

DRAFT NAPA/SONOMA REGIONAL FAIR HOUSING PLAN

SONOMA COUNTY



January 2023

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I. Executive Summary

The Napa/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 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 document 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 provided 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.

Sonoma County's most recent data shows that approximately 63% of residents are white (non-Hispanic), 27% are Hispanic or Latino, 4% of residents are 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, the County has become somewhat more diverse, but white residents still make up the clear majority of residents in the County. There have been slight increases in the population of Hispanic and Asian American residents since the last fair housing analysis was completed in 2012. Seniors (aged 65 years or more) makes up 19% of the County population and they are likely to become a larger part of the population in coming years. Overall, Sonoma County 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, research, and data analysis, the County has identified the following contributing factors to segregation, lack of access to opportunities, and lack of fair housing:

- Access to proficient schools by students with disabilities;
- Access to financial services;
- Access to publicly supporting housing by persons with disabilities;
- Access to transportation systems for persons with disabilities;
- Admissions and occupancy policies and procedures, including preferences in publicly supported housing;
- Availability of affordable, accessible housing units in a range of sizes;

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- Availability, type, frequency, and reliability of public transportation;
- Community opposition to housing projects for lower income households;
- Deteriorated and abandoned properties;
- Displacement of and or lack of housing support for victims of domestic violence, dating violence, stalking, and sexual assault;
- Displacement of residents due to economic factors;
- Impediments to housing mobility;
- 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, integrated housing for people who need supportive services;
- Lack of assistance for housing accessibility modifications;
- Lack of assistance for transitioning from institutional settings to integrated housing;
- Lack of community revitalization strategies;
- Lack of local private fair housing outreach and enforcement;
- Lack of local public fair housing outreach and enforcement;
- Lack of meaningful language access for individuals with limited English proficiency;
- Lack of private investment in specific neighborhoods;
- Lack of public investment in specific neighborhoods;
- Lack of regional and local cooperation;
- Lack of resources for fair housing agencies and organizations;
- Lack of state or local fair housing laws;
- Land use and zoning laws;
- Lending discrimination;
- Location and type of affordable housing;
- Location of accessible housing;
- Location of employers;
- Location of environmental hazards;
- Location of proficient schools and school assignment policies;
- Loss of affordable housing;
- Occupancy codes and restrictions;
- Private discrimination;
- Quality of affordable housing information programs;
- Regulatory barriers to providing housing and supportive services for persons with disabilities;
- Siting, selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs;
- 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; and
- Unresolved violations of fair housing or civil rights laws in apartments, family homes, supportive housing, and other integrated settings.

To address the contributing factors listed above, this assessment of fair housing plan proposes the following goals and strategies, which are detailed in Section V of this report.

1. Increase the supply of affordable housing in higher opportunity areas and areas with ongoing or threatened displacement.

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- a. Promote affordable housing bond issues at multiple levels of government.
 - b. Create and maintain an inventory list of sites where housing development is allowed, including affordable housing in High Opportunity Areas, that will address RHNA requirements for all income levels with special focus on lower-income housing.
 - c. Provide incentives to single-family homeowners and or 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
2. 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.
3. 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 and or rezone parcels to enable mix-income 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 transit-rich area or urban in-fill site.
 - c. Update the zoning codes across the region to reflect recent changes to California laws that are designed to increase affordable housing.
4. Increase access to opportunity for Housing Choice Voucher Families.
- a. Explore the feasibility of 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.
5. Prevent displacement by preserving affordable housing and protecting tenant's rights.
- a. Expand funding for tenants in landlord-tenant proceedings.
 - b. Study the viability of rent stabilization for mobile home (manufactured) park developments.
 - 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.
6. 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.
7. Increase support for fair housing enforcement, education, and outreach.

II. Community Participation Process

The Community Development Commission staff worked with a community engagement consultant to develop a fair housing survey for residents in both English and Spanish. Bilingual canvassers were sent out in lower-opportunity and Limited English Proficient neighborhoods with gift cards, that were purchased with non-federal funds, to incentivize participation, and a link to an online version was made available on the Commission’s website and social media pages. In November and October of 2019 staff advertised on the radio the solicitation of a community engagement consultant and discussed the purpose of the assessment of fair housing.

Additionally, various stakeholder meetings were held in the planning process. Below is a list of meetings and the date they were held.

| Organization | Date of Meeting |
|--|------------------------|
| Boys & Girls Club | March 29, 2019 |
| Living Bridges | June 11, 2019 |
| La Luz Latino Leadership Program | June 19, 2019 |
| Los Cien | June 21, 2019 |
| Legal Aid of Sonoma County | June 25, 2019 |
| Multiple west county service providers | August 21, 2019 |
| Roseland residents and service providers | August 27, 2019 |

Staff presented an overview of the assessment of fair housing process, efforts and objective for various committee bodies and City offices as listed below:

| Meeting | Date |
|--|--------------------|
| Resident Engagement and Empowerment | May 6 and 24, 2019 |
| Community Development Committee | May 22, 2019 |
| Sonoma Intersections Coalition | June 3, 2019 |
| Adult and Aging Housing Committee | June 11, 2019 |
| Government Alliance on Regional Equity | July 25, 2019 |
| Bay Area Health Inequities Initiative | October 2019 |

In collaboration with the cities of Santa Rosa and Petaluma, a community engagement report was produced by the Commission’s consultant, which can be found in Attachment 1. The report provides information on the approach taken to select areas throughout the county to solicit engagement, methods by which public engagement was sought, participation rate, analysis, and findings.

III. Assessment of Past Goals and Actions

The 2012 Analysis of Impediments to Fair Housing Choice identified the following impediments to fair housing and actions to address the findings:

Impediments:

- High levels of discrimination in Sonoma County of Sonoma;
- Ethnically segregated areas in Sonoma County, which could be related to lack of affordable housing;
- Shortage of transit opportunities and services for persons with disabilities;
- Fair housing information not available on the County’s website.

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Actions:

- Strengthen the capacity of a local fair housing organization to reduce discriminatory activities;
- Increase affordable, accessible housing in all areas of Sonoma County;
- Improve transit options in Sonoma County;
- Improve and make more uniform fair housing information on jurisdictional websites.

1.a. Discuss what progress has been made toward the achievement of past goals.

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.

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).

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 Kincadee 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, 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, completion of housing projects were delayed due to budget shortfalls and limited access to building materials. The country as a whole was economically burdened by high inflation, which has impacted many facets of City and County services, housing production, and housing costs.

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3.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 received \$96 million of federal American Rescue Plan Act (ARPA) funds in March of 2021 geared to support COVID-19 response efforts; support local governments to provide vital public services, including job retention; support economic stabilization for households and businesses; and address systemic public health and economic challenges that have contributed to the unequal impact of the pandemic. The first allocation was \$8 million to construct two new public health facilities and an additional \$8 million allocation in essential worker pay for current County employees who worked during the pandemic and targeted investments designed to improve the County's capacity for cultural responsiveness. In September of 2022 the Board of Supervisors used \$710,000 of ARPA funds to retain the services of two consultants in developing a language access plan, community engagement plan and policy recommendations for all county departments with an end to achieve equitable participation and access to County services and resources by underserved communities.

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 County was allocated \$2.9 million. The use of these funds is restricted to specific low-income populations, including homeless populations. The County developed a HOME-ARP Allocation Plan in accordance with HUD requirements to allocate funds to eligible projects, which will intentionally target households at-risk of homelessness, the homeless, persons/households fleeing or experiencing domestic violence, stalking, and or human trafficking as well as other lower income vulnerable populations.

A new program that the County supported in fiscal year 2022-23 is a 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 and other factors, which could jeopardize their housing situation. The goal of the program is to help residents remain in their home, or depending on the situation, acquire housing by assisting them to manage their debt and ease their 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.

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

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The community engagement report prepared for this analysis identifies “high rents/cost of living/condition of housing” as the number one concern. This concern is followed by “community infrastructure”, “homelessness” and “safety”. These concerns are similar to those noted in the last assessment. 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 to comply with applicable ADA laws, support projects that create and or preserve affordable housing, including 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 1: Demographics, Sonoma County

| Race/Ethnicity | Number | | Percent |
|--|------------------------------|--------|---------|
| White, Non-Hispanic. | 316,022 | | 63.2% |
| Black, Non-Hispanic | 7,399 | | 1.5% |
| Hispanic | 133,569 | | 26.7% |
| Asian/Pacific Island, Non-Hispanic | 21,565 | | 4.3% |
| Native American, Non-Hispanic | 2,343 | | 0.5% |
| #1 country of origin | Mexico | 46,768 | 10.0% |
| #2 country of origin | China excl. Taiwan | 2,383 | 0.5% |
| #3 country of origin | Philippines | 2,361 | 0.5% |
| #4 country of origin | El Salvador | 2,295 | 0.5% |
| #5 country of origin | Other South Eastern Asia | 2,222 | 0.5% |
| #6 country of origin | Canada | 1,823 | 0.4% |
| #7 country of origin | Other Central America | 1,632 | 0.4% |
| #8 country of origin | Germany | 1,528 | 0.3% |
| #9 country of origin | Eastern Africa | 1,446 | 0.3% |
| #10 country of origin | India | 1,390 | 0.3% |
| Limited English Proficiency (LEP) Language | | | |
| #1 LEP Language | Spanish | 42,419 | 9.1% |
| #2 LEP Language | Other Indo-European Language | 2,432 | 0.5% |

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| | | | |
|-------------------------------|--------------------------------|---------|-------|
| #3 LEP Language | Other Asian & Pacific Language | 1,793 | 0.4% |
| #4 LEP Language | Chinese | 1,628 | 0.4% |
| #5 LEP Language | Other & Unspecified Language | 784 | 0.2% |
| #6 LEP Language | Vietnamese | 766 | 0.2% |
| #7 LEP Language | Tagalog | 667 | 0.1% |
| #8 LEP Language | Slavic Language | 542 | 0.1% |
| #9 LEP Language | West Germanic Language | 287 | 0.1% |
| #10 LEP Language | Korean | 285 | 0.1% |
| Disability Type | | | |
| Hearing difficulty | | 18,277 | 3.7% |
| Vision difficulty | | 9,268 | 1.9% |
| Cognitive difficulty | | 21,725 | 4.6% |
| Ambulatory difficulty | | 28,256 | 6.0% |
| Self-care difficulty | | 11,921 | 2.5% |
| Independent living difficulty | | 21,018 | 5.3% |
| Sex | | | |
| Male | | 244,045 | 48.8% |
| Female | | 255,727 | 51.2% |
| Age | | | |
| Under 18 | | 99,290 | 19.8% |
| 18-64 | | 305,669 | 61.2% |
| 65+ | | 94,913 | 19.0% |
| Family | | | |
| Families with children | | 47,477 | 39.4% |

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.

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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%

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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 overall proportion of the white 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 2: Demographic Trends, Sonoma County

| | 1990 | Trend | 2000 | Trend | 2010 | Trend | 2020 | Trend |
|----------------|--------|---------|--------|---------|--------|---------|--------|---------|
| Race/Ethnicity | Number | Percent | Number | Percent | Number | Percent | Number | Percent |

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|---|----------------|--------------|----------------|---------------|----------------|--------------|----------------|--------------|
| 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 | 14.33% | 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% |
| <i>Source: American Community Survey, 2015-2019</i> | | | | | | | | |

Although the white population continues to be in the majority throughout Sonoma County, the Hispanic and Asian American population have grown considerably as well. The Hispanic population in Santa Rosa now makes up one-third 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. By contrast, Native Americans residents have declined in Santa Rosa and Sonoma County. Nevertheless, 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 Santa Rosa and Sonoma County. Santa Rosa has experienced the highest increase of foreign-born residents who now make up twenty percent of the city's population, and seventeen percent in Sonoma County. Santa Rosa and Sonoma County have experienced growth in the population of residents with limited English proficiency, tripling to almost fifteen percent in Santa Rosa and doubling to almost eleven percent in Sonoma County,

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 most jurisdictions. 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 at least seventeen percent in Santa Rosa 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.

Table 1: Dissimilarity Index Values by Race and Ethnicity

| Racial/Ethnic Dissimilarity Index | | | | |
|--|------------|------------|------------|---------|
| 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> | | | | |

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.

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.

Table 2: 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> | | | | |

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 3: 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 |
| <i>Source: Diversity and Disparities, Spatial Structures in the Social Sciences, Brown University.</i> | | | | |

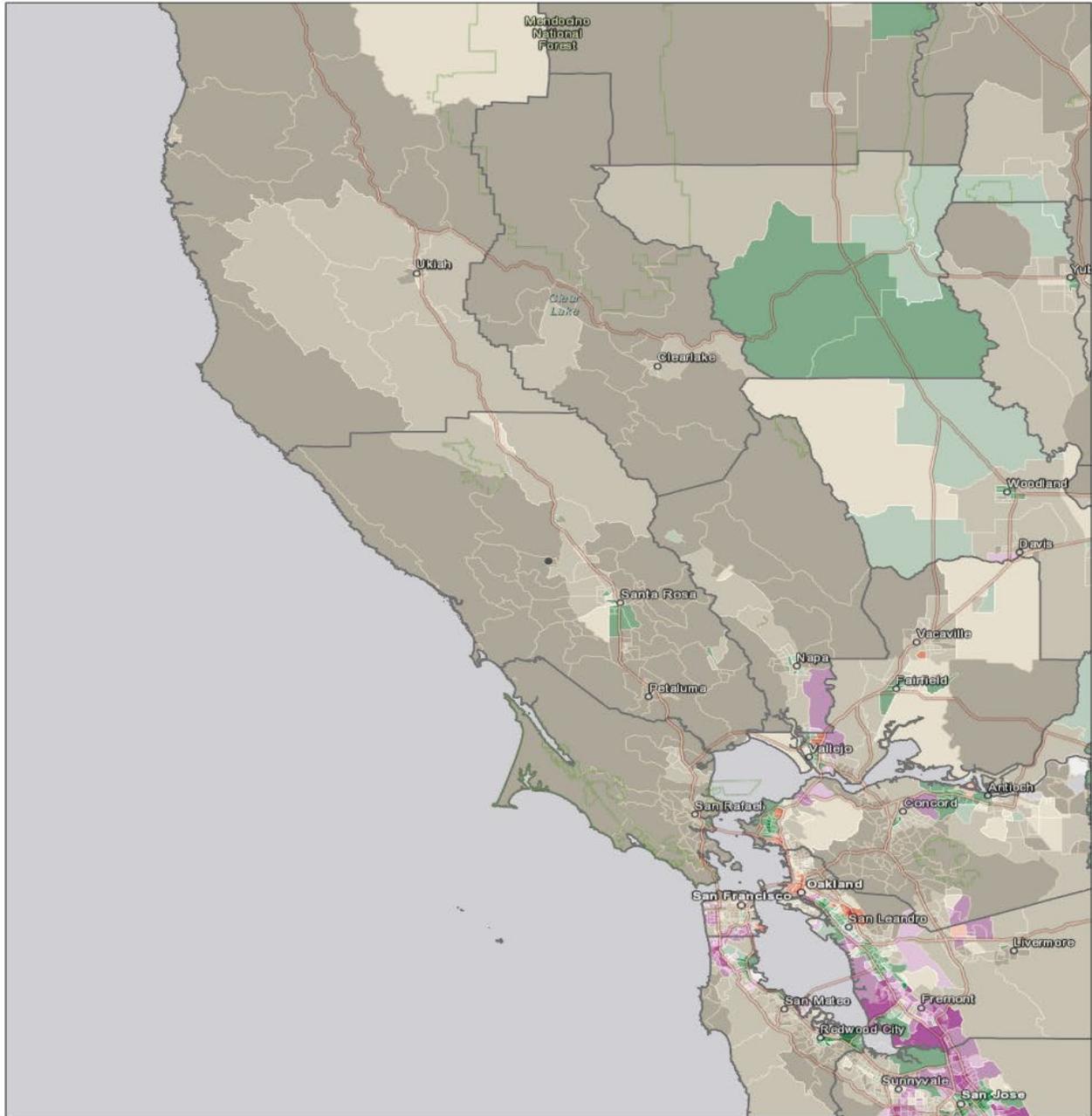
Sonoma County

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.

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: 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%)

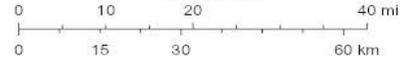
(R) Predominant Population - Asian Majority Tracts

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - African American Majority Tracts

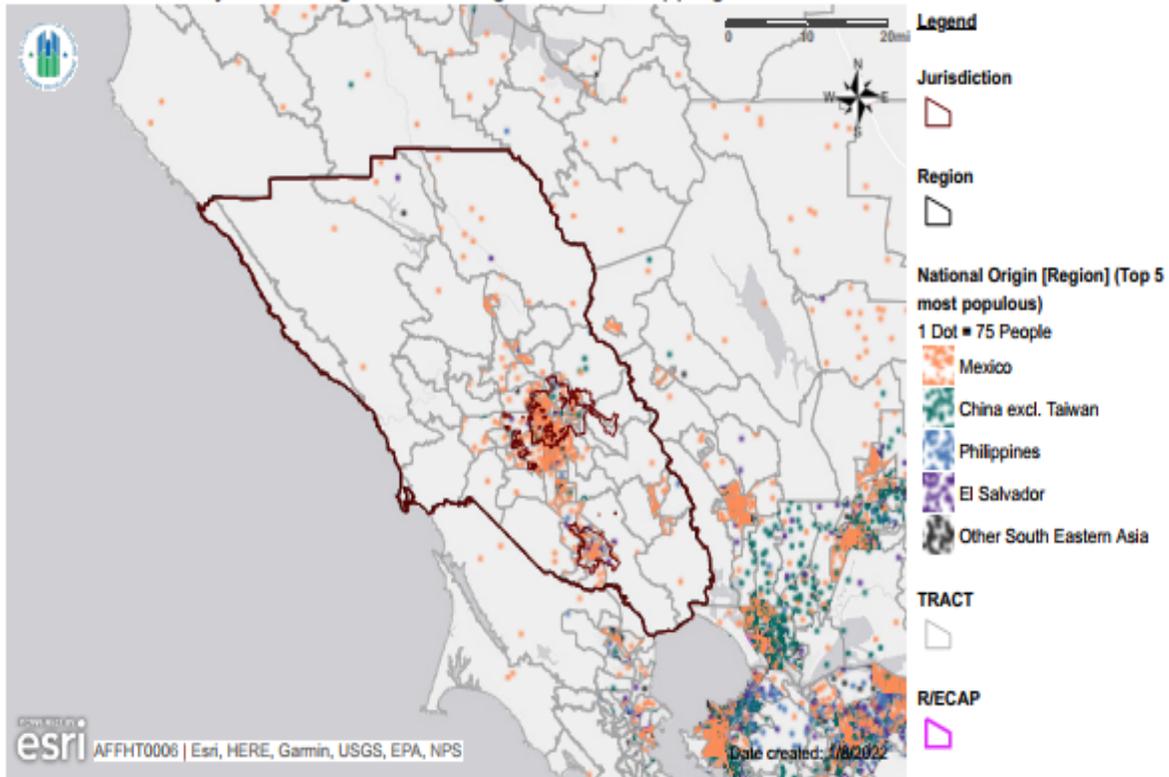
- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

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Map 3: Sonoma County National Origin

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

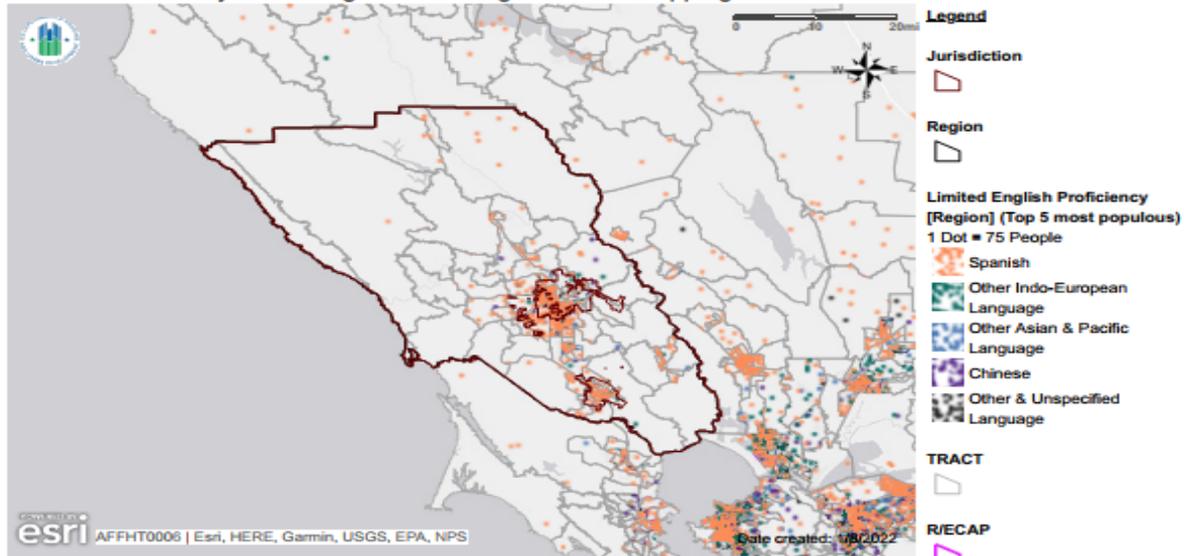
Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Sonoma County

In Sonoma County, a majority of the residents are white, with Hispanic residents being the next largest group. While most of the County is white, there are Hispanic majority tracts near and directly south of the city of Santa Rosa.

Map 4: Sonoma County Limited English Proficiency
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Sonoma County

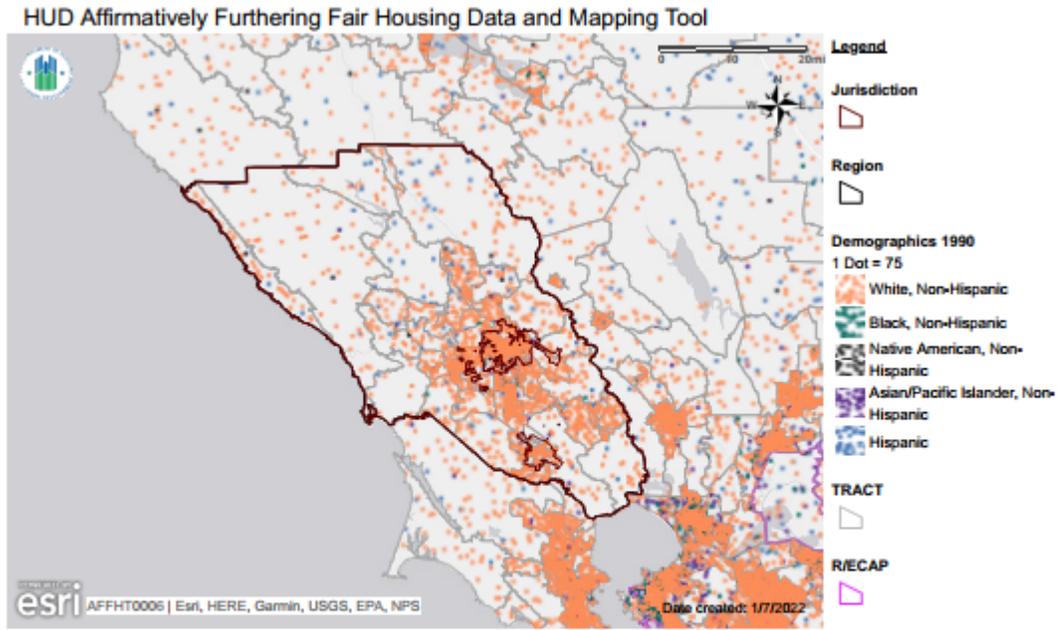
In Sonoma County, the top foreign languages spoken by those with limited English proficiency (LEP) are Spanish, followed by Other Indo-European Language. LEP residents are most prevalent near the more urban areas of the County. Specifically, there are large clusters of Spanish speaking residents near 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.

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

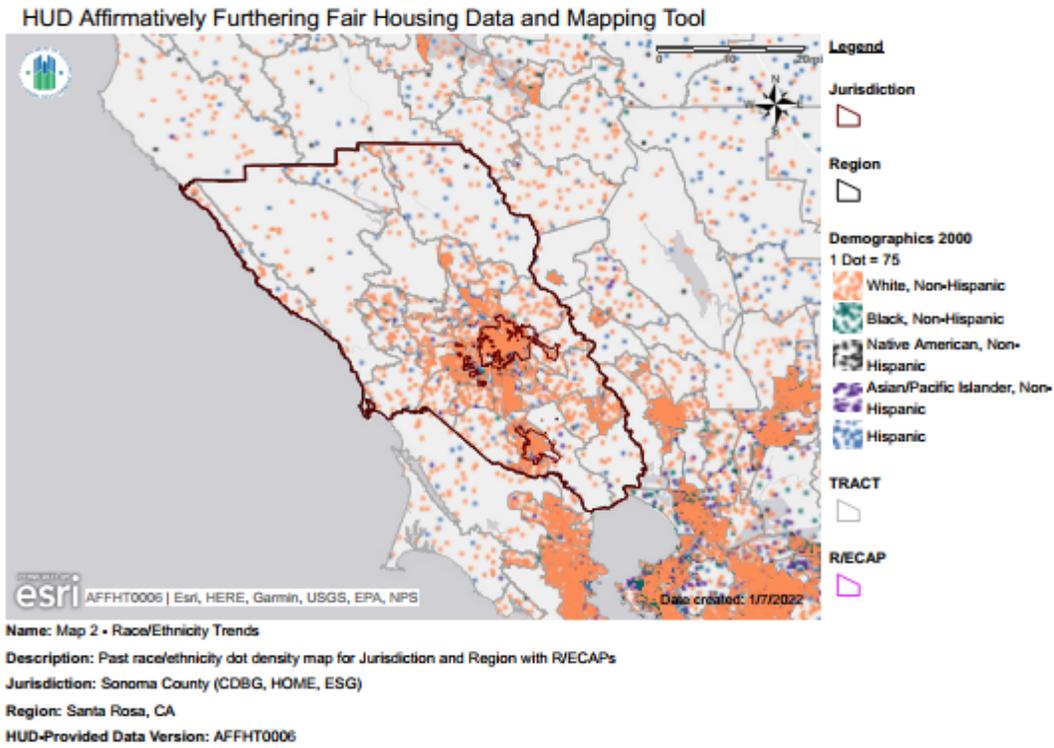
1.e. Discuss how patterns of segregation have changed over time (since 1990).

