing, only permits up to twelve units per acre. Petaluma's land use and zoning measures to support affordability and high-density housing are insufficient to absorb its share of the RHNA and otherwise promote equitable housing.

VI. Contributing Factors

Access for students with disabilities to proficient schools

Sonoma County experiences large proficiency disparities within their public-school systems, and this affects the counties' students with disabilities. The county's highest performing schools do not correlate with where children with disabilities reside. In Sonoma County, as the highest concentrations of students with disabilities do not correspond with the county's highest-performing public schools. While students with disabilities reside around the city, there are very few students in the county's southwest region. This area correlates with the highest school proficiency index, and this may suggest inaccessibility for students with disabilities. Furthermore, Sonoma County schools experience a much wider discipline gap than the state's average. 8.1% of Sonoma County students with disabilities faced suspension in the 2018-19 school year, compared to just 3.6% of students without disabilities.²⁹ Not only did the suspension rate double for students with disabilities, but Sonoma County's suspension rate fell 1.5% above the statewide average.³⁰ This limits the ability for many students with disabilities to receive consistent educational interactions, and correlates with indicators that hinder future educational performance, economic mobility, and self-esteem.

Access to financial services

The Federal Deposit Insurance Corporation (FDIC) provides data on the location of bank branches. While FDIC data reports on physical access to financial institutions within cities, counties, and states, a more useful measurement to track disparities would include neighborhood-level access. Reduced access to full service, brick-and-mortar bank branches increases likelihood of 1) discrimination in lending and credit services, and 2) concentrated economic immobility. Financial institutions may be more likely to engage in predatory practices if physical access has diminished, which may also further racial and socioeconomic inequities. The following tables indicate physical access to financial services within Sonoma municipalities and the county at-large:

FDIC-Regulated Bank Branches by Sonoma County Municipality in 2022³¹

Municipality	Population ³²	% Minority Population	FDIC-Regulated Full-Service Brick and Mortar Branches	FDIC-Regulated Non-Brick and Mortar Branches
Santa Rosa, CA	178,127	48.8%	38	11
Petaluma, CA	59,776	33.4%	10	1
Rohnert Park, CA	44,390	41%	8	0
Windsor, CA	26,344	46.7%	4	2
Healdsburg, CA	11,340	36.8%	11	0
Sonoma, CA	10,739	27.9%	11	0

²⁹ KidsData, *Students Suspended from School, by Disability Status*, May 2021, <https://www.kidsdata.org/topic/2197/suspensions-disability/trend#fmt=2712&loc=2,338&tf=126,128&ch=1417&pdist=24>

³⁰ *Id.*

³¹ Federal Deposit Insurance Corporation, *BankFind Suite: Find Institutions by Name & Location*, <https://banks.data.fdic.gov/bankfind-suite/bankfind>.

³² US Census Bureau, *QuickFacts*, July, 2021, <https://www.census.gov/quickfacts/fact/table/US/PST045219>

Cloverdale, CA	8,996	42.2%	2	0
Cotati, CA	7,584	25.9%	1	0
Sebastopol, CA	7,521	21.7%	6	0
County Total	488,863	40.6%	99	13

Sonoma residents appear to have reasonable access to financial services, even in the counties' rural regions. However, Santa Rosa's financial services are distributed inequitably and correlate with the city's segregated neighborhood demographics. More banks are present in the city's eastern region than in its western region,³³ and HUD AFFH data indicates that the city's western region is home to most of the city's majority-minority neighborhoods. While Santa Rosa's western region still has access to financial services, this adds additional racial disparities to accessible financial services.

Geographic distribution contributes to inaccessible financial services, but this alone does not reflect the financial barriers to these resources. The costs of opening a bank account and the ramifications of overdraft fees exclude many low-income residents from accessing financial services. To combat ongoing unbanked and underbanked rates, members of the California State Assembly recently introduced AB 1177 to establish a public banking system. This system expands access to financial services by eliminating the consumer costs to open an account and use its services, as well as reducing overdraft fees.³⁴ Communities of color and low-income people experience concentrated effects of California's unbanked and underbanked rates, and the legislative text indicates that "41.1 percent of all Hispanic-identifying households were unbanked or underbanked in 2017 compared to 15.5% of white-identifying households" statewide.³⁵ In addition to prioritizing equitable distribution of financial services across Sonoma County, public banking would enhance economic opportunity for the counties' communities of color and low-income residents.

Access to publicly supported housing for persons with disabilities

Across jurisdictions, persons with disabilities have inconsistent levels of access to publicly supported housing programs that feature hard units. By contrast, persons with disabilities appear to be able to obtain Housing Choice Vouchers at rates that exceed their proportion of the income-eligible population across all of Sonoma County. As discussed in the Disability and Access section of this assessment, persons with disabilities appear to be underrepresented in Other Multifamily programs in the city of Santa Rosa, and in the Project-Based Section 8 program in Sonoma County. Persons with disabilities do not appear to lack access to hard units of affordable housing in Petaluma, and, as discussed in the Publicly Supported Housing section of this assessment, there is no traditional public housing in Sonoma County. Data on the degree to which persons with disabilities are able to access LIHTC developments, developments assisted with state or local funds, or inclusionary housing units is not available.

Access to transportation for persons with disabilities

Sonoma County Transit offers bus zones that connect the county's regions to Santa Rosa. The bus system is wheelchair-accessible, as it offers lifts for standard buses and select buses have the ability to be lowered.³⁶ Sonoma County Transit also offers paratransit services for people with disabilities,

³³ Santa Rosa Metro Chapter, *Santa Rosa Metro Area Banks*, <https://web.santarosametrochamber.com/Banks?xsort=true>

³⁴ The Climate Center, AB 1177 Fact Sheet, March 2021, <https://theclimatecenter.org/wp-content/uploads/2021/04/AB-1177-Santiago-Fact-Sheet.pdf>

³⁵ California Legislative Information, AB-1177 California Public Banking Option Act. October, 2021, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1177

³⁶ Sonoma County Transit, *Accessibility*, <https://sctransit.com/accessibility/>

allowing for additional accessible options for the county's residents, and the program connects to regional transit networks. Sonoma County Transit maintains coordination with regional and city transportation services.

One general concern relates to the lack of transportation access in the county's rural areas, particularly those in western Sonoma County along the coast. Reduced transit in these areas has raised accessibility concerns, especially when coordinating a regional natural disaster response. Expanding access to transportation networks throughout Sonoma County would support adults with disabilities who live in the county's rural regions.

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

This assessment looks specifically at two types of admissions and occupancy policies and procedures that can disproportionately limit access to housing for individuals and families based on race and ethnicity. First, overly restrictive criminal background screening policies are more likely to deny housing to Black and Hispanic households than they are to white and Asian households due to underlying disparities in the criminal justice system. HUD has outlined features of criminal background screening policies that may violate the Fair Housing Act in its guidance. In particular, HUD considers unlimited or unreasonably long look-back periods that result in the consideration of offenses that took place in the distant past and the consideration of arrest records to be problematic. In its Administrative Plan, the Sonoma County Housing Authority does not limit look-back periods and explicitly states that "arrest warrants" may be considered credible evidence of criminal activity. A more inclusive practice would be rule out consideration of arrest records entirely.

The second type of policy considered in this assessment is residency preferences. When the demographics of a housing authority's service area or a local government's jurisdiction are less diverse than those of the broader regional housing market, residency preferences – or live-work preferences, which tend to slightly decrease the disproportionate impact of residency preferences – tend to disproportionately exclude people of color and reinforce existing demographic patterns. The Sonoma County Housing Authority does not have a live-work preference though it does have an "in-place" preference that takes effect under certain circumstances (generally when voucher lease-up is difficult). This policy inherently prioritizes current residents, but the extent of any disproportionate impact likely depends on the proportion of the time during which the policy is implemented in practice. Lastly, although there is no general information about such a live-work preference on the website of the Town of Healdsburg, it appears from the Mill District Affordable Housing Design Charrette Minutes linked to in the footnote below that the Town has had a live-work preference in place.³⁷ Healdsburg has lower concentrations of Black and Asian or Pacific Islander residents than both Sonoma County as a whole and the broader Bay Area.

Availability of affordable units in a range of sizes

Sonoma County's overcrowding rates remain a consistent issue for residents, and this tends to disproportionately affect the county's communities of color. More specifically, over twenty-five percent of Latino residents and nearly twenty percent of Asian Pacific Islander residents reported living in overcrowded rental conditions, compared to just three percent of white rental units.³⁸ Overcrowding also concentrates heavily in Santa Rosa's western neighborhoods, thus, the HUD AFFH data indicates that Latino residents disproportionately tend to reside in overcrowded portions of the city.³⁹

³⁷ Mill District Affordable Housing Design Charrette Minutes, July 2018, <https://www.ci.healdsburg.ca.us/AgendaCenter/ViewFile/Item/2887?fileID=4661>,

³⁸ Generation Housing, *State of Housing in Sonoma County*, January 2022, https://generationhousing.org/wp-content/uploads/2022/02/2022_Feb_SOH_Sonoma-County.pdf

³⁹ *Id.*

Furthermore, there is limited information on Section 8 housing availability for larger units, but the Sonoma Community Development Corporation's August 2021 lottery offered three-bedroom units in just four developments.⁴⁰ Sonoma County residents also wait on average between eight to ten years to access Section 8 housing and other subsidized programs.⁴¹

Additionally, both the limited capacities of larger housing units and increased rent burdens correspond with Sonoma County's reduced family residency rates. Since 2000, reports indicate that the number of households with children has decreased in most of Sonoma County's cities.⁴² The county's limited range of affordable units causes families to decide between living in overcrowded units or relocating outside the county.

Availability, type, frequency, and reliability of public transportation

1.72% of Sonoma County residents use public transportation to commute to work.⁴³ However, Sonoma County offers transit services that connect to the county's urban areas and to the rest of the Bay Area.

Sonoma County's three main public transportation systems are the Sonoma County Transit, the Sonoma-Marin Area Rail Transit (SMART), and the Santa Rosa CityBus. The Sonoma County Transit system operates within twenty bus lines that extend across Sonoma County, including north from Cloverdale, southwest from Occidental, and southeast from Petaluma and Sonoma City.⁴⁴ Although these bus systems reach across Sonoma County, headway times consistently take around 40 minutes to an hour, even on the most popular bus routes.⁴⁵ This undermines the Sonoma County Transit's reliability and frequency. Additionally, Sonoma County Transit fares increase proportionate to the number of zones a rider travels through, costing up to \$4.80 to travel across five regional zones of the county.⁴⁶ Recently, Sonoma County Transit buses have transitioned to fare-free programs. As of March 2022, Sonoma County Transit 24, 28, 32, 66, 67, and 68 bus lines do not require fees.⁴⁷ The Sonoma County Board of Supervisors is considering a proposal to expand the fare-free bus program to other Sonoma County Transit lines.⁴⁸ These programs support accessible and affordable bus ridership, ensuring that socioeconomic factors do not impose barriers to access.

The SMART system provides an opportunity to connect the county's public transit directly with the Bay Area's surrounding counties. Despite the program's recent implementation, this inter-regional transit option offers thirty-to-sixty minute headway times on weekdays.⁴⁹ SMART Transit also operates on the weekends, and riders can also store bicycles on trains for just five cents per ride.⁵⁰ Overall, this train system is an important step to connect Sonoma County residents with the rest of the Bay Area. The plan also incorporates the county's rural areas to regional transportation access, as SMART stations are expanding to reach Sonoma County's smaller towns such as Windsor, Cloverdale, and Healdsburg.⁵¹

⁴⁰ *Id.*

⁴¹ Laura Hagar Rush, SoCoNews, *Big changes coming to Section 8 housing process*, May 2019, https://soconews.org/cloverdale_reveille/news/big-changes-coming-to-section-8-housing-process/article_c217b636-7754-11e9-98e5-83d95935d892.html#:~:text=According%20to%20a%20recent%20press,wait%20much%20longer%20than%20that.

