

CHAPTER 11: ASSESSMENT OF FAIR HOUSING

AFFIRMATIVELY FURTHERING FAIR HOUSING

In 2018, the Governor signed AB 686 into law. AB 686 requires that all public agencies administer programs and activities related to housing and community development in a manner that affirmatively furthers fair housing and to not take any action that is materially inconsistent with this obligation. AB 686 also requires local governments to include an assessment of fair housing within their housing elements.

Public agencies may affirmatively further fair housing by taking actions that:

- Foster inclusive communities
- Address segregated living patterns with integrated living patterns
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity
- Maintain compliance with civil rights and fair housing laws

This chapter acts as an assessment of fair housing practices, pursuant to Government Code Section 65583 (c)(10), and discusses three documents which together begin the County's approach to addressing systemic issues of racism and inequity; the Resolution Declaring Racism as a Public Health Crisis; the Environmental Justice Element; and the Analysis of Impediments to Fair Housing Choice prepared for the Sacramento Valley Region. It examines existing conditions and demographic patterns —concentrated areas of poverty within the county, concentrated areas of low- and median- income housing, and concentrated areas of low and high opportunity — to compare how past discriminatory housing practices inhibit fair housing practices in the county today.

Environmental Justice Communities

Many programs use Environmental Justice Communities (EJ Communities) as geographic areas of focus. The EJ Element's geographic focus of analysis and policies is EJ Communities - areas that are considered disadvantaged compared to other parts of the unincorporated County. Staff used two sources to determine the extent and boundaries of EJ Communities. Consistent with Senate Bill 1000, staff utilized the California Communities Environmental Health Screening Tool (more commonly known as CalEnviroScreen). The other source utilized was the Sacramento Area Council of Governments' (SACOG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). State law requires SACOG to conduct an environmental justice and Title VI analysis as part of the MTP/SCS to determine whether the MTP/SCS equitably benefits low-income and minority communities (Sacramento Area Council of Governments, 181). SACOG refers to these areas as Low Income High Minority (LIHM) Areas.

Staff then combined CalEPA's disadvantaged communities with SACOG's LIHM areas to delineate EJ Communities. There are four EJ Communities: North Highlands/Foothill Farms, North Vineyard, South Sacramento and West Arden-Arcade. The North Highlands/Foothill Farms EJ Community includes Old Foothill Farms. These EJ Communities include Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) and TCAC areas of High Segregation and Poverty.

FAIR HOUSING ENFORCEMENT AND OUTREACH

Local Data and Knowledge

Fair housing complaints can be used as an indicator to identify characteristics of households experiencing discrimination in housing. Pursuant to the California Fair Employment and Housing Act [Government Code Section 12921 (a)], the opportunity to seek, obtain, and hold housing cannot be determined by an individual's "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code."

Fair housing issues that may arise in any jurisdiction include but are not limited to:

- housing design that makes a dwelling unit inaccessible to an individual with a disability;
- discrimination against an individual based on race, national origin, familial status, disability, religion, sex, or other characteristic when renting or selling a housing unit;
- and, disproportionate housing needs including cost burden, overcrowding, substandard housing, and risk of displacement.

The County of Sacramento works with many cities in its jurisdiction to conduct outreach related to fair housing. The County provides fair housing resources on the County website and directs residents to appropriate agencies and resources for fair housing assistance. The County also participates in the Renter's Helpline, a regional telephone and internet-based resource that provides counseling and mediation services for residents of Sacramento County to help resolve a housing crisis or dispute. The program counselors deal directly with concerns regarding landlord-tenant disputes and help refer fair housing issues to the appropriate agency. Renter's Helpline service providers also perform outreach to County residents through social media posts, TV and radio advertisements, community events, and trainings.

Table 68 shows county data from the Renter's Helpline, including the unincorporated county, for the years 2015-2019. In the years shown, calls from residents in the unincorporated county accounted for almost half of all calls countywide.

Table 68: Renter's Helpline Records 2015-2019			
	Countywide	Unincorporated County	
	Number	Number	Percent
2015-2016			
Calls	7,182	3,076	42.8%
Dispute Resolutions	61	48	78.7%
Potential Fair Housing Violations	63	58	92.1%
2017-2018			
Calls	8,302	3,369	40.6%
Dispute Resolutions	61	48	78.7%
Potential Fair Housing Violations	85	29	34.1%
2018-2019			
Calls	8,079	3,616	44.8%
Dispute Resolutions	134	58	43.3%
Potential Fair Housing Violations	114	48	42.1%

Source: Project Sentinel, 2020.

In spring and fall of 2020, seven focus groups meetings were held to inform stakeholders about the Housing Element Update and to receive knowledge from 19 organizations that include local/regional advocates and service providers. A summary of the focus groups meetings is in the Introduction Chapter and Appendix A. During these focus group meetings, the County received the following feedback related to fair housing.

- For immigrants and refugees in the County, the challenges that were discussed were language barriers, lack of immediate income for security deposits, and lack of housing for large families. Focus group attendees recommended that the County provide short-term affordable housing

options with low barriers to entry, provide housing assistance, and make housing requirements flexible.

- For people experiencing homelessness, the challenges that were discussed included general opposition from the public, nimbyism, and xenophobia. Focus group attendees recommended that the County create broader community education efforts to help the public accept different types of housing, provide services on site at emergency and supportive housing options, protect housing and service providers for people experiencing homelessness, and provide leadership from the “top-down” for homeless programs.
- For people with disabilities, the challenges that were discussed were housing affordability, aging housing stock, limited affordable and accessible housing stock, a lack of understanding of renters’ rights, and physical, systemic and economic barriers. Recommendations to the County were to expand the existing Universal Design program, incentivize development of additional accessible units, develop a system to share new accessible units that are built with stakeholders, and encourage higher than the minimum Building Code requirements for developing accessible units.
- For tenants, focus group attendees recommended that the County consider methods to keep people in their homes such as eviction protections, homeless diversion programs, aging in place programs, and funding for increased accessibility in the existing housing stock.

This feedback directly resulted in the creation of the following Housing Element programs: B8 Missing Middle Housing, B5 Affordable Housing Education, D1 Universal Design, D2 Accessible Unit Tracking, D10 Tiny Homes, D14 Housing for People Experiencing Homelessness, E3 Affordable Housing Ordinance Amendment, and G1 through G6 specific to Affirmatively Furthering Fair Housing.

OUTREACH FOR REGIONAL ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

Local Data and Knowledge

In addition to outreach conducted for the Housing Element, the Sacramento Valley Fair Housing Collaborative had a community engagement process including focus groups with residents and stakeholders, engagement at local events, and a resident survey as part of research to inform for the Sacramento Valley Analysis of Impediments to Fair Housing Choice (AI).

RESIDENT SURVEY

The resident survey was available in Chinese, Korean, Russian, Spanish, and Vietnamese. It was offered online and accessible to participants using assistive devices (e.g., screen readers), and in a postage-paid paper mail-back format. Additionally, residents who would prefer to take the survey by phone could do so by calling the project team’s 800 number. Outreach and promotional efforts included broad and targeted activities. The survey was promoted directly to residents and the participating partners asked local organizations to encourage clients, residents, consumers, and members to participate in the survey through various platforms. Sacramento County’s Communications and Media staff promoted the availability of the resident survey on the County’s social media channels, including NextDoor posts reaching more than 60,000 Sacramento County residents.

There were 3,388 total participants in the resident survey. Of those participants, approximately 2,129 participants were residents in the County of Sacramento including the cities of Citrus Heights, Elk Grove, Rancho Cordova, and Sacramento City. About 224 were county residents who did not reside in an incorporated city. This section reports on survey data for Sacramento County and excludes responses from residents of Citrus Heights, Elk Grove, Rancho Cordova, and the City of Sacramento.

The major findings from the resident survey are summarized below:

Housing Challenges. Among Sacramento County survey respondents, 42 percent worry about rent increasing to an amount they cannot afford; 32 percent struggle to pay rent (e.g., sometimes paying late, not paying other bills to pay rent, not buying food or medicine); 37 percent want to buy a house but cannot

afford the down payment, and 25 percent worry about property taxes increasing to an amount they cannot afford

Displacement Experience. Overall, 28 percent of survey respondents had been displaced from a housing situation in Sacramento County in the past five years. When examined for members of protected classes and by income, experience with displacement varies widely. African American, Hispanic, and Native American respondents, large families, households with children, and respondents whose household includes a member with a disability experienced higher displacement rates than regional survey respondents overall. Additionally, lower income households are much more likely than higher income households to have experienced displacement in the past five years. Higher income households that did experience displacement were more likely to have been displaced due to the landlord selling their home.

Experience with Housing Discrimination. Overall, 17 percent of survey respondents said that they experienced discrimination when they were looking for housing in the region. Among the jurisdictions, about one in four residents of Sacramento, Elk Grove, and Sacramento County experienced housing discrimination. Among members of protected classes, African American respondents, Native American respondents, and households that include a member with a disability had the highest rates of housing discrimination experiences. Respondents who believed they experienced discrimination when looking for housing in the region provided the reasons why they thought they were discriminated against. The top five reasons for discrimination were as follows: race/ethnicity (29 percent), income/income too low (23 percent), age (18 percent), familial status/having children (18 percent), and disability status (16 percent).

FOCUS GROUPS

In partnership with the participating jurisdictions and nonprofit organizations throughout the region, the project team facilitated six resident focus groups and six stakeholder focus groups. Focus groups consisted of 80 residents representing various stakeholders working in the fields of housing, real estate and development, supportive services, fair housing advocacy, and economic development.

As with survey participants, housing costs and lack of available housing to rent or buy are significant challenges for residents. Other common challenges discussed by focus group participants include barriers to renting due to rental requirements, poor housing conditions, overcrowding, lack of options for voucher holders, and difficulties with publicly supported housing policies and practices.

Poor Housing Conditions. Resident focus group participants shared stories of poor housing condition, ranging from units in need of repair, problems with mold, and pest infestations. Many shared that they were afraid to request repairs or remediation out of fear of being evicted or having the rent increase. Evictions resulting from code enforcement actions were described in nearly all resident focus groups, regardless of the community where they were held.

Overcrowding. Participants in a number of resident focus groups discussed how they live with extended family, roommates, or other friends in order to afford their housing. Sometimes two or more households share a unit; large families have an especially difficult time finding affordable housing that is large enough to accommodate their family.

Minimum income requirements. High deposit requirements and requirements that tenants have incomes of at least 3X (three times) the rent are very common among Sacramento Valley housing providers. Residents described these policies as a significant barrier to housing choice.

Lack of options for voucher holders. Focus group participants who are voucher holders described the difficulty they have experienced when faced with finding a new place to rent. Stakeholders also described that too few landlords in the region accept Section 8 vouchers and that more landlords or properties are opting out of the program altogether.

Lack of affordable accessible housing units. Residents with disabilities who participated in focus groups discussed the challenges they experienced when trying to find housing they could afford that met their accessibility needs. For residents with disabilities, particularly those relying on disability benefit income, finding affordable housing that also meets their accessibility needs in the home is incredibly

difficult. Market rate units that are accessible and financially out of reach. Older units that may be naturally occurring affordable housing, including properties in less transit-rich environments are rarely accessible. In addition to other challenges, residents who rely in part on disability benefit income must carefully balance their employment earnings. For many, especially those with cognitive difficulties, this is a difficult task with serious consequences for their housing situation. Lack of ADA accessible infrastructure or infrastructure in disrepair further narrows where residents with mobility disabilities can seek housing. Overall, one in three (35 percent) households surveyed through the AI that include a member with a disability live in a home that does not meet the needs of the resident with a disability.

HISTORY OF SEGREGATION IN THE REGION (OTHER RELEVANT FACTORS)

The majority of the data used in this assessment is from the Analysis of Impediments to Fair Housing Choice (AI) prepared for the Sacramento Valley Fair Housing Collaborative in February 2020. The regional study assessed fair housing in cities and unincorporated jurisdictions of Sacramento, Placer, and Yolo counties. The complete AI is available on the County's Fair Housing webpage¹.

The AI includes a summary of the history of housing discrimination in the Sacramento Region based on research by Jesus Hernandez, PhD at the University of California, Davis. Sacramento County, like many other places across the nation, has a past history of systemic segregation and exclusion in housing including practices of:

- Mortgage redlining, leading to disinvestment in low-income areas and area primarily inhabited by People of Color;
- Racially restrictive covenants on housing developments, restricting the access of residents of color to certain areas of the region; and
- Urban renewal programs aimed at redeveloping "blighted" areas or areas primarily inhabited by People of Color.²

Dr. Hernandez has documented racial covenants, which prohibited People of Color from purchasing or renting a home, in the Sacramento region as early as the 1920s. By the 1940s, these covenants were being reinforced by mortgage redlining practices, which excluded people of color from receiving government-backed home loans with favorable terms.

Due to covenants and redlining, many of Sacramento's people of color were living in the West End neighborhood by 1950. The City then targeted this neighborhood with urban renewal efforts to redevelop "blighted" areas with commercial development. People of color who were displaced from the West End then resettled in other non-covenant restricted areas. This resettlement and the redlining practices that followed resulted in a southwest to northeast pattern of racial covenants that extended beyond the City of Sacramento into the unincorporated County of Sacramento and the region at large (as shown in Figure 9).

Specifically, Dr. Hernandez found that racial covenants spanned from Sacramento's Pocket neighborhood in the southwest including River Park, East Sacramento and Arden- Arcade, and Fair Oaks in the northeast Figure 18. These covenants caused communities of color to settle in areas to the north and south of the City of Sacramento and were prevented from moving to more desirable neighborhoods while non-Hispanic white residents expanded to the northeast suburbs. These government practices of exclusion and disinvestment prevented People of Color from attaining the same intergenerational wealth that white families achieved. This history is partly why in 2016, the net worth of a median white household (\$171,000) was 10 times that of a median Black household (\$17,150) in America³.