Map 6: Sonoma County Racial Demographics in 1990

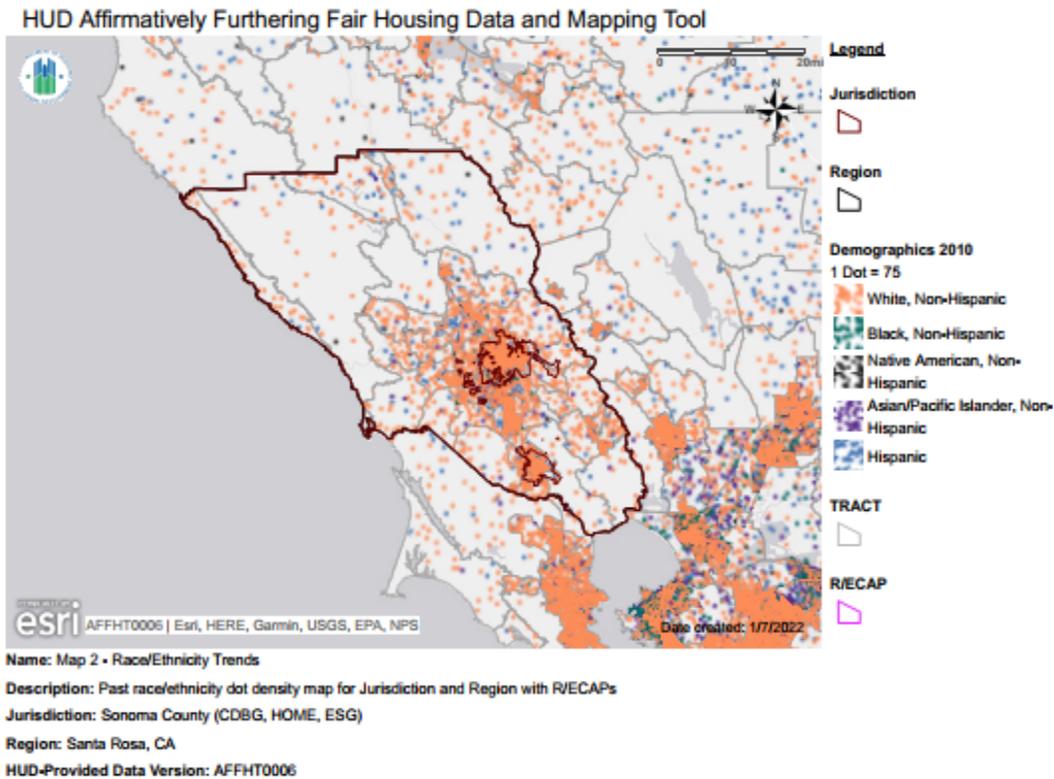


Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Sonoma County (CDBG, HOME, ESG)
Region: Santa Rosa, CA
HUD-Provided Data Version: AFFHT0006

Map 7: Sonoma County Racial Demographics in 2000



Map 8: Sonoma County Racial Demographics in 2010



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 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.

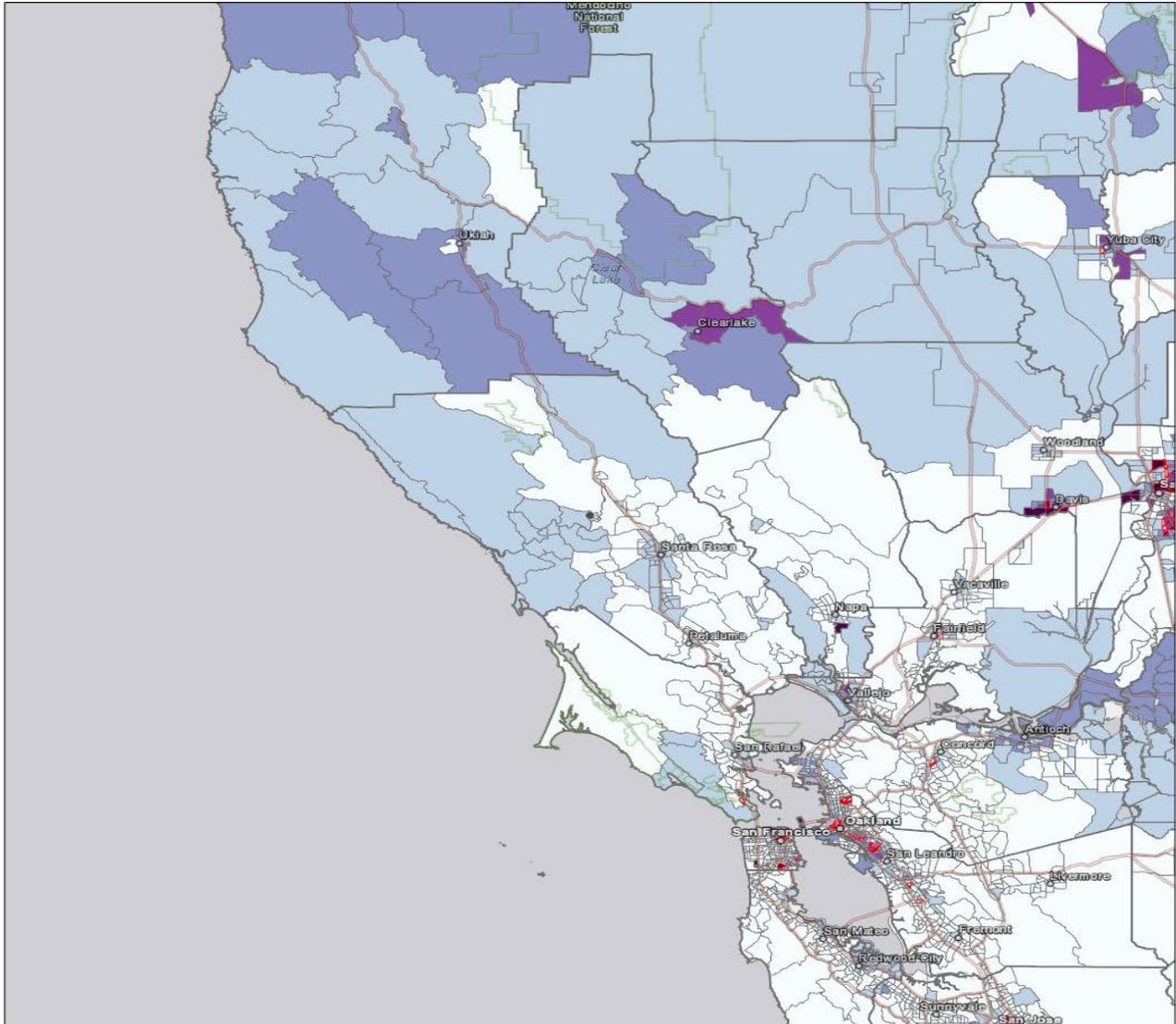
As defined, there are no R/ECAPs in Sonoma County.

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Map 1: Sonoma County R/ECAPs with Poverty Rates

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

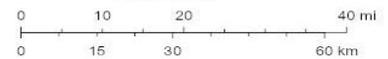
< 10%

10% - 20%

20% - 30%

30% - 40%

> 40%



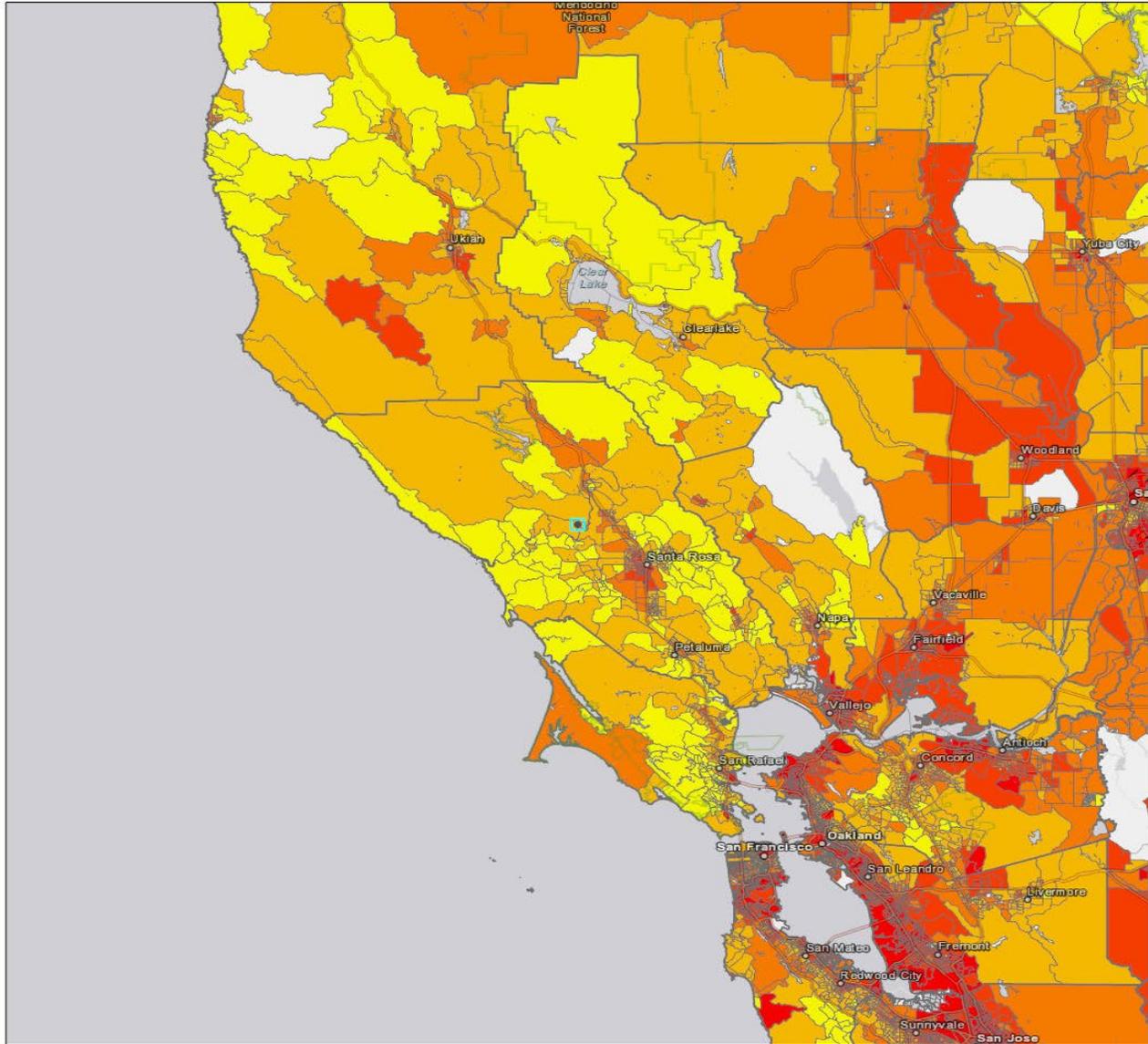
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Map 2: Sonoma County R/ECAPs with Non-White Percentage of the Population

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%

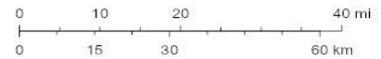
21 - 40%

41 - 60%

61 - 80%

> 81%

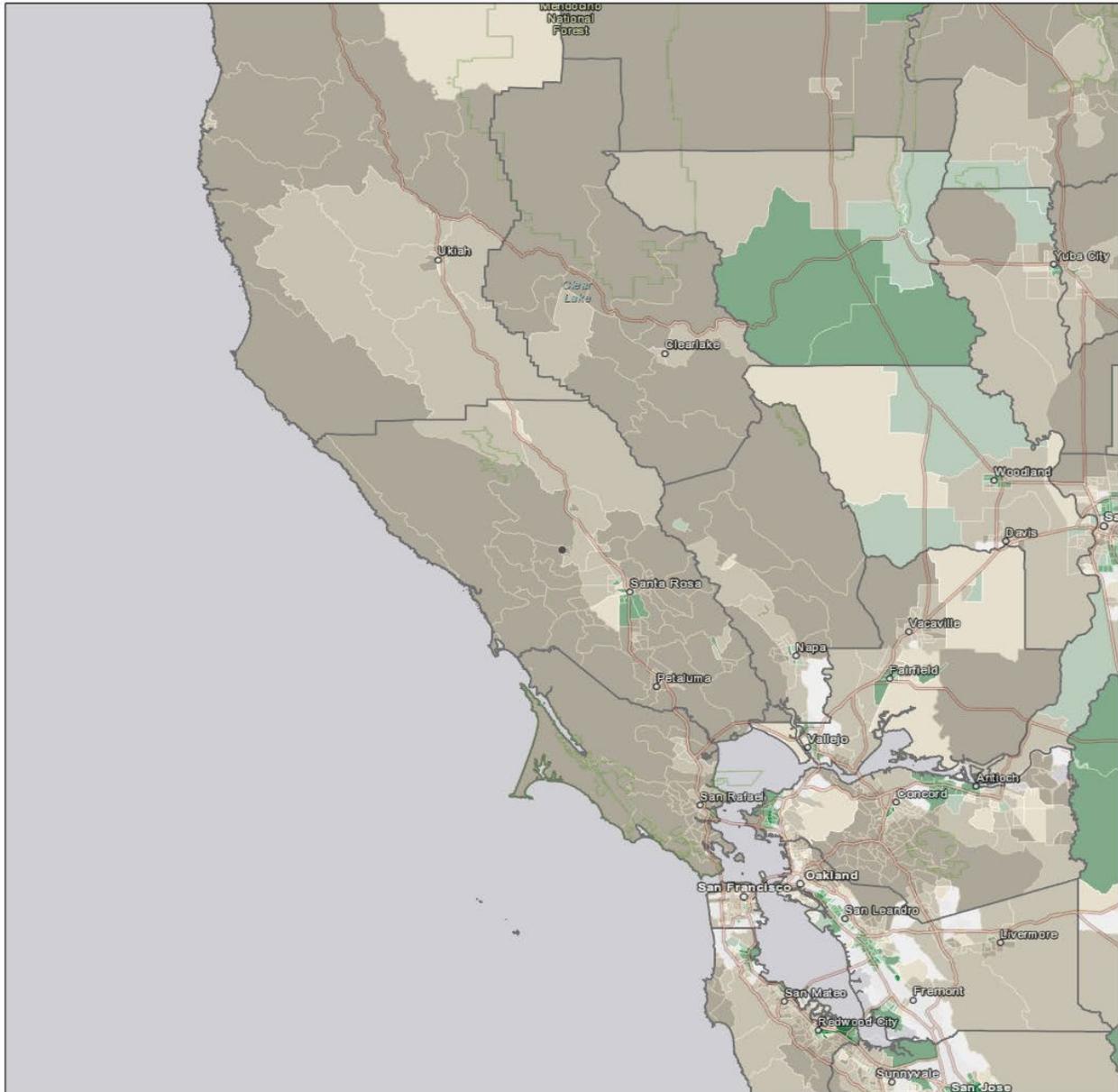
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 Sonoma County

Map 3: Sonoma County Predominant Racial Group
 Sonoma County Predominant Racial Group



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County Boundaries

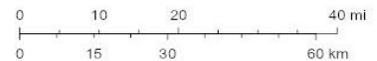
(R) Predominant Population - White Majority Tracts

- 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%)

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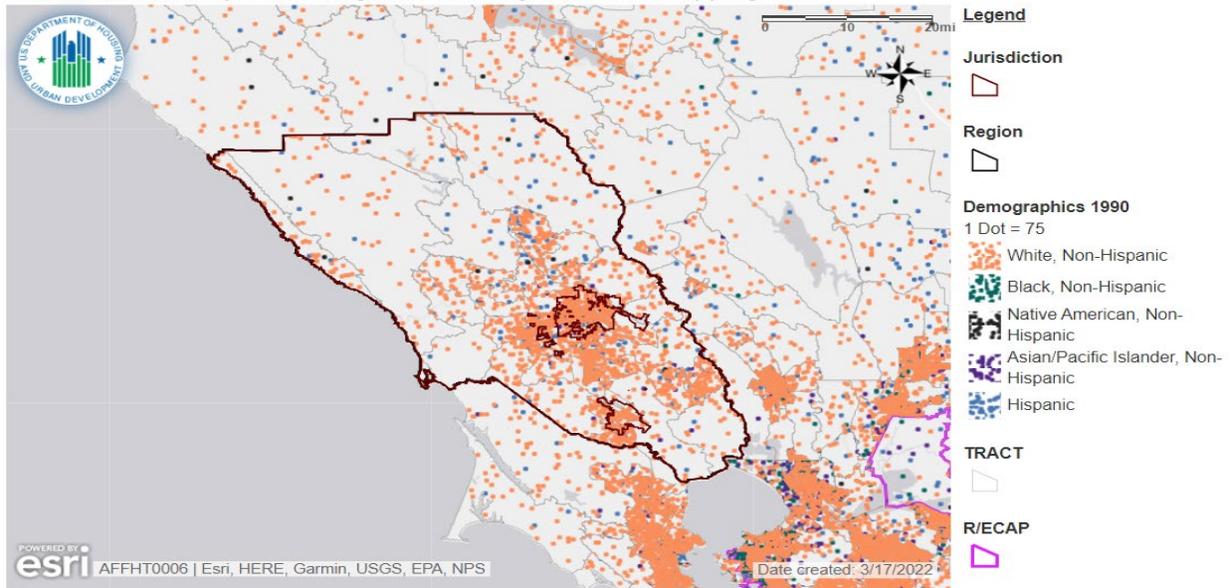
In Sonoma County, poverty rates are primarily 20% or lower, with some areas having poverty rates of less than 10% and others having rates between 10% and 20%. One tract in Santa Rosa has a poverty rate between 20% and 30%. Most of the County has a non-white population of under 20% or between 20% and 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 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).

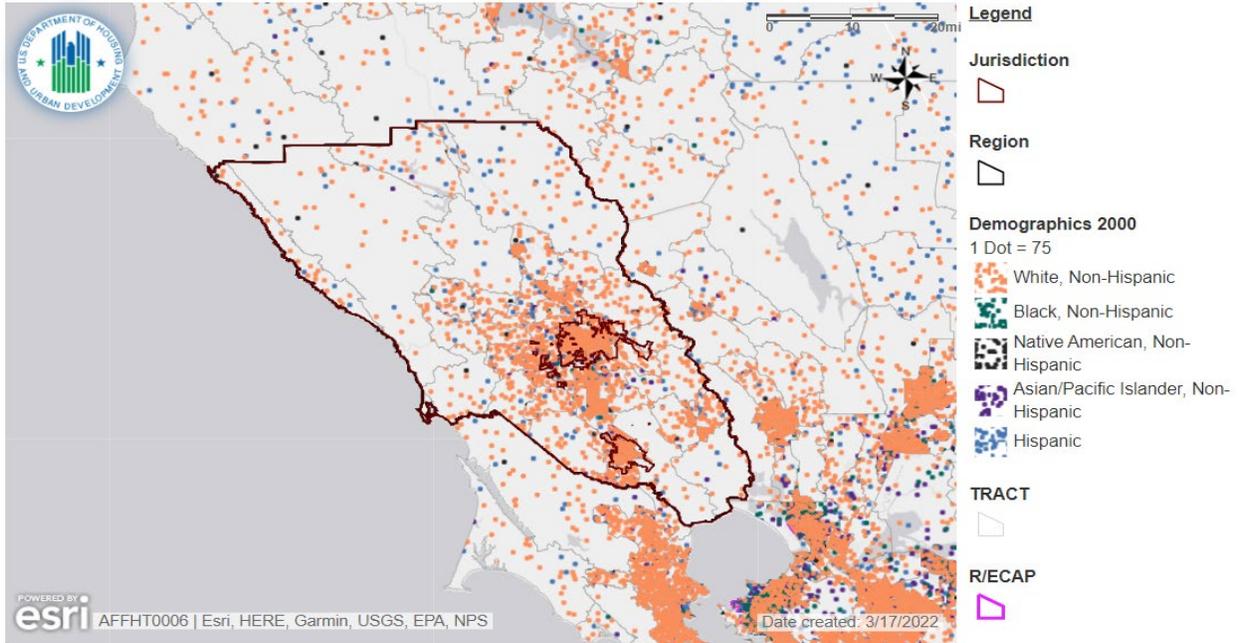
Map 4: Sonoma County R/ECAPs Demographics 1990
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Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Sonoma County (CDBG, HOME, ESG)
Region: Santa Rosa, CA
HUD-Provided Data Version: AFFHT0006

Map 5: Sonoma County R/ECAPs Demographics 2000

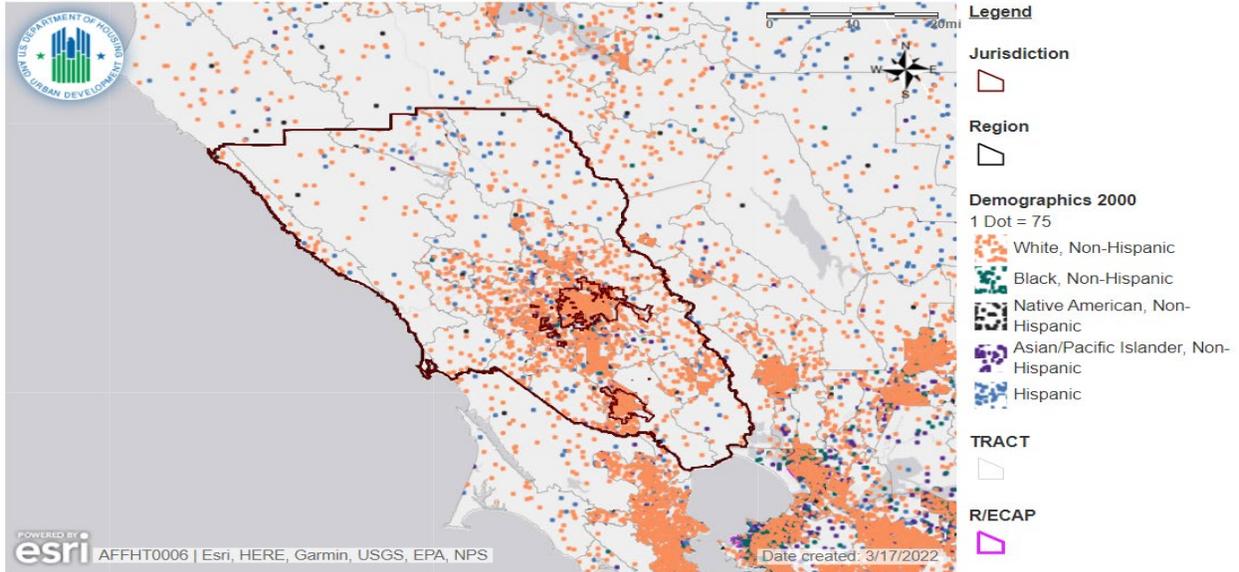
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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

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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 Sonoma County

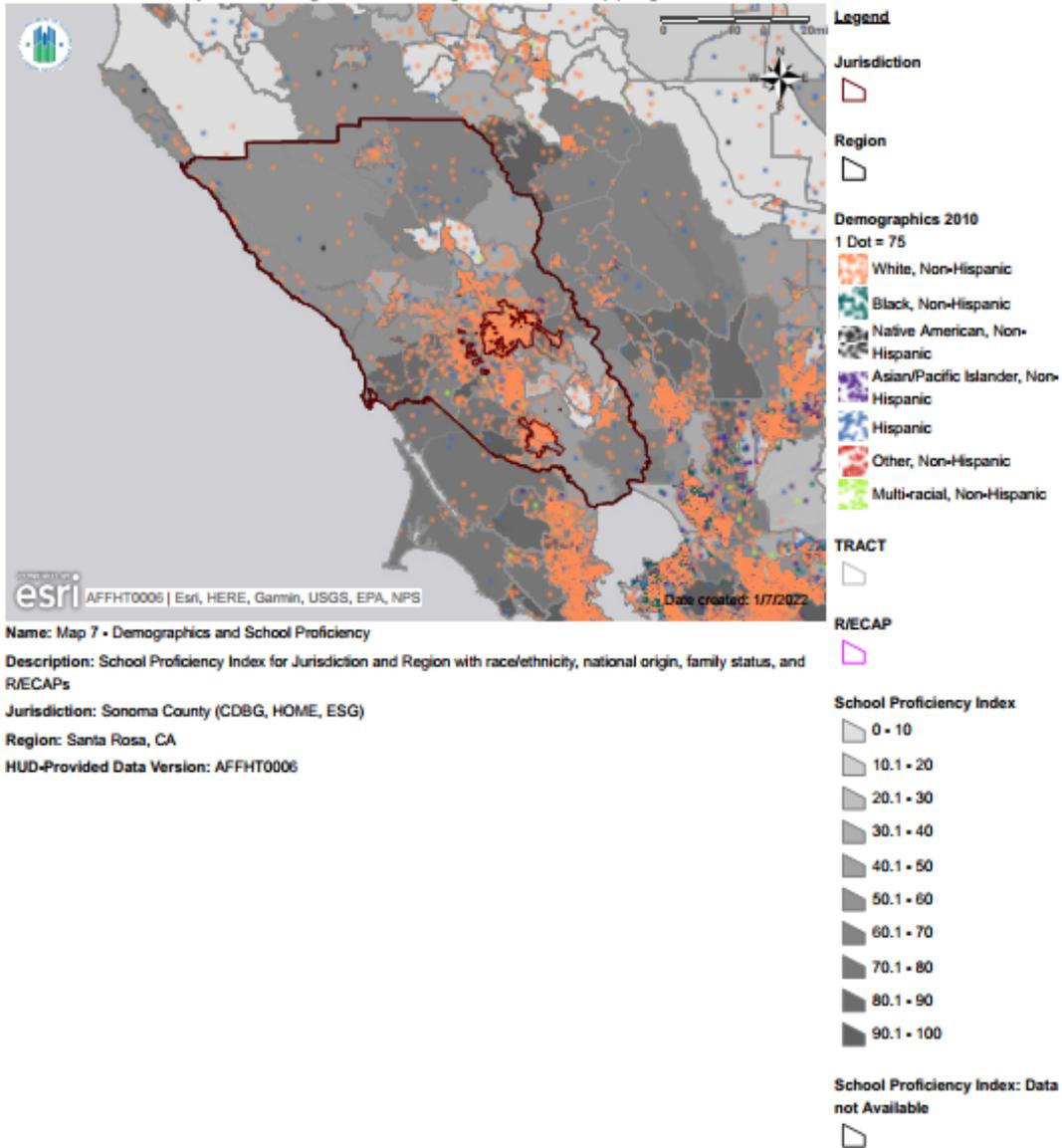
| | Sonoma County |
|--|---------------|
| Total Population | |
| White, Non-Hispanic | 47.64 |
| Black, Non-Hispanic | 40.88 |
| Hispanic | 36.48 |
| Asian or Pacific Islander, Non-Hispanic | 43.67 |
| Native American, Non-Hispanic | 42.10 |
| Population below federal poverty line | |
| White, Non-Hispanic | 42.55 |
| Black, Non-Hispanic | 30.75 |
| Hispanic | 35.89 |
| Asian or Pacific Islander, Non-Hispanic | 40.03 |
| Native American, Non-Hispanic | 37.37 |

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.