⁴² *Id.*

⁴³ DataUSA, Sonoma County, <https://datausa.io/profile/geo/sonoma-county-ca>

⁴⁴ Sonoma County Transit, *Fares*, <https://sctransit.com/fares/>

⁴⁵ Sonoma County Transit, *Schedule*, https://sctransit.com/wp-content/uploads/2021/12/SCT_Schedule_44-48.pdf

⁴⁶ Sonoma County Transit, *Fares*, <https://sctransit.com/fares/>

⁴⁷ *Id.*

⁴⁸ Emmett Hopkins, the Press Democrat, *Close to Home: Fare-free transit delivers for riders and climate*, January 2022, <https://www.pressdemocrat.com/article/opinion/close-to-home-fare-free-transit-delivers-for-riders-and-climate/>

⁴⁹ Sonoma-Marin Area Rail Transit (SMART), *Schedules*, <https://www.sonomamarintrain.org/schedules-fares>

⁵⁰ Sonoma County Bicycle Coalition, *Bikes on SMART*, <https://www.bikesonoma.org/bikes-on-smart/>

⁵¹ Sonoma-Marin Area Rail Transit (SMART), *Stations*, <https://www.sonomamarintrain.org/stations>

Community Opposition

Sonoma County contributes to the Bay Area's Democratic majority, with 74.5% of county residents voting for the Democratic Party in the 2020 election cycle.⁵² However, statewide and county initiatives to alleviate California's affordable housing crisis remain unpopular, despite the COVID-19 pandemic's direct effects on the county's housing market.

Housing prices spike following the COVID-19 pandemic's onset in March 2020, as many out-of-county residents moved to the Bay Area's peripheral regions. Higher-income individuals and families composed the majority of Sonoma County's 13,200 new households, and this caused the market's average price to rise from 678,910 in March 2020 to 780,000 in May 2021.⁵³ In October 2021, Governor Newsom signed Senate Bill 9 into law that designates construction targets of affordable and market-rate units for county and municipal governments by the end of 2023.⁵⁴ However, recent proposals to develop affordable housing have faced backlash from community members, as Sonoma County Supervisor Gore indicated that the current proposal experiences "visceral opposition."⁵⁵

Community opposition to housing developments exacerbates the state's affordable housing crisis. According to Sonoma Developmental Center reports, white homeowners have a disproportionate influence on survey response rates regarding affordable housing and development.⁵⁶ This undermines the ability for communities of color and low-income people to advocate for housing solutions at the state and local levels.

Deteriorated and Abandoned Properties

In addition to ongoing displacement and gentrification across the Northern Bay Area, many Sonoma County residents continue to live in inadequate and unsafe housing conditions. The county's rent burdens and rising housing prices prevent tenants from addressing unlivable housing conditions. Economic constraints have forced residents to lack access to basic services and needs for their wellbeing, reducing the ability for tenants to fully address these concerns in both the short and long-term. Cities in Sonoma County provide code enforcement services to monitor and support residents in substandard living conditions.

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

As is the case throughout the country, domestic violence (DV) remains a pervasive problem in Sonoma County. Though the number of DV and battery cases reported to the Sonoma County Sheriff's office dropped starkly during the early months of the pandemic, most advocates believe this was a result of fear and lack of choice – a problem inherent in DV, but exacerbated by the pandemic.⁵⁷ Rates have since returned to pre-pandemic levels. Across the region, survivors of domestic violence are forced to make the decision between remaining within a physically or emotionally abusive relationship or

⁵² Sonoma County, *Official 2020 General Election Results*, November 3, 2020,

<https://results.enr.clarityelections.com/CA/Sonoma/107135/web.264614/#/summary>

⁵³ Ethan Varian, Sonoma Magazine, *Can You Afford to Live Here? A Look at Sonoma's Hot Housing Market*, August, 2021, <https://www.sonomamag.com/can-you-afford-to-live-here-a-look-at-sonoma-countys-hot-housing-market/>

⁵⁴ California Legislative Information, *SB-9 Housing development: approvals*, September 2021, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB9

⁵⁵ KSRO, Supervisor Gore: "Visceral Opposition" To Affordable Housing, November 22, 2021, <https://www.ksro.com/2021/11/22/supervisor-gore-visceral-opposition-to-affordable-housing/>

⁵⁶ Chase Hunter, Sonoma Index-Tribune, *Reality cheque on the SDC redevelopment proposals*, January 10, 2022, <https://www.sonomanews.com/article/news/reality-cheque-on-the-sdc/>

⁵⁷ Chase Hunter, Sonoma Index-Tribune, *Domestic violence reports dropped during pandemic lock down, but fear continued*, February 25, 2022, <https://www.sonomanews.com/article/news/domestic-violence-reports-dropped-during-pandemic-lock-down-but-fear-conti/>

household to ensure themselves access to housing or to adopt the risk of losing such shelter in order to escape this violence.

California state law protects victims of domestic violence, sexual assault, stalking, human trafficking, or abused elder or dependent adult who terminates their lease early. The tenant must provide written notice to the landlord, along with a copy of a temporary restraining order, emergency protective order, or protective order that protects the household member from further domestic violence, sexual assault, stalking, human trafficking, or abuse of an elder or dependent adult. Alternatively, proof may be shown by submitting a copy of a written report by a peace officer stating that the victim has filed an official report, or documentation from a qualified third party acting in their professional capacity to indicate the resident is seeking assistance for physical or mental injuries or abuse stemming from the abuse at issue. Notice to terminate the tenancy must be given within 180 days of the issuance date of the qualifying order or within 180 days of the date that any qualifying written report is made.

The county provides some limited information on resources for DV survivors on its website. Organizations like the Family Justice Center of Sonoma County, and the YWCA provide support and shelter to victims of DV.

Displacement of residents due to economic factors

Sonoma County's housing market continues to experience a shortage, and housing prices continue to accelerate despite the COVID-19 pandemic.⁵⁸ With more than half of Sonoma County residents allocating more than 30% of their incomes on housing costs, many residents were already vulnerable to displacement pre-pandemic.⁵⁹ More specifically, the University of California, Berkeley reported that more than half of Santa Rosa's households lived in neighborhoods that were susceptible to displacement due to the ongoing shortage and rising housing costs.⁶⁰ Sonoma County's vulnerability to natural disasters also poses threats to its housing market. The housing supply decreased by 5,300 homes following the 2017 fires, and this corresponded with the displacement of many longtime residents and an overall population decline.⁶¹ Overall, Sonoma County faces both typical and unique causes of displacement and rising housing costs.

Impediments to mobility

Municipality	HCV Waiting List Status	HCV Payment Standard for 2 Bedrooms	Housing Choice Voucher Lease Up Time	Source of Income Protection Law?
Santa Rosa, CA	Closed to New Applicants. ⁶²	Tenants pay 30-40% of their income per month. ⁶³	120 days.	Yes

⁵⁸ Ethan Varian, Sonoma Magazine, *Can You Afford to Live Here? A Look at Sonoma's Hot Housing Market*, August, 2021, <https://www.sonomamag.com/can-you-afford-to-live-here-a-look-at-sonoma-countys-hot-housing-market/>

⁵⁹ Robert Digitale, The Press Democrat, *Sonoma County ranks high for 'cost burdened,'* November 3, 2016, <https://www.pressdemocrat.com/article/business/sonoma-county-ranks-high-for-cost-burdened-renters/>

⁶⁰ California Housing Partnership, *Santa Rosa 2021 Affordable Housing Needs Report*, May, 2021, https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2021/05/Sonoma_Housing_Report.pdf

⁶¹ *Id.*

⁶² City of Santa Rosa, *The Section 8 Housing Choice Voucher Program*, <https://srcity.org/599/Housing-Choice-Voucher-Section-8>

⁶³ *Id.*

Sonoma County, CA	Closed to New Applicants. ⁶⁴	\$2,241 ⁶⁵	120 days.	Statewide: Yes
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California's statewide housing shortage contributes to the counties' largest impediment to mobility: lack of affordable housing. The counties' largest housing authorities are unable to extend their HCV waitlists, and the process of securing a voucher may take several years. The delays in securing subsidized housing programs limits residents' ability to reduce rent burden.

The California legislature implemented statewide source of income protections in January 2020.⁶⁶ Prior to the passage of this bill, there were no statewide protections that prevented landlords from discriminating against Section 8 voucher holders.⁶⁷ This program expanded fair housing options and accommodations for voucher participants and provided guidelines for landlords to support applicants.⁶⁸ Source of income protection laws have been difficult to implement at the local level, as Sonoma County officials were hesitant to support similar protections for Section 8 participants following the 2017 wildfires.⁶⁹ However, the City of Santa Rosa passed local protections that verified vouchers as a legitimate income source in 2019.⁷⁰

Additionally, Sonoma County is protected under HUD's Small Area Fair Area Markets program, allowing greater flexibility for Section 8 participants.⁷¹

Inaccessible government facilities or services

16.8% of Sonoma County residents have a disability and may require accessible housing,⁷² and these residents need ADA-compliant government services in order to ensure that they can access stable housing.

Sonoma County conducted an ADA Self-Evaluation and Transition Plan Update in December 2009 and set forth a 12-year preliminary schedule for barrier removal. Now, in 2022 and after the 12-year preliminary schedule has sunset, a number of improvements appear to have been made. For example, the County website is routinely tested using "Wave," a web accessibility evaluation tool provided by Web AIM, and the County monitors its own compliance with Siteimprove's ADA compliance checker. In addition, there is a designated ADA Coordinator, grievance procedure, website accessibility policy and additional policies that appear to mirror the objectives laid out in the transition plan. This progress is particularly promising given that Sonoma County has its own community development commission,

⁶⁴ Sonoma County Housing Authority, *Apply for Rental Assistance Wait List*, <https://sonomacounty.ca.gov/cdc/housing-authority/applicants/>

⁶⁵ *Id.*

⁶⁶ State of California Department of Fair Employment and Housing, *Source of Income FAQ*, February 2020, https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/02/SourceofIncomeFAQ_ENG.pdf

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ Kevin Fixler, Press Democrat, *Low-income renters face difficult search for housing in Sonoma County after October wildfires*, August 16, 2018, <https://www.pressdemocrat.com/article/news/low-income-renters-face-difficult-search-for-housing-in-sonoma-county-after/?ref=related>

⁷⁰ Will Schmitt, Press Democrat, *Santa Rosa OKs protections for low-income renters after making concessions to landlords*, September 25, 2019, <https://www.pressdemocrat.com/article/news/santa-rosa-oks-protections-for-low-income-renters-after-making-concessions/>

⁷¹ Center on Budget and Policy Priorities, *A Guide to Small Area Fair Market Rents (SAFMRs)*, May 2018, <https://www.cbpp.org/research/housing/a-guide-to-small-area-fair-market-rents-safmrs>

⁷² Association of Bay Area Governments, *Housing Needs Data Report: Sonoma*, April 2, 2021, https://srp-prod-public-pdfs.s3-us-west-2.amazonaws.com/TLRcDiiP_2EaFiMOveY8er1j_5o.pdf

Sonoma County Community Development Commission (SCCDC), which administers affordable housing programs in the area.⁷³ Accordingly, any cities within the County are governed by the transition plan.