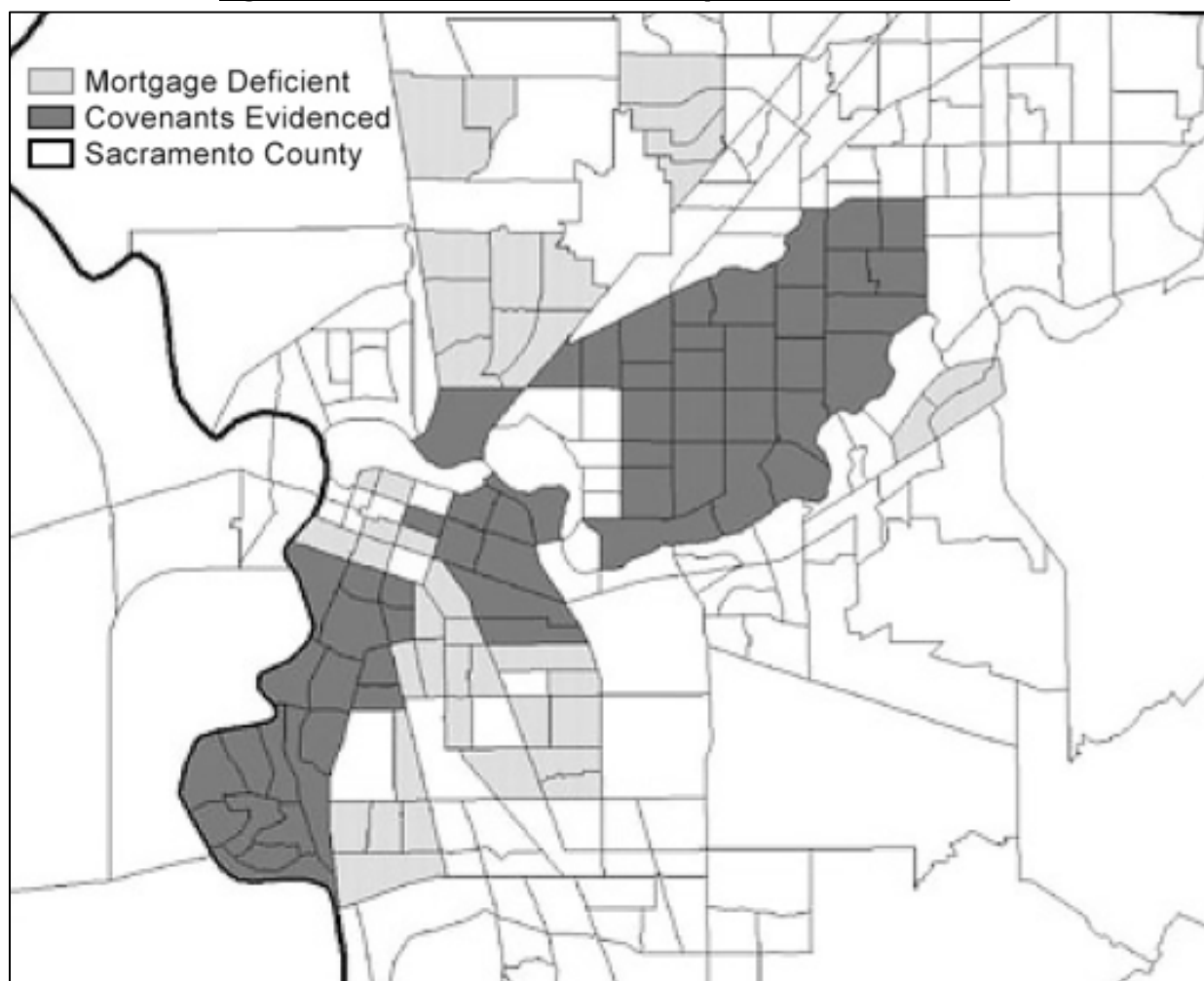
¹ <https://www.saccounty.net/FairHousing/Pages/default.aspx>

² Hernandez, Jesus. (2009). Redlining Revisited: Mortgage Lending Patterns in Sacramento 1930-2004. International Journal of Urban and Regional Research. 33. 291-313. 10.1111/j.1468-2427.2009.00873.x.

³ Brookings Institute, "Examining the Black-White Wealth Gap" (2020).

Mortgage redlining, racially restrictive covenants, and urban renewal programs created the historic patterns of segregation in the Sacramento region but single-family zoning districts are another part of the reason that the region is still segregated today. According to SACOG's Housing Policy Toolkit Appendix: History and Context, Sacramento's historic redlining map of low-risk areas are still predominately zoned as single-family today. These areas also correspond directly with high opportunity areas, or areas identified by HCD as having access to jobs, high-performing schools, and low pollution levels. Single-family zoning districts prevent residential uses that are more affordable from developing in opportunity areas.

Figure 18: Areas with Historic Racially Restrictive Covenants



Source: Hernandez Jesus. (2009) Redlining Revisited: Mortgage Lending Patterns in Sacramento 1930-2004.

Local Data and Knowledge

The unincorporated Sacramento County has similar trends and patterns related to concentrated areas of affluence and racial segregation that occurred elsewhere in the region, state and even the country. The population has changed throughout County history to reflect significant historical events/trends. The Sacramento region experience substantial change with the impact of the Gold Rush and creation of the rail lines. The non-white immigrants that were hired for mining work then shifted to the agricultural work, domestics, or merchants. This growing population experienced strong anti-immigrant sentiment. During the late 1800s and early 1900s, the rise of large community builders across the U.S. transformed home construction into a nationwide industry with restrictive covenants used as the primary method by which

they implemented their planning and design visions (Weiss 1987:3). These covenants places limits on who could use the land (reside), place limits on exchange (ownership), and dictate how the land could be used.

When the Federal Housing Administration (FHA) was created in the 1930s, it marked the shift in local residential mortgage financing. Since FHA financing aided both construction and sales of new homes, developers of new communities in Sacramento during this period readily complied with FHA mandates for racial restrictions on residency. The demand for affordable home financing made possible by the FHA-insured mortgage program created a new market for community builders and expanded the boundaries of racially excluded space beyond the city limits. Developers of new suburban tracts used racial covenants to attract buyers and advertised the use of “wise restrictions” along with FHA Title II financing to assure buyers of the safety of their investment. FHA loan programs during this period helped institutionalize long-standing local realtor practices of racial segregation and played an important role in shaping the city’s residential geography during the 1930s and 1940s. Lenders were unable to sell loans to Fannie Mae unless the mortgaged property had race covenants in place. Consequently, race covenants in property deeds became a standard practice and a necessary condition in the rapidly growing Sacramento housing industry.¹⁸

These trends coincide with the establishment of the Carmichael Colony in Carmichael and the Fair Oaks Sunset Colonies in the early late 1800 to early 1900’s as farming communities and their conversion to suburban communities post World War II with racially restrictive covenants.

CURRENT PATTERNS OF INTEGRATION AND SEGREGATION

Race and Ethnicity

The Sacramento Valley region has grown similarly to the other counties in the SACOG region and has correspondingly increased in diversity. In 2017, non-Hispanic White residents made up 55.7 percent of the population within the Sacramento Valley region, compared to 73 percent in 1990. Figure 9 displays regional patterns of racial and ethnic segregation as of 2010. The 2010 patterns of settlement indicate that most non-White residents (including Black, Asian/Pacific Islander, as well as Hispanic/Latino residents) who live in the unincorporated county live near the cities of Sacramento and Elk Grove. The population within rural, agricultural areas tends to primarily be non-Hispanic White with a greater presence of Hispanic/Latino residents than any other community of color.

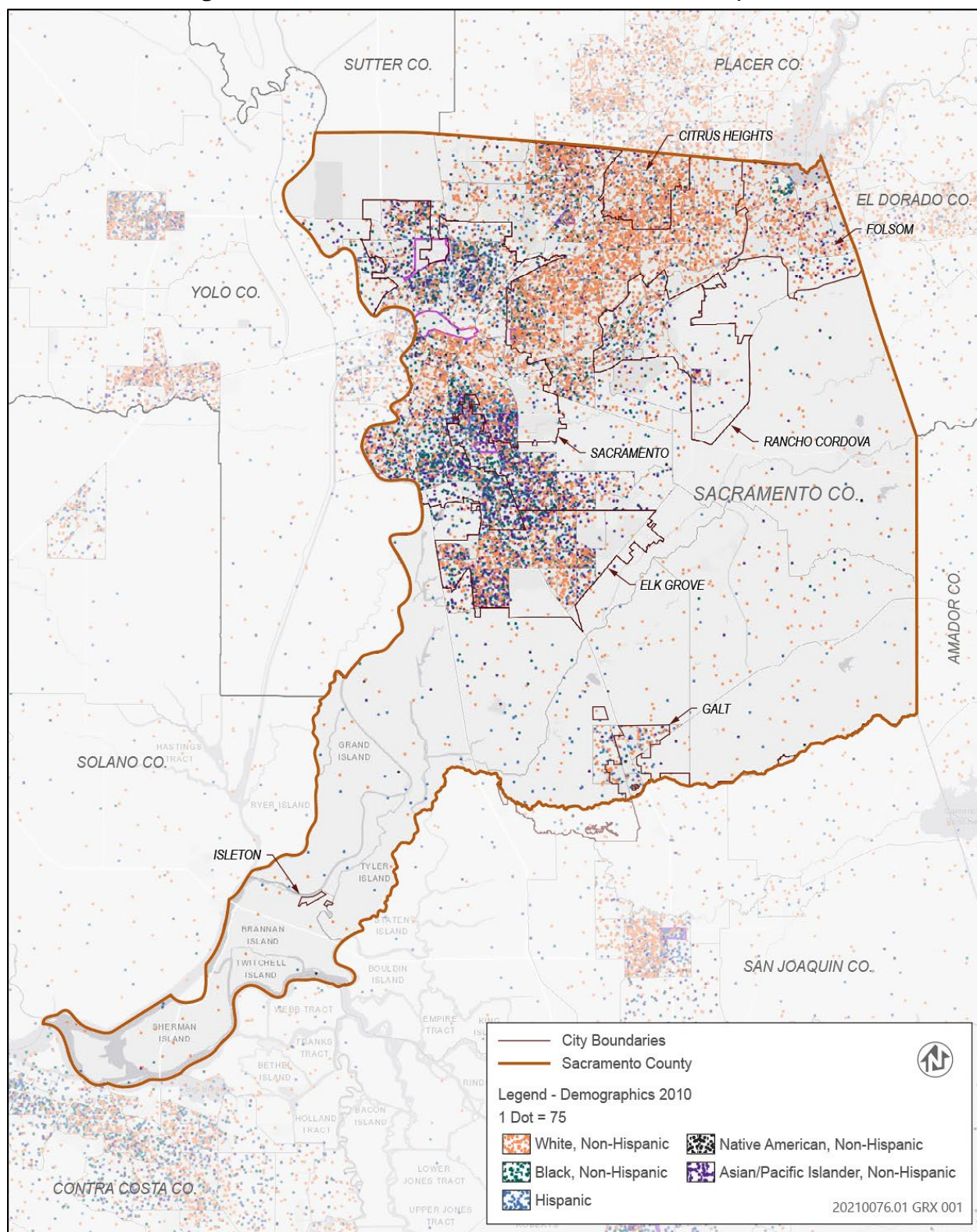
Between 2010 and 2018, the percent of the total non-White population for most census block groups in the county increased from 21-40 percent in 2010 to 41-60 percent in 2018. As shown in Figure 10, people of color now comprise a large majority of the population within many block groups correlating to identified communities. The percentage of non-White residents is predominately clustered in the more urban communities of Arden Arcade, South Sacramento and North Highlands/ Foothill Farms. The proportion of people of color is also increasing in the unincorporated areas of Rio Linda and Antelope. These are the areas of the County that historically did not have racially restrictive covenants. The population becomes more White in the suburban areas of Carmichael/Old Foothill Farms, Fair Oaks and the predominately agricultural communities of Southeast and Cosumnes. Portions of these suburban areas were subject to racially restrictive covenants. Orangevale, a suburban/rural residential community located at the northeast corner of the County is the least diverse portion of the County, with portions being less than 20 percent non-White.

As shown in Figure 19, there are far more predominately White census tracts than any other race or ethnicity and these tracts generally follow the Interstate-80 Highway and are outside of city centers in Carmichael, Fair Oaks (areas subject to racially restrictive covenants) and Orangevale. Most Hispanic/Latino majority census tracts are in the southern areas of the county in the Florin and Rio Vista areas. Asian residents are most predominant in the Florin area as well, north of Elk Grove. Additionally, there are two

census tracts with predominant Black populations located in the unincorporated county outside of the northern boundary of the City of Sacramento in the Natomas community.

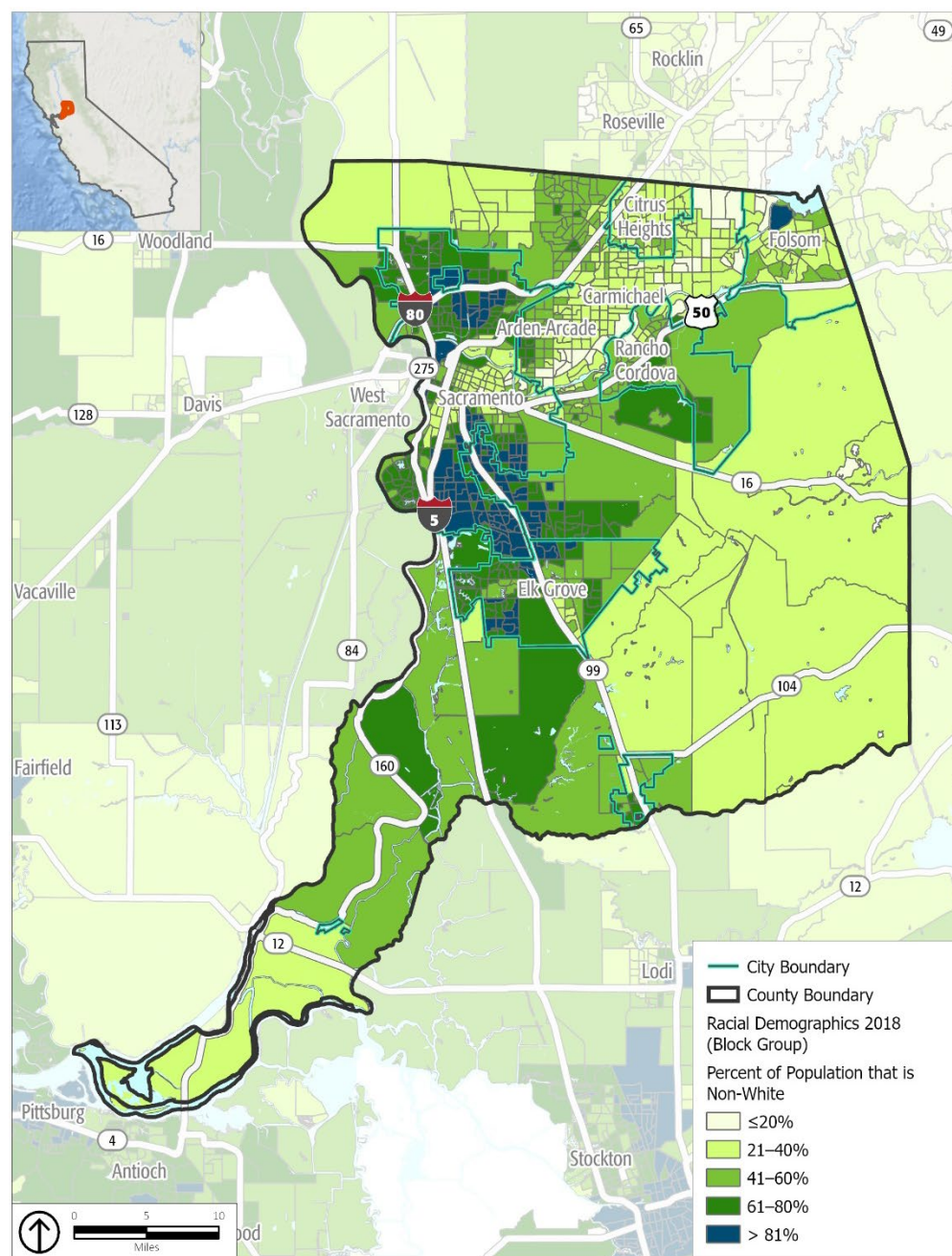
¹⁷ Hernandez, J. 2021 Race and Place in Sacramento: A Report for the City of Sacramento to support preparation of the Environmental Justice Element of the Sacramento 2040 General Plan Update. JCH Research. Sacramento