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

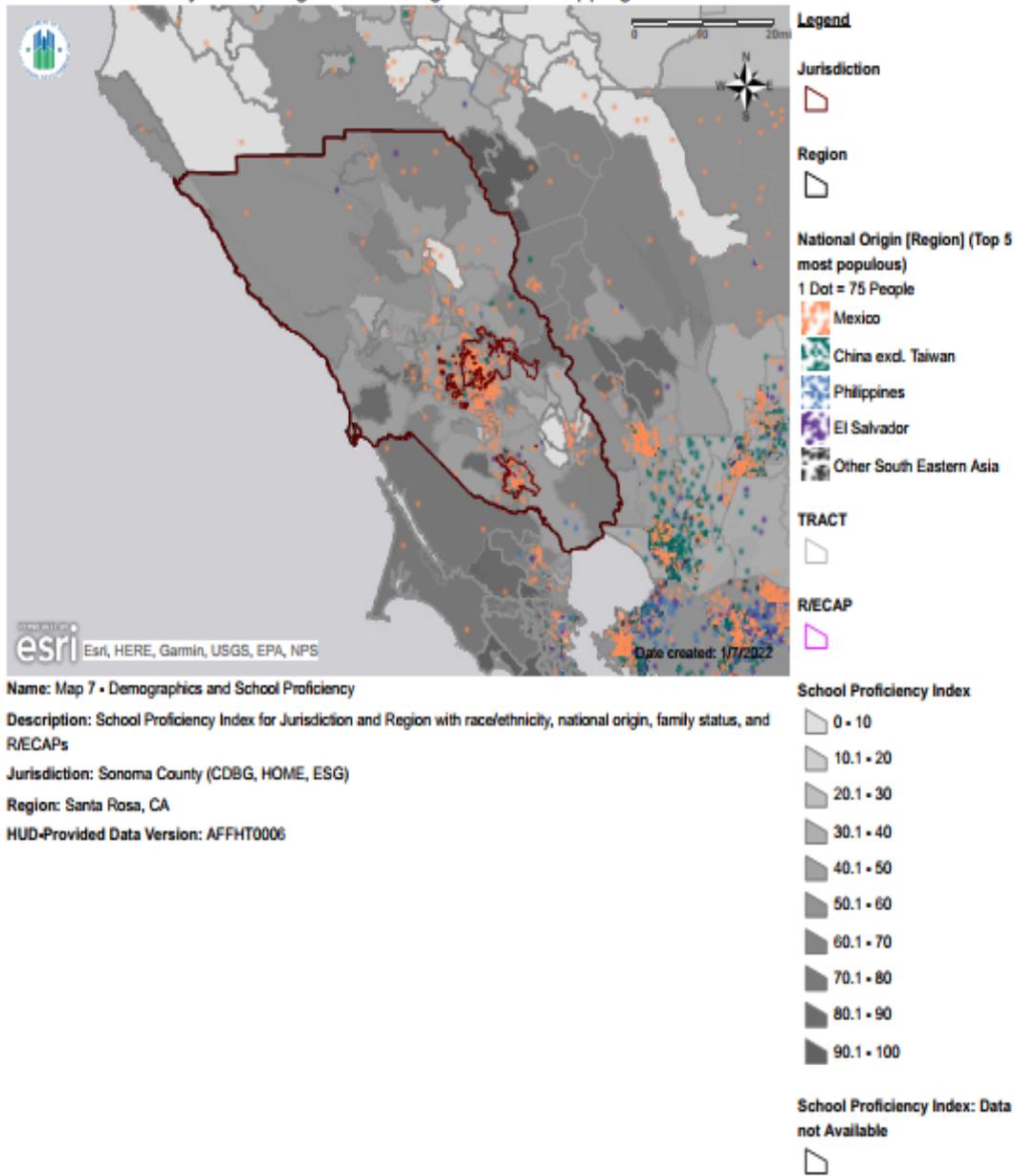
Map 1a: Race/Ethnicity and School Proficiency, Sonoma County

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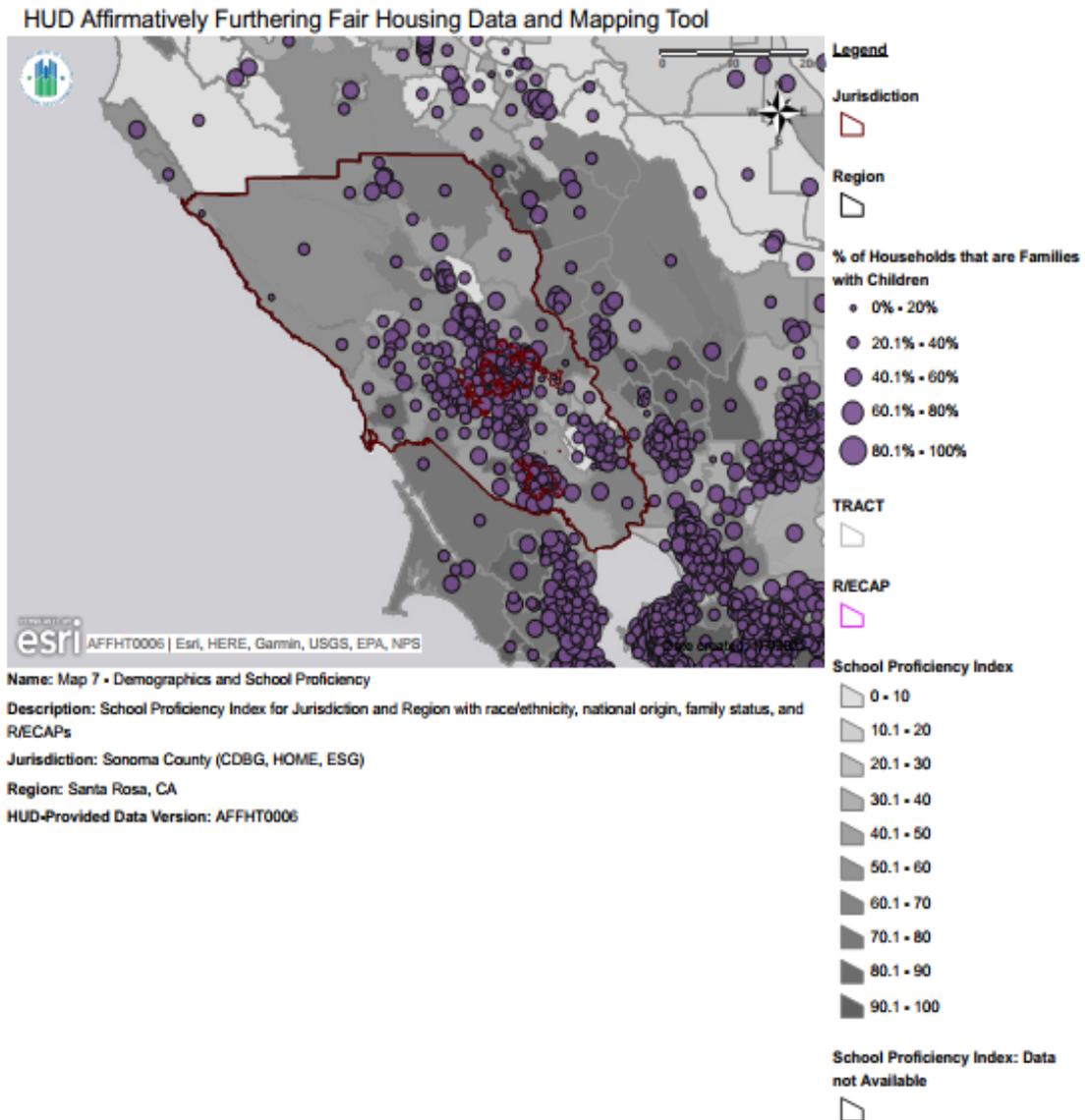


Name: Map 7 - Demographics and School Proficiency
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/IECAPs
Jurisdiction: Sonoma County (CDBG, HOME, ESG)
Region: Santa Rosa, CA
HUD-Provided Data Version: AFFHT0006

Map 1b: National Origin and School Proficiency, Sonoma County
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Map 1c: 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 when 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 when 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.

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 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, Sonoma County

| 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 |

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| | | |
|--|--------------|--------------|
| 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> | | |

Hispanic residents enjoy the highest Jobs Proximity Index values in Santa Rosa. White residents experience the lowest Jobs Proximity Index value. When compared to the Countywide values, 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, increases for white, Black, and Native American residents. Asian or Pacific Islander residents. The value decreases for Hispanic and Asian or Pacific Islander residents.

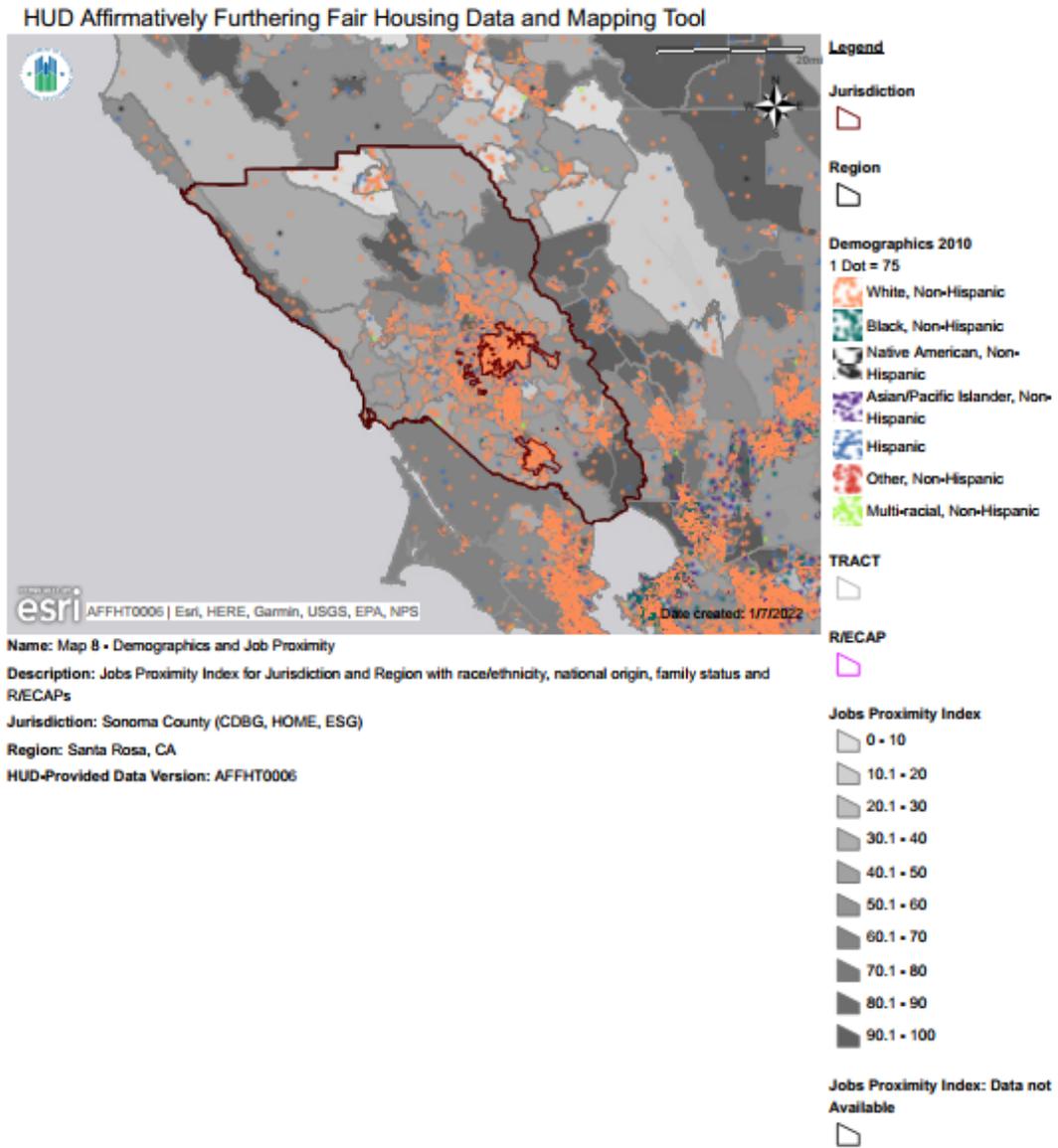
Sonoma County

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.

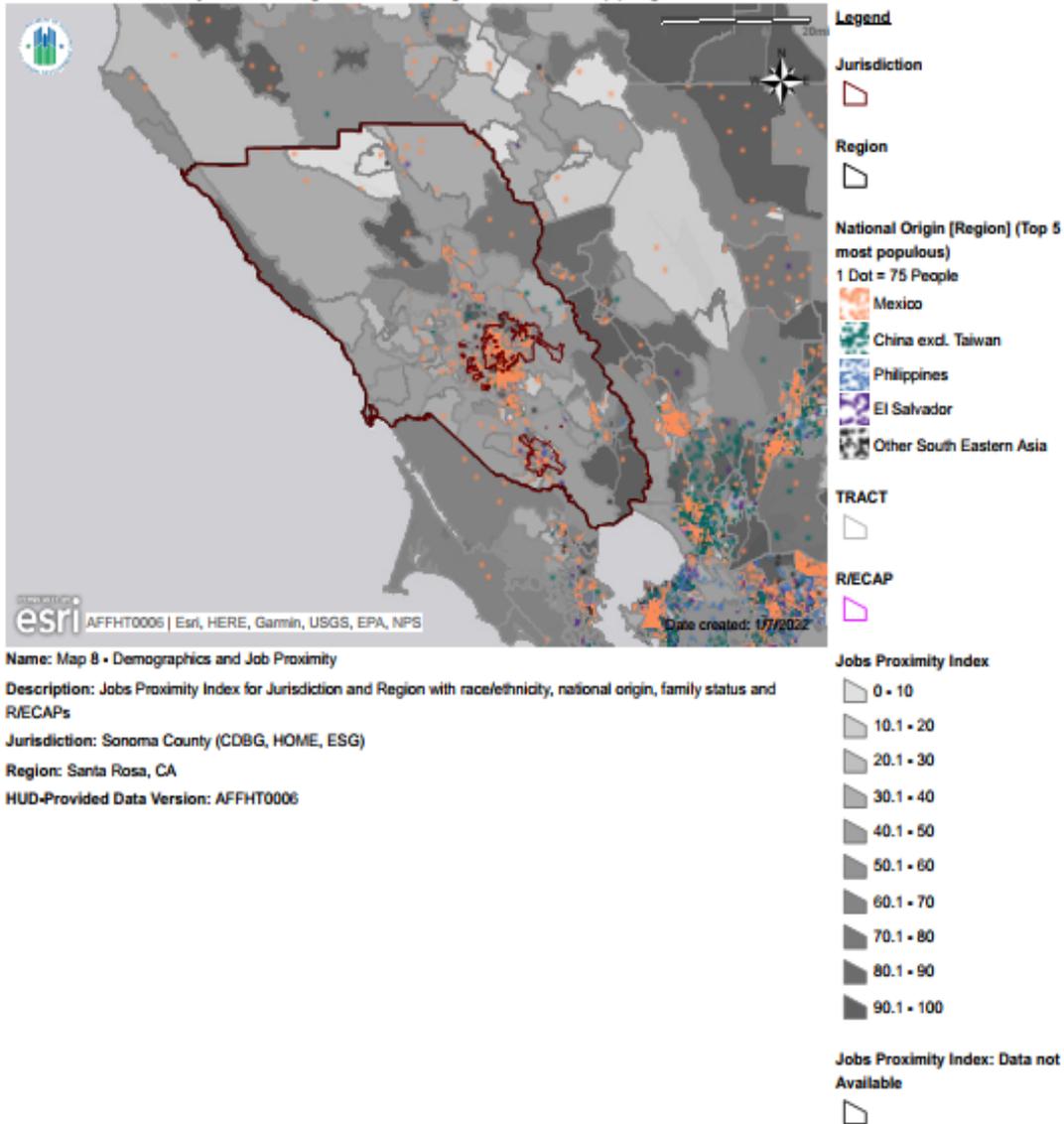
ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

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



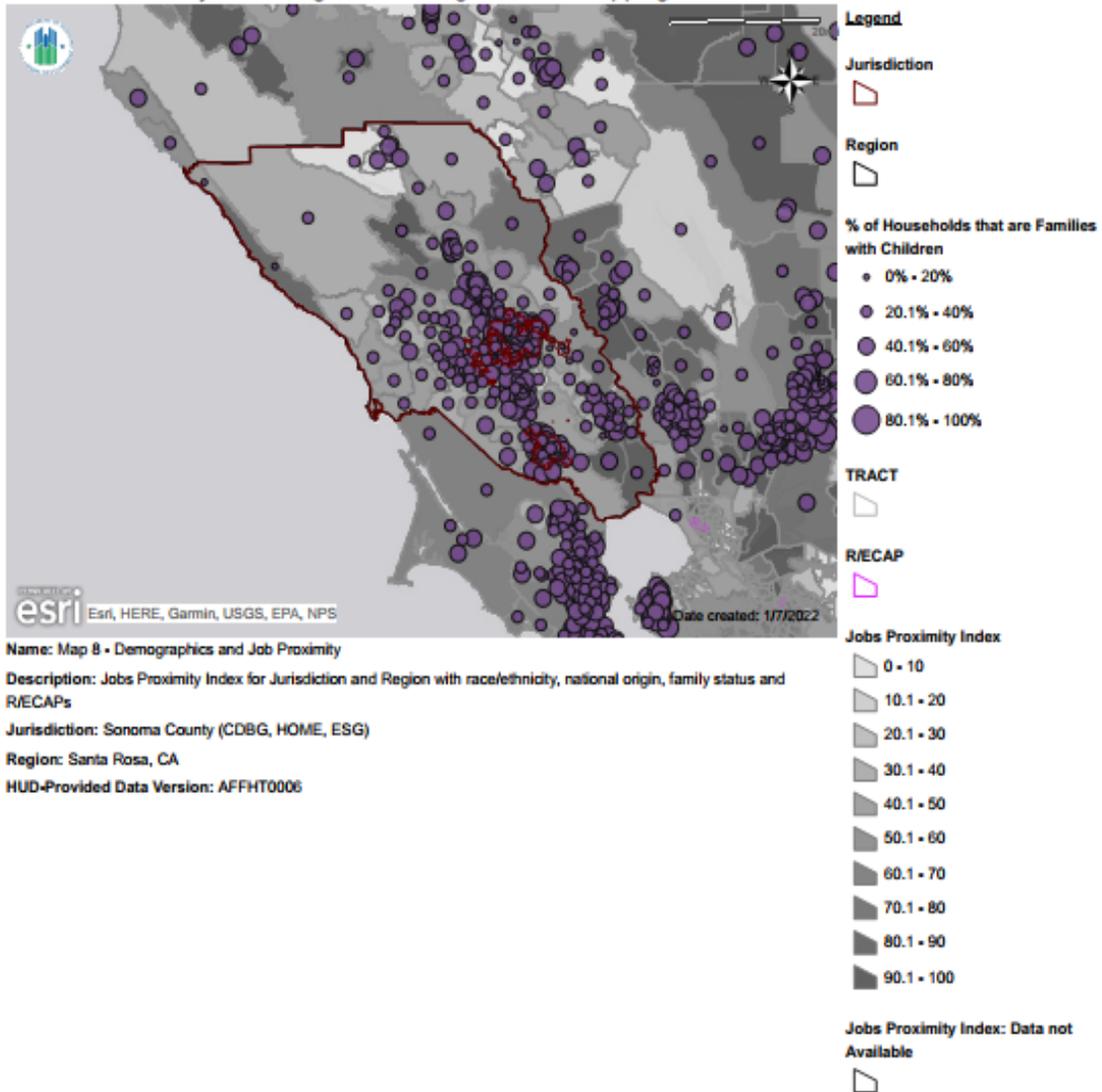
Map 2b: Demographics and Job Proximity (National Origin), Sonoma County

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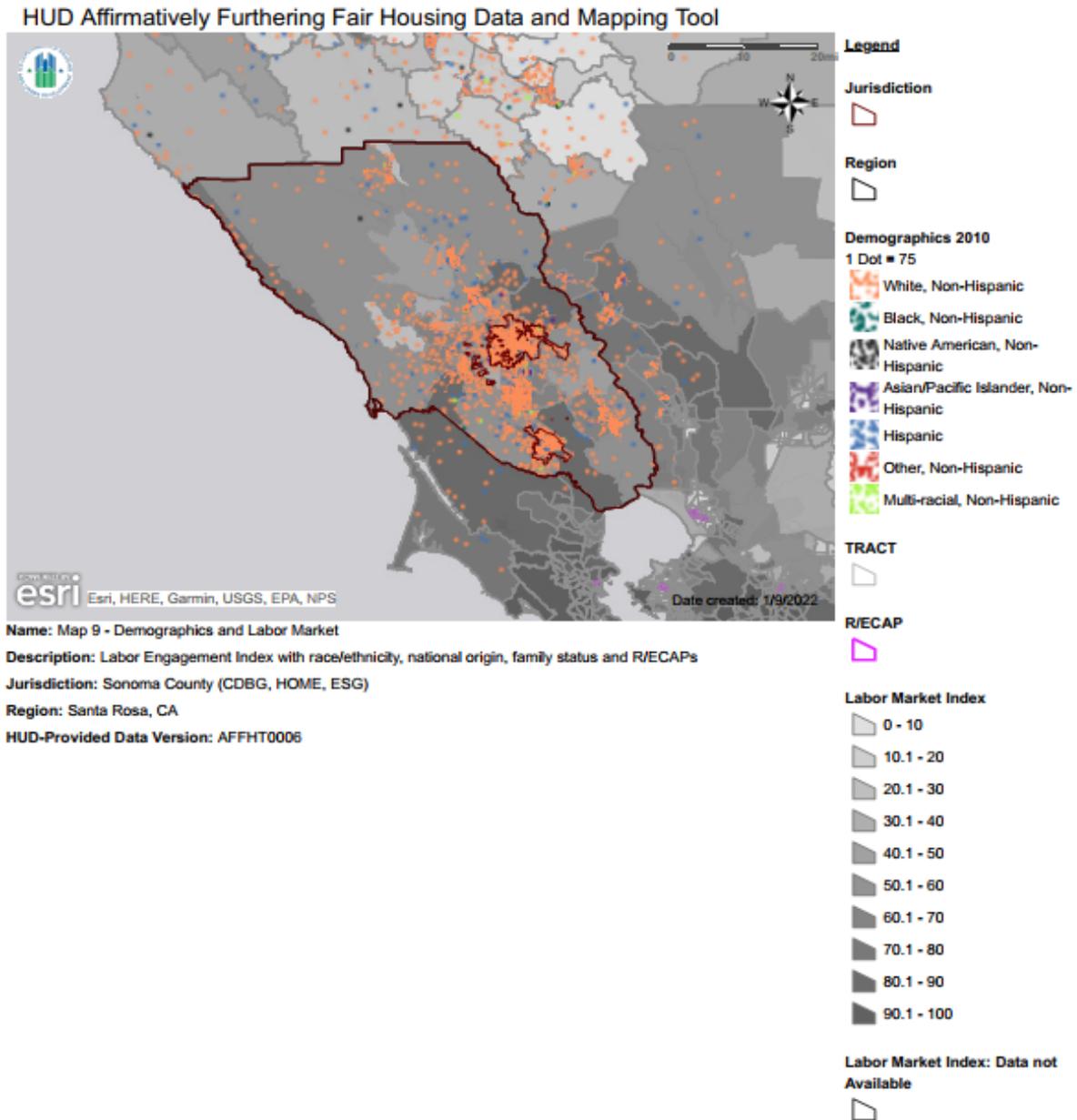