Inaccessible public or private infrastructure

Sonoma County provides ADA Self-Evaluation and Transition Plan documents. These reports outline the accessibility for public and private facilities, deem facilities inaccessible based on defined criteria, and provide specific guidelines to modify spaces under Title II of the Americans with Disabilities Act. These plans also ensure that public right-of-way spaces, such as roads and sidewalks, do not impose undue burdens on residents with disabilities. Additionally, Sonoma County's Commission appoints an ADA Coordinator to monitor and enforce accessibility standards.

Lack of access to opportunity due to high housing costs

Sonoma County's rapid increase in housing costs correspond with trends across the state of California. As of 2021, the median home price in Sonoma County was \$780,000.⁷⁴ The county has experienced drastic increases in home prices since the COVID-19 pandemic's onset, and this trend exacerbates cost burdens for low-income residents.⁷⁵

Sonoma County's extremely low-income residents are most vulnerable to housing cost burdens. 65% of Sonoma County's residents earning extremely low incomes allocate half their annual income to pay for housing, which reflects severe cost burdens for Sonoma County's low-income tenants.⁷⁶ Additionally, most hourly wage earners only receive half the necessary income to afford a standard two-bedroom apartment in Sonoma County.⁷⁷ Moreover, a 2018 report indicated that residents of color were more likely to experience rent burden than Sonoma County's white residents.⁷⁸

Lack of affordable, accessible housing in a range of unit sizes

As discussed throughout this assessment, there is a significant overall lack of affordable housing throughout all of the jurisdictions of Sonoma County. For persons with disabilities who need mobility features in their homes, this deficit is exacerbated by the fact that the housing stock in Sonoma County is much more dramatically skewed towards single-family homes, which are not subject to the Fair Housing Act's design and construction standards, than the housing stock in the other metropolitan statistical areas in the broader Bay Area. 67.2% of housing units in Sonoma County. By contrast, just 49.6% of housing units in the San Francisco-Oakland-Berkeley, CA Metro Area and 52.6% of housing units in the San Jose-Sunnyvale-Santa Clara, CA Metro Area are detached single-family homes. Although the relative lack of multifamily housing makes it more difficult to find accessible housing, the preponderance of single-family homes is also associated with a greater share of units with more bedrooms, which, in turn, are suitable for families with children and individuals with live-in aides. In Sonoma County, 14.5% are while, in the San Francisco-Oakland-Berkeley, CA Metro Area and the San Jose-Sunnyvale-Santa Clara, CA Metro Area, the proportions are 22.7% and 17.6%, respectively.

Lack of affordable in-home or community-based supportive services

Based on the available information, it does not appear that Sonoma County lacks affordable in-home or community-based supportive services for residents who qualify for Medicaid or have SSI. Individuals

⁷³ *Id.* at 72.

⁷⁴h Ethan Varian, Sonoma Magazine, *Can You Afford to Live Here? A Look at Sonoma's Hot Housing Market*, August, 2021, <https://www.sonomamag.com/can-you-afford-to-live-here-a-look-at-sonoma-countys-hot-housing-market/>

⁷⁵ *Id.*

⁷⁶ California Housing Partnership, Sonoma County 2021 Affordable Housing Needs Report, May, 2021, https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2021/05/Sonoma_Housing_Report.pdf

⁷⁷ *Id.*

⁷⁸ North Bay Jobs and Justice, *The State of Working Sonoma*, Fall 2018, https://www.northbayjobswithjustice.org/State%20of%20Working%20Sonoma%202018_Final%20Report%20-Feb.pdf

who are ineligible for these programs, due to immigration status or other preclusive conditions, have a disparate lack of access to these services. Sonoma County provides affordable in home and community-based supportive services through the State's In-Home Supportive Services program to residents who are aged, blind or have a disability lasting longer than 12 months i.e. "permanent." This program is funded by California's Medicaid program: Medi-Cal. In home care providers offer a range of services including personal care services like bathing, cleaning services such as washing and meal prep, accompaniment to medical appointments and programs, paramedical Services, as ordered by a physician, and protective supervision. To obtain these services a person must first apply and wait 30 days for their application to be processed. Eligibility for this program is based on several conditions. First, an individual must be enrolled in Medicaid or receive Supplemental Security Insurance ("SSI"); eligibility for these programs is dependent on several factors including immigration status. Second, A person must also live in a home which is construed broadly to encompass hotels in addition to houses and apartments. Third, an individual must obtain a referral from a licensed medical professional. This requirement could restrict access if an individual does not have regular access to medical professionals. Last, the person must be at risk of outside placement. These services are publicly available on Sonoma County's web platforms but may reduce access for limited English proficient residents due to the lack of information provided in languages other than English. Moreover, because these services are tied to Medicaid and SSI, individuals living without documentation below the age of 50 are unable to access services. Projections estimate that undocumented Californians make up the largest group of the uninsured, with nearly 1.3 million individuals under the age of 65 lacking health insurance. Individuals within this group who have a disability do not have access to these services nor do individuals otherwise found to be ineligible for Medi-Cal coverage. Mexican and other Hispanic immigrant populations who lack documentation and are between the age of 50 and 26 are ineligible for health insurance and are most likely to be disproportionately harmed by lack of access to these services in Sonoma County where large populations of these ethnic groups reside.

Lack of affordable, integrated housing for people who need supportive services

There is a lack of affordable, integrated housing for individuals who need supportive services – more commonly called permanent supportive housing – in Sonoma County; however, that shortage is primarily reflective of the overall shortage of affordable housing in the counties. In fact, both through more established programs and through newer initiatives like Project Homekey, jurisdictions appear to be effectively prioritizing permanent supportive housing as a critical need within their broader affordable housing efforts. Moving forward, as jurisdictions attempt to meet ambitious Regional Housing Needs Allocation goals, it will be critical to leverage mixed-income development that is in or will be entering the pipeline in order to ensure the inclusion of scattered-site permanent supportive housing units within such development. That may provide a more inclusive and more integrated model for the future than Project Homekey, which primarily focuses on the development of 100% permanent supportive housing.

Lack of assistance for housing accessibility modifications

Housing rehabilitation programs that can be used for accessibility modifications appear to be in place in all jurisdictions throughout Sonoma County. However, current levels of funding may not be sufficient to meet total need, reliance on loans rather than grants may underserve the most vulnerable residents, and certain types of housing may not be eligible based on jurisdiction rules. That assistance is supplemented by the Disability Services & Law Clinic, which has a Housing Access Modification Program that provides free assistance. It is not clear whether renters can benefit from the program.

Lack of assistance for transitioning from institutional settings to integrated housing

A variety of nonprofit service providers assist individuals in transitioning from institutional settings to integrated housing in Sonoma County. Additionally, the networks for the provision of transition services typically operate, at least, on a countywide basis. As a result, what city or town one lives in within each

county does not appear to significantly influence what services individuals can receive. At the same time, physical office locations for service providers are more likely to be located in larger cities rather than in smaller town and rural unincorporated areas. The Disability Services & Legal Clinic operates a Housing Search Assistance Program that appears to serve residents of Sonoma County, and includes monthly workshops in Santa Rosa. Additionally, Buckelew Programs operates the Sonoma County Independent Living Program, which is limited to Sonoma County residents. This program is very specifically focused on assisting with transitions from “long-term 24-hour care settings” rather than just providing broad housing search assistance to persons with disabilities.

Lack of community revitalization strategies

Sonoma County and Petaluma dedicate significant time and funds to community revitalization. All make use of the federal government’s opportunity zone program to incentivize developers to build within economically disadvantaged neighborhoods. Sonoma County has three opportunity zones, one in the Highway 12 corridor in the Fetters Hot Springs-Agua Caliente area and two in Santa Rosa, one in Downtown and one in Roseland,

Sonoma County provides financial assistance for repairs for low-income owner-occupants of single-family or mobile homes and ADA modifications. The City of Petaluma provides financial assistance to rehabilitate single-family dwellings occupied primarily by low-income seniors and disabled individuals and replace inefficient furnaces in senior affordable housing communities.

Lack of local private fair housing outreach and enforcement

Lack of local private fair housing outreach and enforcement is not a contributing factor to segregation and various kinds of fair housing issues. There is a number of legal and fair housing in the region that offer legal advice and representation to low-income individuals experiencing housing issues.

Fair Housing Advocates of Northern California is a nonprofit organization with a stated mission of ensuring equal housing opportunity and educating communities on the value of diversity in their neighborhoods. FHANC provides fair housing counseling services, fair housing complaint investigation, and assistance in filing fair housing administrative complaints. FHANC also offers counseling and education programs on foreclosure prevention and pre-purchase homebuying.

Lack of local public fair housing outreach and enforcement

Jurisdictions in Sonoma County falls under the California Department of Fair Employment and Housing (DFEH). Residents may submit complaints to the agency, which they will investigate and determine whether or not the complainant has a right to sue. Residents also have the option to file fair housing complaints with HUD because DFEH tends to have a high volume of cases, with advocates reporting intake interviews sometimes taking place up to four months after filing a complaint. There has also been inconsistent reporting among various investigations. DFEH tends to achieve better results if there is more evidence provided upfront. There have been a number of complaints filed recently because of unjust evictions and rent increases that are not permitted under California tenant protection laws.

Lack of meaningful language access for individuals with limited English proficiency

18% of Sonoma County residents were born outside the United States, and 58% of the county’s immigrant population was born in Mexico. With 11.26% of Sonoma County’s population identifying as “linguistically isolated,” translation services — particularly Spanish-specific programs — are essential for the county’s residents. Sonoma County offers Spanish translation resources under the Title VI guidelines, which mandate that all entities that receive federal funding provide translation assistance. However, limited translation assistance is available in Sonoma County’s public services. According to a 2019 report, the Sonoma County Community Development Commission concluded that the agency

lacked sufficient translation services and committed to expanding access to language interpreters and written services.

Another concern relates to Sonoma County's segregation and its influence on the distribution of language access services. While more foreign-born residents live in Sonoma County's eastern regions, the county's varying racial demographics limits interpretation services in the western portions. This may force Spanish-speaking residents to relocate within the county in order to find accessible translation services, further exacerbating the county's segregated characteristics.

Lack of private investment in specific neighborhoods

There is significant private investment and development in Sonoma County, including a number of proposed residential and commercial projects.

Sonoma County

Sonoma County receives a high level of private investments overall in its neighborhoods, but levels of investment are inconsistent across the County, particularly in the less-populated rural areas. More than 2,200 businesses are located in Sonoma County, with a total of almost 18,000 employees. Ninety percent of all businesses have ten or fewer employees, and almost 17% are home-based.

The largest private sector employers include the Sonoma Raceway, Fairmont Sonoma Mission Inn, St. Francis Winery, The Lodge at Sonoma, Sonoma Market/Glen Ellen Village Market, the girl & the fig restaurants and catering, MacArthur Place Hotel, and Sebastiani Winery. Other major employers include the Sonoma Developmental Center, Sonoma Valley Hospital, and the Sonoma Valley Unified School District. A growing number of employers can be found in the Sonoma Valley's light industrial corridor, including manufacturers, distributors, and specialty foods producers.

Petaluma

More than half of workers in Petaluma are employed in the services industry, followed by retail and construction. There are a number of planned new developments, including the corporate headquarters of Amy's Kitchen, a new hotel, and the 264-unit Riverview Apartments.

Lack of public investment in specific neighborhoods

The Tax Cuts and Jobs Act of 2017 implemented three Opportunity Zones in Sonoma County. Opportunity Zones is a federal program that provides tax incentives for investments in new businesses and commercial projects in low-income communities. Sonoma County's projects include the purchase of electric buses for local service, CVRP, water energy purchases, and a bike and pedestrian improvement project.