Figure 19: Sacramento Racial and Ethnic Distribution, 2013



Source: HCD AFFH Data and Mapping Tool, 2021

Figure 20: Racial Demographics, Sacramento County, 2018

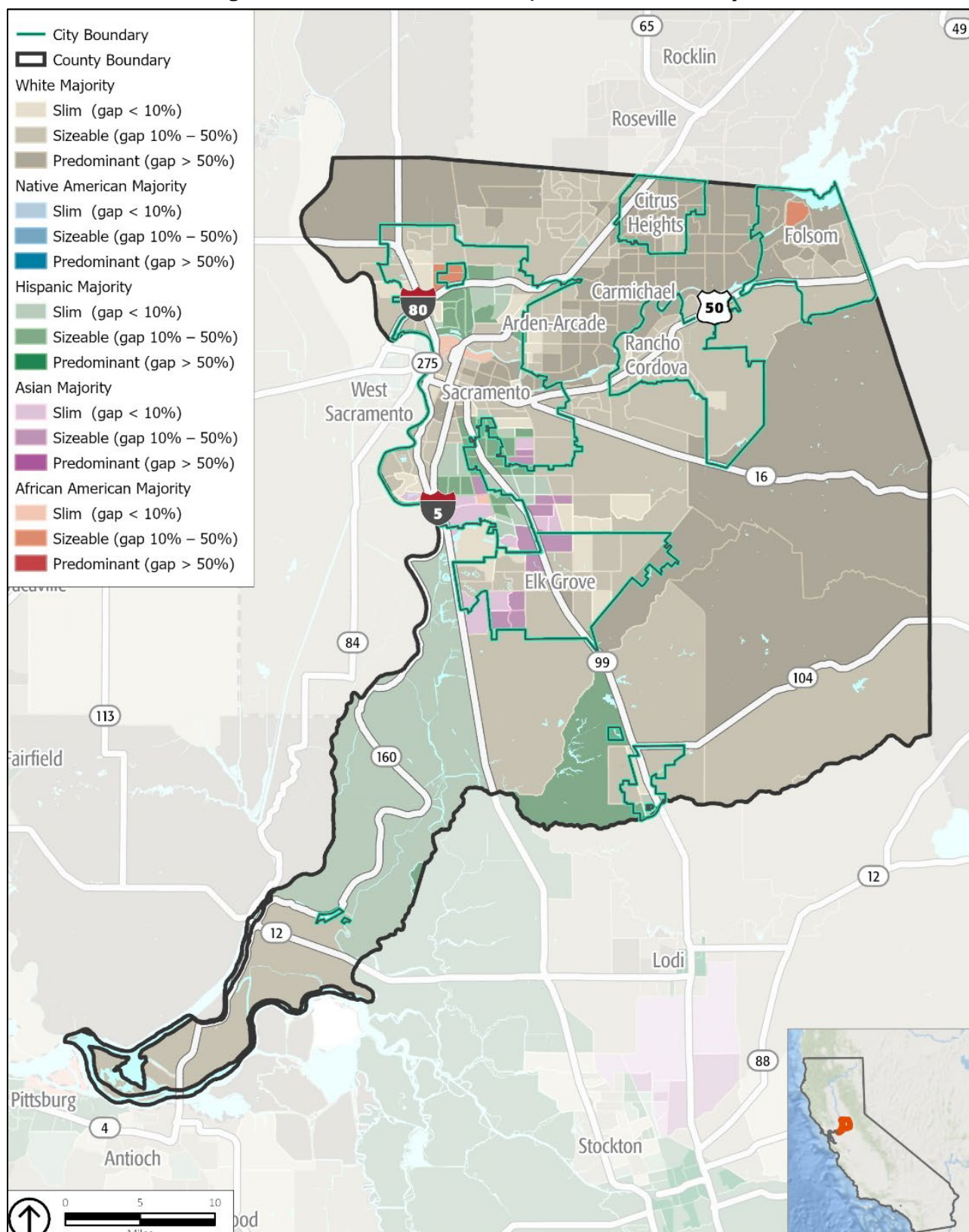


Source:

Percent of Residents that are Non-white by Census Block Group (2018)

Source: HCD AFFH Data and Mapping Tool, 2021

Figure 21: Racial Predominance, Sacramento County



Dissimilarity Index

A common measure of the magnitude of segregation within a city or county is the dissimilarity index (DI). The DI measures the degree to which two specific groups are distributed across a geographic area. The DI varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A dissimilarity index of 0 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A dissimilarity index of 100 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group.

It is important to note that the DI provided by HUD uses non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of non-Hispanic White residents and do not directly measure segregation between two minority groups (e.g., Black and Hispanic segregation).

The AI found that segregation in Sacramento County is “moderate” as defined by the DI (Figure 22). However, the AI also notes that segregation in the county has increased each decade since 1990. Overall, the DI shows that 36 percent of all “minority” households would need to relocate neighborhoods in order to be evenly dispersed with non-Hispanic White households. About half (48.5 percent) of all Black households would need to move neighborhoods (census tracts) to be proportionally even. Black segregation has been “above moderate” in the balance of Sacramento County since 1990 and has actually increased in recent years, which means that most Black households live in concentrated, neighboring, or segregated communities. The concentration of Black households, and many communities of color, over a 30-year time period is largely due to the long-term effects of redlining and mortgage discrimination.

The segregation of Asian residents also rose to “moderate” from 2012 to 2013 (the most recent year data are available).

Figure 22: Dissimilarity Index, 2013

Jurisdiction	Minority/NHW Dissimilarity Index		Hispanic/NHW Dissimilarity Index		Black/NHW Dissimilarity Index		Asian/NHW Dissimilarity Index	
	Index	Rating	Index	Rating	Index	Rating	Index	Rating
Citrus Heights	18.54	Low	20.64	Low	25.50	Low	18.52	Low
Elk Grove	27.10	Low	19.63	Low	28.80	Low	34.68	Low
Davis	17.96	Low	16.62	Low	21.90	Low	23.63	Low
Rancho Cordova	17.87	Low	18.52	Low	25.16	Low	36.80	Low
Roseville	15.92	Low	20.19	Low	19.41	Low	29.67	Low
Rocklin	12.74	Low	13.44	Low	21.48	Low	24.21	Low
Balance of Sacramento	36.41	Low	36.76	Low	48.52	Moderate	45.19	Moderate
City of Sacramento	37.80	Low	39.56	Low	44.92	Moderate	43.73	Moderate
W. Sacramento	19.26	Low	27.57	Low	29.52	Low	24.27	Low
Woodland	21.58	Low	22.69	Low	30.89	Low	39.69	Low

Note: NHW is Non-Hispanic White.

Source: Decennial Census 2010 pulled from the HUD Exchange and Root Policy Research.

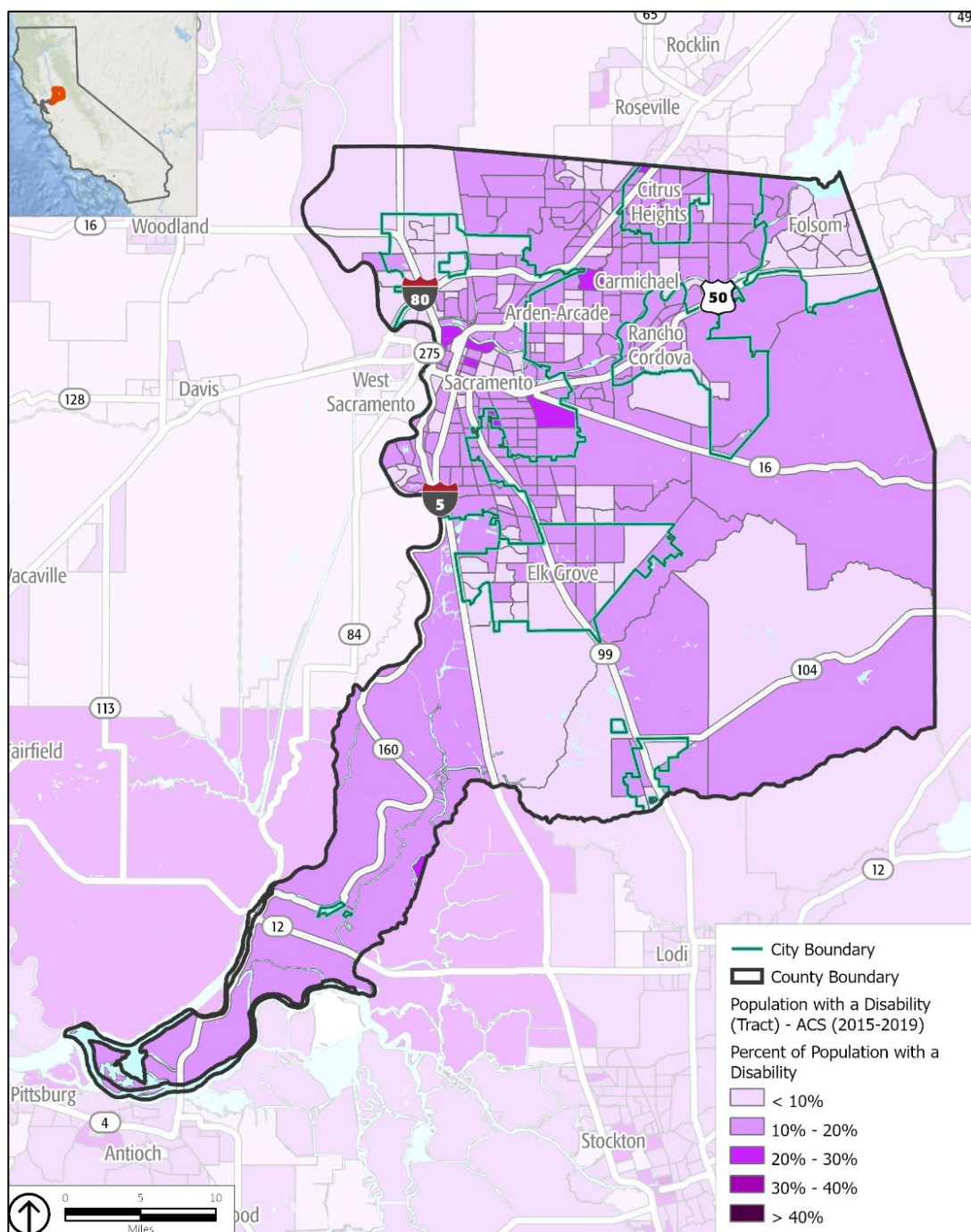
Disability

The U.S. Census Bureau defines disability as one of the following: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. As was discussed in the Special Housing Needs section of Chapter 6, People with Disabilities, the average

proportion of unincorporated county residents (total non-institutionalized) living with a disability in 2018 (10 percent) was higher than that of the state (8 percent). Thirty-seven percent of the 43,662 people with a disability in 2018 had an ambulatory difficulty (26 percent) or a self-care limitation (11 percent), which makes it harder to live independently.

Figure 23 shows the population of persons with a disability by census tract in the county using American Community Survey data from 2015-2019. At a regional level, the county is relatively homogenous in that most census tracts have 20 percent or less of their less population living with a disability. Many smaller tracts throughout the northern part of the county have less than 10 percent of people living with a disability. Conversely, there are a few areas with ≤ 40 percent of people living with a disability. The County currently administers a number of programs that serve people with various special needs, including those that have developmental disabilities.

Figure 23: Percent of Population with a Disability, Sacramento County



Source: HCD AFFH Data and Mapping Tool, 2021

Income

Sacramento County is a rapidly growing region of the state and known as a desirable place to raise a family. Like any county, Sacramento has a mix of residents with low- to extremely low- income individuals and families and higher income individuals and families. In 2019, the whole of Sacramento County had a median household income of \$67,151, which was lower than the state (\$75,235). Approximately 17.7 percent of households in the county earned less than \$25,000 in 2019 while 32 percent of households earned more than \$100,000. Compared to 16.4 percent of households earning less than \$25,000 and 37.7 percent earning more than \$100,000 in the state, Sacramento is relatively average for households with lower and higher incomes indicating a need for a variety of housing types affordable to differing incomes but achievable for households with lower to moderate incomes.

Figure 24 shows the geographic distribution of households by median household income by block groups in Sacramento County. Many block groups in the county are less than or equal to the 2020 State Median Income (\$87,100). Households with the highest incomes mostly live outside of the incorporated cities in the more rural parts of the county and in the unincorporated suburban communities to the northeast of the City of Sacramento. This is particularly the case in Arden Arcade, Carmichael, Fair Oaks and Orangevale on larger suburban parcels in closest proximity to the American River. The Planned Community of Rancho Murieta in the eastern portion of the County and the Natomas in the north portion are also areas with the highest incomes. Households with lower incomes are generally north and south of the City of Sacramento in the Arden Arcade and South Sacramento communities and into the Rio Linda/North Highlands area. These areas of income generally follow the areas with racially restrictive covenants in that the wealthier areas tend to be more White and in areas where the covenants were historically in place.

Figure 25 further displays this information by showing the percentage of low to moderate income households by census tract. As displayed in the figure, tracts with the highest percentage of low and moderate income households are located in and around the City of Sacramento (Arden Arcade, South Sacramento, Rio Linda and North Highlands communities) while the lowest percentages (or households with higher incomes) are located in the outer areas of the county. (Rancho Murieta and Southeast community) were properties are larger and predominately rural in nature.

As shown in Figure 26, which displays poverty status by census tract in the county, the areas with the highest percent of population with incomes below the poverty level (40 percent or more) are north and south of the City of Sacramento. While poverty exists throughout the county, it is most concentrated in the unincorporated communities near the City of Sacramento.