Map 2c: Demographics and Job Proximity (Family Status), Sonoma County

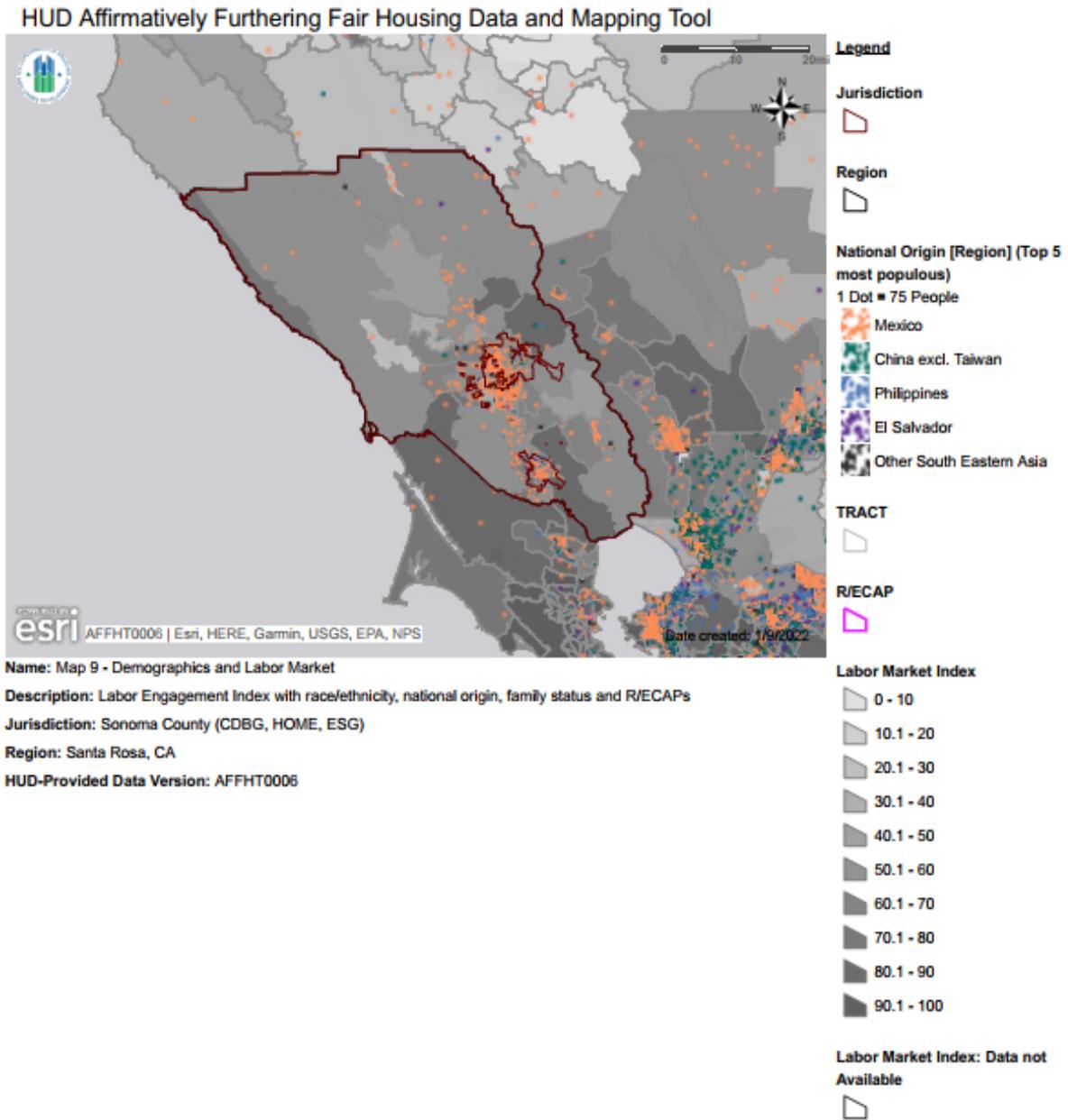
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



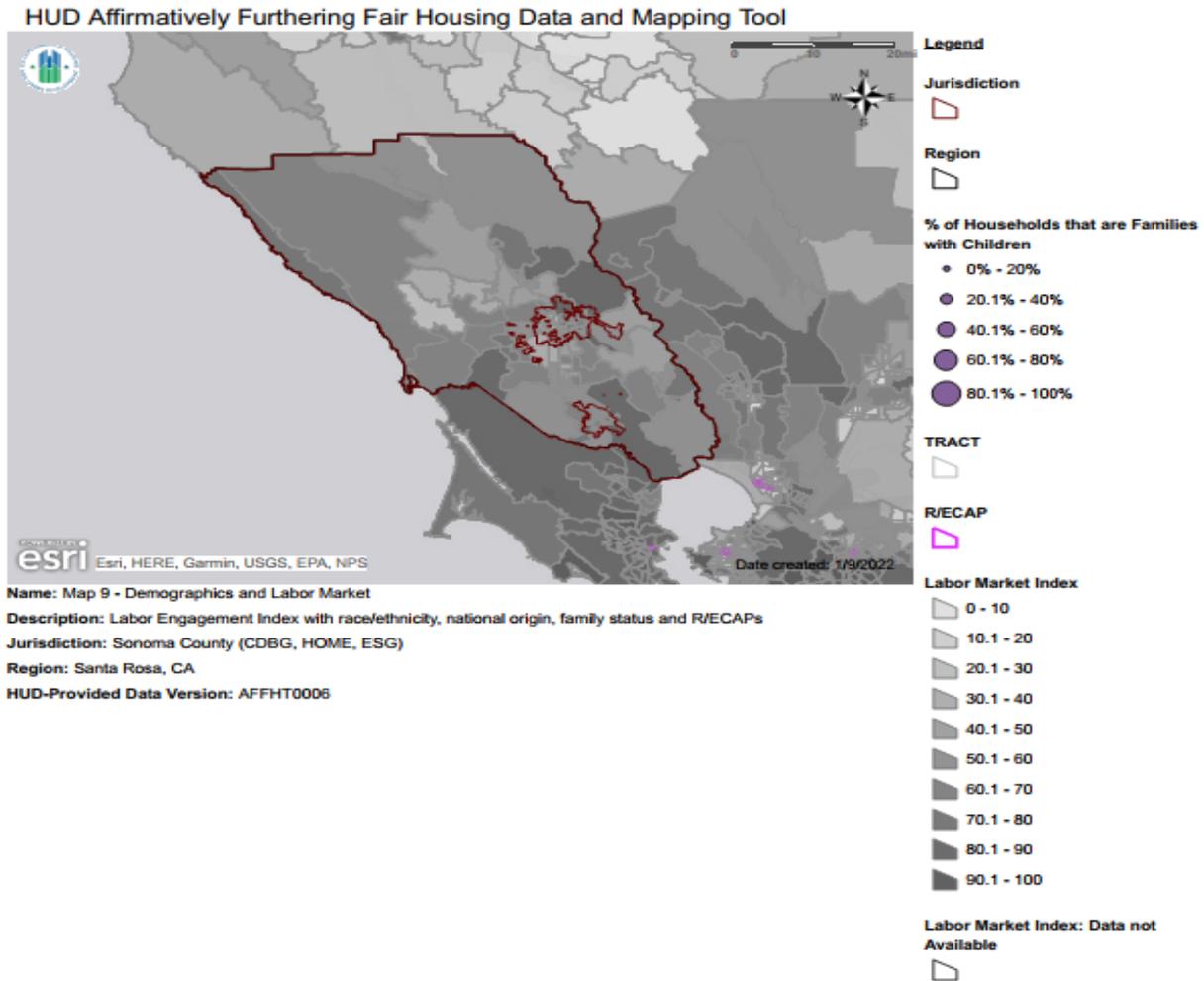
Map 4a: Demographics and Labor Market (Race/Ethnicity), Sonoma County



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 2021.¹ The state of California unemployment rate is 5.8%.² Their unemployment rate is also in line with the unemployment rates of the neighboring counties of Napa (4.1%),³ Marin (4.2%),⁴ and Lake (4.2%).⁵ 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.⁶

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 Sonoma Works 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.

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 the county, 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 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

¹ Bureau of Labor Statistics, Local Area Unemployment Statistics, March 2022..

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ 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>

per month.”⁷ 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.”⁸ 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 that 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 public transit access is less needed 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.

⁷ Sonoma County Transportation Authority, *Transit Integration and Efficiency Study*, <https://scta.ca.gov/wp-content/uploads/2019/10/TIES-Draft-Final-Report.pdf>

⁸ *Id.*

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

| Sonoma County | Transit Index | Low Transportation Cost Index |
|--|---------------|-------------------------------|
| 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 |
| <i>Source: Location Affordability Index (LAI) data, 2012-2016.</i> | | |

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.

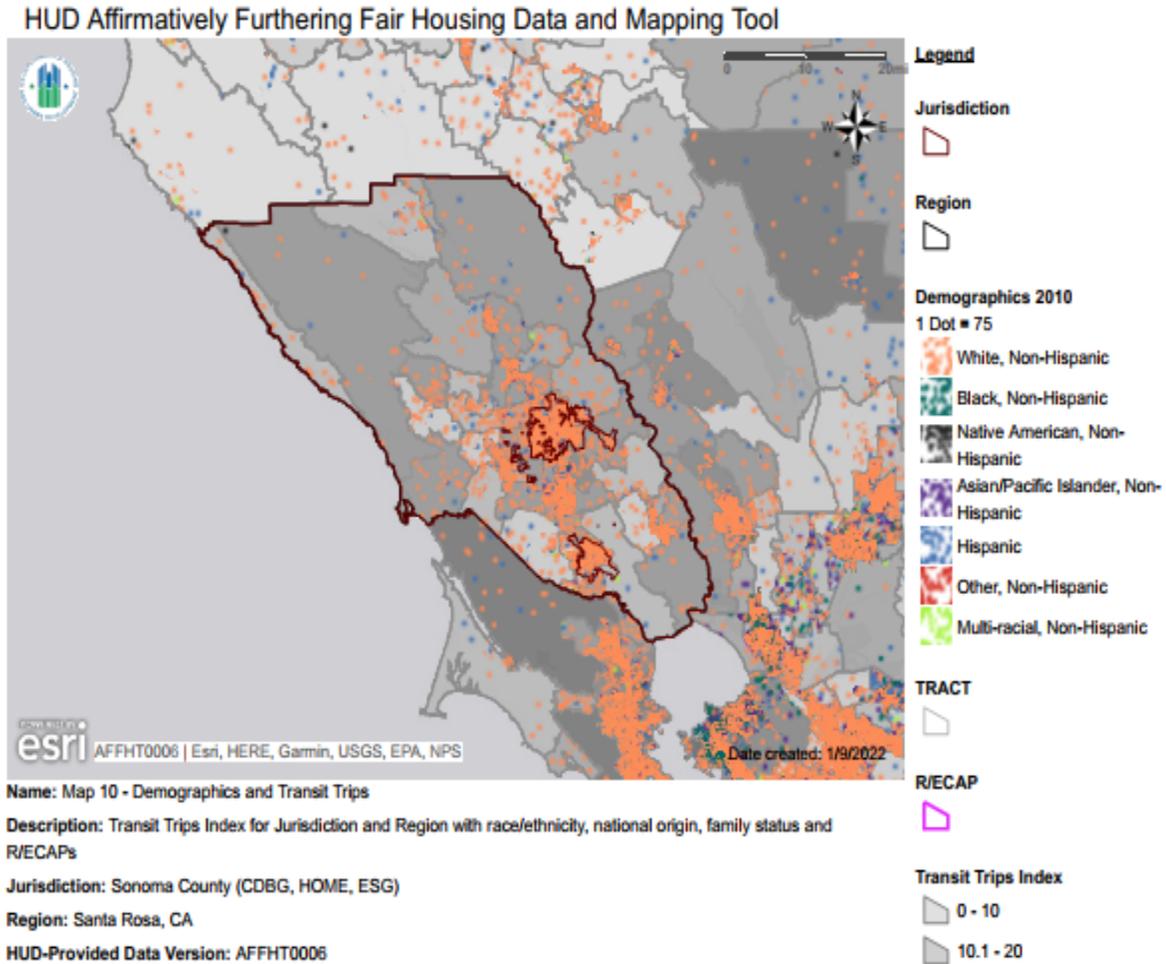
The County’s LTCI values strongly correspond with the trend for the individual jurisdictions in Sonoma ranging from 66 to 71. As is the case throughout, Black residents have slightly higher LTCI values, 71, than other groups while white residents have the lowest, 66. The index value trend for low-income residents also corresponds to the jurisdictional ones for LTCI values. All racial groups undergo slight

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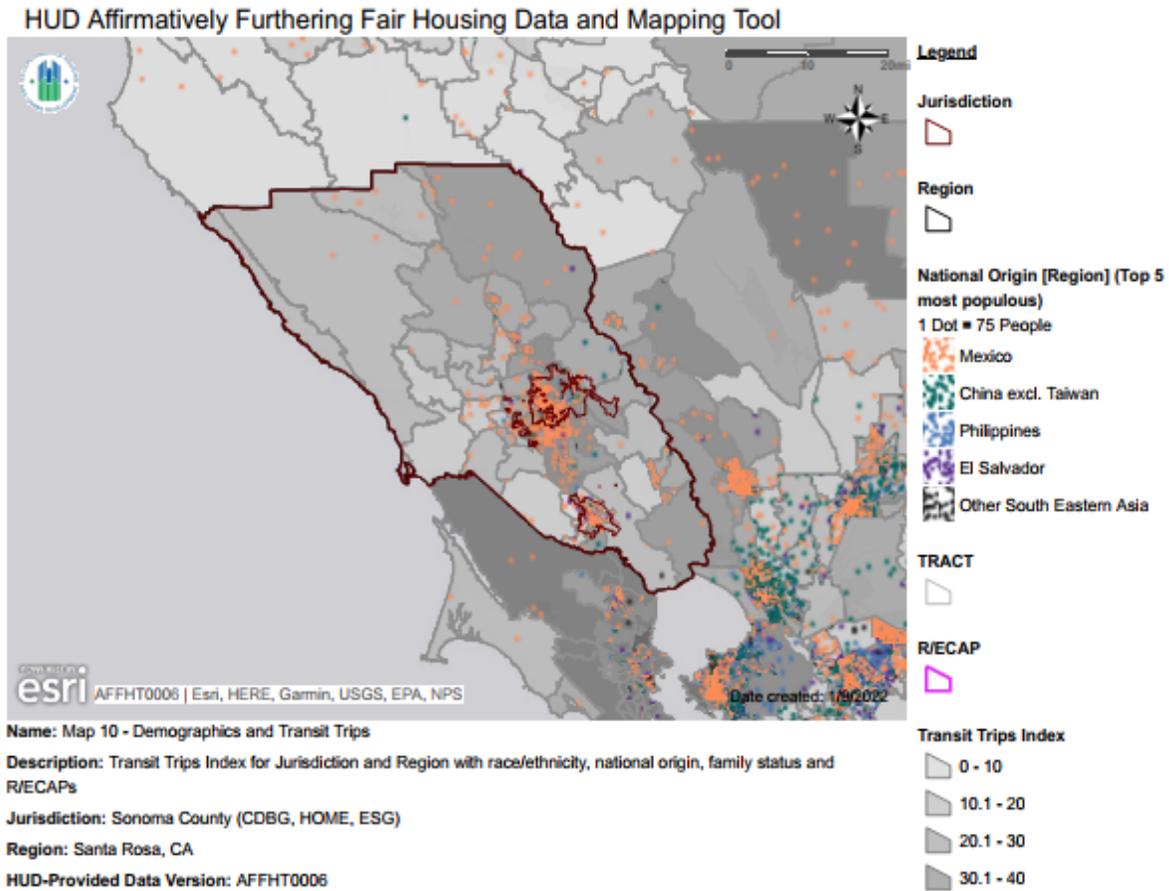
increases in LTCI values when economic status is considered and as these values increase, the racial disparity between white residents' index values and Black residents' index values widens.

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.

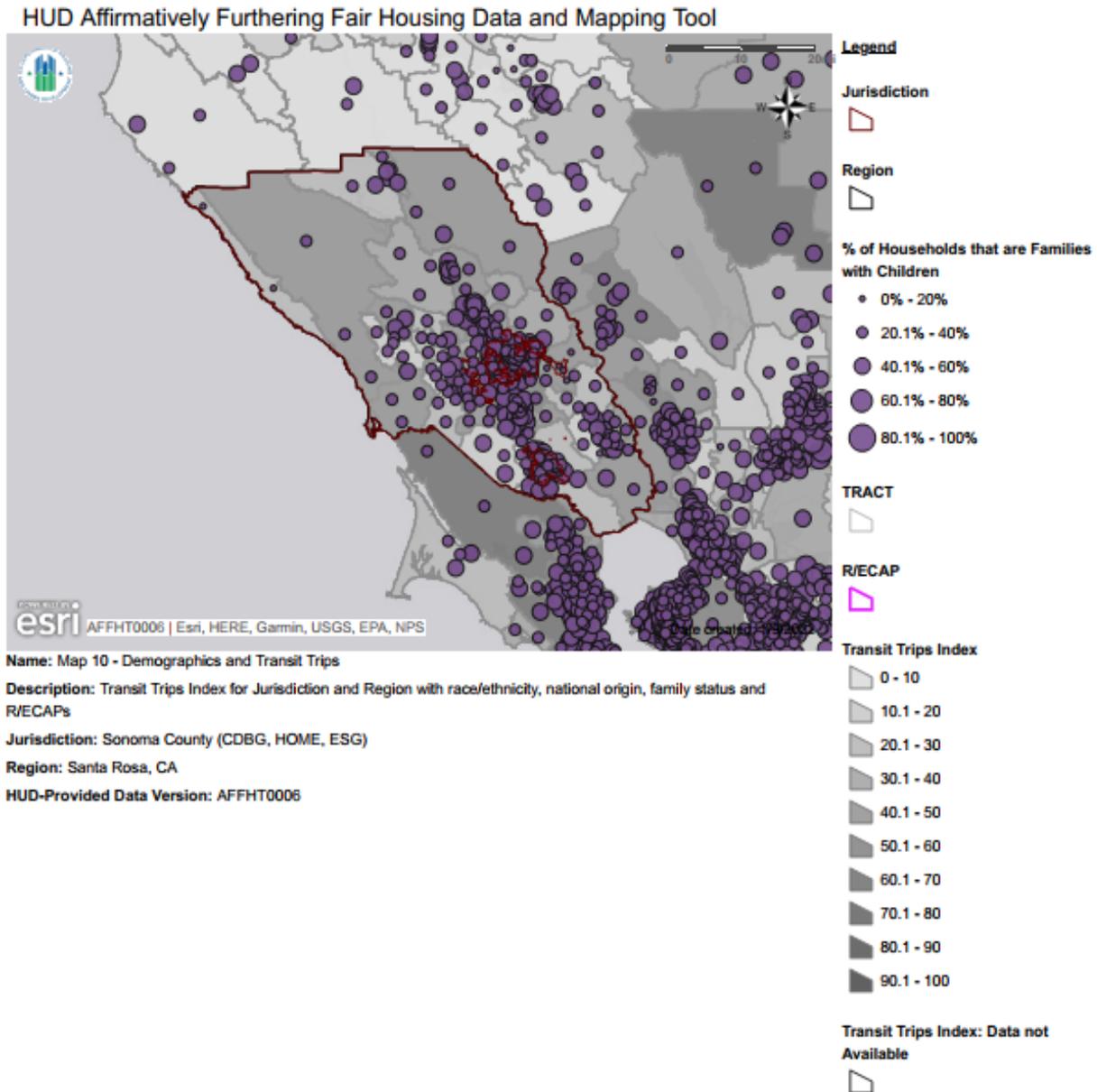
Map 5a: Demographics and Transit Trips (Race/Ethnicity), Sonoma County



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



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



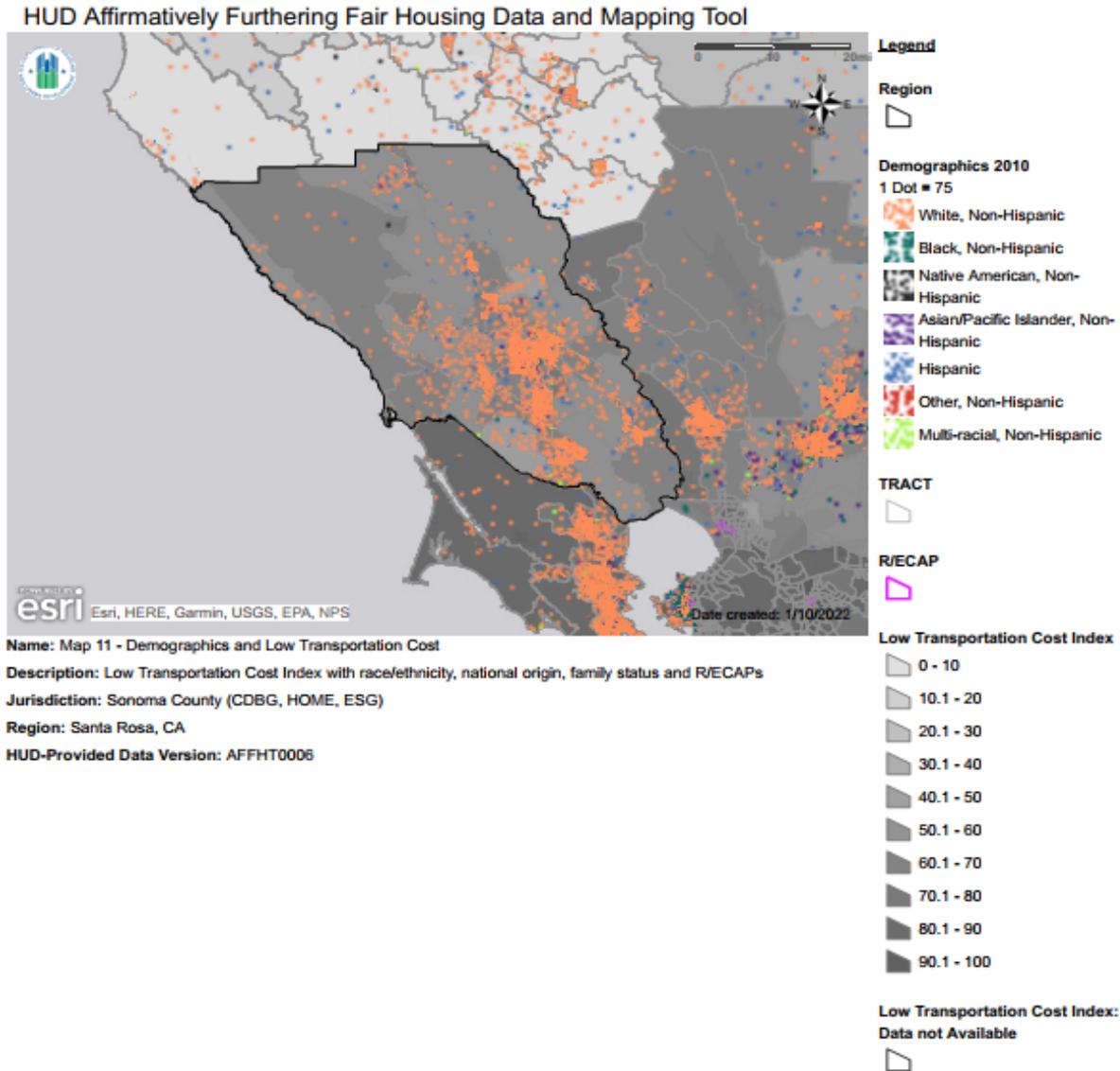
Sonoma County

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

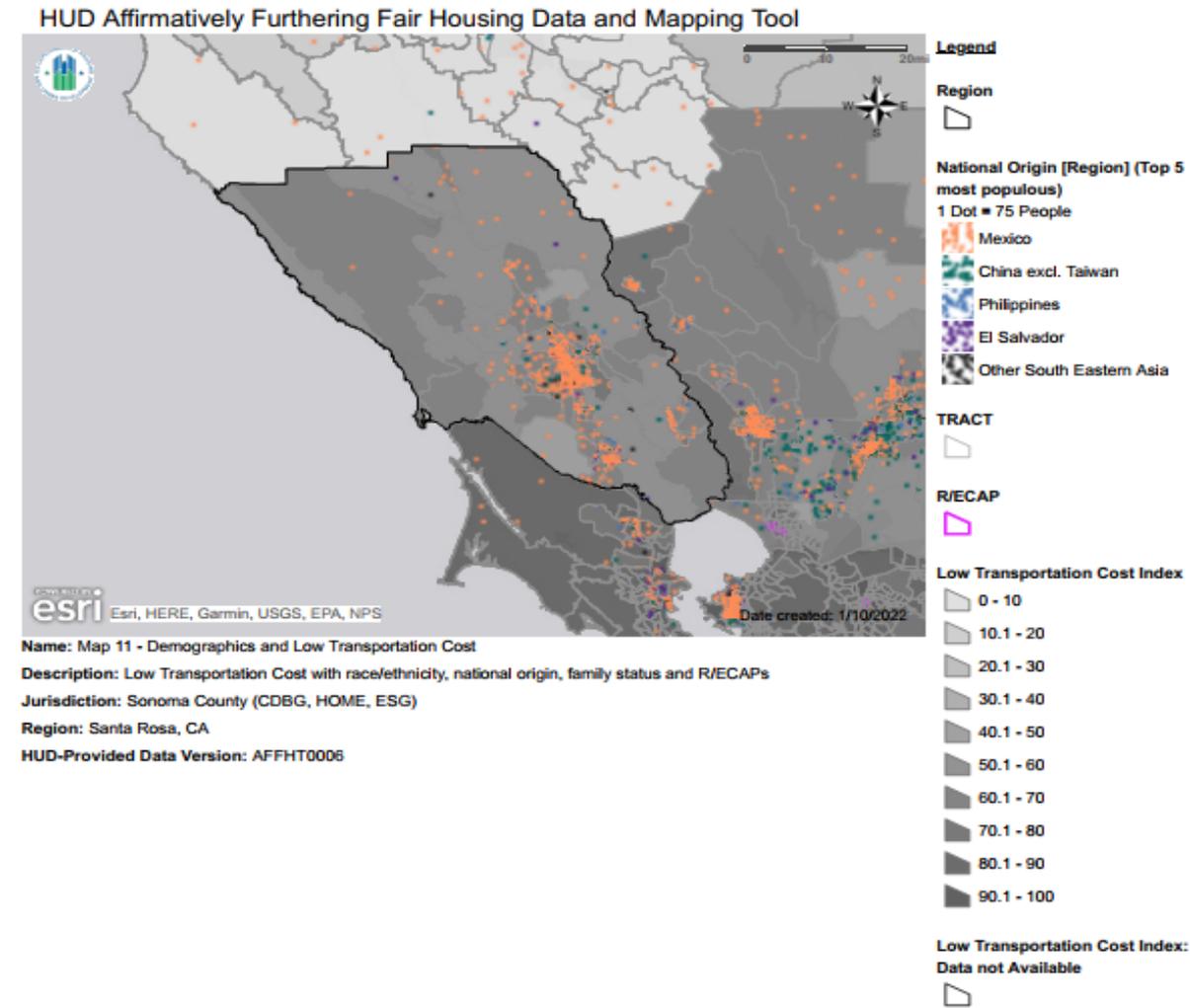
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area's transit trip index value of 26 is much lower. When family status is considered, no discernible pattern of disparities arises. The residential patterns based on LTCI values closely correspond to the transit trip index pattern. As is the case 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.