Sonoma County has invested more than \$18.8 million in local dollars into affordable housing production over the past three years and expects to contribute another approximately \$3 million. These resources provide gap financing in permanent soft debt for affordable rental development projects that often use federal Low-Income Housing Tax Credits, a standard combination of other private debt and equity sources.

Lack of regional and local cooperation

Lack of regional and local cooperation is not a contributing factor to fair housing issues in the Sonoma region. The region's primary cooperative body is the Association of Bay Area Governments (ABAG), which is comprised of representatives from nine counties and 101 cities and towns across the region. ABAG was founded in 1961 by local government leaders to address common issues from a regional perspective, and formed the first council of governments in California. ABAG's areas of focus include research and analysis, education and outreach, and regional coalition coordination on topics such as

land use, housing, environmental protection, water resource protection, disaster resilience, and energy efficiency,

ABAG is responsible for preparing and implementing the Regional Housing Needs Assessment Plan to the California Department of Housing and Community Development (HCD). HCD required the Bay Area to plan for and revise local zoning to accommodate 441,176 additional housing units during the 2023-31 period.

Lack of resources for fair housing agencies and organizations

Sonoma County has several private fair housing enforcement organizations, as well as an active state agency that fights housing discrimination. California's Department of Fair Employment and Housing (DFEH) is a state agency that focuses on enforcing California's civil rights laws. DFEH focuses on investigating fair housing complaints. It is also a HUD Fair Housing Assistance Program (FHAP) agency and receives funding from HUD to enforce fair housing laws. Multiple fair housing organizations in the counties also receive or have received Fair Housing Initiative Program (FHIP) funds from HUD, and also benefit from Community Development Block Grant funds. These agencies have had difficulties hiring and/or retaining staff due to the high cost of living in the area.

Fair Housing Advocates of Northern California (FHANC) focuses on fair housing complaint investigation, landlord/tenant counseling and outreach. The Sonoma Valley Housing Group (SVHG) focuses on educational outreach. They are a newly formed volunteer organization and also have a much lower capacity than FHANC.

Overall, it seems clear that the diverse group of fair housing organizations work hard to fill the various fair housing outreach and enforcement needs, but that lack of resources is still a pressing issue in the Region.

Lack of state or local fair housing laws

There is a dearth of local fair housing laws in the City of Petaluma. However, Sonoma County have passed ordinances that provide clear instruction on how individuals with disabilities can obtain a reasonable accommodation to modify zoning or land use requirements.⁷⁹ Additionally, California's robust fair housing protections provide significant protections for residents in these jurisdictions. In Sonoma County, low-income individuals have limited access to affordable and accessible housing; these disparities in access are likely to harm persons with disabilities, undocumented individuals, and large families in Sonoma County. Because California's fair housing law protects individuals with disabilities and those discriminated against because of family status or immigration status.

State of California

Passed in 1959, California's Fair Employment and Housing Act (FEHA) protects many forms of discrimination against tenants and homeowners based on their "race, color religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information, and immigration status."⁸⁰ This law targets owners of any housing accommodation, banks, mortgage companies, and other financial institutions accused of discrimination.

⁷⁹ Sonoma County Code, Article 93. - Requests for Reasonable Accommodations Under the Fair Housing Acts, https://library.municode.com/ca/sonoma_county/codes/code_of_ordinances?nodeId=CH26SOCOZORE_ART93REREACU_NFAHOAC

⁸⁰ Fair Employment and Housing Act (FEHA), 12955-12957 GOV (1959), https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=3.&title=2.&part=2.8.&chapter=6.&article=2

This law prohibits cities, counties, and all other local government agencies from having zoning or land-use policies that discriminate against people for any of the traits listed above. FEHA also addresses many forms of discrimination, such as denying someone a home loan or homeowner's insurance, sexual harassment for housing rights or privileges, refusing to provide reasonable and necessary modifications for a tenant with a disability, etc.⁸¹ This law also targets practices that have a discriminatory effect, which result in a disparate impact on a particular group of people or creates or reinforces segregated housing patterns.⁸² The law also includes financial assistance practices with discriminatory effects, such as creating terms or conditions of financial assistance that result in discrimination, failing to provide information about access to financial assistance, etc.⁸³ This law also applied to discrimination in land use practices.⁸⁴

California recently passed statewide source of income protections. California also has a robust set of statewide antidiscrimination laws, including the Unruh Civil Rights Act, Ralph Civil Rights Act, Bane Civil Rights Act, the Fair Employment and Housing Act, California Civil Code Section 1940.3, and Government Code Sections 11135, 65008, and 65580-65589.8. Whether complaints regarding these laws can be fully and timely pursued, however, is a different matter. Advocates have commented approvingly on recent changes to unlawful detainer laws, which increased the time period from five calendar days to five business days. Additionally, in 2019 California enacted the Farmworker Housing Act to streamline the approval process for the construction of employee housing on agricultural land.⁸⁵ This indirectly promotes fair housing by removing zoning barriers that are likely to produce disparate overcrowding and high cost burdens for communities; communities that tend to be people of color, individuals with disabilities, and limited English proficiency individuals, and families.⁸⁶ Based on this law, fair housing protections guaranteed to tenants in employee housing also apply to tenants residing in agricultural employment housing.

California also recently passed the California Tenant Protection Act of 2019 (AB 1482; California Civil Code 1946.2, 1947.12 and 1946.13) prohibits tenants from being evicted without “just cause,” which means that tenants who have lived in a unit for at least a year may only be evicted for enumerated reasons, such as failure to pay rent, criminal activity or breach of a material term of the lease. The law also caps rent increases at 5% for a period of 10 years.

Land Use and zoning laws

The State of California has enacted several laws to encourage the development of affordable housing that Sonoma County has enacted. California's A.B. 1505 authorizes localities to adopt inclusionary zoning ordinances to increase affordable housing or pay in lieu fees,⁸⁷ provide for off-site development,⁸⁸ or perform other alternatives be available to satisfy the RHNA mandates of each jurisdiction. Currently, Sonoma County has inclusionary zoning laws, density bonus laws, housing trust funds, and a housing impact fees for non-residential development to increase its supply of affordable housing.⁸⁹ Additionally, Sonoma County has eased restrictions on the development of accessory

⁸¹ *Id.*

⁸² *Practices with a Discriminatory Effect*, 12060 2 CCR, [https://govt.westlaw.com/calregs/Document/I6B716F755D0E4E5683D6FABF3ADF9751?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I6B716F755D0E4E5683D6FABF3ADF9751?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

⁸³ *Id.*

⁸⁴ *Id.*

⁸⁵ California Legislative Information, AB-1783 H-2A worker housing: state funding: streamlined approval process for agricultural employee housing development, October 2019, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1783

⁸⁶ *Id.*

⁸⁷ (paying a penalty in lieu of constructing affordable units)

⁸⁸ (building a separate building with affordable units)

⁸⁹ Sonoma County Permit Sonoma, Affordable Housing Policies and Programs, <https://permitsonoma.org/regulationsandinitiatives/housing/housinginitiatives>

dwelling units; a necessary change that allows for increased residential density on land previously zoned for single use occupancy.

The lack of affordable housing is especially pronounced in Sonoma County where few areas are zoned for high density housing development. As a consequence of these local zoning preferences, there is a significant shortage of housing, particularly for low-wage workers who are priced out of housing in close proximity to their employment. Sonoma County shows a preference for low-density development and a tendency to limit multi-family dwelling units to medium density developments. Throughout the jurisdictions, there is an uneven allocation of permits favoring single family and accessory dwelling units over multi-family housing. Although the jurisdictions have adopted incentives to promote affordable housing development, these incentives have not made a significant impact on increasing the construction of affordable housing. Below, there is an analysis of the fair housing ramifications of land use and zoning laws in each of the participating jurisdiction.

Land use and zoning laws play a significant role in a variety of fair housing issues in Sonoma County. Specifically, overly restrictive zoning to retain low-density development has suppressed the production of affordable housing resulting in the exclusion of low-income individuals from many parts of the area. Many low-income residents, particularly people of color, disproportionately occupy high-density housing because it tends to be more affordable than the purchase or rental of a single-family home. High density housing can generally be built only in areas zoned for multi-family homes or mixed-use development. This generally results in the segregation of people of color in the municipal areas zoned for high-density housing. Additionally, these restrictive laws are more likely to generate disproportionately high rates of housing cost burden and overcrowding among some racial and ethnic groups, persons with disabilities, and large families. This is especially true in areas like Sonoma County, where low-density development is the preferred land use because of the agricultural character of the region.

Sonoma County

Sonoma County has four primary residential zoning designations. The primary residential designation in Sonoma County's unincorporated areas are agricultural residential and rural residential. In Sonoma County, two zoning districts, R-2 (Medium Density Residential District) and R-3 (High Density Residential District) allow for multifamily housing which is typically necessary in order to ensure affordability and provide meaningful access to low-income households that are disproportionately members of protected groups. The number of dwelling units allowed in R-3 districts can vary greatly while R-2 districts permit up to 10 dwellings per an acre. In Sonoma County, very few parcels receive R-3 designation except for in a few concentrated areas.

Within the unincorporated areas of Sonoma, even fewer tracts are zoned as R-3 districts; the majority of tracts zoned for this designation are concentrated near the southern part of Santa Rosa adjacent to Highway 101. Another R-3 zone is near Fulton where 10 acres are preserved for multi-family dwellings. A smaller portion is also present near El Verano, Glen Ellen, and Guerneville. For the most part, Sonoma County relies on R-2 zoning districts to provide higher density multi-family housing. R-2 zones are located near the R-3 zones and make up the bulk of land zoned for multi-family dwellings within the County. As a result, most housing reserved for multi-family housing limit the density of housing to 10 units per an acre.

⁹⁰ Sonoma County. Code Article 89. *Affordable Housing Program Requirements and Incentives*, http://sonomacounty-ca.elaws.us/code/coor_ch26_art89

92 City of Sonoma Codes, <https://www.codepublishing.com/CA/Sonoma/html/Sonoma19/Sonoma1944.html>; Cloverdale, <https://www.codepublishing.com/CA/Cloverdale/html/Cloverdale18/Cloverdale1813.html>; Petaluma, https://petaluma.granicus.com/MapView.php?vview_id=31&clip_id=2531&meta_id=398291; Santa Rosa, http://gcode.us/codes/santarosa/view.php?topic=21-21_02&frames=on.