Figure 24: Distribution of Median Income by Block Group, Sacramento County, 2015-2019

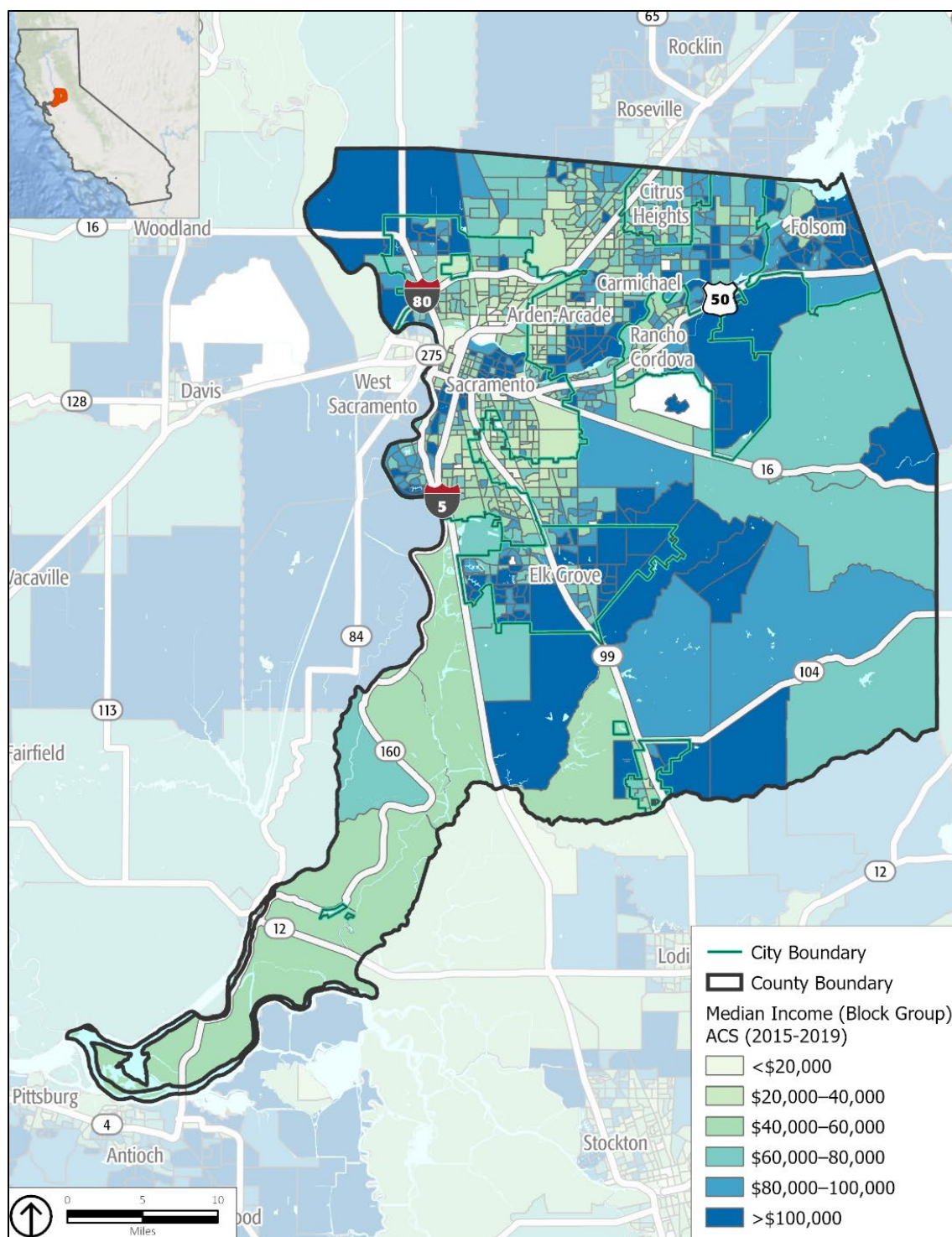


Figure 25: Percent of Low to Moderate Income Households by Census Tract, Sacramento County, 2015-2019

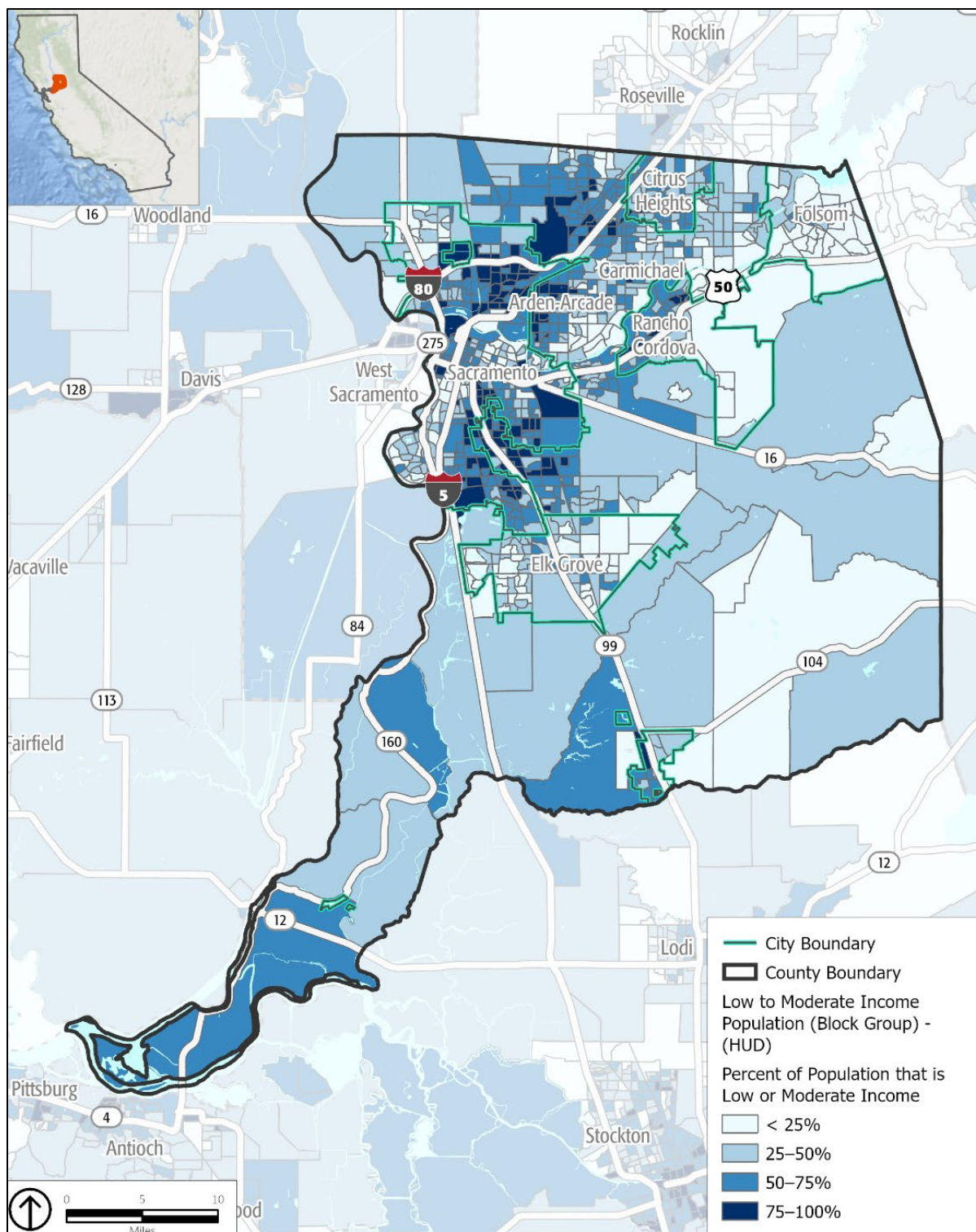
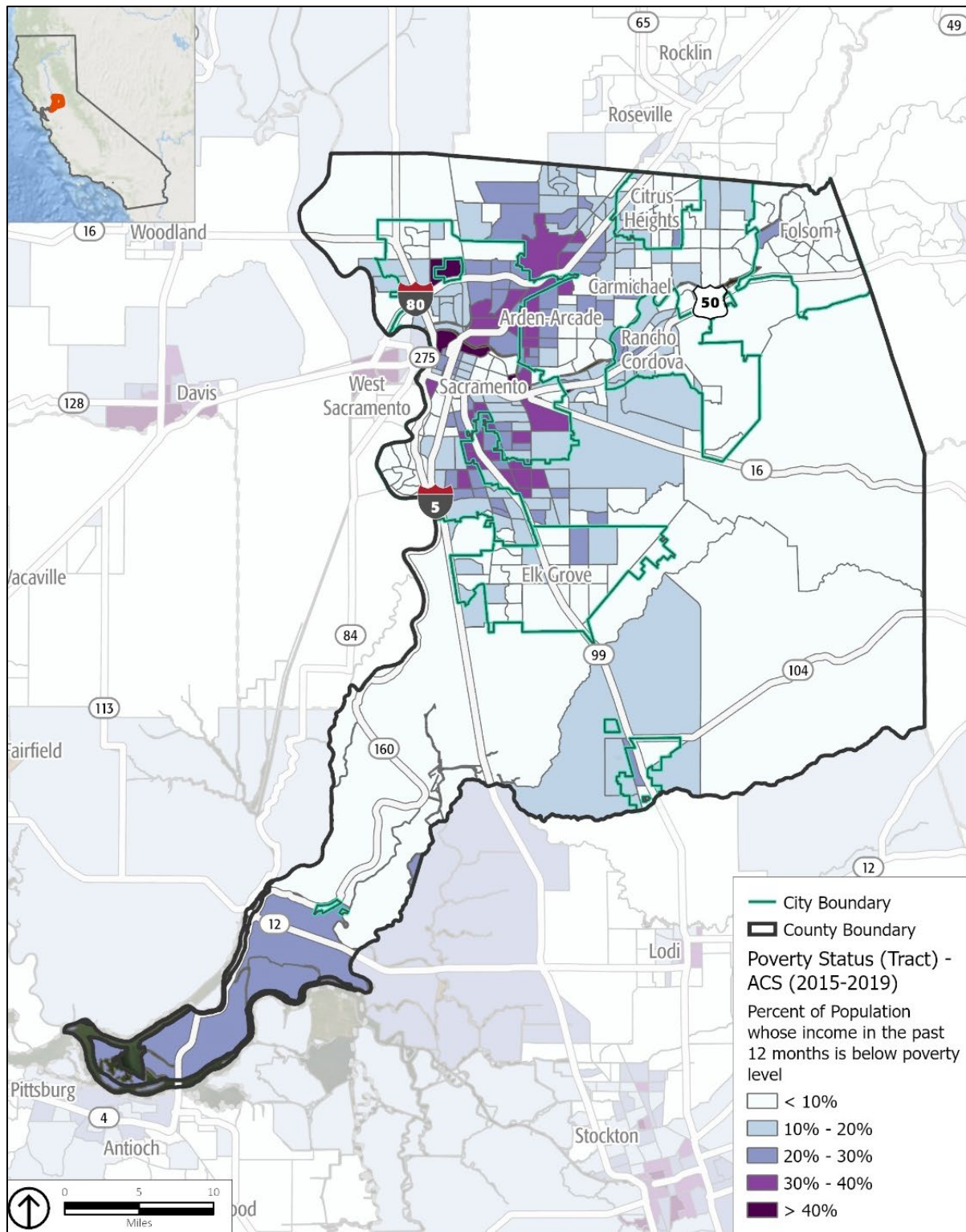


Figure 26: Poverty Status, Sacramento County, 2015-2019



Familial Status

During the 2015-2019 ACS survey period, Sacramento County had a larger proportion of family households (34.0 percent) compared to the state as a whole (31.3 percent). About 20.4 percent of the total households in Sacramento County (543,025) were married-couple family households with children under 18 years old in the home. Figure 27 displays the percent of children in married couple households in the county of Sacramento. The map generally shows a wide distribution in the percent of children throughout the county who live in households with married-couple families. Lower percentages of children live in married-couple households in the unincorporated communities near the City of Sacramento. It is also clear that higher percentages of children are in married-couple households in the outer county and in the cities of Folsom, Rancho Cordova, and Elk Grove.

Sacramento County had a higher proportion of single parent households with children (10.1 percent) than the state on average (8.7 percent) between 2015-2019. About 7.2 percent of households were headed by a single female. Figure 28 shows the regional distribution of the percent of children in female-headed households with no spouse present. The map indicates less than 20 percent of children in most census tracts throughout the county live in single female headed households with larger percentages located in Arden Arcade, South Sacramento and North Highlands communities. Although the low proportion of children in single-female headed households does not indicate a distinct fair housing issue, this could be a result of the limited supply of housing in the greater county region that is affordable for single-headed, one-income households with children.