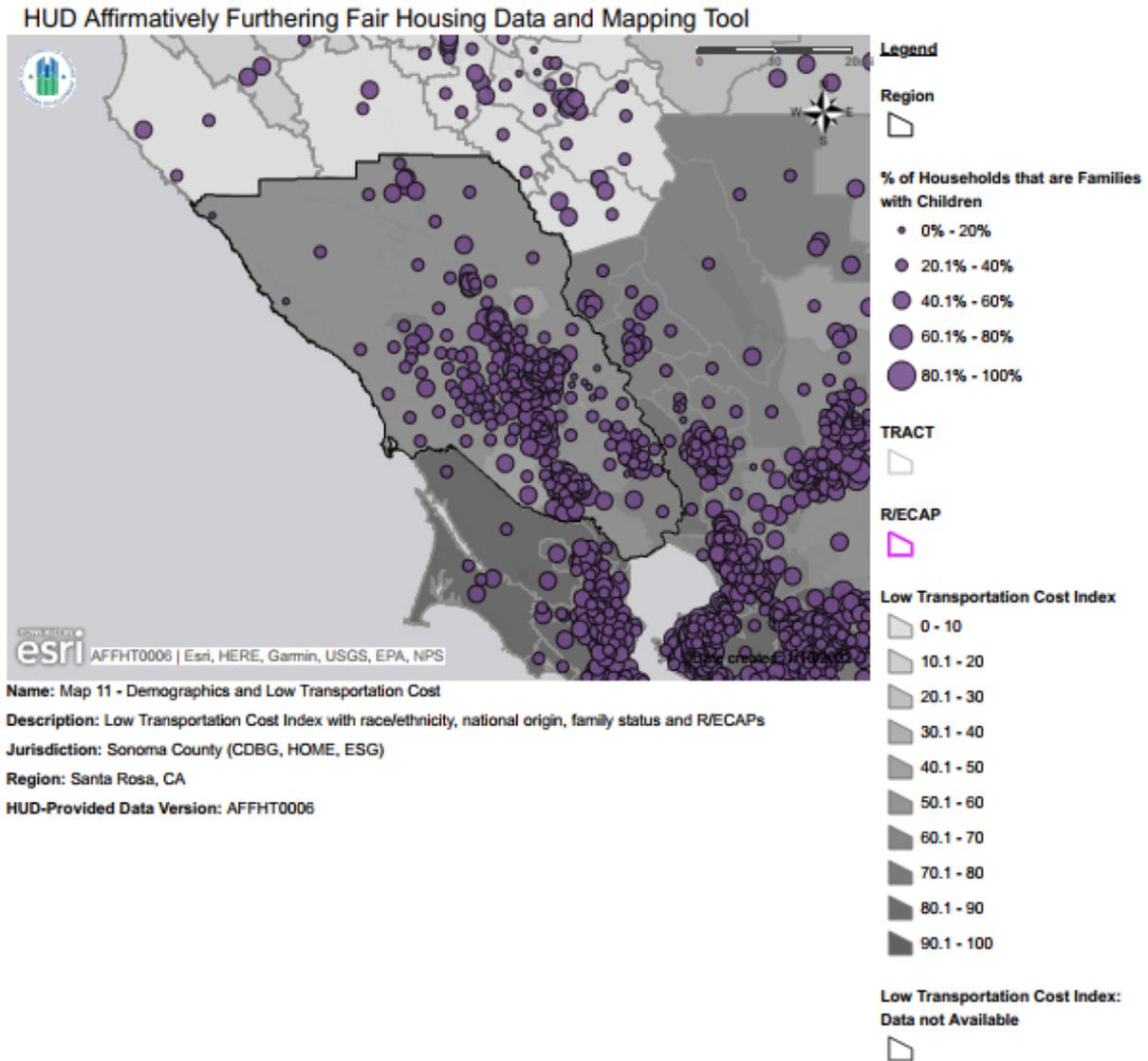
Map 5d: Demographics and Low Transportation Cost (Race/Ethnicity), Sonoma County



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



Map 5f: 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, wildfire disasters have become a 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.⁹

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.¹⁰ 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.¹¹ Petaluma Transit, by contrast, only has 11 buses to provide transit services in Santa Rosa.¹² Santa Rosa CityBus has 28 vehicles and provides the largest urban network of bus transit amongst the three transit providers.¹³ 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.¹⁴ 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.

⁹ Santa Rosa Evacuation Zone Map, <https://www.srcity.org/3368/Evacuation-Zones>
Sonoma County Evacuation Zones Map, <https://socoemergency.org/get-ready/evacuation-map/>

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

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ *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, 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. Although Sonoma has been able to reduce 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 experience environmental injustice 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).¹⁵" 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.

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.

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.

¹⁵ Bay Area Council Economic Institute, Another Inconvenient Truth, <http://www.bayareaeconomy.org/report/another-inconvenient-truth/>

Table 4: Low Poverty Index, Sonoma County

| 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 |
| <i>Source: American Community Survey (ACS), 2011-2015.</i> | |

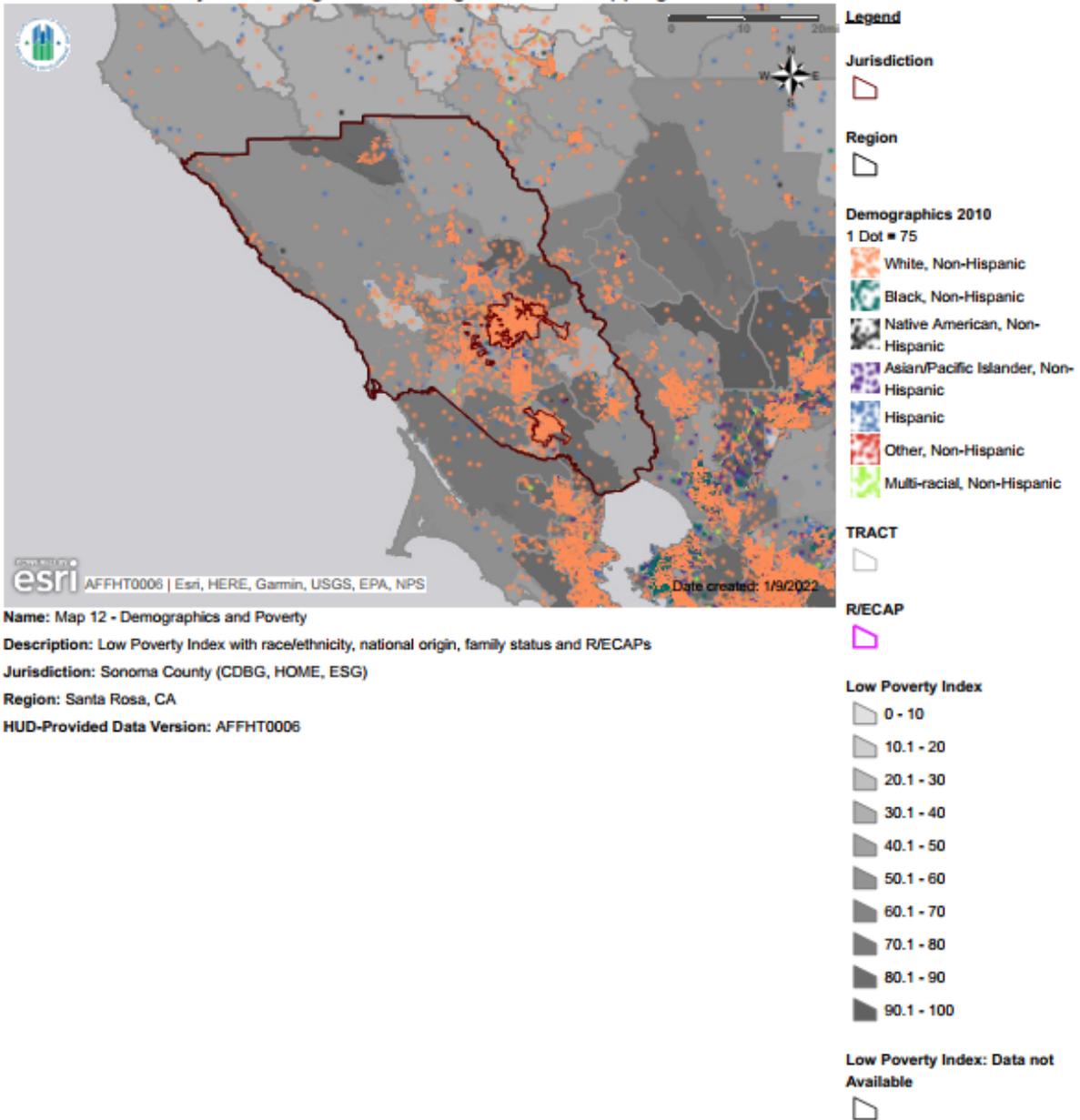
Sonoma County

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.

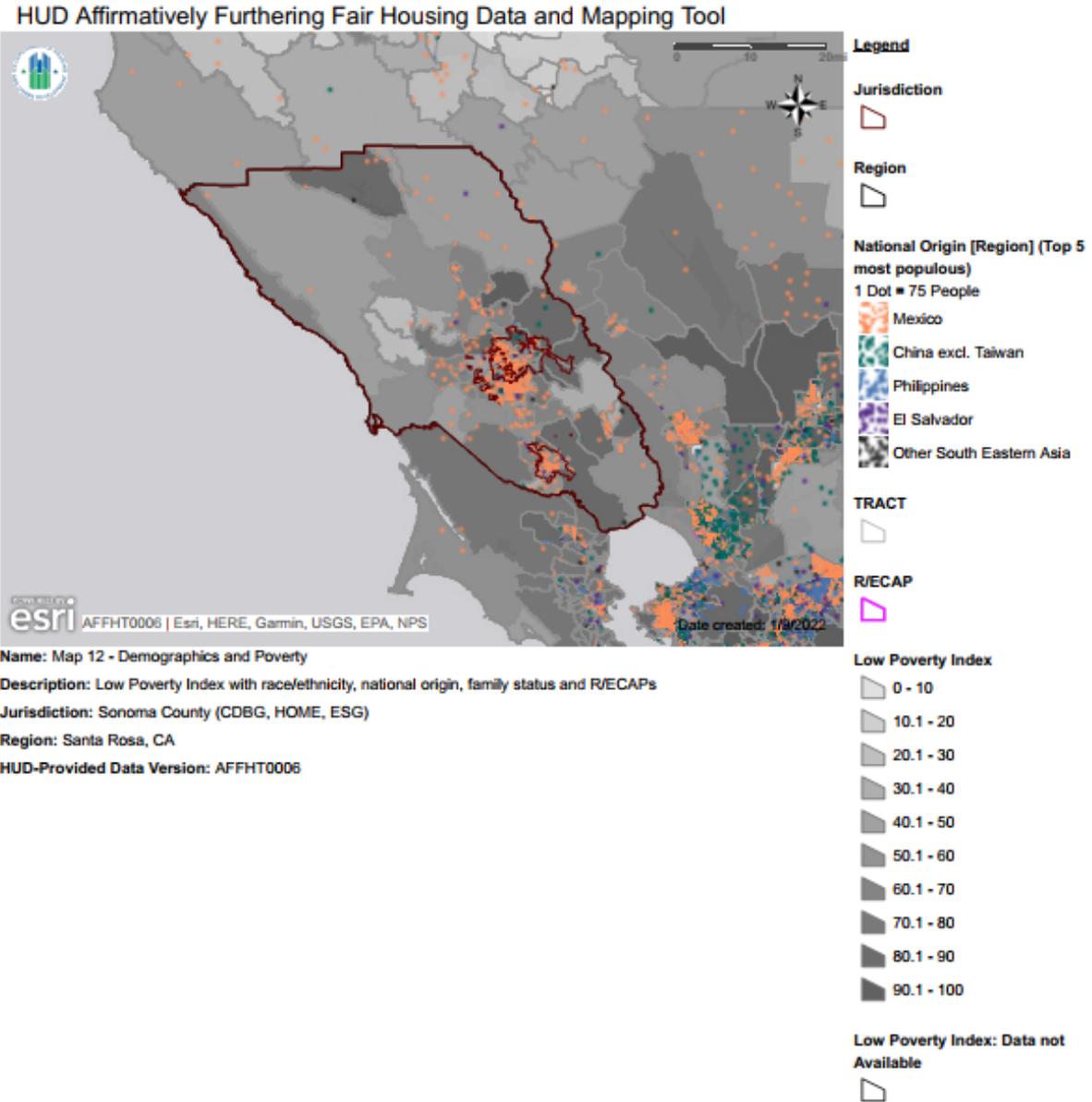
- ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.*

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

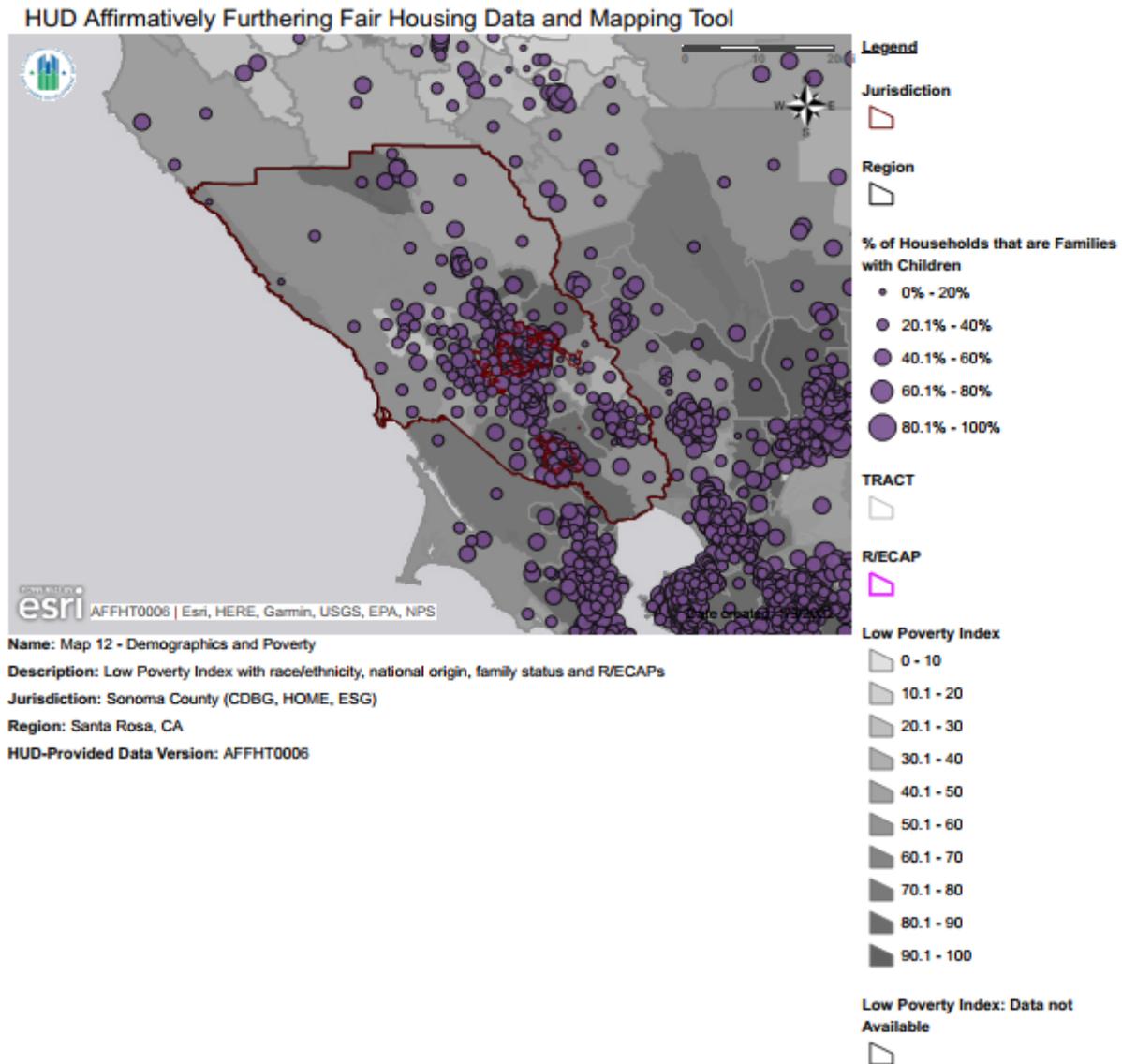
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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



Map 6c: 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 even less housing options in low poverty neighborhoods.¹⁶ 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. In these areas, there is strong opposition to 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, Sonoma County

| 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 |

¹⁶ 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-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 |
| <i>Source: National Air Toxics Assessment (NATA) data, 2014</i> | |

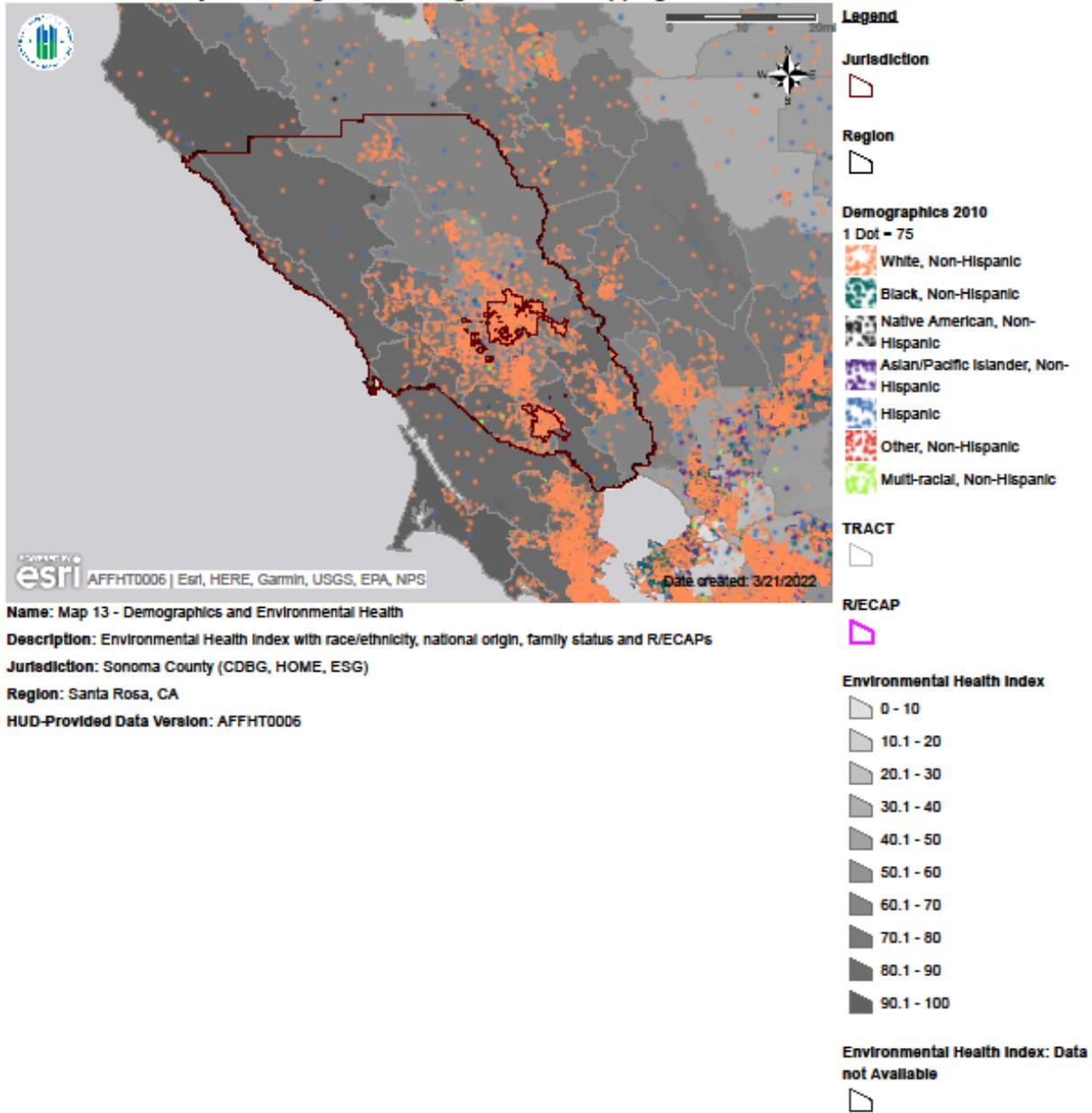
There are negligible disparities in access to environmentally healthy neighborhoods based on race and ethnicity in Santa Rosa, though these disparities are slightly more pronounced in looking at the population below the poverty line. Generally, white residents have the most access, followed closely by Asian American residents. Black, Native American, and Hispanic residents, respectively, have slightly lower levels of access. In looking exclusively at the population below the federal poverty line, it is White residents who have the most access, followed by Asian or Pacific Islander and Hispanic residents. Black residents below the poverty line have slightly less access, and Native American residents have the least.