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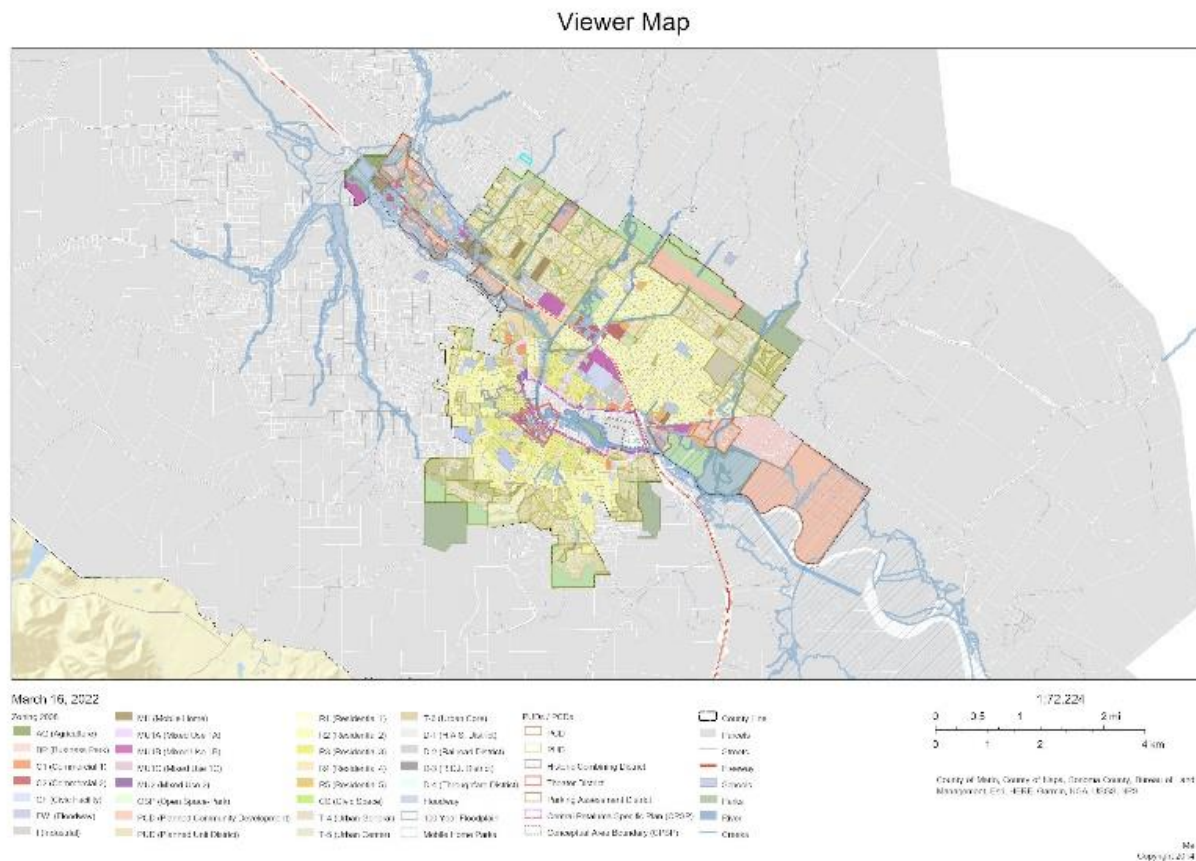
Sonoma's Unincorporated County has made significant progress in meeting its RHNA obligation, but its permitting decisions do reveal a preference for single family and accessory dwelling units versus multi-family housing. In comparison to other jurisdictions, the Unincorporated County of Sonoma has a fairly strong record of meeting its RHNA obligations for all households regardless of income status and has already satisfied its RHNA requirements. But the permitting data shows that single family and accessory dwelling units permits were the primary forms of development permits issued this past year. Over 20 single family units and 32 accessory dwelling units were issued while only 6 permits for multi-family dwellings. This preference for low density housing is consistent with the primary land use of this area.

Because this jurisdiction is primarily agricultural, high density housing is unlikely to comport with rural character of the area. For the most part, this area is zoned as rural residential meaning that development is limited to low-density housing that precludes the construction of multi-family housing. By contrast, ADUs provide additional density that conforms to the existing character of the area. It would likely be impracticable to increase high density housing in these areas until additional infrastructure including water, sewer, employment, and transportation services are available to meet the needs of new residents. In line with this view, Sonoma County has passed laws to streamline the construction of ADU permits and to allow for their construction in agricultural areas for employees and their families.

Petaluma

Petaluma has five different residential zoning districts. R-1 and R-2 districts apply to low-density development while R-3, R-4, and R-5 zoning districts allow for high density residential development including the permitting of multi-dwelling units. R-3 permits up to 12 units; R-4 permits up to 18; and R-5 permits up to 30 units. As displayed by the map below, a disproportionate number of tracts are reserved for single family homes under R-1 and R-2 zoning designations. By contrast, few areas are available to support medium and, in particular, high-density development. Multi-family dwelling zoning districts are unevenly lopsided falling on the southside of Highway 101 while on the northern side of the Highway, housing is primarily zoned for single residential. The primary zoning district used by the City to permit multi-family dwelling is R-3 which only allows for up to 12 units, on the other hand, in very few areas, the City uses R-4 and R-5 districts meaning that few parcels allow for high density i.e. above 12 units per an acre. Petaluma's land use and zoning measures to support affordability and high-density housing are insufficient to absorb its share of the RHNA or otherwise promote equitable housing.

Petaluma Land Use Map



Lending Discrimination

Percentage of Loans Applications Resulting in Loans by Race or Ethnicity in Sonoma County, 2020
Home Mortgage Disclosure Act Data

Race/Ethnicity	% of Loan Applications resulting in Origination	% of Loan Applications Denied	% of total loan applications across racial categories or ethnic categories	% of total loan applications resulting in Origination across racial or ethnic categories	% of total loan applications denials across racial or ethnic categories
White, Not Hispanic	67.34	9.07	65.89	69.52	66
Black, Not Hispanic	55.06	10.42	.73	.63	.84
Asian, Not Hispanic	61.99	12.08	3.53	3.43	4.71
Hispanic/Latino	50.34	14.38	7.51	6.99	12.31

Data retrieved from: <https://ffiec.cfpb.gov/data-browser/data/2020?category=states>

The data above shows that white applicants are the most likely to have successful loan applications. They have the highest percentage of applications resulting in loan origination across racial/ethnic categories. White applicants are also overrepresented in the percentage of total applications approved for origination when compared to the total percentage of applications made by white applicants. Hispanic applicants were least likely to have a successful loan application. Hispanic applicants have the lowest rate of applications resulting in origination across racial/ethnic categories. Hispanic applicants are also underrepresented in the percentage of total applications approved for origination when compared to the total percentage of applications made by Hispanic applicants.

The data also shows that Hispanic applicants are most likely to have their loan applications denied. Hispanic applicants have the highest percentage of applications denied. Hispanic applicants are also overrepresented in the percentage of total loan applications denied when compared to the total percentage of applications made by Hispanic applicants. White applicants were least likely to have their applications denied. White applicants have the lowest rate of loan applications denied across racial/ethnic categories. White applicants are also underrepresented in the percentage of total applications denied when compared to the total percentage of applications made by White applicants.⁹⁴

Location and type of affordable housing

As is documented in the Publicly Supported Housing section of this Assessment, publicly supported housing is concentrated in the more urban parts of the region.

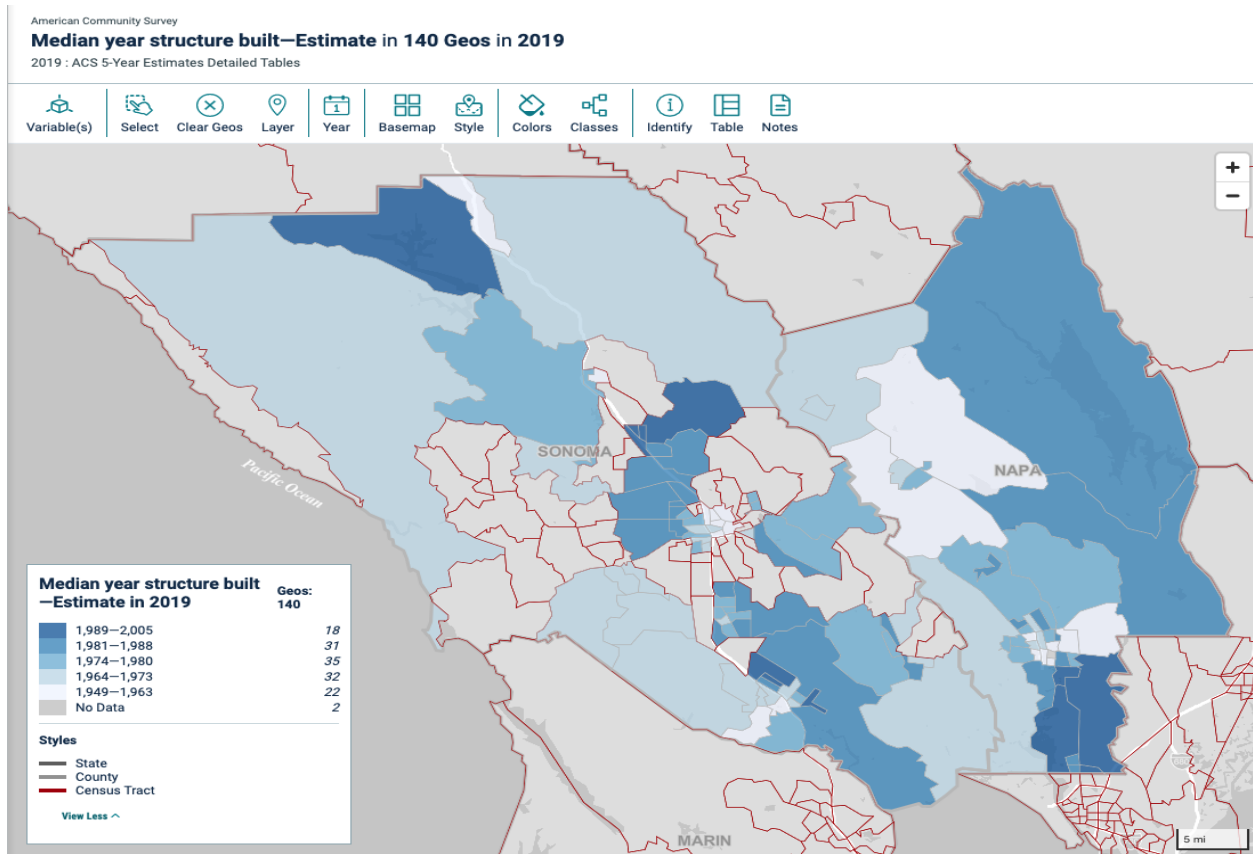
Sonoma County's publicly supported housing is more evenly distributed throughout the county rather than clustered in one jurisdiction. Areas with publicly supported housing include Santa Rosa, which has the highest number, Rohnert Park, Windsor, Healdsburg, Sebastopol, and Cloverdale. Similar to In Sonoma County, LIHTC developments appear to be the most prevalent, followed by Project-based Section 8 and Other Multifamily. There are no public housing developments in the region.