Figure 27: Percent of Children in Married Couple Households, Sacramento County

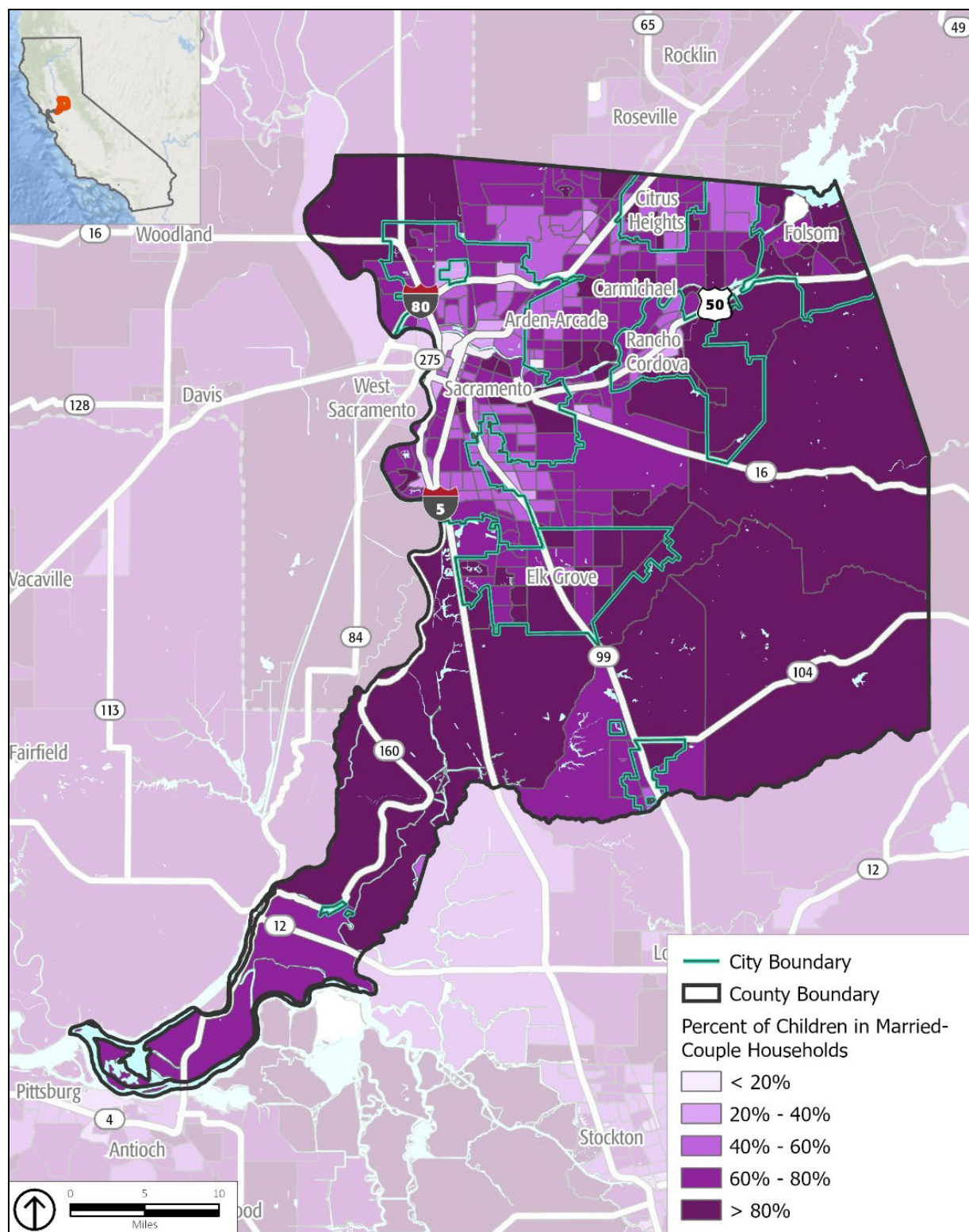
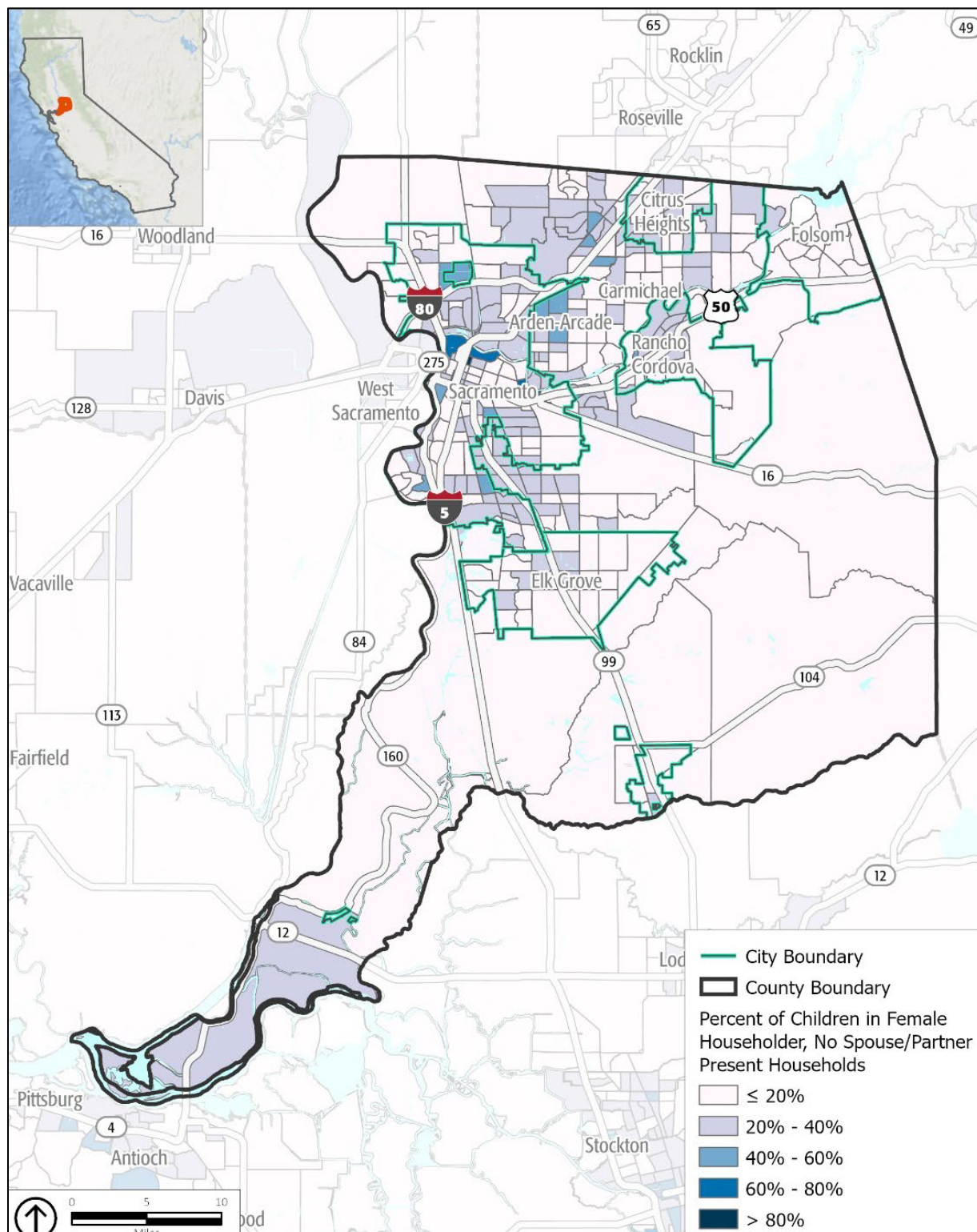


Figure 28: Percent of Children in Female-Headed Households, No Spouse Present; Sacramento County



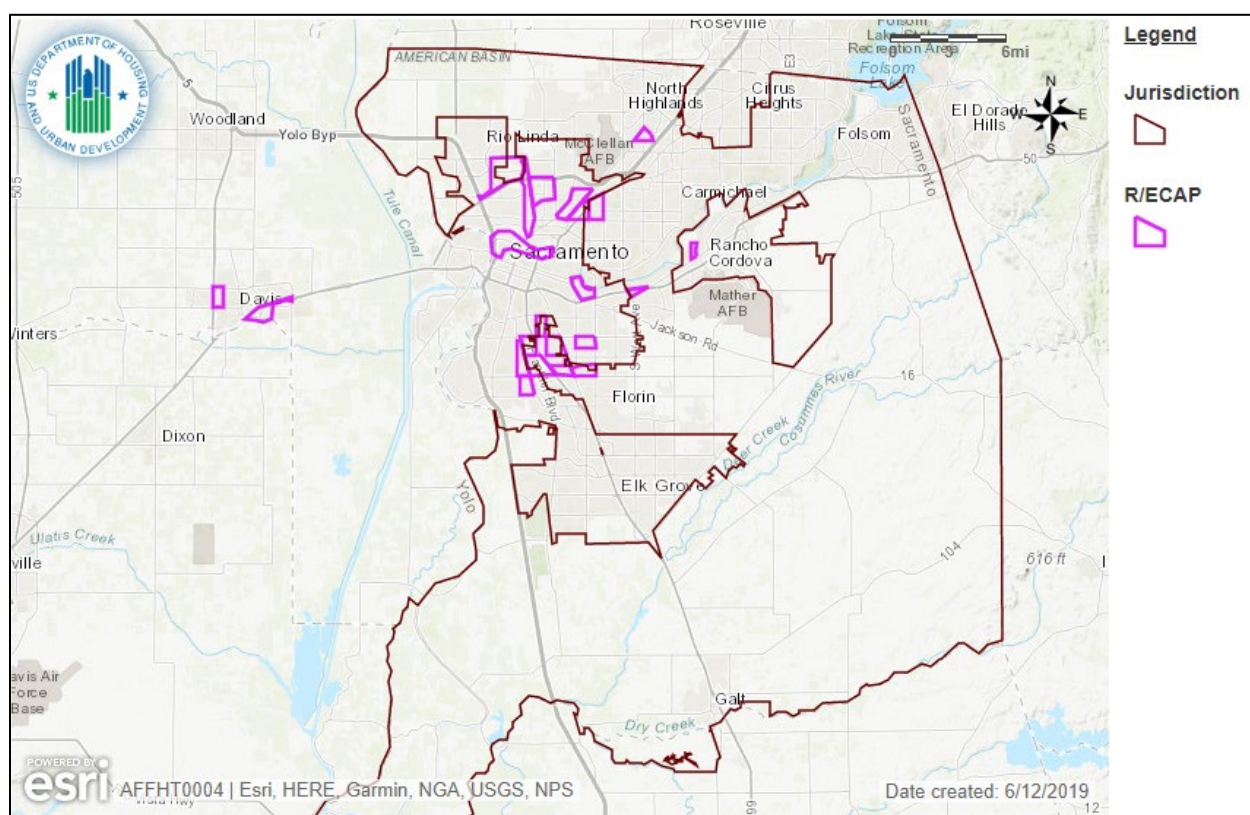
RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) are neighborhoods in which there are both racial concentrations and high poverty rates. R/ECAPs are used to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunities. HUD defines R/ECAPs as census tracts with:

- a non-White population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- a non-White population of 50 percent or more (majority-minority) AND the poverty rate is three times the average poverty rate for the county, whichever is lower.

Figure 29 displays R/ECAPs in Sacramento County. According to HUD's AFFH tool, the Sacramento Valley region had 22 RECAPs, most which are in the Cities of Sacramento, Davis, and Rancho Cordova. In the unincorporated county, R/ECAPs are located adjacent to the City of Sacramento in the Arden Arcade, North Highlands and South Sacramento communities. These areas are included in the Environmental Justice Communities of North Highlands, West Arden Arcade, South Sacramento and North Vineyard.

Figure 29: Locations of R/ECAPs, Sacramento County, 2013



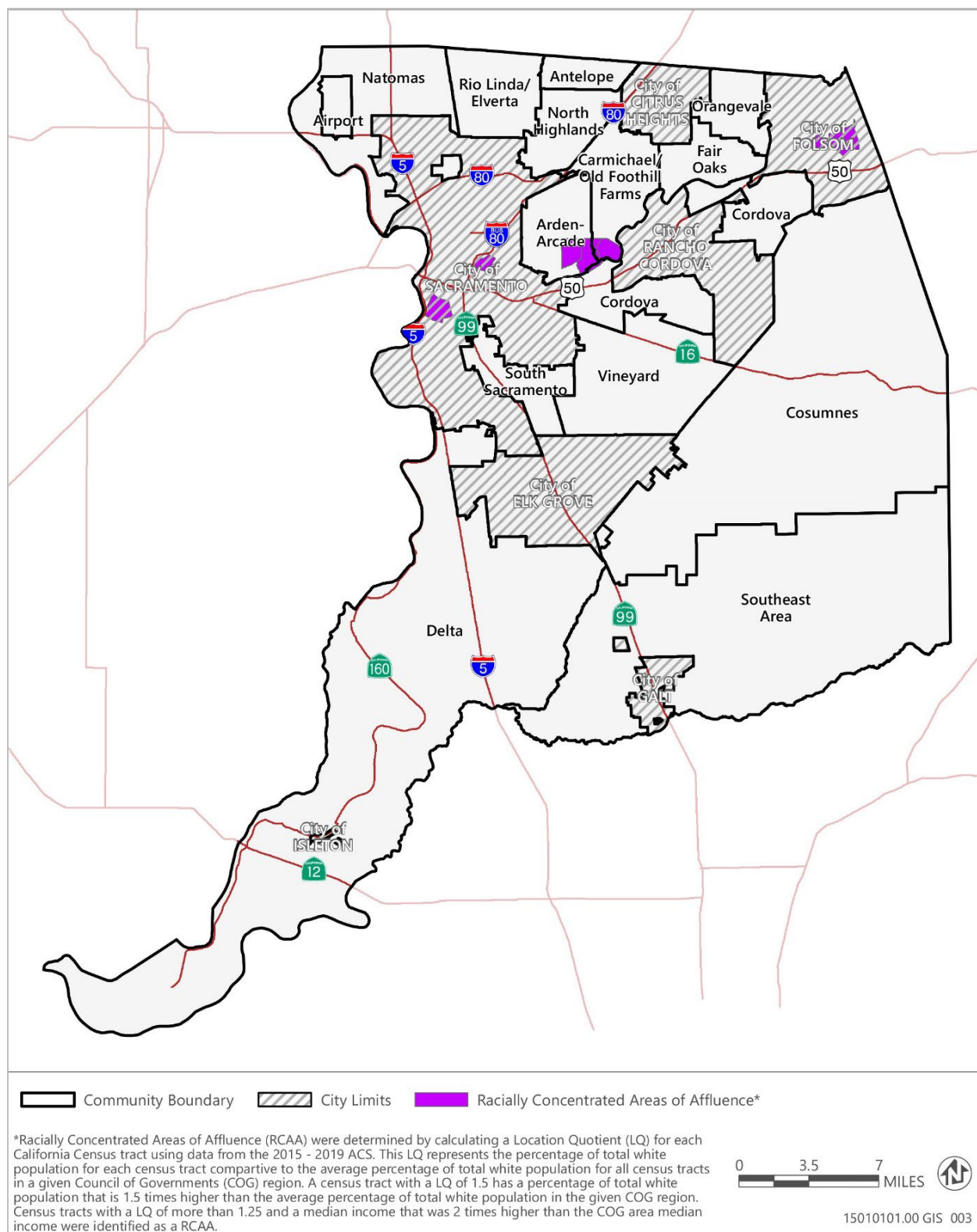
Source: HUD AFFH Data and Map tool and Root Policy Research.

RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF AFFLUENCE

Racially or Ethnically Concentrated Areas of Affluence (RCAs) are generally understood to be neighborhoods in which there are both high concentrations of non-Hispanic White households and high household incomes. As was discussed previously and shown in Figure 30, non-Hispanic Whites are the most

predominant racial/ethnic group in the county, with more predominance outside of city centers and generally following the Interstate-80 Highway. Similarly, this pattern also applies to households with annual incomes above \$100,000. Figure 20 displays RCAAs in Sacramento County using income and demographic data from the 2015-2019 ACS. Within the unincorporated county, there are three adjoining census tracts in the Arden Arcade community that meet the definition of RCAAs to include neighborhoods such as Sierra Oaks, Wilhaggen, Del Dayo, and Mariemont/Gordon Heights. There are also a few census tracts within the City of Sacramento and the City of Folsom. These census tracts have: (1) an average total White population that is 1.25 times higher than the average total White population in the SACOG region and (2) a median income that is 1.5 times higher than the SACOG area median income (\$86,017).

Figure 30: Location of RCAAS, 2019



Source: American Community Survey (ACS), 2015 - 2019; Original data sourced from PlaceWorks, 2021.

ACCESS TO OPPORTUNITY

Across the nation, affordable housing has been disproportionately developed in minority neighborhoods with high poverty rates, thereby reinforcing the concentration of poverty and racial segregation in low opportunity and low resource areas. Several agencies have developed “opportunity indices” to assess and measure geographic access to opportunities, including HUD; the University of California at Davis, Center for Regional Change; and HCD in coordination with the California Tax Credit Allocation Committee (TCAC). For the purpose of this assessment, the opportunity index prepared by HCD and TCAC is used to analyze access to opportunity in Sacramento County.

HCD/TCAC Opportunity Areas

HCD and TCAC prepare opportunity maps to determine areas with the highest and lowest resources. The TCAC/HCD Opportunity Maps are intended to display the areas, according to research, that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity.

As shown in Figure 31, most census tracts in the northern unincorporated county (Rio Linda/Elverta, Antelope, and North Highlands communities) are considered low or moderate resource areas by TCAC’s composite score for economic, educational, and environmental opportunities. Many areas in the southern and eastern portions (Cosumnes and Southeast communities) of the unincorporated county are considered high or highest resource.

Educational Opportunity

Education scores in the county show mixed outcomes (Figure 32). The areas north and south of the City of Sacramento, and in the southern county, have the lowest education scores per census tract and are found to have less positive educational outcomes. While unincorporated communities near the cities of Elk Grove and Folsom are shown to have more positive education outcomes. These patterns are generally indicative of patterns across the state.