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.*

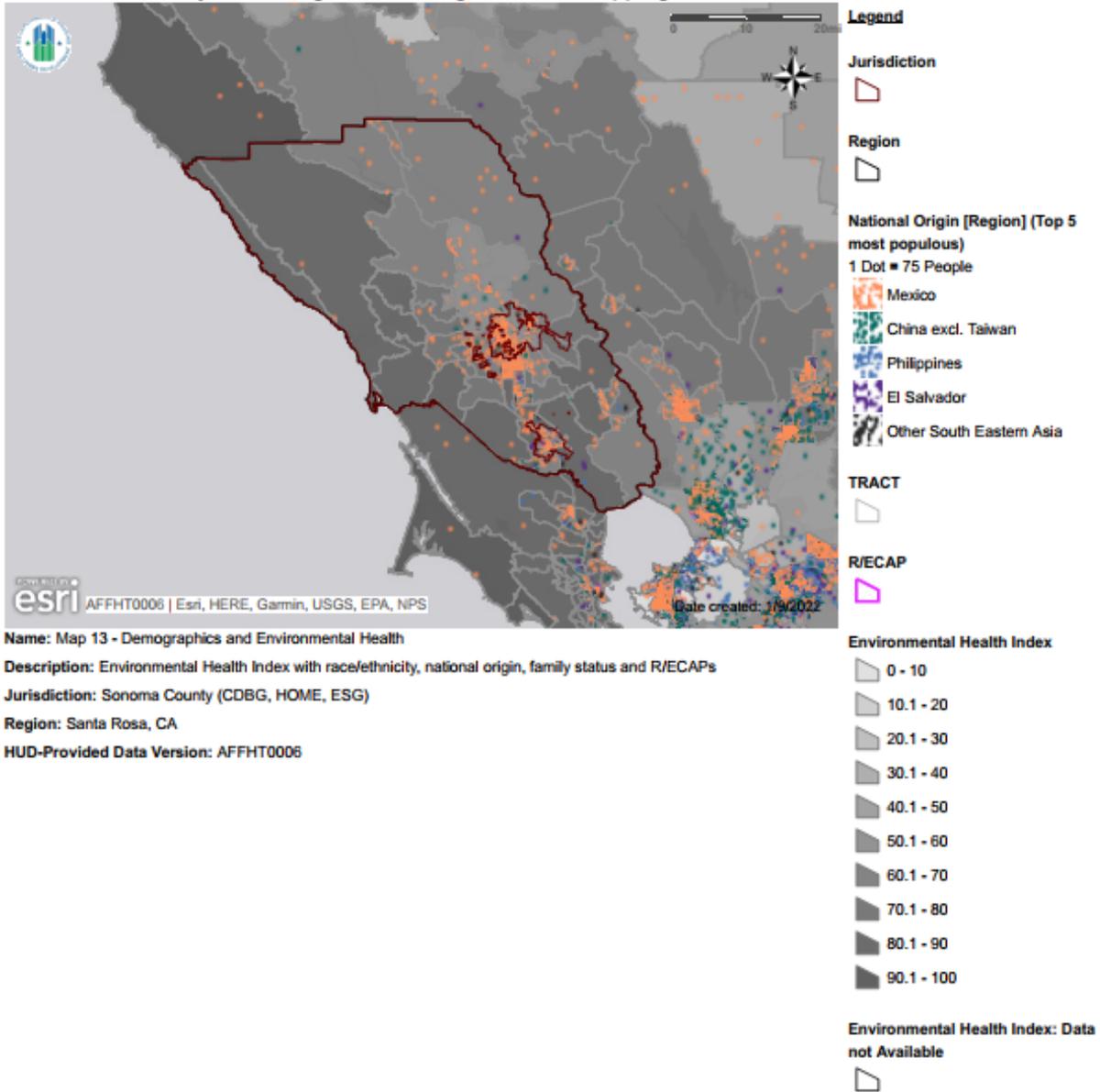
Map 7a: Demographics and Environmental Health (Race/Ethnicity), Sonoma County

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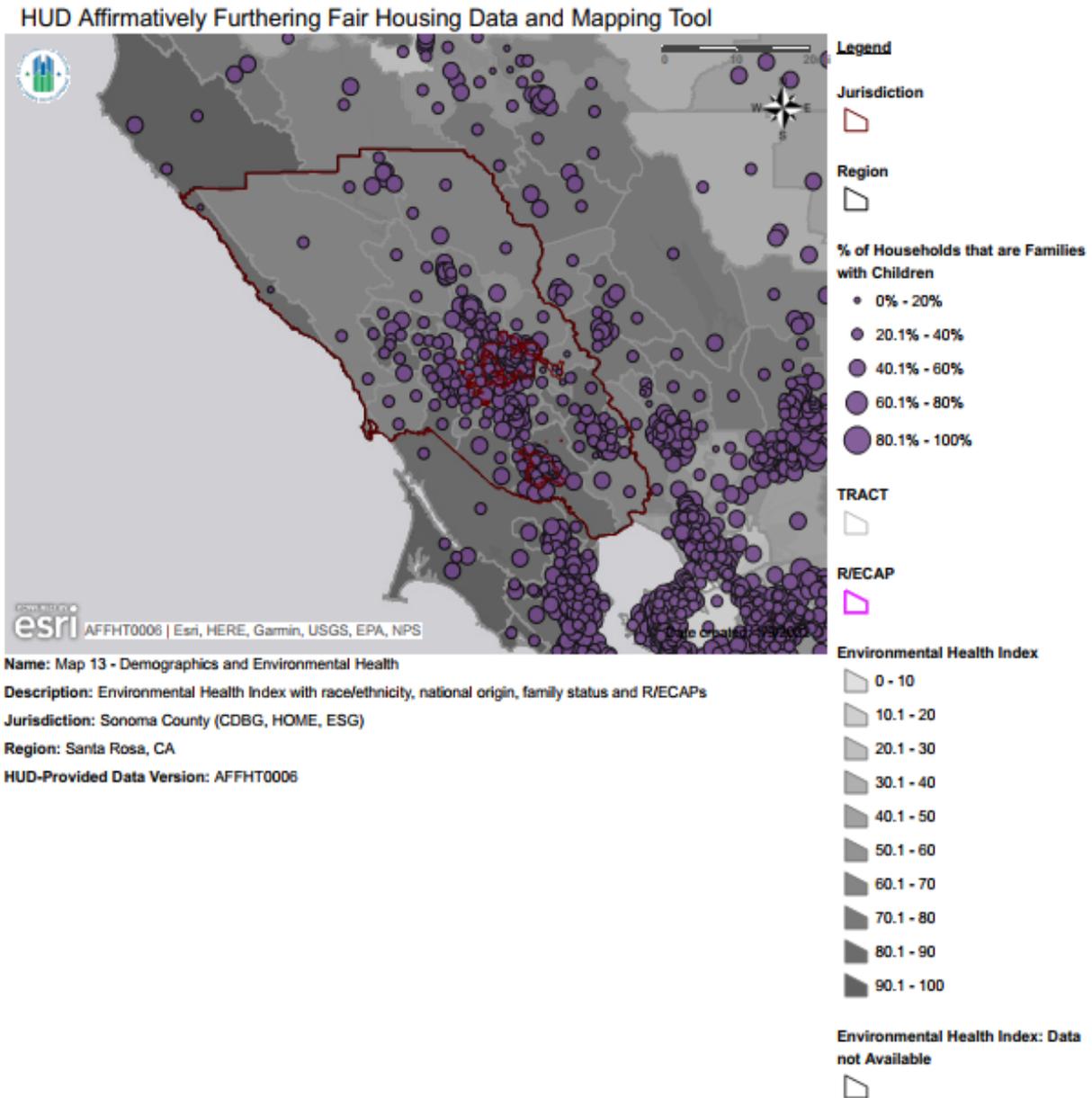


Map 7b: Demographics and Environmental Health (National Origin), Sonoma County

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

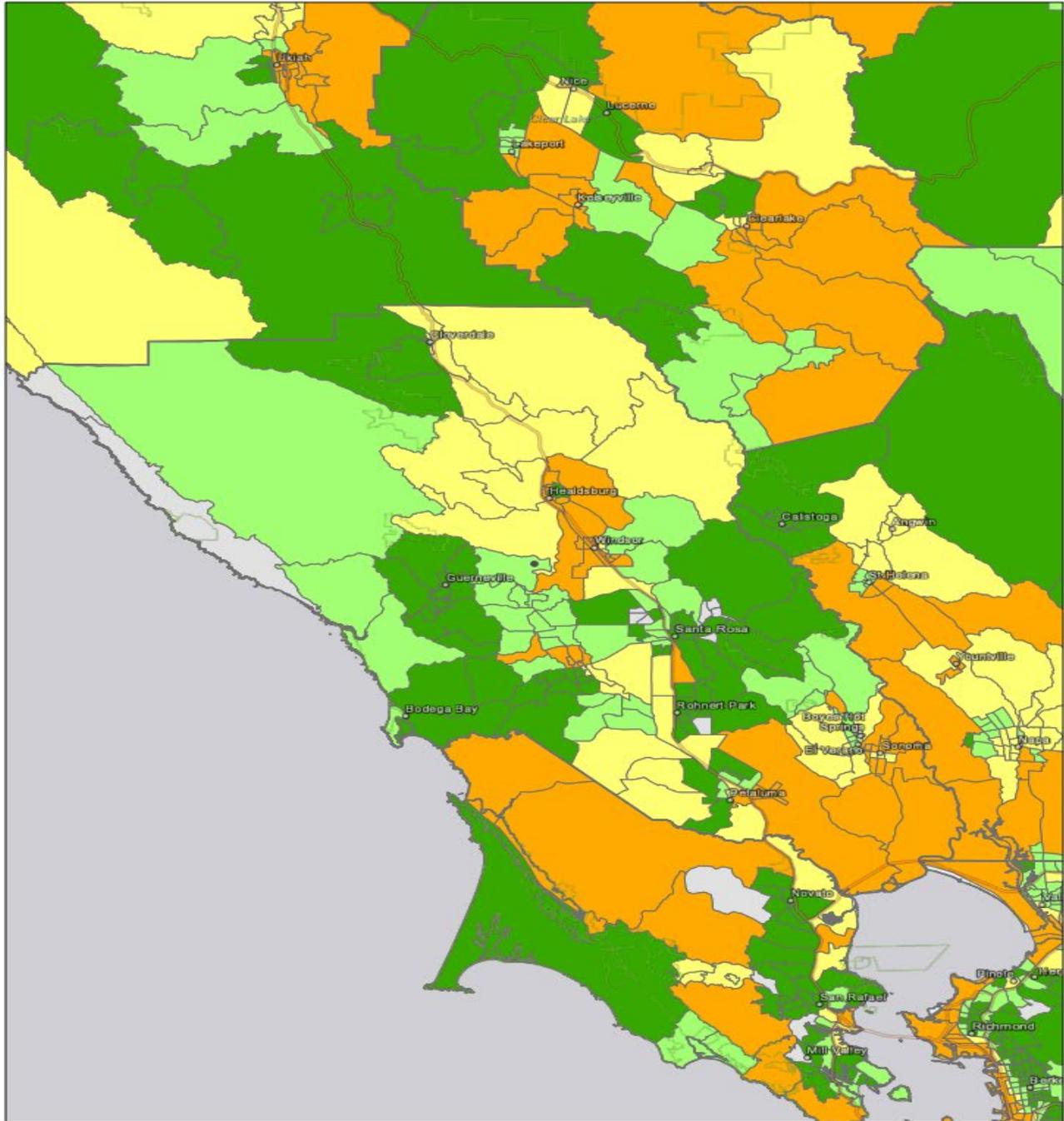


Map 7c: Demographics and Environmental Health (Family Status), Sonoma County



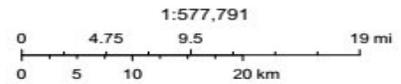
Map 8: Sonoma County TCAC Opportunity Areas – Environmental Score

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



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 Esri, HERE, Garmin, USGS, EPA, NPS

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.

Sonoma County

Sonoma County intends to create and implement policies and programs aimed at focusing on environmental justice. At this time it is unclear 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. 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 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. 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.

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 southern area 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.¹⁷ 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, Sonoma County

| Households experiencing any of 4 housing problems | Number with problems | Number of households | Percent 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 | 80,124 | 189,048 | 42.38% |
| Household Type and Size | | | |
| Family households, <5 people | 36,720 | 103,275 | 35.56% |

¹⁷ U.S. Department of Housing and Urban Development, *CHAS Background*, https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

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| | | | |
|--|-----------------------------|----------------------|------------------------------|
| 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 | Number with severe problems | Number of households | Percent 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 | 44,273 | 189,048 | 23.42% |
| <i>Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.</i> | | | |

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

| Race/Ethnicity | Number with severe cost burden | Number of households | Percent 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% |

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| | | | |
|--|---------------|----------------|---------------|
| 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% |
| <i>Source: Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.</i> | | | |

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 | |
|----------------------|-------------------------------|-------------|------------------|-------------|----------------------------|-------------|------------------------------------|-------------|--------------|--------------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| 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

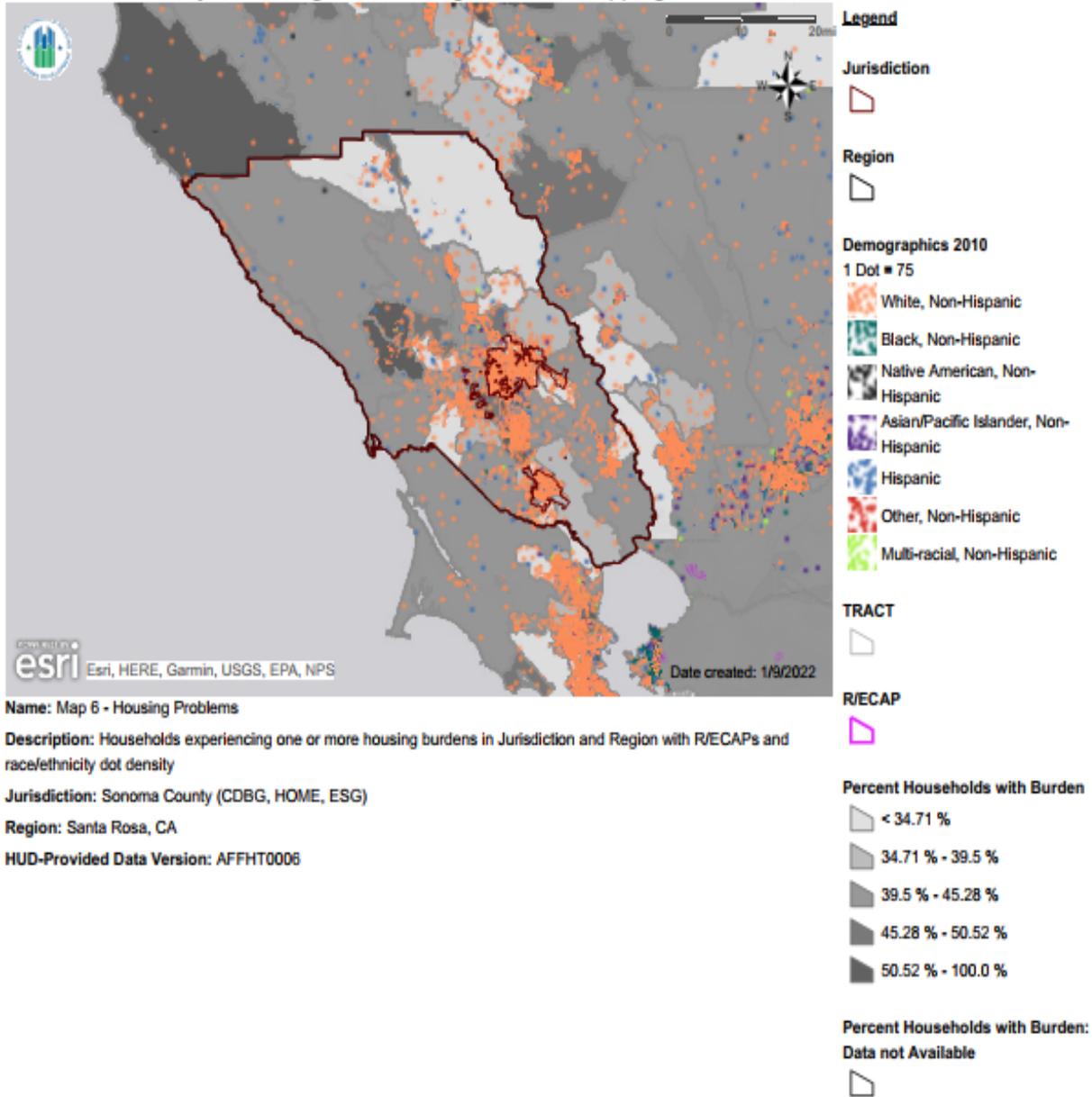
Sonoma County

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?

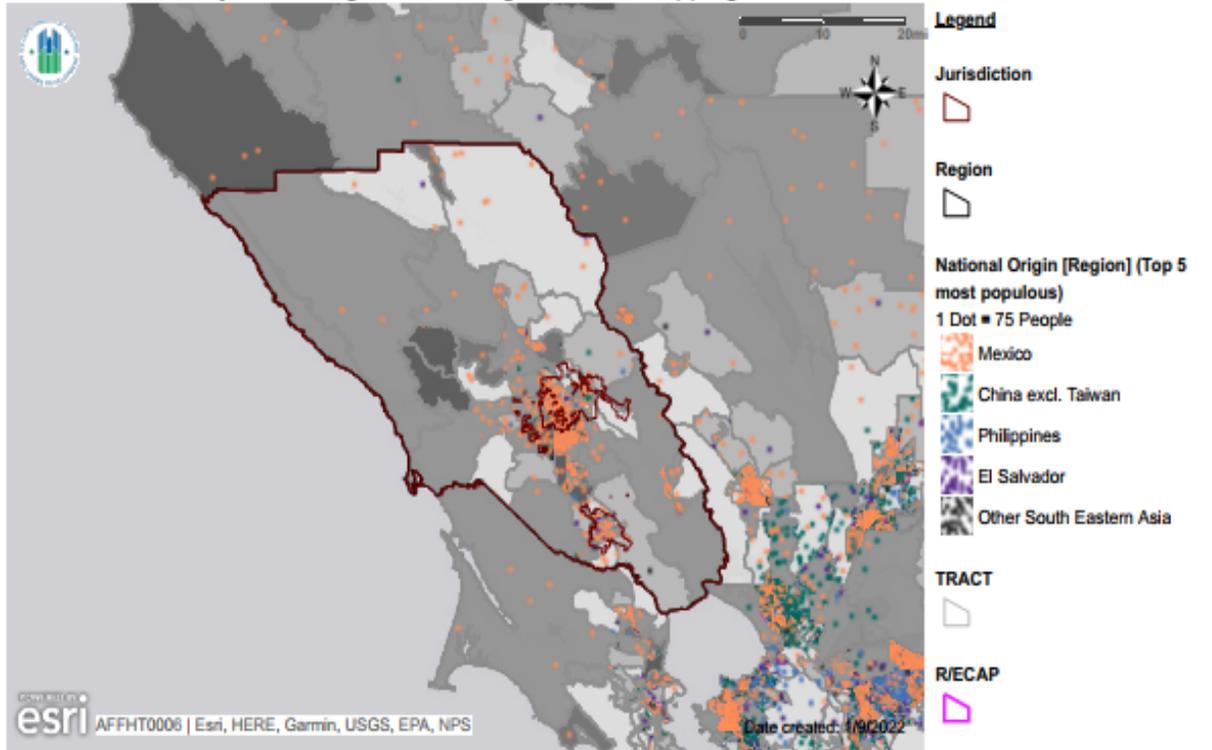
Map 1b: Households with Any of the Four Housing Problems by Race/Ethnicity, Sonoma County

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



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

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 6 - Housing Problems

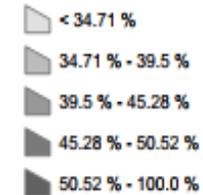
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and national origin dot density

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

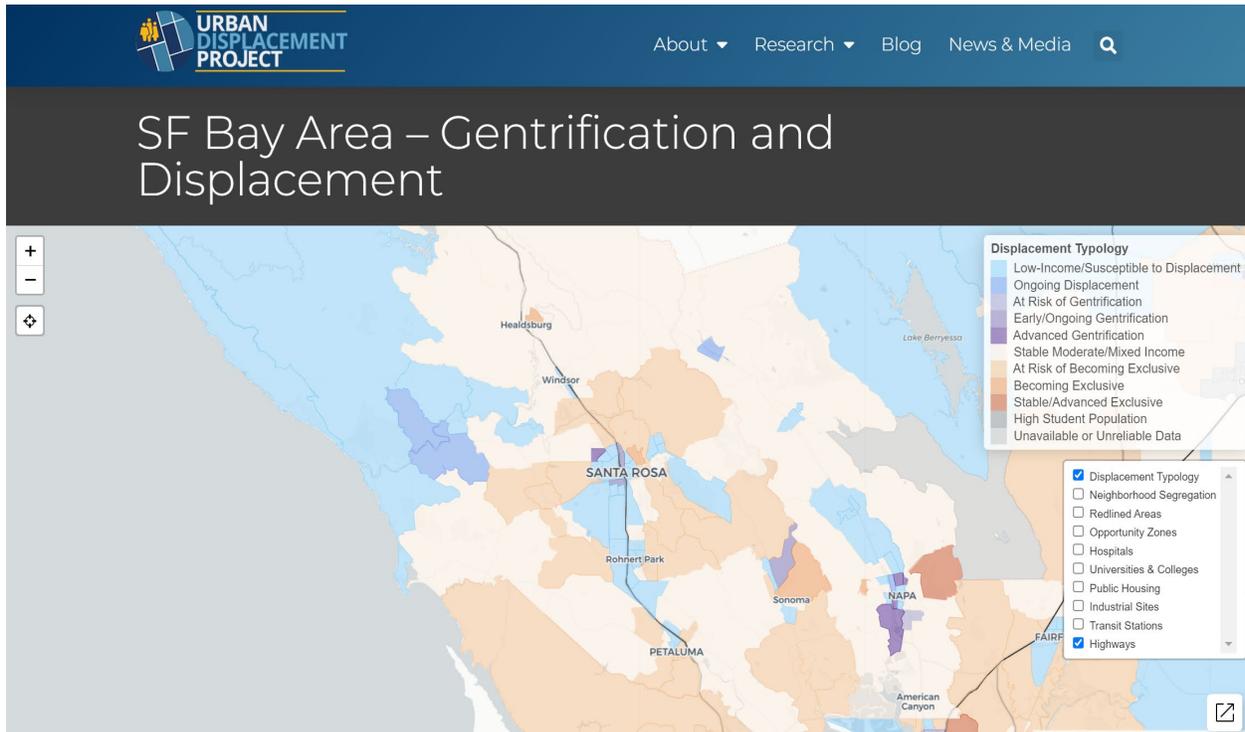
Percent Households with Burden



Percent Households with Burden:
 Data not Available



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

| Sonoma County | Households in 0-1 Bedroom Units | | Households in 2 Bedroom Units | | Households in 3+ Bedroom Units | | Households with Children | |
|-------------------------|---------------------------------|---------|-------------------------------|---------|--------------------------------|---------|--------------------------|---------|
| | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| 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.

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

| Race | Tenure | Number | Percent |
|---------------------|-----------------|---------|---------|
| White, Non-Hispanic | Owner Occupied | 187,405 | 76.9 |
| | Renter Occupied | 56,261 | 23.1 |
| Hispanic | Owner Occupied | 21,970 | 50.9 |
| | Renter Occupied | 21,200 | 49.1 |
| Black | Owner Occupied | 16,268 | 46.3 |
| | Renter Occupied | 18,892 | 53.7 |

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| | | | |
|-------------------------------------|-----------------|--------|------|
| Native American | Owner Occupied | 624 | 58.8 |
| | Renter Occupied | 438 | 41.2 |
| Asian American and Pacific Islander | Owner Occupied | 40,728 | 68.9 |
| | Renter | 18,420 | 31.1 |

Table 5: Population Growth by Housing Type

| Jurisdiction | Owner-Occupied Percentage | Renter-Occupied Percentage |
|--|---------------------------|----------------------------|
| Sonoma County | -3% | 16% |
| <i>Source: American Community Survey (ACS), 2011-2015.</i> | | |

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

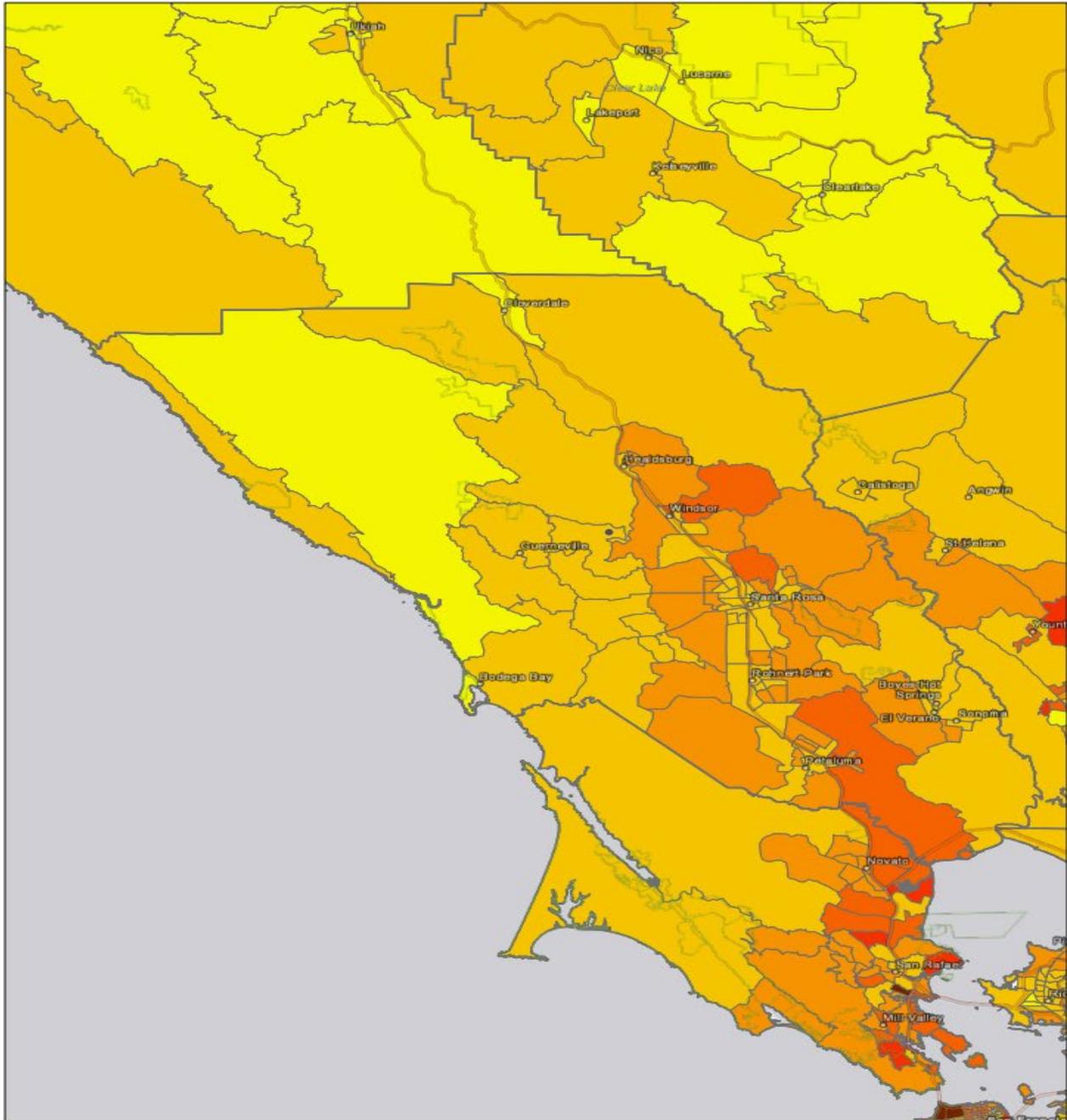
2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and Region affecting groups with other protected characteristics.