Location of accessible housing

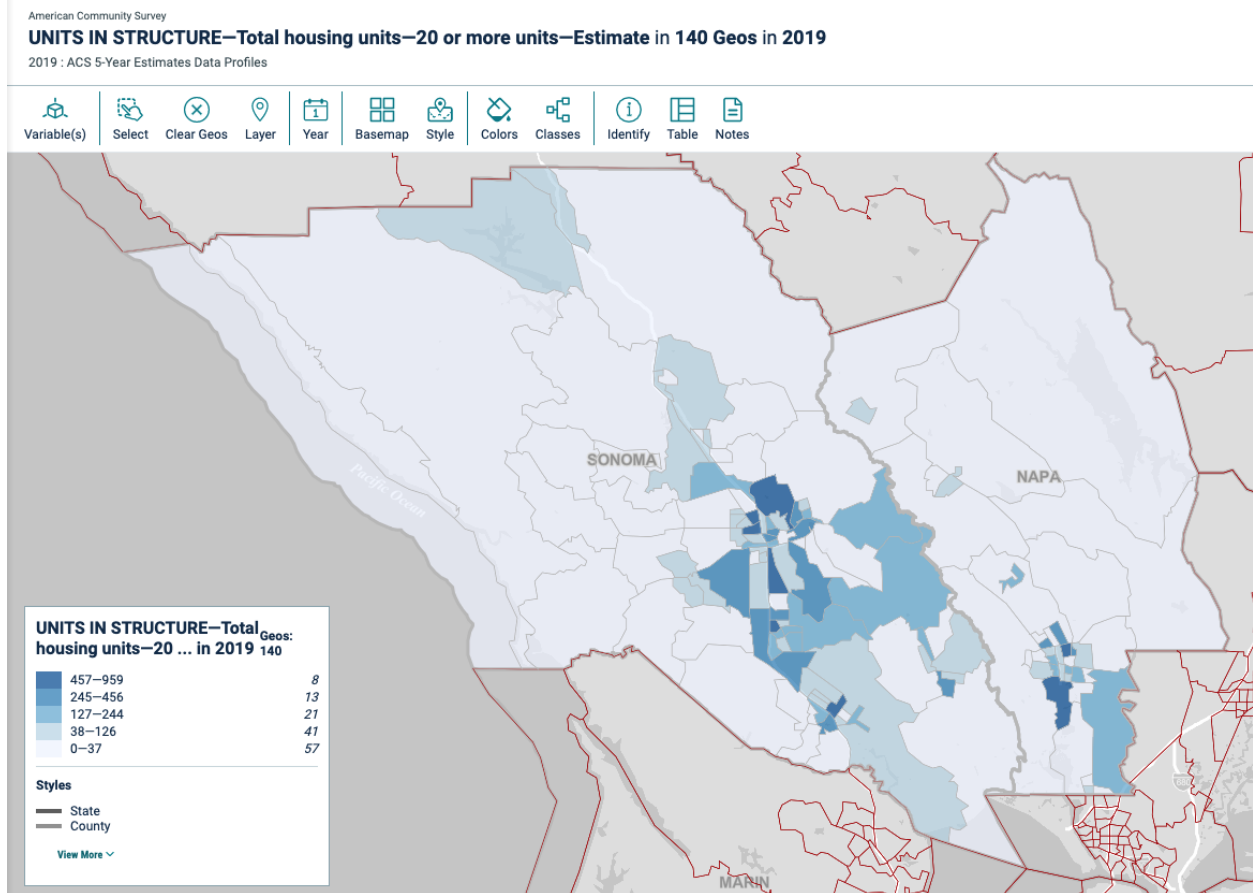
The location of accessible housing is not a significant contributing factor to fair housing issues in Sonoma County. Although it is not possible to precisely map the location of accessible housing in the area, it tends to exist where there are concentrations of new, multifamily housing and where there are concentrations of publicly supported housing. These two dimensions cut in somewhat contradictory directions. The American Community Survey does not facilitate the disaggregation of housing units by units in structure and year structure built together but does allow a look at those two data points separately. As the maps below reflect, there is some overlap. For example, both newer and denser housing is clustered in the surrounding areas Santa Rosa, the urban center of the county. There are concentrations of new, predominantly single-family homes in the northwestern part of Sonoma County. There are also concentrations of older multifamily housing in parts of Santa Rosa. The parts of the county with more new, multifamily housing offer high access to opportunity in an area-wide perspective.

⁹⁴ This data and analysis may overstate the amount of differing treatment between races/ethnicities because the datasets could not be separated by the cost of the loans and therefore were not illustrative of the extent to which certain groups are receiving high-cost loans.

Map 1: Median Year Structure Built, Napa-Sonoma Area



Map 2: Units in Structure (20+), Napa-Sonoma Area⁹⁵

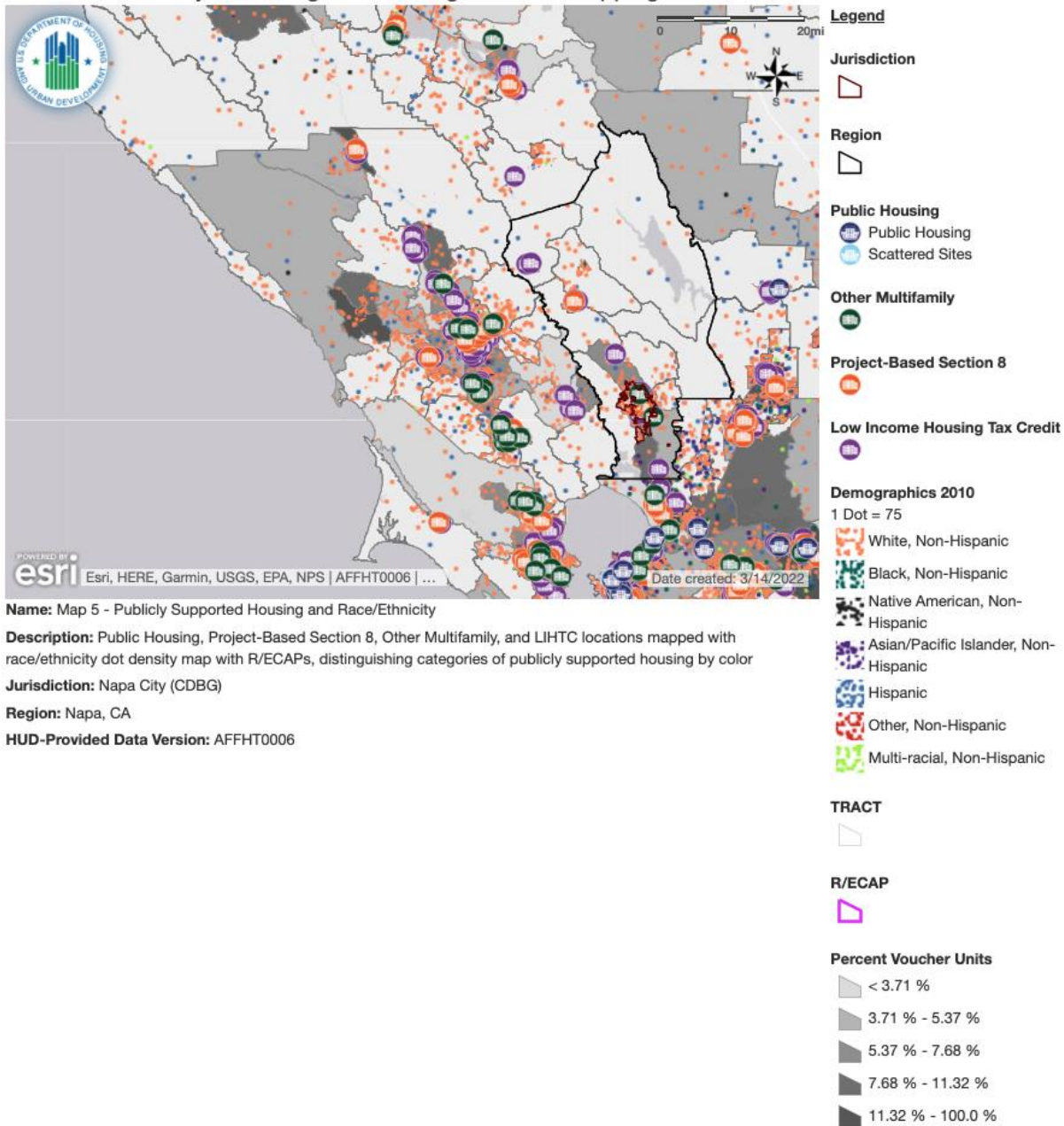


While also clustered near Santa Rosa, publicly supported housing, as reflected in the map below, is much more concentrated in places that do not have concentrations of new, multi-family development. The upshot is that it is likely that, between the two categories of types of housing that are comparatively more likely to be accessible, there is wide dispersion across the area. Across the two counties, places with accessible housing include high opportunity areas. When affordability is not factored into consideration, the location of accessible housing does not appear to significantly contribute to fair housing issues.

⁹⁵ ACS 2019 5-Year Estimates, [Table DP04](#).

Map 3: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Location of employers

The location of employers may be a contributing factor to disparities in access to opportunity in California's Sonoma County.

To date, commute times are the best measure we have to understand the extent to which the location of employers may contribute to unequal access to opportunity among an area's residents. A spatial mismatch in the location of employers and access to affordable housing can price individuals out of a city, pushing them further away from their place of work. Long commutes can cut into time that could otherwise be spent with family members or friends, or pursuing interests unrelated to their work life.

Traveling to and from work — enduring traffic jams, unforeseen circumstances, and bad weather — are all stressful, too. Numerous studies have shown that individuals with long commutes suffer from psychosomatic disorders at a much higher rate than people with short trips to work.⁹⁶ The psychological, physical, and financial burdens that coincide with long commutes can all play a factor in hindering individuals from accessing equal opportunity.

However, Sonoma County residents experience lower than average commute times, with the average Sonoma County resident 25.2 minutes to work each day.⁹⁷ Only 4.28% of Sonoma County residents travel more than 90 minutes to work each day,⁹⁸ a percentage that dims in comparison to the 11.7% of all San Joaquin County residents that are considered “super commuters.”⁹⁹ Interestingly, Sonoma County super commuters earn significantly more on average than fellow residents who do not endure lengthy commutes to work. Sonoma County super commuters earn an average median salary of \$99,000 a year.¹⁰⁰ The average median salary in Sonoma County is \$87,828 for comparison.¹⁰¹ This is a reversal of a trend found throughout many American regions, in which an area’s poorest residents commonly endure the longest commutes.¹⁰²

These shorter than average commute times suggest that Sonoma County does not experience a spatial mismatch in the location of employers and access to local affordable housing. Nevertheless, Sonoma County employers frequently cite long commutes as a barrier that prohibits applicants from accepting job opportunities in these counties. Employers in the restaurant industry, in particular, cite this, as restaurant employees typically cannot afford to live in Sonoma County and are thus subjected to long commutes from the surrounding area.¹⁰³ Nevertheless, it is impossible to gauge the effect that the potential of long commutes has on hiring employees. The data thus suggests that these counties’ residents are largely able to live and work in close proximity, indicating that the location of employers in Sonoma County is not a contributing factor to disparities in their residents’ access to opportunities.

Location of environmental health hazards

Sonoma is ranked 11th of all counties in CA for its “physical environment.” In general, access to environmentally healthy neighborhoods is better in the southern portions of the county. Its air pollution particle rating is also consistently better than the state average. As of 2016, Sonoma County was improving its energy consumption, renewable energy capacity, water usage per capita, reservoir water storage, air quality, and acreage of protected lands. Sonoma County is home to two former superfund sites, one in Petaluma and one in Cloverdale. The increasing risk of wildfires will likely impact these values in Sonoma.

⁹⁶ [Schaefer, Annette](#). “Commuting Takes Its Toll.” *Scientific American*. 2005.

⁹⁷ U.S. Census Bureau. American Community Survey, 5-Year Estimates. 2019.

⁹⁸ [Data USA](#). “Sonoma County, CA.”

⁹⁹ [Data USA](#). “San Joaquin County, CA.”

¹⁰⁰ [Popov, Igor and Chris Salviati](#). “Traffic, Trains, or Teleconference? The Changing American Commute.” 2019.

¹⁰¹ [Data USA](#). “Sonoma County, CA.”

¹⁰² [National Equity Atlas](#). “Commute Time: All Workers Should Have Reasonable Commutes.” 2019.

¹⁰³ [Santa Rosa Press Democrat](#). “Why Santa Rosa’s \$699 Million Affordable Housing Pipeline Might Not Be Enough,” March 27, 2021.

Location of proficient schools and school assignment policies

Sonoma County schools vary significantly in their “California School Rankings” score, with values ranging the full spectrum of possible values, even within the same district. Sonoma County has 40 different Districts, each with their own policies on school assignments and school transfers, though most assign based on a student’s residential address. Given the existence of racial residential patterns in Sonoma, there remains de jure school segregation throughout the county. This is reflected in each racial group’s Access to Proficient Schools” value, explored in full in the section on “Disparities in Access to Opportunity.”