Proximity to Jobs

The 2014-2017 U.S Department of Housing and Urban Development’s (HUD) job proximity index quantifies the accessibility of a given neighborhood to all jobs within a core-based statistical area (CBSA). Figure 33 shows the job opportunity index ratings for Sacramento County. As shown in the figure, the areas with the closest proximity to jobs (shown in blue) are in and around the Cities of Sacramento and Rancho Cordova. Unincorporated areas in the south, west of Elk Grove, and in the North Highlands area (indicated on the map in red) have the furthest proximity to jobs and must commute further from their homes to their places of work. These are the Delta, Southeast, and Cosumnes communities that are rural in nature and generally lack commercial or industrial job centers requiring many of the residents commute to Sacramento or Elk Grove or be employed in agricultural industries.

Environmental Health

The TCAC/HCD Opportunity Maps measure environmental opportunity using the exposure, pollution burden, and environmental effect indicators from the California Communities Environmental Health Screening Tool (more commonly known as CalEnviroScreen 3.0). The areas of less positive environmental outcomes (a score of less than 0.25) align with the Environmental Justice Communities identified by the

County Environmental Justice Element, including: South Sacramento, North Highlands, West Arden Arcade, and Vineyard. The Environmental Justice Communities were identified using CalEnviroScreen 3.0 scores based on environmental, health, and socioeconomic factors as well as SACOG's MTP/SCS, which identified neighborhoods with high percentages of low income and/or "minority" residents. There are also other areas in the County which have scores of less than 0.25 such as the Cosumnes and Delta Communities, which are rural in nature, and in the Natomas Community. Environmental outcomes tend to be more positive (score of 0.75 and higher) in parts of the Rio Linda, Antelope, Vineyard, Southeast Area Communities of the County as well as part of the incorporated cities of Elk Grove, Folsom and the City of Sacramento.

Access to Transportation

The Low Cost Transportation Index, developed by HUD, estimates the percentage of income that residents use to pay for transportation, measured at the census tract scale. The higher an index score, the lower the cost of transportation. Index scores can be influenced by factors such as access to public transportation, housing density, and proximity of employment centers and other services.

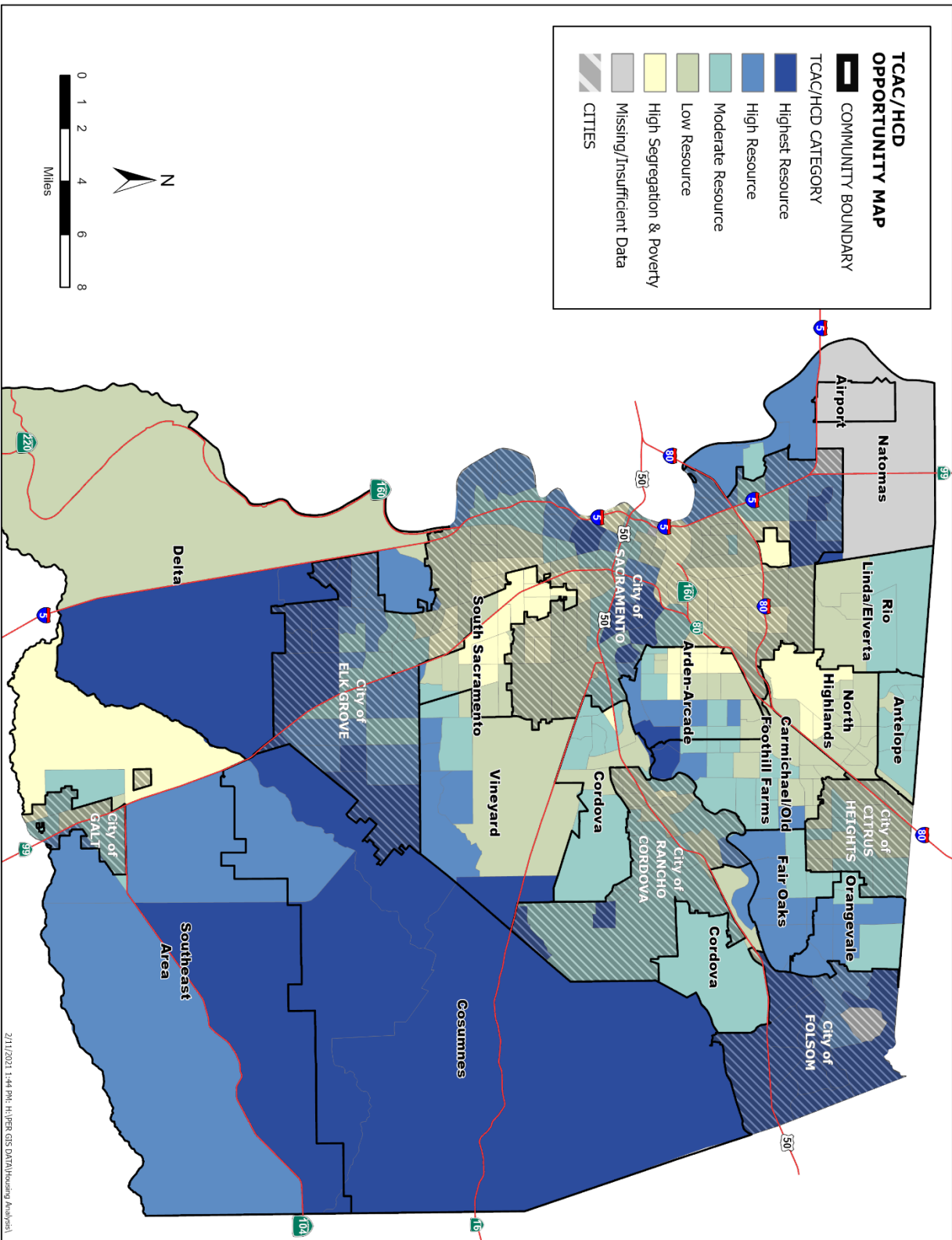
As a whole, Sacramento County has an average index rating of 66, meaning it has lower transportation costs than 66 percent of the nation. In comparison, the average score for California is also 66. As shown in **Figure 34**, transportation is more affordable to residents in the City of Sacramento, South Sacramento, Arden-Arcade, and in the North Highlands and Carmichael communities along the Interstate-80 corridor. These areas have higher index scores (79-99) than the rest of the county and therefore lower transportation costs. Costs are lower because these areas are in closer proximity to the main Interstate Highway, services, and employment centers. They also have ample public transportation choices and have some of the higher housing densities in the county. There was not a clear pattern of disparity associated with the location of low transportation cost neighborhoods and race or ethnicity.

In contrast, there are lower scores in the Natomas, Rio Linda, Cordova/Folsom, and southern Delta communities (40-58), indicating less affordable transportation. This is largely due to their distance from services and employment centers. These areas are also further than ½ mile away from existing light rail and bus stops (**Figure 34**).

It is also important to provide good access to affordable and reliable transportation for people with disabilities to bolster opportunities for education, employment, healthcare, and housing. Figure 35 shows the existing light rail and bus stops within a ¼ mile radius with the percent of people with a disability by census tract in the county. In most census tracts of the county, 20 percent or less of the population has a disability. For residents with disabilities living in the northern county, public transportation is relatively accessible as indicated by the existing light rail and bus stops within a ¼ of a mile. For residents with disabilities in the southern and southeastern communities of the county, travelling via public transportation can be more problematic. South County Transit (SCT) provides four types of service as follows:

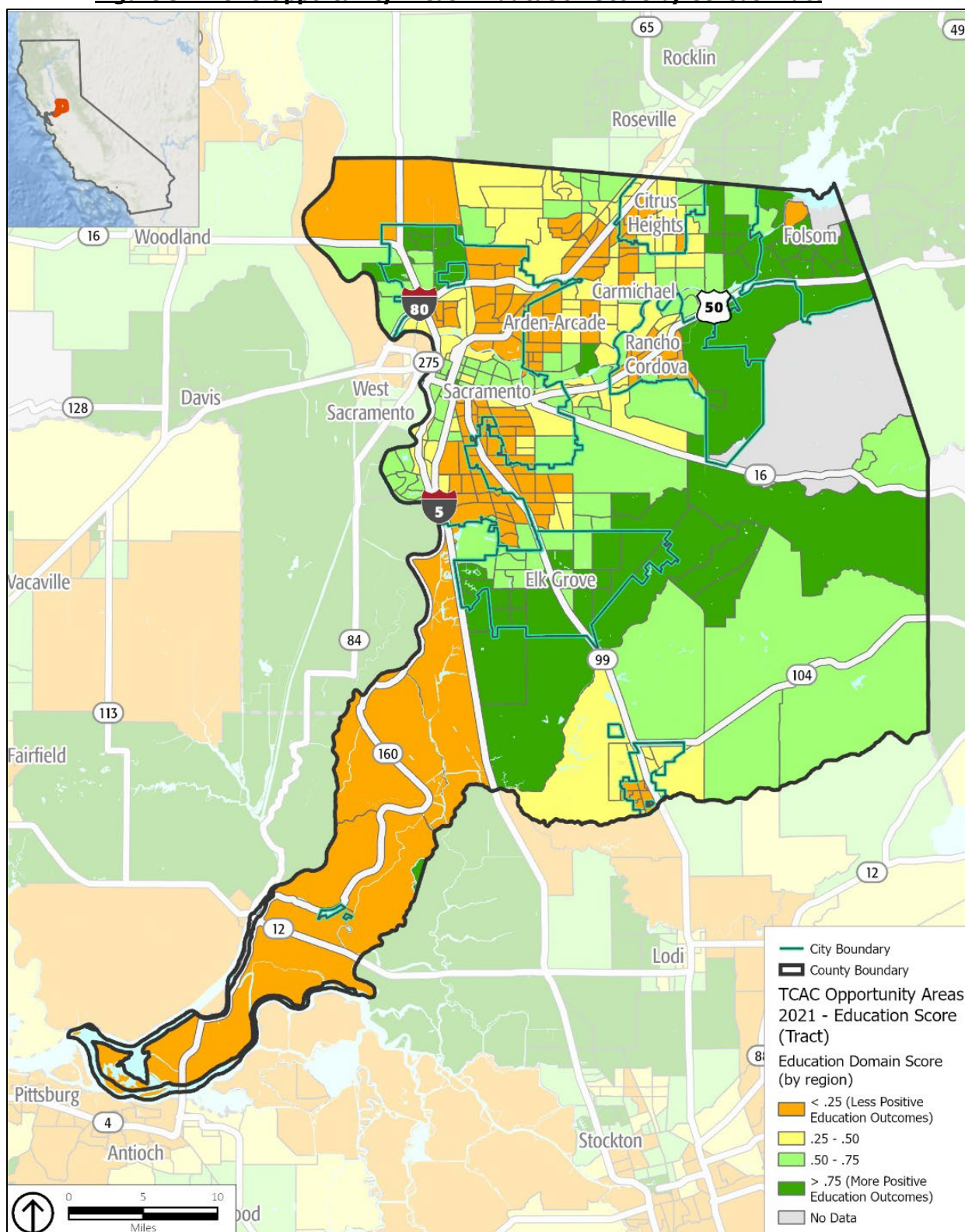
- Dial-A-Ride curb-to-curb service within the city limits of Galt between 6:30 am and 6:30 pm Monday through Friday, and between 8:00 am and 4:30 pm on Saturday.
- The *Hwy 99 Express* providing service connecting Galt with the Lodi Transit Center, Elk Grove, and South Sacramento operating Monday through Friday from 5:20 am to 7:20 pm.
- The *Delta Route* providing service from Isleton and other Delta communities to Galt, with connecting service via the Hwy 99 Express to Lodi, Elk Grove, and Sacramento. The Delta Route runs 5 times a day Monday through Friday.
- The *Galt to Sacramento Commuter Express* providing direct service from Galt to midtown and downtown Sacramento on Wi-fi equipped motor coaches running 3 times a day, Monday through Friday.

Figure 31: Locations of TCAC/HCD Opportunity Areas



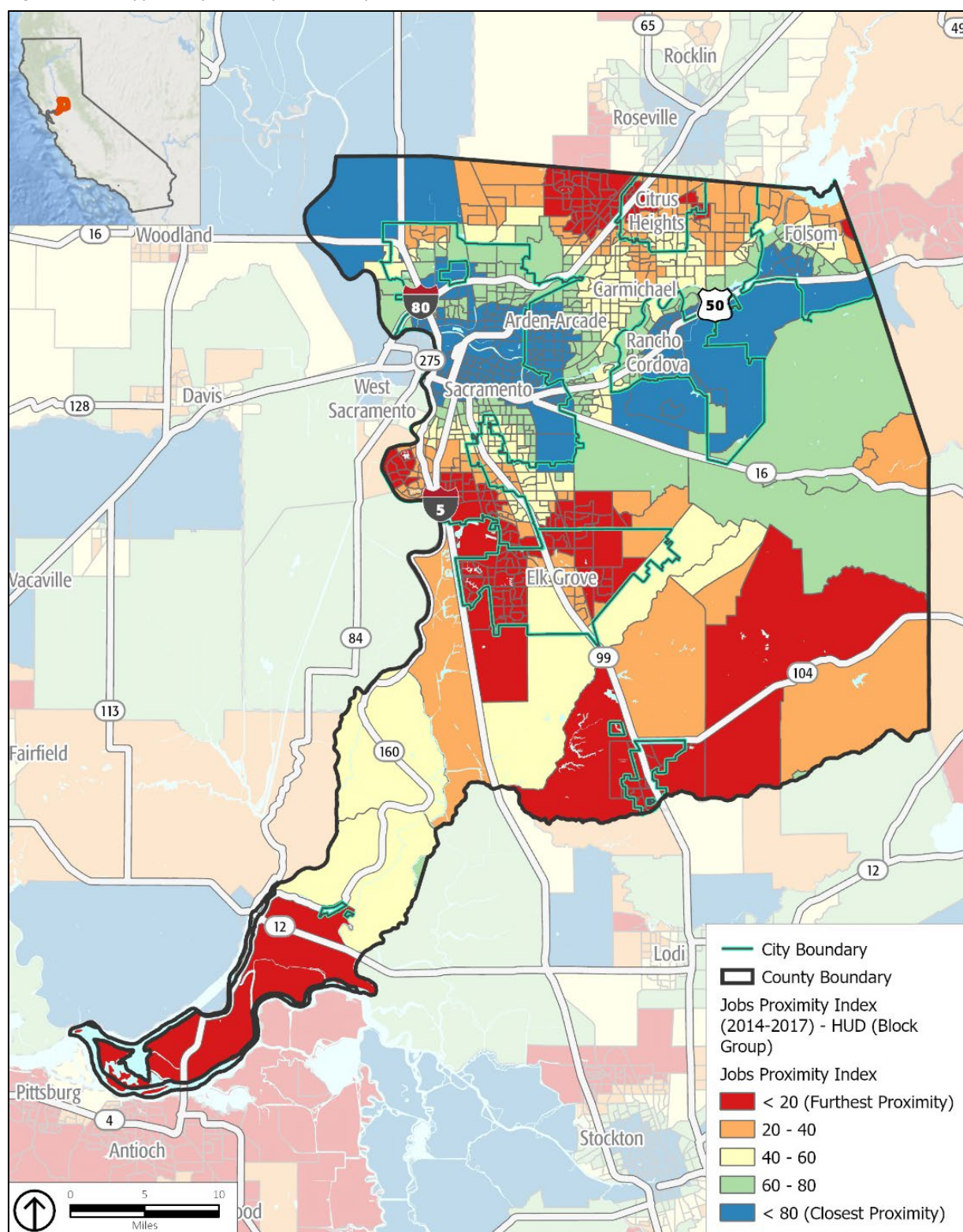
Source: TCAC/HCD Opportunity Area Map, 2020