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

Location Affordability Index (HUD)



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County Boundaries

(R) Location Affordability Index (HUD) - Tract

<\$1,000

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Greater than \$3,000

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0 4.75 9.5 19 mi

0 5 10 20 km

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 Esri, HERE, Garmin, USGS, EPA, NPS

CA HCD

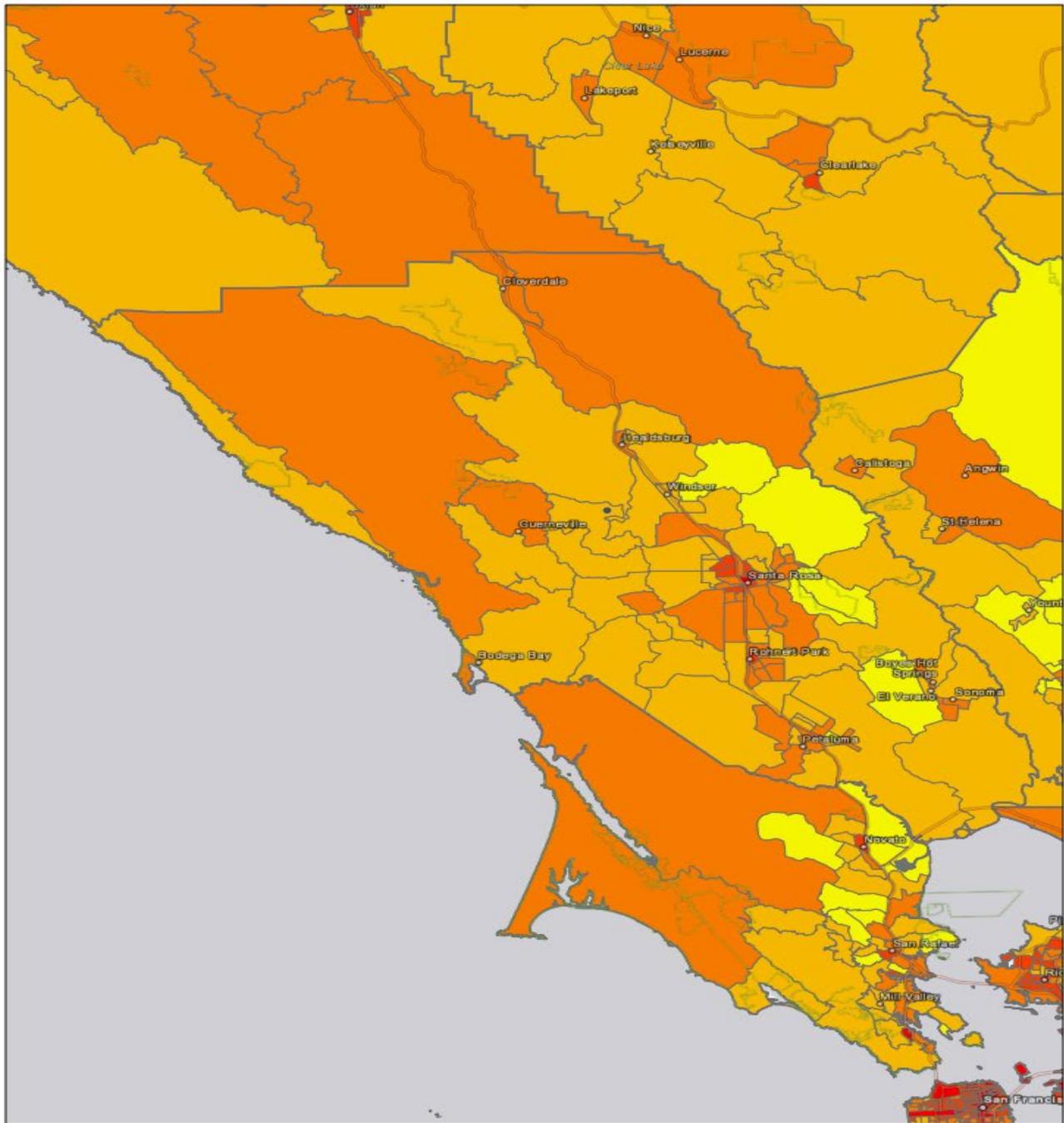
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The proportion of the housing stock that is affordable in Sonoma County is higher in the northern, more rural part of the County bordering Mendocino County and away from job centers. The areas to the north of Santa Rosa and the east of Petaluma have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

2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

Map 4: Percent Renter Occupied Households, Sonoma County

Renter-Occupied Households



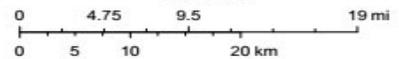
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County Boundaries

(R) Percent of households in renter - occupied housing units (HUD) - Tract

- ≤ 20 %
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

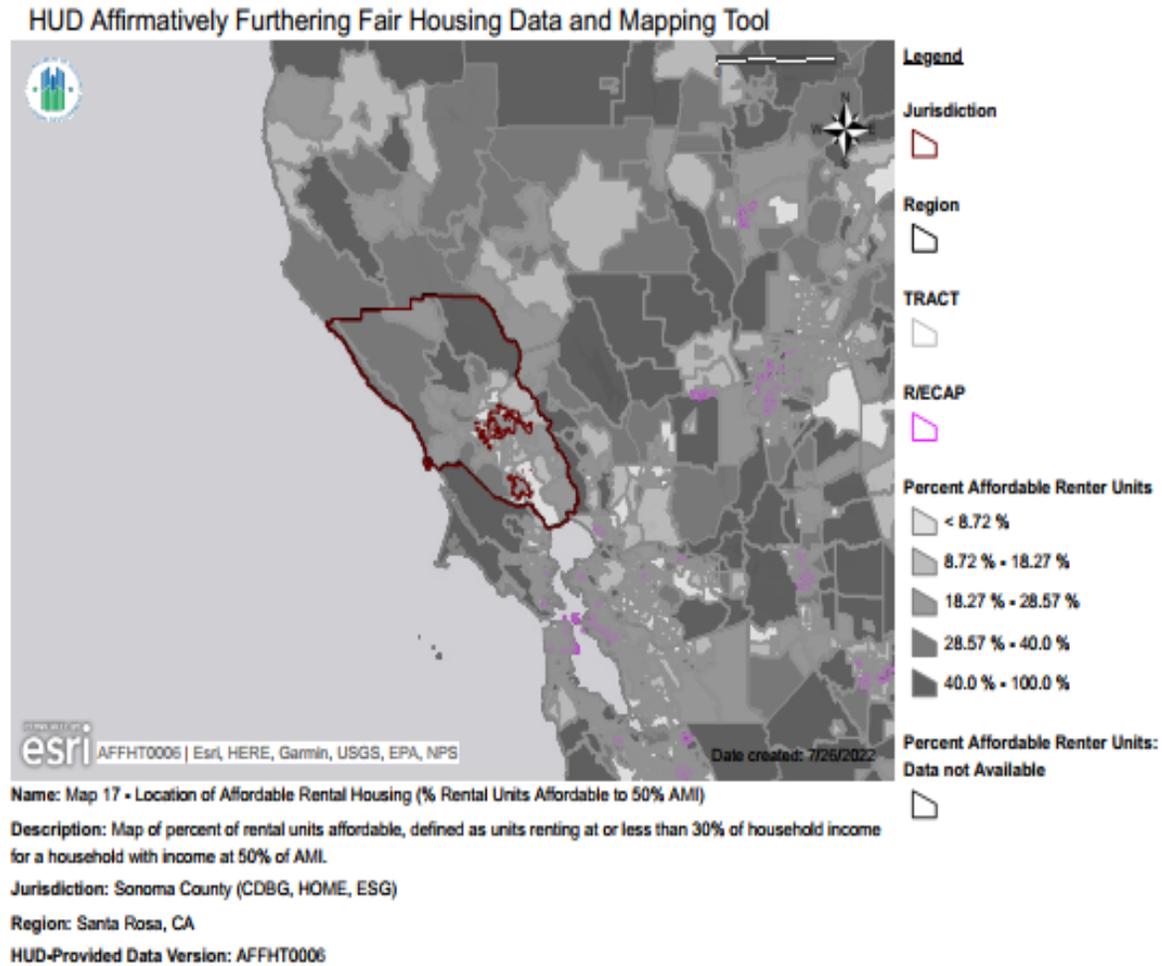
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CA HCD

Map 5: Location of Affordable Rental Housing, Sonoma County



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, Sonoma County

| Housing Units | Number | Percent |
|---|---------|---------|
| 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% |
| <i>Sources: Inventory Management System (IMS)/ PIH Information Center (PIC), 2019; Tenant Rental Assistance Certification System (TRACS), 2019.</i> | | |

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, Sonoma County

| | White | | Black | | Hispanic | | Asian or Pacific Islander | |
|-------------------------|--------|---------|--------|---------|----------|---------|---------------------------|---------|
| Housing Type | Number | Percent | Number | Percent | Number | Percent | Number | Percent |
| 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.

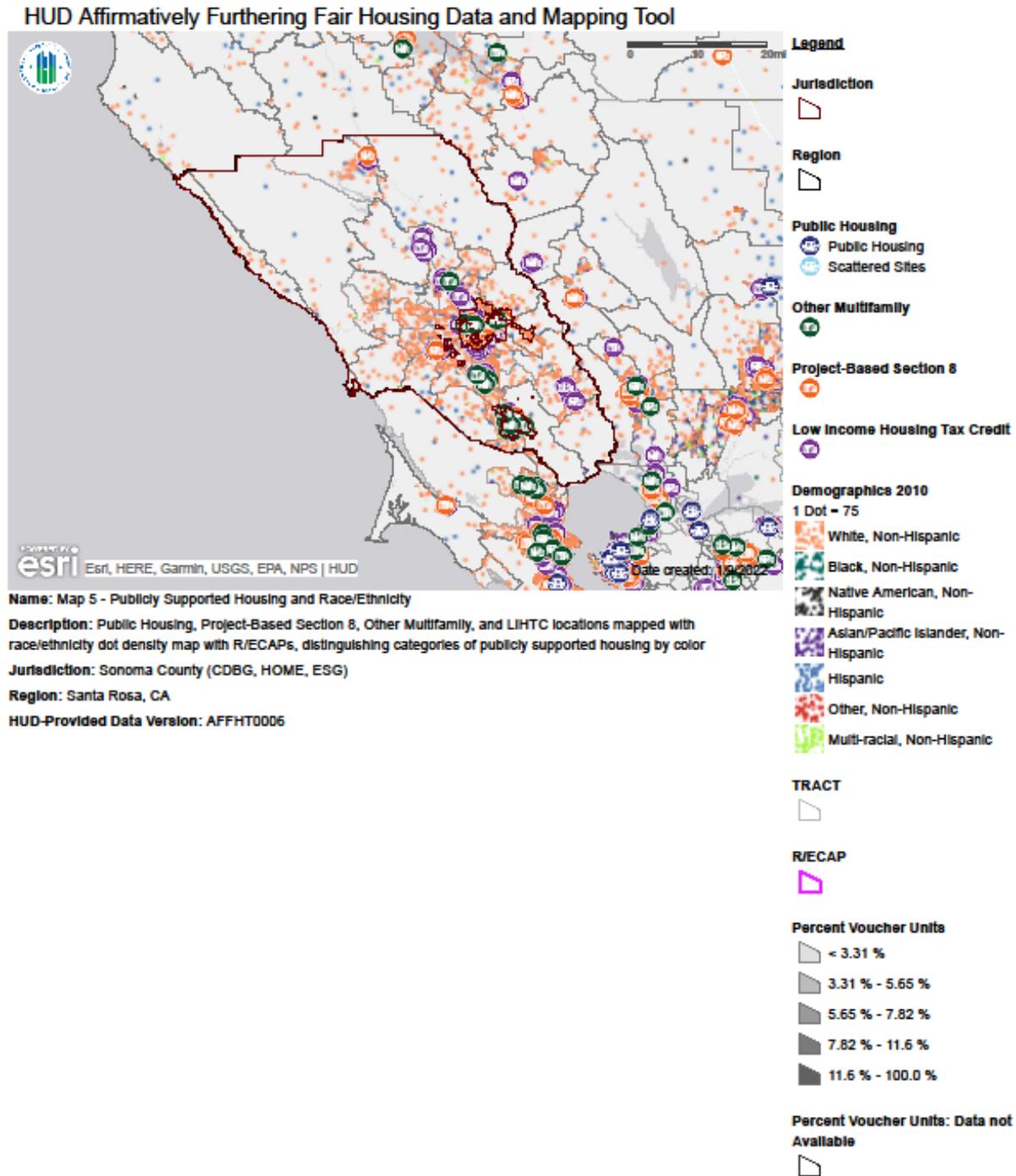
Sonoma County

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, 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 Sonoma 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.

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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, 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 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, Sonoma County

| Type | Development Name | Number of Units | Percent White | Percent Black | Percent Hispanic | Percent Asian or Pacific Islander | Percent Households with children |
|---------------------------|---------------------------------------|-----------------|---------------|---------------|------------------|-----------------------------------|----------------------------------|
| Project-Based Section 8 | MARVIN'S GARDENS In Rohnert Park | 37 | 48.57 | 22.86 | 25.71 | N/a | 57.14 |
| Project-Based Section 8 | WINDWOOD APARTMENTS In Cotati | 28 | 69.23 | 11.54 | 19.23 | N/a | 57.69 |
| Project-Based Section 8 | KINGS VALLEY APARTMENTS In Cloverdale | 75 | 83.1 | 1.41 | 12.68 | 1.41 | 1.41 |
| Project-Based Section 8 | BURBANK HEIGHTS In Sebastopol | 67 | 95.38 | 1.54 | 3.08 | N/a | N/a |
| Project-Based Section 8 | BURBANK ORCHARDS In Sebastopol | 60 | 94.92 | 1.69 | 3.39 | N/a | N/a |
| Other Multifamily Housing | MUIRFIELD APARTMENTS In Rohnert Park | 24 | 69.57 | 13.04 | 8.7 | 8.7 | N/a |

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| | | | | | | | |
|---------------------------|--------------------------------|----|-------|------|-------|------|-----|
| Other Multifamily Housing | CHARLES STREET In Cotati | 47 | 80.85 | N/a | 17.02 | 2.13 | N/a |
| Other Multifamily Housing | VINECREST SENIOR In Windsor | 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. Marvin Gardens is an affordable housing complex for families that was built in 1983, while Burbank Orchards and Heights are restricted to seniors only and they were constructed in 1991 and 1989 respectively.

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.

Sonoma County has not 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.

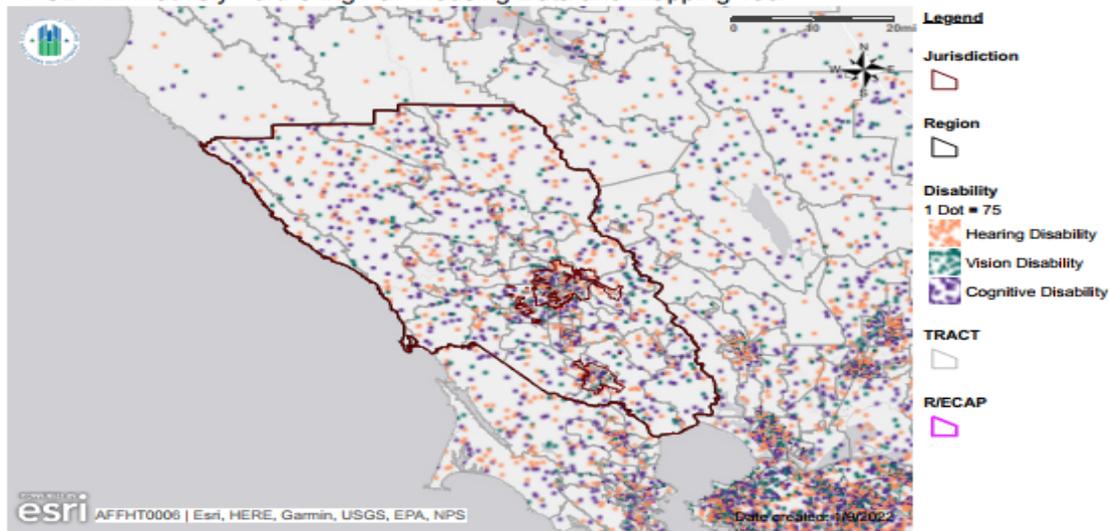
D. Disability and Access Analysis

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.

1. Population Profile

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

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Name: Map 14 - Disability by Type

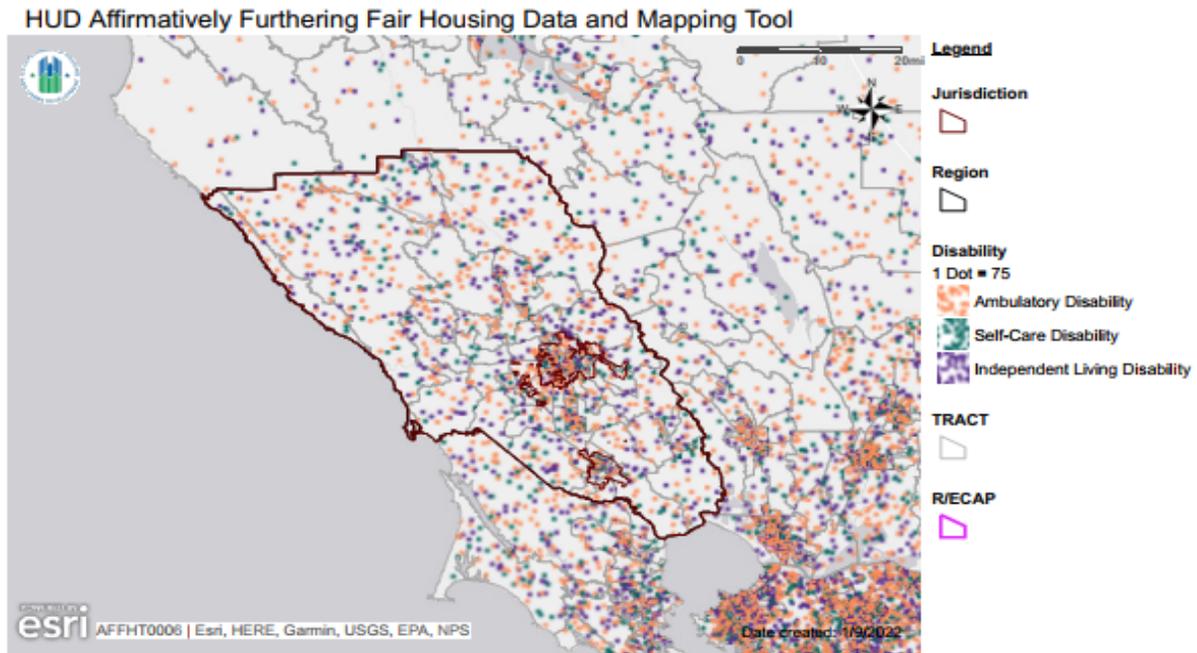
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

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



Name: Map 14 - Disability by Type

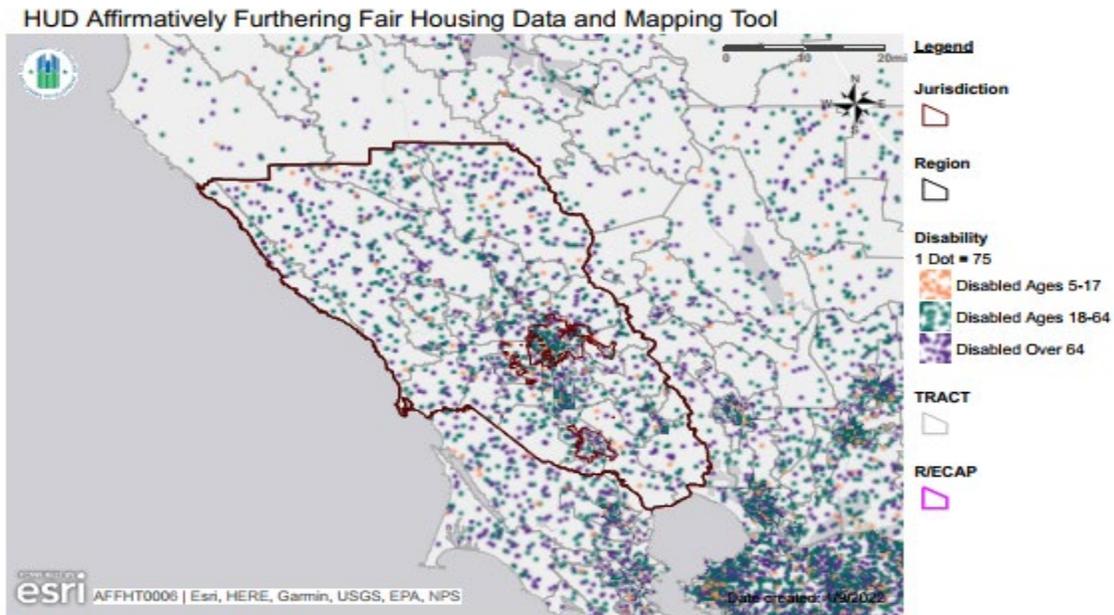
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Map 3: Sonoma County 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: Sonoma County (CDBG, HOME, ESG)

Region: Santa Rosa, CA

HUD-Provided Data Version: AFFHT0006

Table 1: Disability by Type, Sonoma County

| Disability Type | Number | Percent |
|---|--------|---------|
| 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% |
| <i>Source: American Community Survey (ACS), 2011-2015</i> | | |

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.

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.

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

| | People with a Disability | People with a Disability |
|---|--------------------------|--------------------------|
| | Number | Percent |
| 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.

3. 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 Center ¹⁸

| 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% |

¹⁸ <https://nbrc.net/wp-content/uploads/NBRC-2020-PC-Year-End-Report.pdf>

Table 4: Type of Setting by Race or Ethnicity, North Bay Regional Center ¹⁹

| Type of Setting | Total Served | Percent White | Percent Black | Percent Asian | Percent Hispanic | Percent 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 are 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 living in institutions or at risk of institutionalization. Additionally, some of the Other Multifamily housing in the region is Section 811 housing for persons with disabilities. Permanent supportive housing programs, described 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.

4. 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, ²⁰ 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. 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

¹⁹ <https://nbrc.net/wp-content/uploads/NBRC-2021-Expenditure-Report-1.pdf>

²⁰ 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

the County monitors its own compliance with Siteimprove’s ADA compliance checker. The County has made ADA improvements to the County animal shelter building, Sherrif’s office building, and installed automatic door openings and ramps in office buildings at the County Government Center. In addition, almost every County department has 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 the Sonoma County Community Development Commission (SCCDC), which administers affordable housing and rental assistance programs in the area, is planned to relocate to a different office location in spring of 2024, which will be a newer office facility that complies with ADA requirements. ²¹.

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

The County’s Public Infrastructure Department administer various County programs and projects to address equal access to public infrastructure systems by individuals with a disability. Since 2013, the County has been spent more than \$24 million on capital projects for removal of ADA architectural barrier removals. Some of these funds are delegated to other County departments for their ADA projects. An example of funded infrastructure projects include ADA improvements to the multiple Park & Ride locations, signalized intersections, curb cuts at the County Government Center campus, and parking lots. The County continues to address the findings in the County Government Center 2009 Self Evaluation Transition Plan, which was last updated in 2017.

iii. Transportation

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. ²² 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.

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, 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

²¹ *Id.* at 72.

²² Sonoma County Transit, *Accessibility*, <https://sctransit.com/accessibility/>

year, compared to just 3.6% of students without disabilities.²³ Not only did the suspension rate double for students with disabilities, but Sonoma County’s suspension rate fell 1.5% above the statewide average.²⁴ 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 | Percent in Labor Force | Percent 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% |

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 has accessibility tabs on the main pages of its local government websites. The County links to pages that have both information on website accessibility and broader ADA compliance. The County Board of Supervisor meetings are hybrid providing an opportunity for residents with mobility challenges to participate without having to travel to the County administration campus and persons with hearing impairments who opt to view the meeting remotely have access to closed captioning. All public meeting notices are published on the pertinent department’s website and have language informing interested residents with a disability that they are able to make a reasonable accommodation request to participate in the meeting with prior notice. All county government offices are required to abide by ADA laws in their facilities and parking lots. Documents published on the County’s website are remediated for persons with hearing and or visual impairments. Additionally, various County departments provide the option to meet via teleconference with prospective or active program participants, which removes the need to travel to the office building. This provides convenience for members of the public, particularly to those living in rural areas, as well as those who have a physical disability.

²³ 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>

²⁴ *Id.*

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

The Sonoma Public Infrastructure Department addresses requests on a complaint basis and maintains a list of identified sites that call for ADA improvements. The County makes a diligent effort to fund these projects and manages the projects toward completion. Some of the complaint 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.

Disability and Access Issues Contributing Factors

The following Contributing Factors were identified to disability and access disparities:

- 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.*

As of the preparation of this assessment, 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 the 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)²⁵ 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)

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

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.

²⁵ 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

The following Contributing Factors were identified to adversely impact 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

I. 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 (RHNA) 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.

a. 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.

b. Create and maintain an inventory list of countywide sites where housing development is allowed, including affordable housing in High Opportunity Areas, that will address RHNA requirements for all income levels with special focus on lower-income housing.

To assess possible future development of affordable housing to meet RHNA, including low-income housing in High Opportunity Areas, Sonoma County can develop a parcel list identifying sites with their respective maximum densities as well as infrastructure capacity for those densities. Having such a list provides a realistic perspective of housing development potential to County administrators as well as guides interested developers who seek land to develop. The list will assist Sonoma County in meeting its low-income housing needs and ensure that affordable housing is not concentrated in specific areas of the County.

c. Provide incentives to single-family homeowners and/or 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.

- d. *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.

II. 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.

- a. *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.

- b. *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.

- c. *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.

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.

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 and or rezone parcels to enable mixed-income 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. Rezoning parcels to allow higher densities and mixed-income households are an option that helps avoid the “opportunity cost” of scarce sites being dedicated to market-rate development. The geographic rezoning should target higher opportunity areas while also keeping environmental concerns, like fire risk, in mind. The appropriate level of density 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 by-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.

IV. Increase Access to Opportunity for Housing Choice Voucher Families

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

- a. *Explore the feasibility of 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. Housing Authorities in the region should explore and if feasible adopt small area fair market rents or exception payment standards for sub-markets to increase the purchasing power of vouchers in higher opportunity areas.