Loss of affordable housing

Loss of affordable housing is a contributing factor to fair housing issues in Sonoma County. Affordable housing stock can be lost when federal subsidies or regulatory agreements expire, owners opt out of a government-subsidized program or elect to convert their properties to market rate housing. Access to affordable housing can also diminish as a consequence of increasing housing costs which leads to the displacement of middle- and low-income residents who are no longer able to afford housing in the area.

Loss of affordable housing is a concern for the region. The California Housing Partnership provides a catalogue of subsidized affordable housing at risk of losing its affordable status and converting to market rate. These properties are then categorized by severity of risk.¹⁰⁴ According to the organization’s most recent report, from 1997 to 2021, more than 20,000 housing units lost their affordable status in California.¹⁰⁵ Sonoma County is expected to lose affordable housing units, Sonoma has 9,665 affordable units and . Of these total units, 504 of them are at risk of conversion; 474 units in this subset are designated as at high or very high risk of conversion. Santa Rosa has 3,553 affordable units and of these units, 6.3% are at high or very high risk of conversion.¹⁰⁶

In addition to housing losing its affordable status, rising housing costs also threaten to displace middle- and low-income residents no longer able to afford to live in these areas.¹⁰⁷ In Sonoma County, 27.1% of households live in neighborhoods that are susceptible to or experiencing displacement, and 3.4% live in areas at risk of or undergoing gentrification. ¹⁰⁸ Median rent for this area has increased by approximately 30 percent since 2009.¹⁰⁹ Likewise, in Petaluma, an estimated 18 percent of the population live in neighborhoods susceptible to displacement. This is in part is because of rising rental costs. In Petaluma, the median rent has risen by 39 percent since 2009. Moreover, with the recent expiration of a rental cap law in place in Sonoma County, rent costs are likely to go up and lead to further loss of affordable housing.¹¹⁰

¹⁰⁴ Very-High Risk: affordable homes that are at-risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. High Risk: affordable homes that are at-risk of converting to market rate in the next 1-5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Moderate Risk: affordable homes that are at-risk of converting to market rate in the next 5-10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer. Low Risk: affordable homes that are at-risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

¹⁰⁵ . California Housing Partnership, *Affordable Homes at Risk Report*, February, 2022, <https://1p08d91kd0c03rlxhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2022/02/Affordable-Homes-At-Risk-Report-2022.pdf>.

¹⁰⁶ ABAG Housing Needs MTC: Santa Rosa at 34.

¹⁰⁷ John Burns, Petaluma Argus Courier, *Community Matters: California’s housing crisis impacts everyone*, September 2, 2021, <https://www.petaluma360.com/article/news/community-matters-californias-housing-crisis-impacts-everyone/>.

¹⁰⁸ ABAG Housing Needs MTC: Unincorporated Sonoma County at 7.

¹⁰⁹ ABAG Housing Needs MTC: Unincorporated Sonoma County at 38.

¹¹⁰ Ethan Varian, The Press Democrat, *State price gouging restrictions on rents expire for Sonoma County*, January 14, 2022, <https://www.pressdemocrat.com/article/news/state-price-gouging-restrictions-on-rents-expire-for-sonoma-county/>.

Occupancy codes and restrictions

The state of California has not adopted the Universal Building Code. Instead, they have enacted the California Building Code, which also incorporates the International Building Code. The California Building Code has a rather broad definition of family, in that it does not only limit a family to “an individual or two or more persons who are related by blood or marriage,” but expands the definition to any persons who “otherwise live together in a dwelling unit.” This definition is not restrictive in a way that would negatively affect access to housing.

The codes in Sonoma County does not contain the definition of “family.” The City of Santa Rosa’s code contains a definition of family, defined as “an individual, or two or more persons, related by blood, marriage, or adoption; a group of unrelated persons which if numbering five or more persons, must be living together as a group in a dwelling unit, using common cooking facilities and as a group bear the generic characteristics of a family as a relatively permanent household.”

The City of Santa Rosa’s restrictive use of family may contribute to fair housing issues, but occupancy codes and restrictions are not a major factor in reducing access to fair housing in other jurisdictions in Sonoma County.

Private Discrimination

According to the California Department of Fair Employment and Housing (DFEH) Annual Report, there were 143 complaints in Sonoma County. Between 2013-2020, HUD reported that there were fair housing inquiries in Cotati, Healdsburg, Rohnert Park, Santa Rosa, Sebastopol, and Windsor.

Quality of affordable housing information programs

There does not appear to be any general-eligibility mobility counseling programs for Housing Choice Voucher holders in Sonoma County. There does not appear to be any HUD-approved counseling agencies as well.

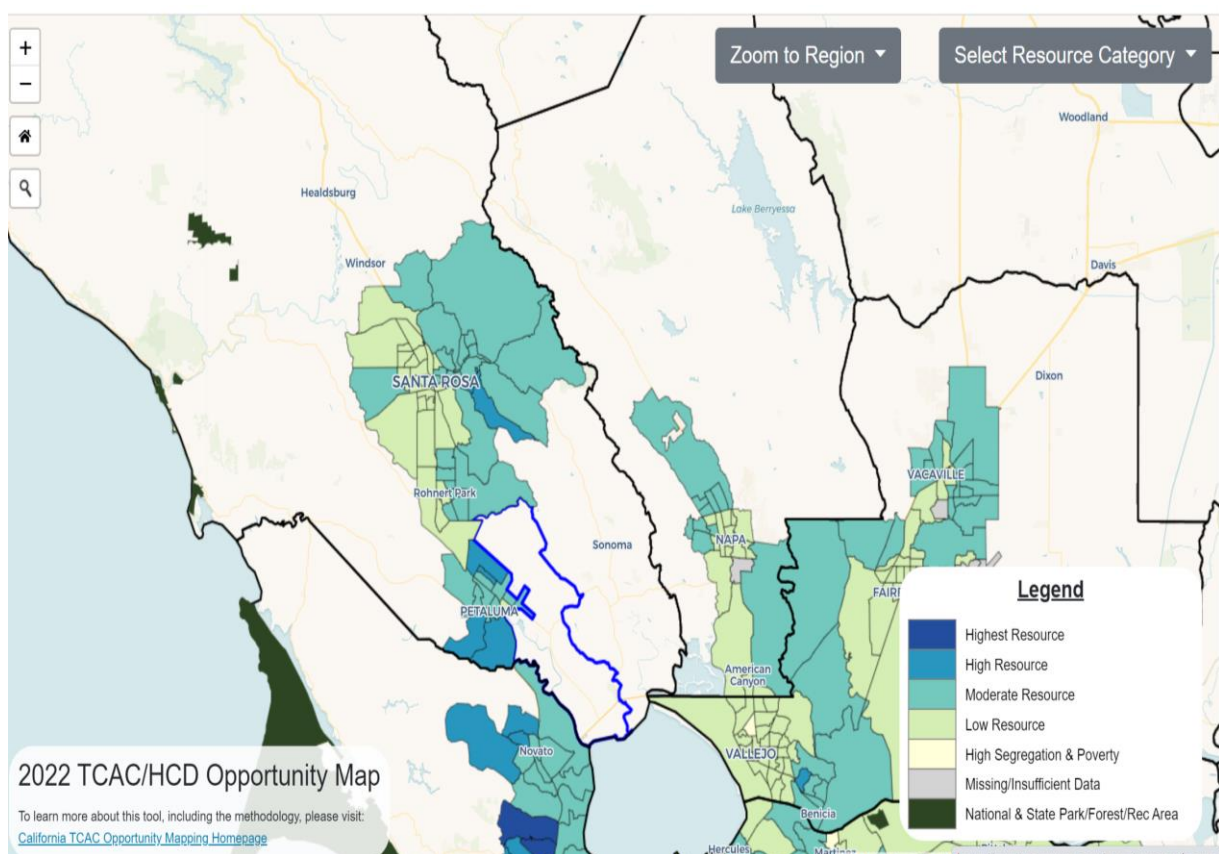
There are a handful of other housing information programs. Santa Rosa’s Burbank Housing provides homeownership counseling and down payment assistance to Sonoma County residents. Fair Housing Advocates of Northern California provides fair housing counseling, tenant workshops in Sonoma County. Disability Services & Legal Center (DSLCL) is one of California’s 28 Centers for Independent Living. Located in Santa Rosa, they provide housing counseling services to people with disabilities.

Regulatory barriers to providing housing and supportive services for persons with disabilities

This assessment did not reveal regulatory barriers to providing housing and supportive services for persons with disabilities beyond those discussed in connection with the Land Use and Zoning Laws and Policies and Occupancy Codes and Restrictions contributing factors.

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

The California Tax Credit Allocation Committee’s QAP heavily incentivizes family-occupancy Low Income Housing Tax Credit (LIHTC) development in what it terms “High Resource” or “Highest Resource” areas. The “Highest Resource” area below is in Marin County, but there are a few “High Resource” locations in Sonoma County. These areas are generally high opportunity areas that are disproportionately white. LIHTC development in these areas would contribute to greater residential racial integration. In light of the significant incentives for LIHTC development in High Resource and Highest Resource areas, the QAP does not currently contribute to segregation. At the same time, it is important to note that the California Tax Credit Allocation Committee adopted the incentives against the backdrop of a long history of allocating credits to developments that perpetuated segregation..



Source of income discrimination

As of 2020, California state law prohibits source of income discrimination.¹¹¹ Santa Rosa also has implemented a local law banning source of income discrimination.¹¹²

Nonetheless, source of income discrimination remains a significant problem throughout Sonoma County. A survey conducted by the Association of Bay Area Governments found that source-on-income discriminations remains an issue, despite it having been made illegal in 2020, and that more proactive enforcement of these laws is necessary. An investigation conducted by the Fair Housing Advocates of North California (“FHANC”) in 2019 uncovered extremely high levels of income discrimination in Sonoma County, with 86% of landlords included in the audit discriminating in some form or another. FHANC has conducted a survey since the state-wide source on income protection was enacted, though it has not yet been made public.

State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

State and local laws, policies, or practices, beyond those that limit the supply of affordable housing, do not tend to discourage individuals with disabilities from living in integrated settings in Sonoma County. Indeed, local governments appear to have broadly embraced Housing First models and have incorporated preferences for persons with disabilities – and, in some instances, persons with disabilities who are living in institutions or at risk of institutionalization – into voucher and affordable housing programs. Among affordable housing that is development, permanent supportive housing very clearly appears to be a priority. There simply is a need for much more affordable housing, including permanent supportive housing.

Unresolved violations of fair housing or civil rights laws in apartments, family homes, supportive housing, and other integrated settings

Unresolved violations of fair housing or other civil rights laws are not a significant contributing factor to Fair Housing Enforcement. As has been previously discussed in the Fair Housing Enforcement section, our research did not uncover any unresolved violations of fair housing laws against any of the entitlement jurisdictions in this analysis.

¹¹¹ California Legislative Information, *Article 2. Housing Discrimination*, §§12955 and 12927, October 2019, [https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=12955#:~:text=\(a\)%20For%20the%20owner%20of,veteran%20or%20military%20status%2C%20or](https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=12955#:~:text=(a)%20For%20the%20owner%20of,veteran%20or%20military%20status%2C%20or)

¹¹² Santa Rosa City Code § 10-46.030, *Prohibited activities*, http://www.qcode.us/codes/santarosa/?view=desktop&topic=10-10_46-10_46_030

VII. Glossary

Accessibility: whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers. See: TTY

Accessory Dwelling Unit (ADU): a smaller, independent residential unit located on the same lot as a stand-alone single-family home. In Fairfax County, these are also known as Accessory Living Units (ALUs).