Figure 32: TCAC Opportunity Areas – Education Score by Census Tract



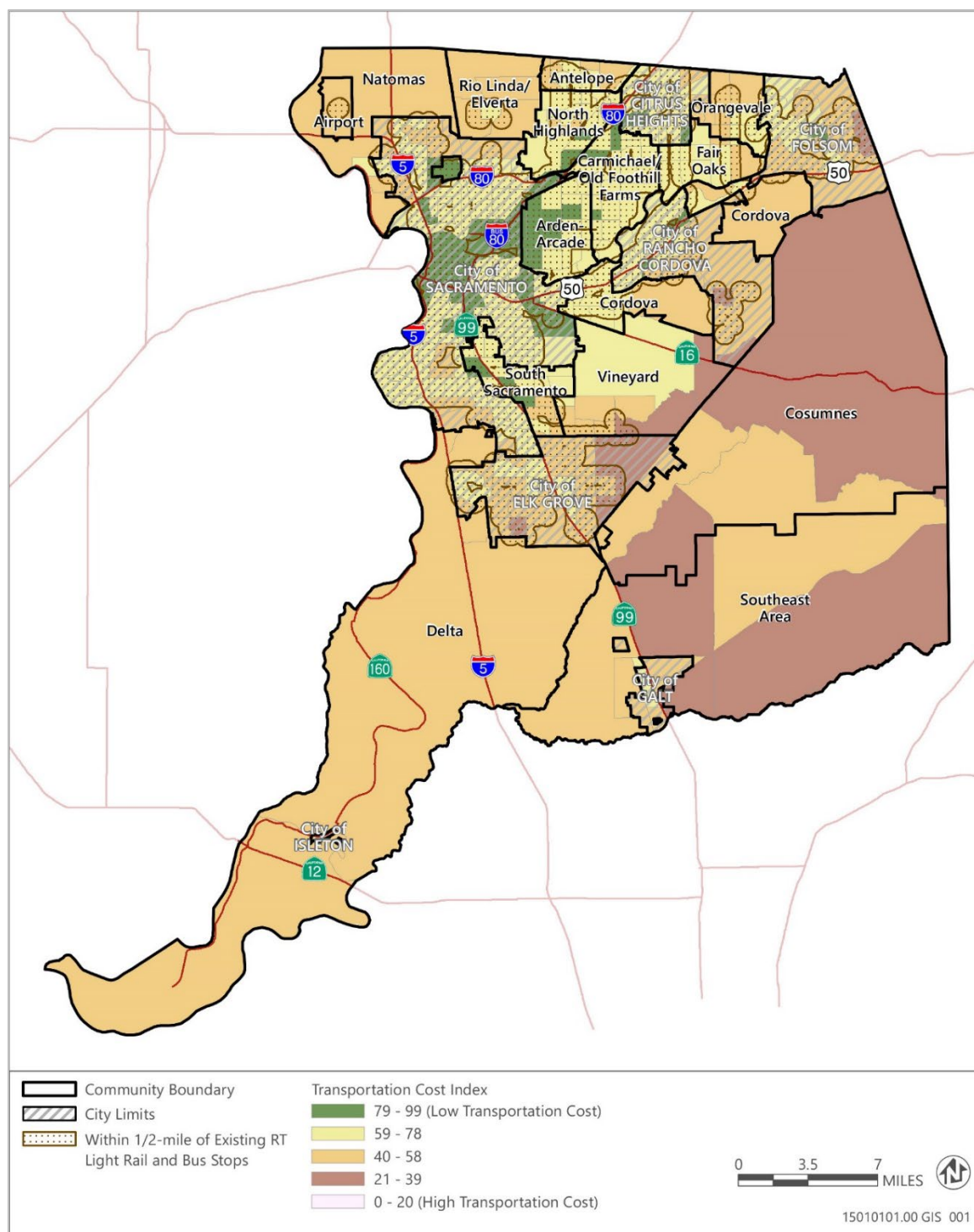
Source: TCAC/HCD Opportunity Area Map, 2020

Figure 33: Job Opportunity Index by Block Group, 2014-2017



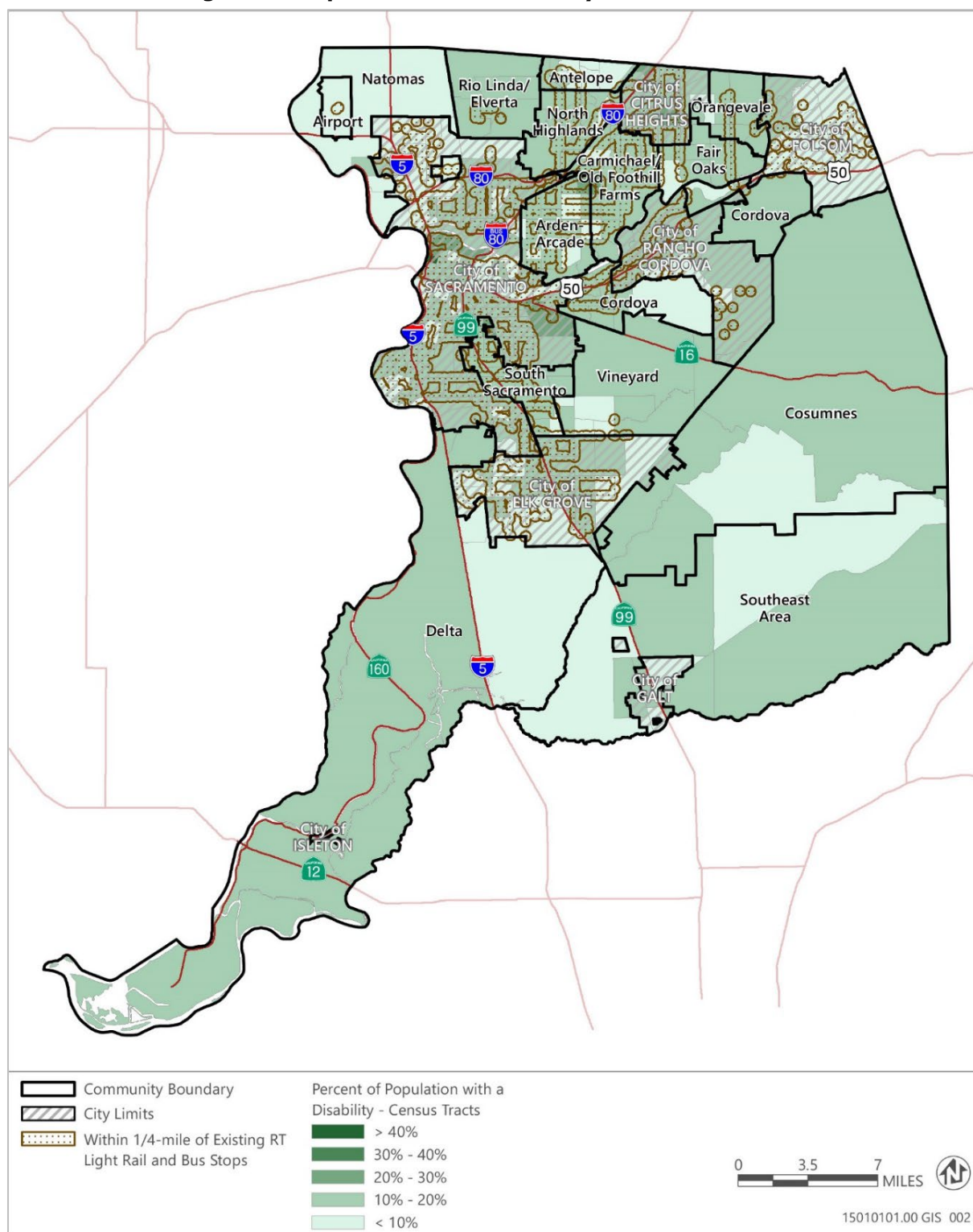
Source: HUD, 2014-2017. HCD AFFH Mapping Tool, 2021.

Figure 34: Low Cost Transportation Index



Source: Data downloaded from the Office of Policy Development and Research in 2021 and SACOG in 2021

Figure 35: Population with a Disability and Access to Transit



Source: Data downloaded from the HCD AFFH Viewer in 2021 and SACOG in 2021

DISPROPORTIONATE HOUSING NEEDS AND HOUSING PROBLEMS

Disproportionate housing needs show how access to the housing market differs for members of different classes. Housing problems may include housing cost burden, overcrowding, or substandard housing. Black and Hispanic households in the region have the highest rates of experiencing a housing problem such as cost burden or crowding, while White, non-Hispanic households are the least likely to experience housing problems across the region.

Households that include a member with a disability may experience housing challenges related to needed modifications to the home or accommodations from their housing provider. In Sacramento County, 42 percent of households that include a member with a disability live in a home that does not meet accessibility needs of the member with a disability, which is higher than the regional amount of 35 percent. In Sacramento County, 20 percent of households with disabled members include roommates/friends, nearly twice the regional share (11 percent), which may be indicative of an insufficient supply of affordable and accessible housing for disabled residents. Among Sacramento County resident survey respondents whose household includes a member with a disability, more than one in four (27 percent) are precariously housed, the third highest rate among the participating jurisdictions.

Overpayment

As previously described, overpayment or cost-burdened is defined as households paying more than 30 percent of their gross income on housing related expenses, including rent or mortgage payments and utilities. As shown in Table 22, 59.5 percent of all lower income owner-occupied households and 73.3 percent of lower income renter households in Sacramento County were overpaying for housing in 2017. Figure 36 shows the trends of overpayment for renters in the county from 2010-2014 and Figure 37 shows the same trends from 2015-2019. Since 2010-2014, more renter households per census tract are overpaying throughout the county. Conversely, the average percentage of homeowners overpaying has decreased since 2014 (see Figure 38 and Figure 39). A large percentage of renters who live near the Cities of Sacramento and Elk Grove in the South Sacramento, Vineyard and the southern Delta communities are overpaying for housing; however, almost every county tract has at least 20 percent of renters overpaying for housing. Meanwhile an average 20-40 percent of homeowners per census tract are overpaying throughout the county.