- 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.

V. 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.

b. Study the viability of rent stabilization for mobile home (manufactured) Park developments.

High rent increases can be massively destabilizing for low-income families, particularly those households on fixed incomes. 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 mobile home park communities, 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,²⁶ jurisdictions can help preserve these community assets for the long term.

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.*

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.

VII. 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.

²⁶ Information on ROC USA can be found here: <https://www.rocusa.org/>

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.²⁷ Not only did the suspension rate double for students with disabilities, but Sonoma County's suspension rate fell 1.5% above the statewide average.²⁸ 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 2022²⁹

| Municipality | Population ³⁰ | Percent 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 |

²⁷ 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>

²⁸ *Id.*

²⁹ Federal Deposit Insurance Corporation, *BankFind Suite: Find Institutions by Name & Location*, <https://banks.data.fdic.gov/bankfind-suite/bankfind>.

³⁰ US Census Bureau, *QuickFacts*, July, 2021, <https://www.census.gov/quickfacts/fact/table/US/PST045219>

**Draft Napa/Sonoma Regional Fair Housing Plan
Sonoma County**

| | | | | |
|-----------------------|----------------|--------------|-----------|-----------|
| 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,³¹ 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.³² 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.³³ 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.³⁴ Sonoma County Transit also offers paratransit services for people with disabilities,

³¹ Santa Rosa Metro Chapter, *Santa Rosa Metro Area Banks*, <https://web.santarosametrochamber.com/Banks?xsort=true>

³² The Climate Center, AB 1177 Fact Sheet, March 2021, <https://theclimatcenter.org/wp-content/uploads/2021/04/AB-1177-Santiago-Fact-Sheet.pdf>

³³ California Legislative Information, AB-1177 California Public Banking Option Act. October, 2021, https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB1177

³⁴ 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 to 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.³⁵ 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.³⁶ 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.³⁷

³⁵ Mill District Affordable Housing Design Charrette Minutes, July 2018,

<https://www.ci.healdsburg.ca.us/AgendaCenter/ViewFile/Item/2887?fileID=4661>,

³⁶ Generation Housing, *State of Housing in Sonoma County*, January 2022, https://generationhousing.org/wp-content/uploads/2022/02/2022_Feb_SOH_Sonoma-County.pdf

³⁷ *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.³⁸ Sonoma County residents also wait on average between eight to ten years to access Section 8 housing and other subsidized programs.³⁹

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.⁴⁰ 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.⁴¹ 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.⁴² 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.⁴³ 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.⁴⁴ 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.⁴⁵ The Sonoma County Board of Supervisors is considering a proposal to expand the fare-free bus program to other Sonoma County Transit lines.⁴⁶ These programs support accessible and affordable bus ridership, ensuring that socioeconomic factors do not impose barriers to access.

The Santa Rosa CityBus system connects residents across Sonoma County's largest metropolitan area with thirteen active service routes.⁴⁷ The CityBus system also offers more seven-day service lines than the Sonoma County Transit routes, and the lines with high ridership have headway times between 15-30 minutes.⁴⁸

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

³⁸ *Id.*

³⁹ 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.

⁴⁰ *Id.*

⁴¹ DataUSA, Sonoma County, <https://datausa.io/profile/geo/sonoma-county-ca>

⁴² Sonoma County Transit, *Fares*, <https://sctransit.com/fares/>

⁴³ Sonoma County Transit, *Schedule*, https://sctransit.com/wp-content/uploads/2021/12/SCT_Schedule_44-48.pdf

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

⁴⁵ *Id.*

⁴⁶ 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/>

⁴⁷ City of Santa Rosa CityBus, *Maps and Timetables*, <https://www.srcity.org/1661/Maps-and-Timetables>

⁴⁸ *Id.*

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

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 burden 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

⁴⁹ Sonoma-Marine 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-Marine Area Rail Transit (SMART), *Stations*, <https://www.sonomamarintrain.org/stations>

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/>

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 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.

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/>

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://1p08d91kd0c03r1xhmhtydpr-wpengine.netdna-ssl.com/wp-content/uploads/2021/05/Sonoma_Housing_Report.pdf

⁶¹ *Id.*

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 |
| Sonoma County, CA | Closed to New Applicants. ⁶⁴ | \$2,241 ⁶⁵ | 120 days. | Statewide: Yes |

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.

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

⁶³ *Id.*

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_2EaFiMQveY8er1i_5o.pdf

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.the County.

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.

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. ⁷³ 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. ⁷⁴

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. ⁷⁵ Additionally, most hourly wage earners only receive half the necessary income to afford a standard two-bedroom apartment in Sonoma County. ⁷⁶ Moreover, a 2018 report indicated that residents of color were more likely to experience rent burden than Sonoma County’s white residents. ⁷⁷

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.

⁷³h 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/>

⁷⁴ *Id.*

⁷⁵ 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

⁷⁶ *Id.*

⁷⁷ 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

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 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 & Legal Center, which has a Housing Access Modification Program that provides free assistance through grants from the County and other jurisdictions.

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 Center 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 research assistance to persons with disabilities.

Lack of community revitalization strategies

Sonoma County 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,

The County of Sonoma and City of Santa Rosa formed a Renewal Enterprise District (RED) as a Joint Powers Authority to promote infill housing. Sonoma County provides financial assistance for repairs for low-income owner-occupants of single-family or mobile homes and ADA modifications.

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 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.

There are numerous planned new developments in the City of Santa Rosa, including several mixed-use projects with housing, retail space, and commercial space. One of the largest planned developments is located at 3575 Mendocino Avenue, which will contain 532 units of market rate, affordable, and senior housing units. There are also plans for a new Sonoma Academy Performing Arts building.

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

Sonoma County passed ordinances that provide clear instruction on how individuals with disabilities can obtain a reasonable accommodation to modify zoning or land use requirements.⁷⁸ 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,

⁷⁸ 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

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.”⁷⁹ This law targets owners of any housing accommodation, banks, mortgage companies, and other financial institutions accused of discrimination.

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.⁸⁰ 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.⁸¹ 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.⁸² This law also applied to discrimination in land use practices.⁸³

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.⁸⁴ 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.⁸⁵ 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

⁷⁹ 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

⁸⁰ *Id.*

⁸¹ Practices with a Discriminatory Effect, 12060 2 CCR, [https://govt.westlaw.com/calregs/Document/16B716F755D0E4E5683D6FABF3ADF9751?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/16B716F755D0E4E5683D6FABF3ADF9751?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

⁸² *Id.*

⁸³ *Id.*

⁸⁴ 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

⁸⁵ *Id.*

zoning ordinances to increase affordable housing or pay in lieu fees,⁸⁶ provide for off-site development,⁸⁷ 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.⁸⁸ Additionally, Sonoma County has eased restrictions on the development of accessory 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 has four primary residential zoning designations. The primary residential designations 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

⁸⁶ (paying a penalty in lieu of constructing affordable units)

⁸⁷ (building a separate building with affordable units)

⁸⁸ Sonoma County Permit Sonoma, Affordable Housing Policies and Programs, <https://permitsonoma.org/regulationsandinitiatives/housing/housinginitiatives>

of permit processing.⁹² Thus the County primarily relies on urban centers to expand affordable housing opportunities.

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 issued 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.

Lending Discrimination

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

| Race/Ethnicity | Percent of Loan Applications resulting in Origination | Percent of Loan Applications Denied | Percent of total loan applications across racial or ethnic categories | Percent of total loan applications resulting in Origination across racial or ethnic categories | Percent 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

⁹² Sonoma County. Code 26-89-030, *Permitted residential density and development criteria*, http://sonomacounty-ca.elaws.us/code/coor_ch26_art18_sec26-18-030

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.⁹³

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.

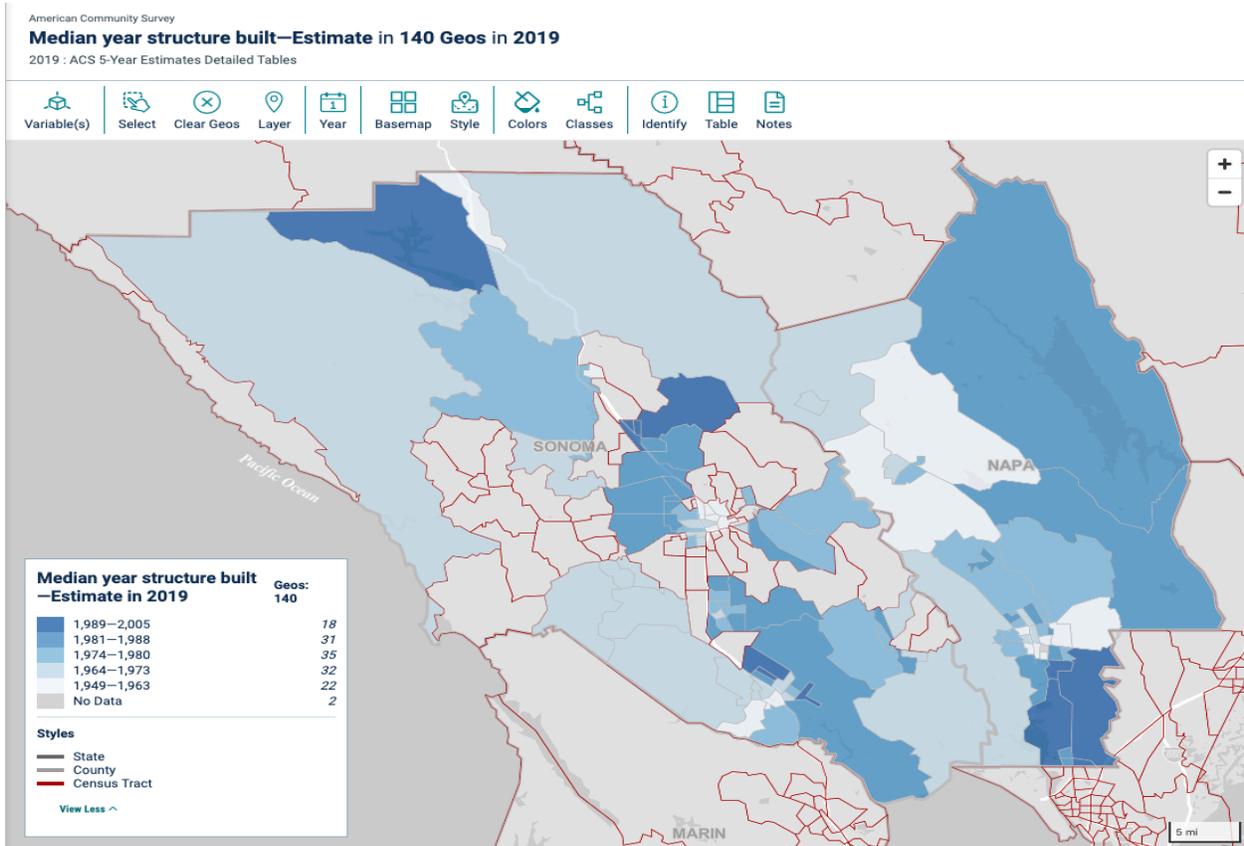
Sonoma County's publicly supported housing is more evenly distributed throughout the County rather than clustered in one jurisdiction. Areas with publicly supported housing include Santa Rosa, which has the highest number, Rohnert Park, Windsor, Healdsburg, Sebastopol, and Cloverdale. Similar to Sonoma 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

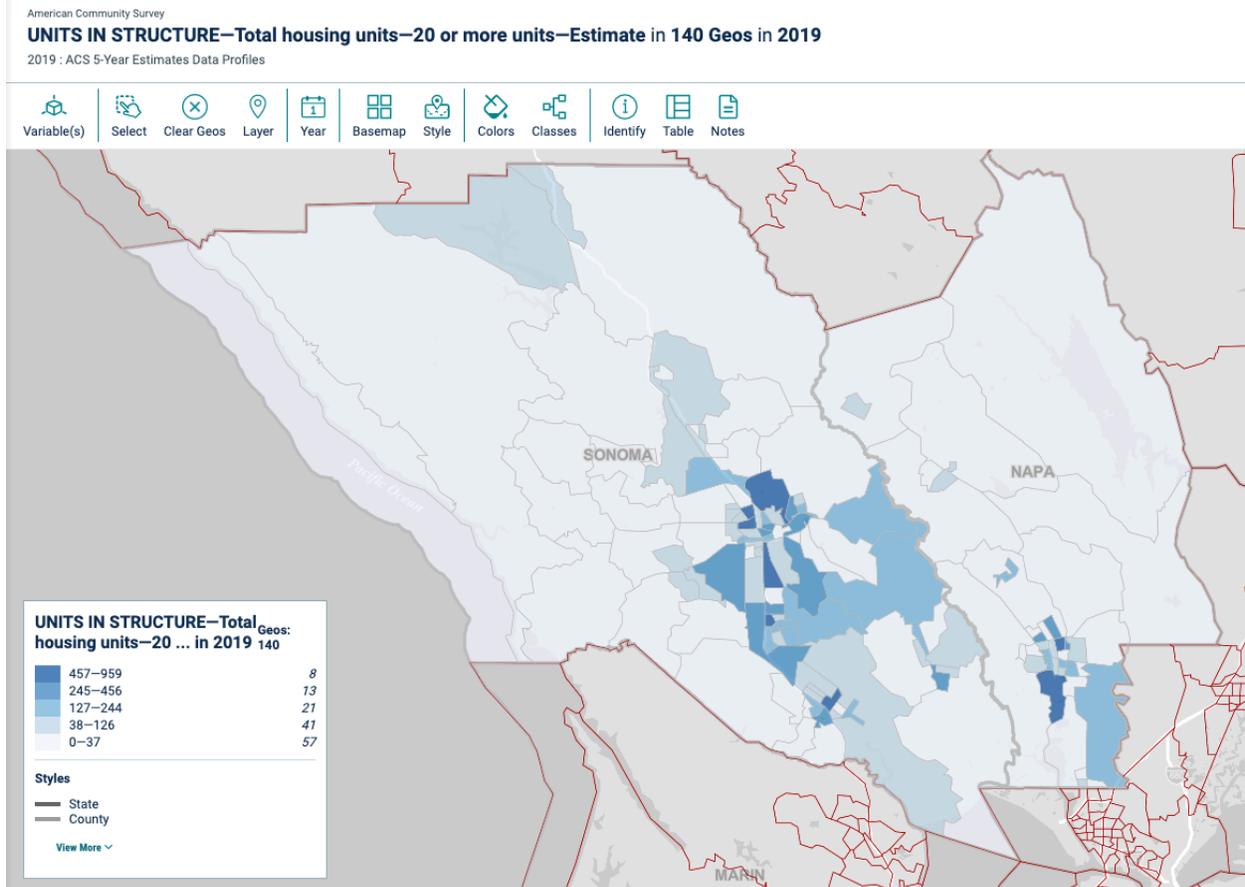
The location of accessible housing is not a significant contributing factor to fair housing issues in Sonoma County. Although it is not possible to precisely map the location of accessible housing in the area, it tends to exist where there are concentrations of new, multifamily housing and where there 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.

⁹³ 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 Area ⁹⁴

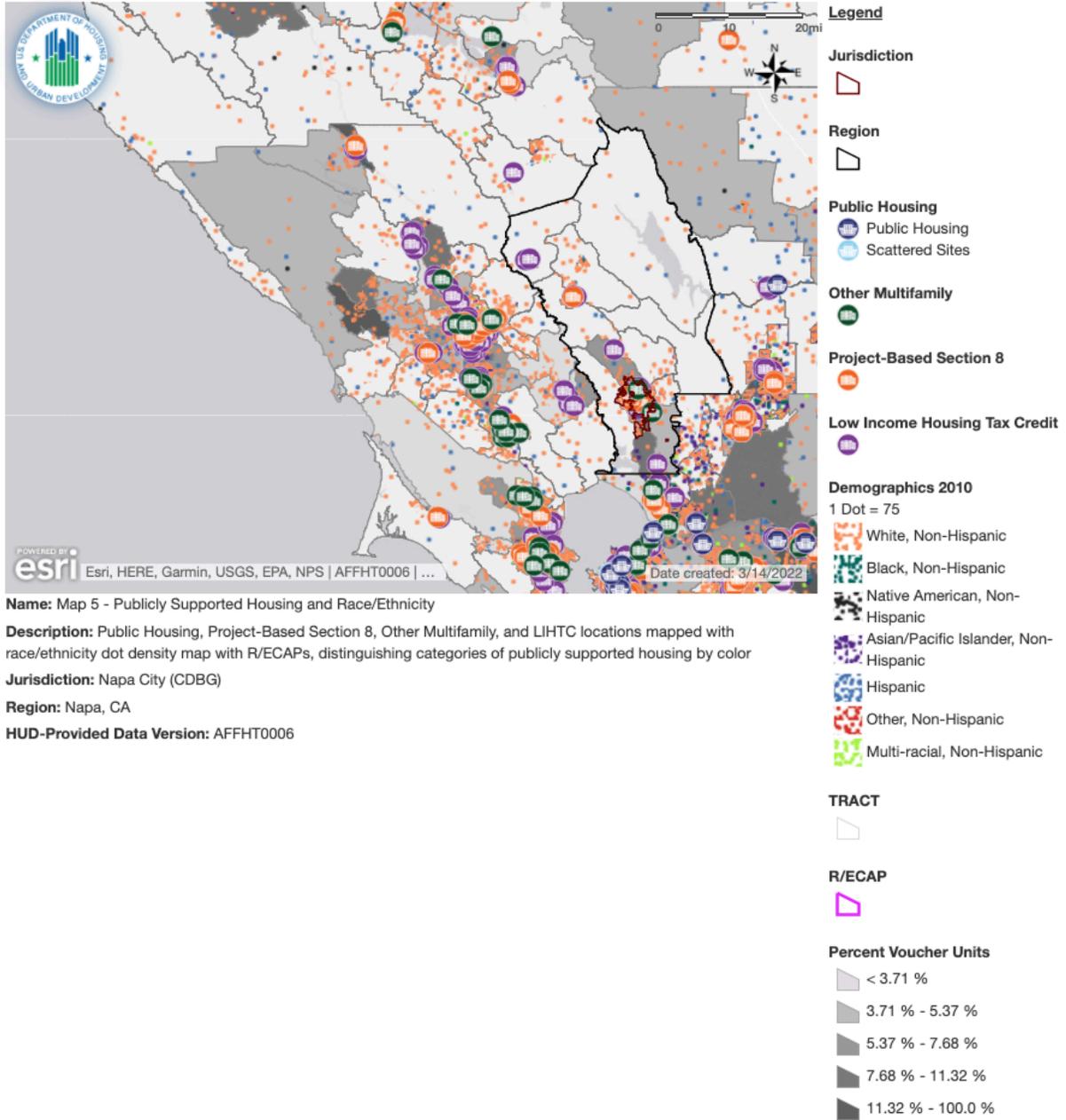


While also clustered near Santa Rosa, publicly supported housing, as reflected in the map below, is much more concentrated in places that do not have concentrations of new, multi-family development. The upshot is that it is likely that, between the two categories of types of housing that are comparatively 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.

⁹⁴ 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.⁹⁵ 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.⁹⁶ Only 4.28% of Sonoma County residents travel more than 90 minutes to work each day,⁹⁷ a percentage that dims in comparison to the 11.7% of all San Joaquin County residents that are considered “super commuters.”⁹⁸ 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.⁹⁹ The average median salary in Sonoma County is \$87,828 for comparison.¹⁰⁰ This is a reversal of a trend found throughout many American regions, in which an area’s poorest residents commonly endure the longest commutes.¹⁰¹

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, cite this as restaurant employees typically cannot afford to live in Sonoma County and are thus subjected to long commutes from the surrounding area.¹⁰² 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.

⁹⁵ [Schaefer, Annette](#). “Commuting Takes Its Toll.” Scientific American. 2005.

⁹⁶ U.S. Census Bureau. American Community Survey, 5-Year Estimates. 2019.

⁹⁷ [Data USA](#). “Sonoma County, CA.”

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

⁹⁹ [Popov, Igor and Chris Salviati](#). “Traffic, Trains, or Teleconference? The Changing American Commute.” 2019.

¹⁰⁰ [Data USA](#). “Sonoma County, CA.”

¹⁰¹ [National Equity Atlas](#). “Commute Time: All Workers Should Have Reasonable Commutes.” 2019.

¹⁰² [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.¹⁰³ According the organization’s most recent report, from 1997 to 2021, more than 20,000 housing units lost their affordable status in California.¹⁰⁴ 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.¹⁰⁵

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. 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. ¹⁰⁶ Median rent for this area has increased by approximately 30 percent since 2009. ¹⁰⁷ In Santa Rosa, “51.9% of households live in . . . neighborhoods that are susceptible to or experiencing displacement, and 6.1% live in areas at risk of or undergoing gentrification.”¹⁰⁸ Rental costs have increased by 42 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.¹⁰⁹

¹⁰³ 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.

¹⁰⁴ . California Housing Partnership, *Affordable Homes at Risk Report*, February, 2022, <https://1p08d91kd0c03r1xhmhtvdpr-wpengine.netdna-ssl.com/wp-content/uploads/2022/02/Affordable-Homes-At-Risk-Report-2022.pdf>.

¹⁰⁵ ABAG Housing Needs MTC: Santa Rosa at 34.

¹⁰⁶ ABAG Housing Needs MTC: Unincorporated Sonoma County at 7.

¹⁰⁷ ABAG Housing Needs MTC: Unincorporated Sonoma County at 38.

¹⁰⁸ ABAG Housing Needs MTC: Santa Rosa.

¹⁰⁹ 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.”

Private Discrimination

According to the California Department of Fair Employment and Housing (DFEH) Annual Report, there were 143 complaints in Sonoma County. Between 2013-220, HUD reported that there were fair housing inquires in 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.

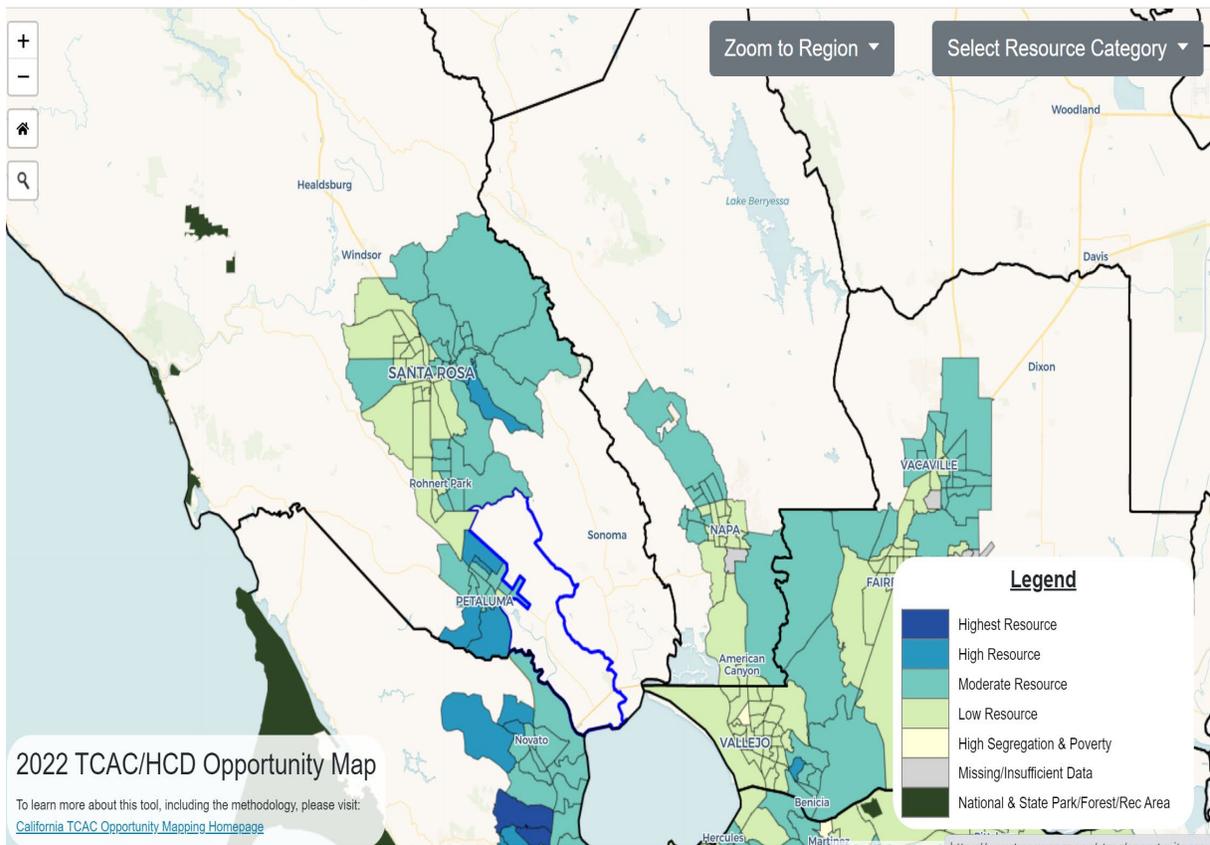
Regulatory barriers to providing housing and supportive services for persons with disabilities

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.

TCAC/HDC Opportunity Map



Source of income discrimination

As of 2020, California state law prohibits source of income discrimination.¹¹⁰ Santa Rosa also has implemented a local law banning source of income discrimination.¹¹¹

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

¹¹⁰ 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)

¹¹¹ Santa Rosa City Code § 10-46.030, *Prohibited activities*, http://www.qcode.us/codes/santarosa/?view=desktop&topic=10-10_46-10_46_030

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.

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.

Attachment

2019 Countywide Assessment of Fair Housing Community Engagement Report prepared by Equity First Consulting:

<https://share.sonoma-county.org/link/HCgW319KfDk/>