Affirmatively Further Fair Housing (AFFH): a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated. See: Segregation

Alternative Accessibility Standard: An alternative to the Uniform Federal Accessibility Standards (UFAS) for HUD grantees to meet Section 504 accessibility requirements. The standard is a modified version of the 2010 ADA Standards for Accessible Design. See also: Uniform Federal Accessibility Standards.

American Community Survey (ACS): a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

Americans With Disabilities Act (ADA): federal civil rights law that prohibits discrimination against people with disabilities.

Annual Action Plan: an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan. See also: Consolidated Plan

Area Median Income (AMI): annual median income calculated by HUD-designated area, based on American Community Survey (ACS) data and Consumer Price Index trends. HUD sets extremely low (30% AMI), very low (50% AMI), and low (80% AMI) income limits by household size to determine eligibility for assisted housing programs.

CDBG: Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement

Census Tract: small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

Community Development Financial Institutions (CDFIs): private sector financial institutions which specialize in personal lending and business development with the goal of expanding economic opportunity in impoverished and under-resourced communities.

Consent Decree: a settlement agreement that resolves a dispute between two parties without admitting guilt or liability. The court maintains supervision over the implementation of the consent decree, including any payments or actions taken as required by the consent decree.

Consolidated Plan (Con Plan): a plan that helps local governments evaluate their affordable housing and community development needs and market conditions. Local governments must use their Consolidated Plan to identify how they will spend money from HUD to address fair housing and community development. Any local government that receives money from HUD in the form of CDBG, HOME, ESG, or HOPWA grants must have a Consolidated Plan. Consolidated Plans are carried out through annual Action Plans. See: Action Plan, CDBG, HOME, ESG, HOPWA.

Continuum of Care (CoC): a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

Data and Mapping Tool (AFFHT): an online HUD resource that combines Census data and American Community Survey data to generate maps and tables evaluating the demographics of an area for a variety of categories, including race, national origin, disability, limited English proficiency, housing problems, environmental health, and school proficiency, etc.

De Facto Segregation: segregation that is not created by the law, but which forms a pattern as a result of various outside factors, including former laws.

De Jure Segregation: segregation that is created and enforced by the law. Segregation is currently illegal.

Density Bonus: an incentive for developers that allows developers to increase the maximum number of units allowed at a building site in exchange for either affordable housing funds or making a certain percentage of the units affordable.

Disparate Impact: practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

Displacement: when residents are involuntarily relocated from a housing unit or neighborhood due to external pressures. Displacement often occurs because of economic factors such as rising housing costs and/or gentrification. See also: Gentrification.

Dissimilarity Index: measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index was 65, then 65% of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

Emergency Rental Assistance Program: a program that helps qualified residents who are dealing with housing emergencies, often by providing money for overdue rent or covering court costs if the household is facing eviction. Additionally, the program can provide support for security deposits and initial rent for residents moving into new apartments. Qualified households are those that earn less than 40% of the Area Median Income (AMI). See: Area Median Income (AMI).

Entitlement Jurisdiction: a local government that receives funds from HUD to be spent on housing and community development. See also: HUD Grantee

Environmental Health Index: a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

Environmental Justice: the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. Historically, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

ESG: Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless

Ethnic Enclave: an area with a high spatial concentration of a particular ethnic group, with a cultural and economic activity partially segregated from the majority culture and greater urban area.

Exclusionary Zoning: the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

Exposure Index: a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

Fair Housing Act: a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

Familial Status: under the Fair Housing Act, the presence of children under 18 in a household. Housing discrimination on the basis of familial status is prohibited by the Act. See also: Fair Housing Act.

Federal Uniform Accessibility Standards (UFAS): a guide to uniform standards for design, construction, and alteration of buildings so that physically handicapped people will be able to access and use such buildings.

Gentrification: the process of renovating or improving a house or neighborhood to make it more attractive to middle-class residents. Gentrification often causes the cost of living in the neighborhood to rise, pushing out lower-income residents and attracting middle-class residents. Often, these effects which are driven by housing costs have a corresponding change in the racial demographics of an area.

High Opportunity Areas/Low Opportunity Areas: High Opportunity Areas are communities with low poverty, high access to jobs, and low concentrations of existing affordable housing. Often, local governments try to build new affordable housing options in High Opportunity Areas so that the residents will have access to better resources, and in an effort to desegregate a community, as minorities are often concentrated in low opportunity areas and in existing affordable housing sites.

HOME: HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

Home and Community Based Services (HCBS): Medicaid programs that provide beneficiaries with medical care and supportive services at their own home or community rather than at an institutional setting. HCBS programs are most often provided through state waivers.

Housing Choice Voucher (HCV)/Section 8 Voucher: a HUD voucher issued to a low-income household that promises to pay a certain amount of the household's rent. Prices are set based on the rent in the metropolitan area, and voucher households must pay any difference between the rent and the voucher amount. Voucher holders are often the subject of source of income discrimination. See also: Source of Income Discrimination.

Housing Cost Burden: households paying more than 30% of income for housing are considered cost-burdened by HUD. Severe cost burden is defined as paying more than 50% of income.

Housing Discrimination: the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lendee based on that person's race, class, sex, religion, national origin, or familial status.

Housing First Model: policy approach to chronic homelessness that prioritizes providing unhoused people with immediate access to permanent supportive housing, without any housing readiness requirements.

Housing Problem: the four HUD-designated housing problems are lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding, and housing cost burden. See also: Overcrowding, Housing Cost Burden.

HUD Grantee: a jurisdiction (city, country, consortium, state, etc.) that receives money from HUD. See also: Entitlement Jurisdiction

Inclusionary Zoning: a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

Individuals with Disabilities Education Act (IDEA): a federal civil rights law that ensures students with a disability are provided with a Free Appropriate Public Education (FAPE) that is tailored to their individual needs.

Integration: the process of reversing trends of racial or other segregation in housing patterns. Often, segregation patterns continue even though enforced segregation is now illegal, and integration may require affirmative steps to encourage people to move out of their historic neighborhoods and mix with other groups in the community.

Isolation Index: a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80% isolation index value for White people would mean that the population of people the typical White person is exposed to is 80% White.

Jobs Proximity Index: a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

Labor Market Engagement Index: a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

Limited English Proficiency (LEP): residents who do not speak English as a first language, and who self-identify as speaking English less than “very well”

Local Data: any data used in this analysis that is not provided by HUD through the Data and Mapping Tool (AFFHT), or through the Census or American Community Survey

Low Income Housing Tax Credit (LIHTC): provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

Low Poverty Index: a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the census tract level. The higher the score, the less exposure to poverty in the neighborhood.

Low Transportation Cost Index: a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50% of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

Market Rate Housing: housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

NIMBY: Not In My Back Yard. A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly-veiled racism.

Overcrowding: when a housing unit is occupied by more than one person per room, excluding bathrooms and kitchens. HUD defines severe overcrowding as more than 1.5 persons per room.

Payment Standard: the maximum monthly assistance payment paid to a household with a Housing Choice Voucher (HCV). A lower payment standard means that the household will pay a greater share of the rent. See also: Housing Choice Voucher (HCV)/Section 8 Voucher.

Poverty Line: the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. As of 2021, the US poverty line for a family of four with two children under 18 is \$27,479 .

Project-Based Section 8: a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

Protected Class: a group of people with a common characteristic (or, “protected characteristic”) who are legally protected from discrimination on the basis of that characteristic. The Fair Housing Act includes seven protected classes: race, color, religion, national origin, sex, disability, and familial status. See also: Housing Discrimination.

Publicly Supported Housing: housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

Qualified Allocation Plan (QAP): a document laying out the eligibility criteria and priorities for the awarding of Low Income Housing Tax Credits (LIHTCs). State governments must update their QAPs each time they receive a federal LIHTC allocation. See also: Low Income Housing Tax Credit (LIHTC).

Quintile: twenty percent of a population; one-fifth of a population divided into five equal groups

Reasonable Accommodation: a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

R/ECAPs: Racially or Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50% non-White residents, and where 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area. In the HUD Data and Mapping Tool (AFFHT), R/ECAPS are outlined in pink. See also: Census Tract

Region: in this analysis, the Region includes the jurisdictions of Montgomery County, the City of Alexandria, Arlington County, Fairfax County, Loudoun County, Prince William County, the District of Columbia Housing Authority, the Alexandria Redevelopment and Housing Authority, the Housing Opportunities Commission of Montgomery County, the Fairfax County Redevelopment and Housing Authority, and the Rockville Housing Enterprises. The following terms—the Metropolitan Washington Region, the Metropolitan DC Region, and the Region—are all used to refer to the aforementioned participating jurisdictions.

Rehabilitation Act (Section 504): a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

Rental Assistance Demonstration (RAD): a HUD affordable housing initiative that allows public housing authorities to convert original public housing properties to a project-based Section 8 platform. Converted properties gain access to additional sources of funding for unit maintenance and repair. See also: Project-Based Section 8.

Restrictive Covenant: a clause in a deed or lease that restricts how people can use their land. The Fair Housing Act banned the use of racial restrictive covenants, which had been commonly used to discriminate against non-white and Jewish people.

Right of First Refusal: a contractual right for some party to enter into a transaction with a person or company before any other party can.

School Proficiency Index: a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

Segregation: the illegal separation of racial or other groups in the location of housing and neighborhoods. Segregation can occur within a city or town, or in comparing multiple cities. Even though segregation is now illegal, often, housing continues to be segregated because of factors that make certain neighborhoods more attractive and expensive than others, and therefore more accessible to affluent White residents. See also: Integration.

Section 811: Supportive Housing for Persons with Disabilities. HUD program that funds rental housing with supportive services for income-eligible persons with disabilities, via subsidies to developers and project rental assistance to state housing agencies.

Source of Income Discrimination: housing discrimination based on whether a potential tenant plans to use a Housing Choice Voucher/Section 8 Voucher to pay part of their rent. Source of income discrimination is illegal under Virginia, Maryland, and District of Columbia law. See also: Housing Choice Voucher/Section 8 Voucher.

Superfund Sites: any land in the U.S. that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment. Superfund sites evaluated as particularly hazardous and/or warranting remedial actions are additionally placed onto the National Priorities List.

Supplemental Security Income (SSI): benefits paid to disabled adults and children who have limited income and resources, or to people 65 and older without disabilities who meet the financial limits.

Testers: people who apply for housing to determine whether the landlord is illegally discriminating. For example, Black and White testers will both apply for housing with the same landlord, and if they are treated differently or given different information about available housing, their experiences are compared to show evidence of discrimination.

Transit Trips Index: a HUD calculation that estimates the number of transit trips taken by a family of three, with a single parent and an income of 50% of the median income for renters for the region. The higher the number, the more likely residents in that neighborhood utilize public transit.

TTY/TDD: Text Telephone/Telecommunication Device for the Deaf. TTY is the more widely used term. People who are deaf or hard of hearing can use a text telephone to communicate with other people who have a TTY number and device. TTY services are an important resource for government offices to have so that deaf or hard of hearing people can easily communicate with them.

Violence Against Women Act (VAWA): a federal law protecting women who have experienced domestic and/or sexual violence. The law establishes several programs and services including a federal rape shield law, community violence prevention programs, protections for victims who are evicted because of events related to domestic violence or stalking, funding for victim assistance services, like rape crisis centers and hotlines, programs to meet the needs of immigrant women and women of different races or ethnicities, programs and services for victims with disabilities, and legal aid for survivors of domestic violence.