Figure 36: Overpayment by Renters, 2010-2014

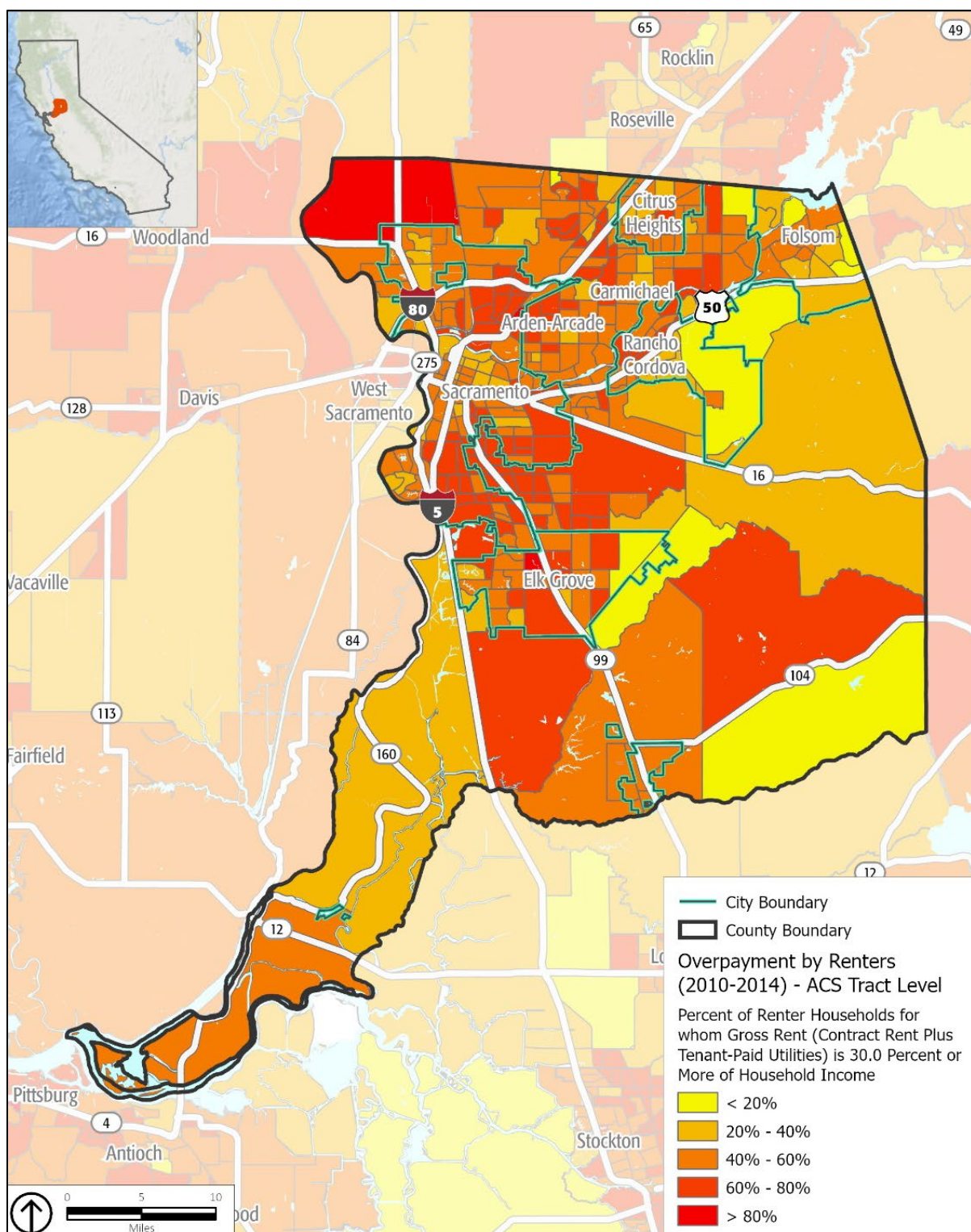


Figure 37: Overpayment by Renters, 2015-2019

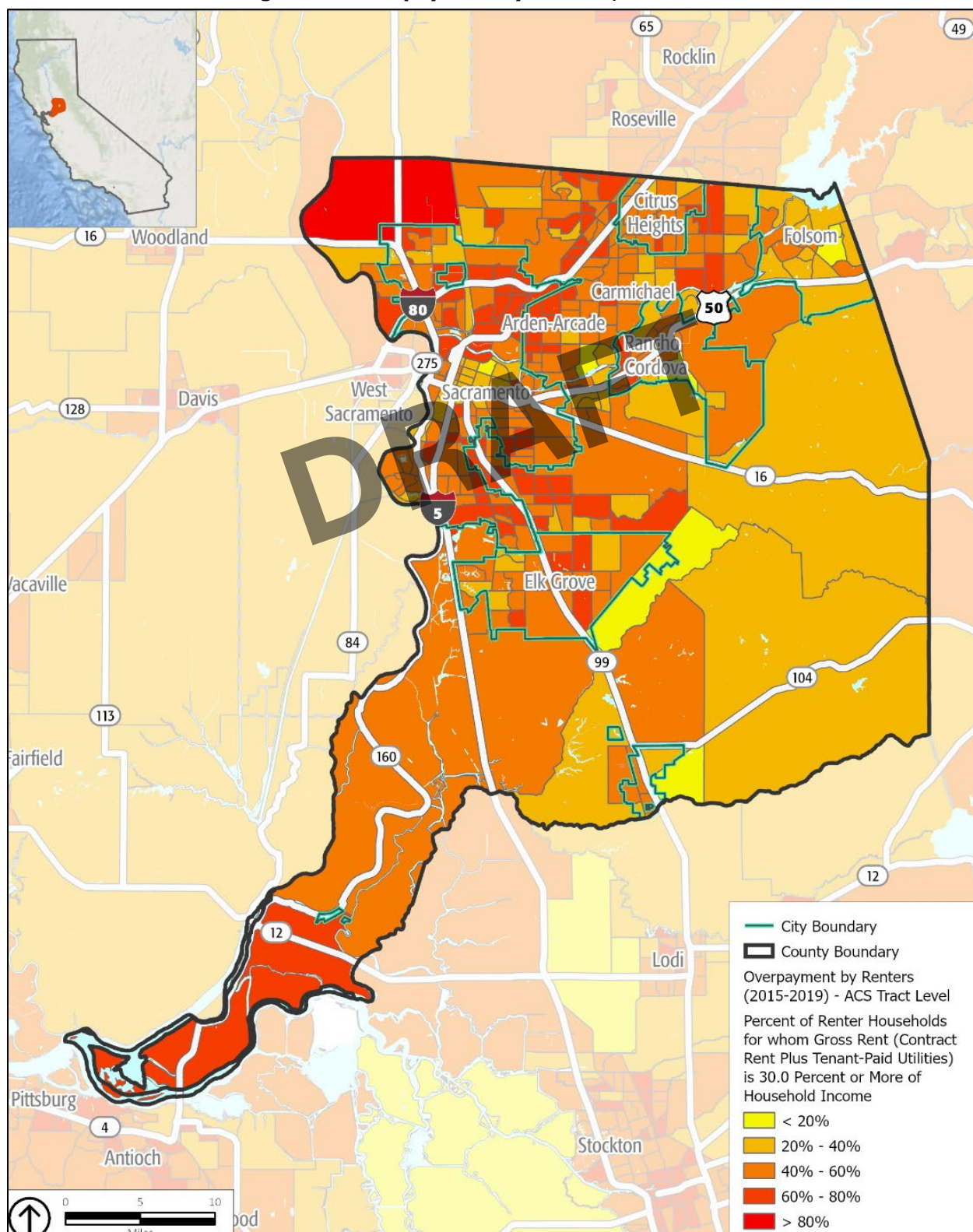
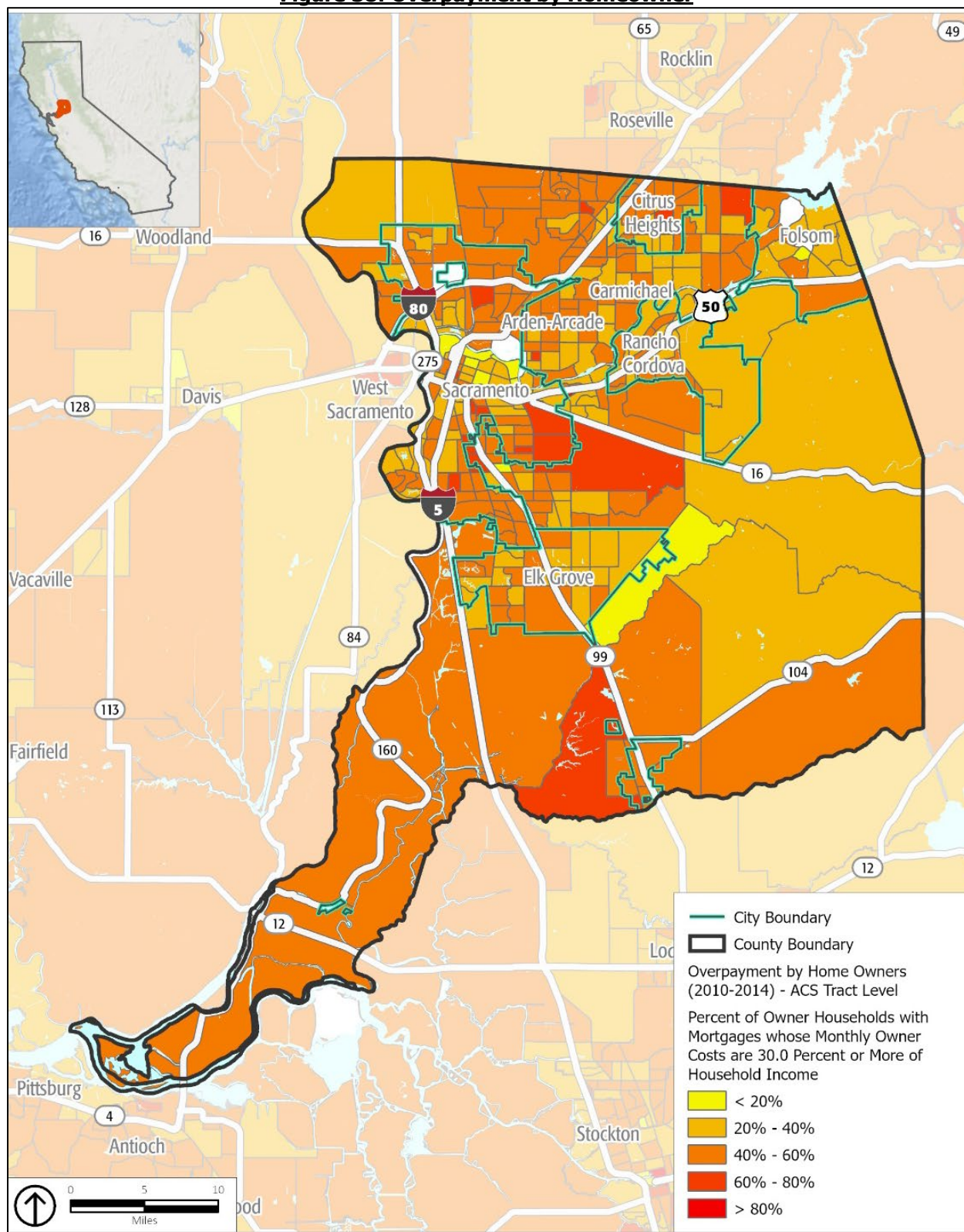
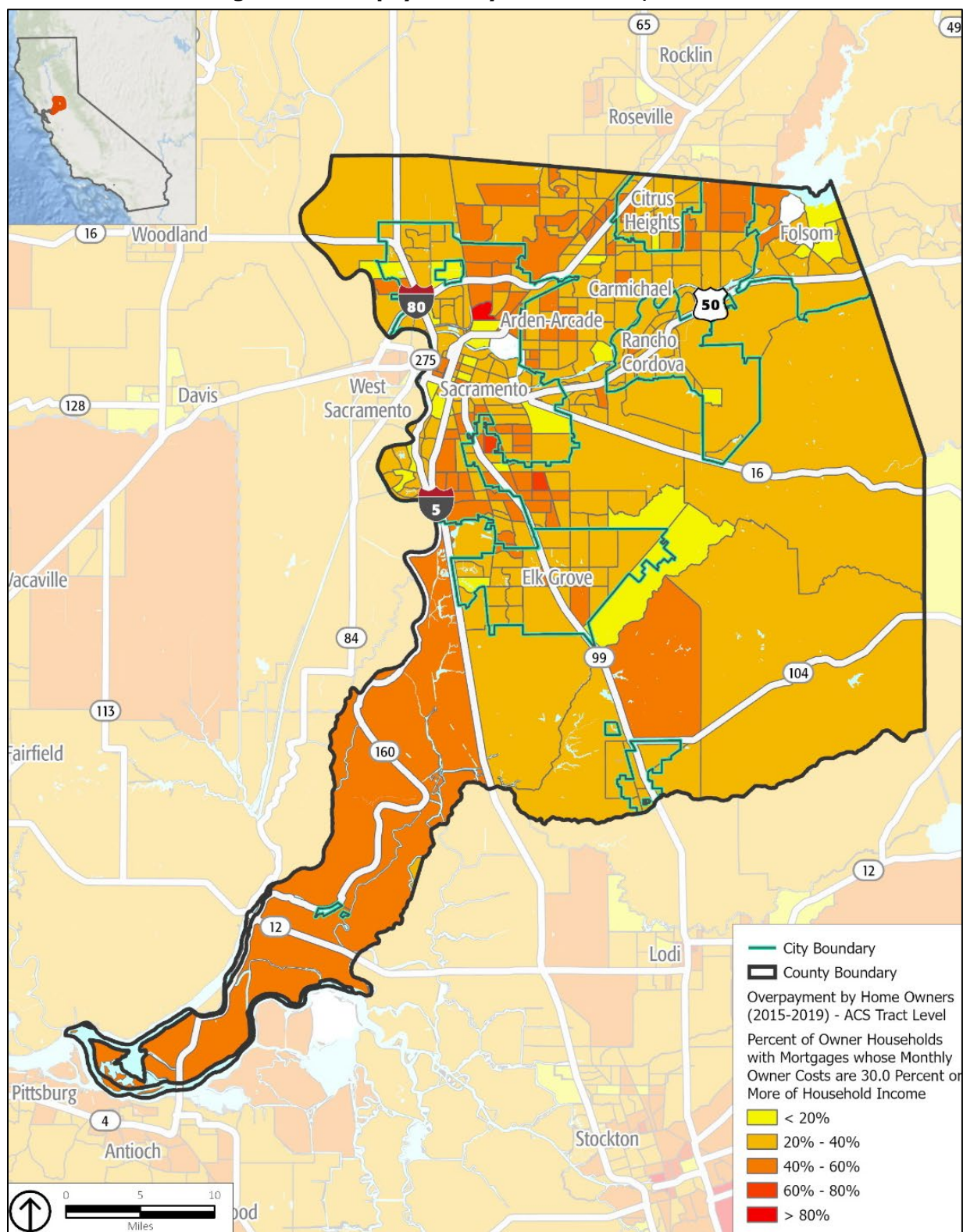


Figure 38: Overpayment by Homeowner



s, 2010-2014

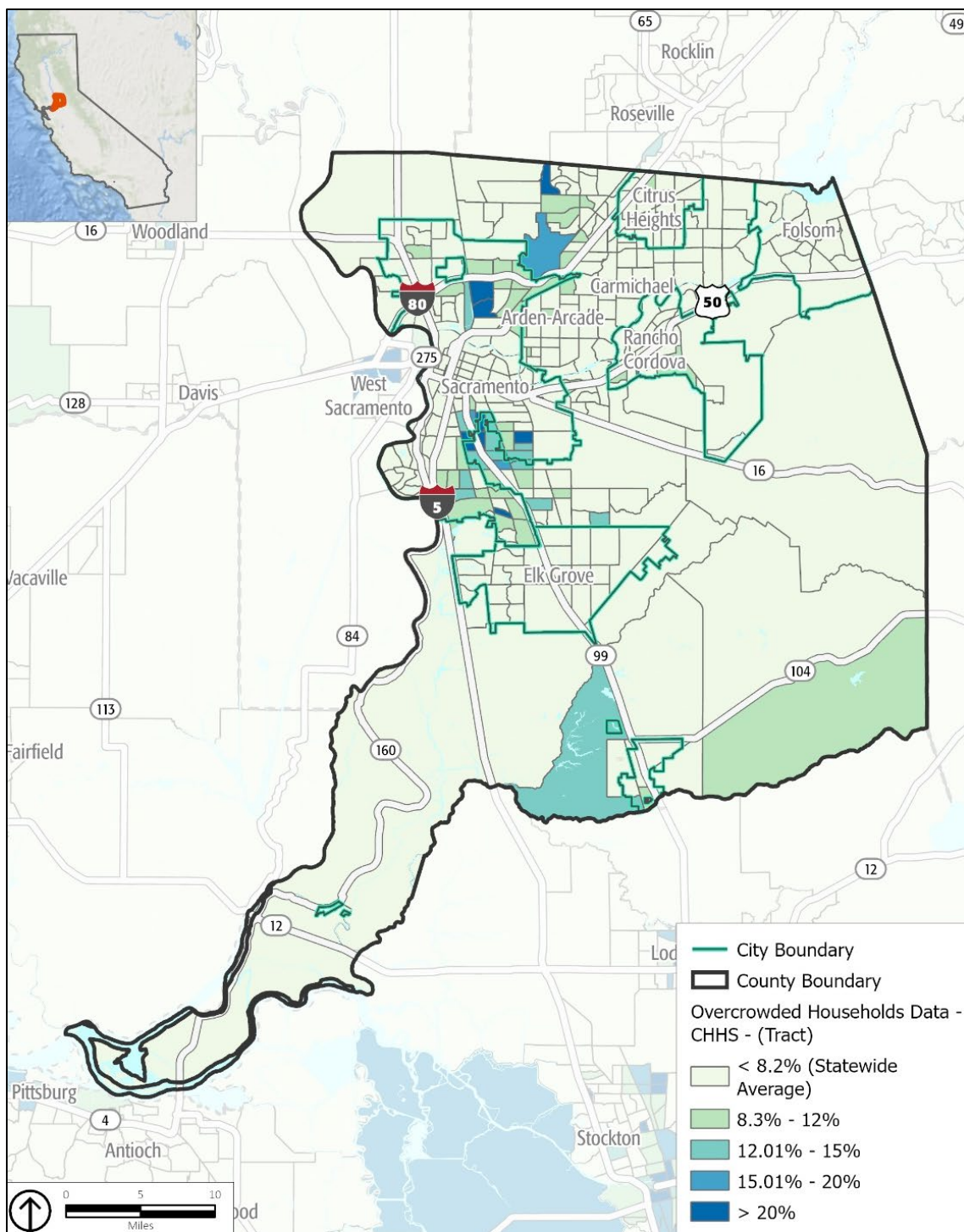
Figure 39: Overpayment by Homeowners, 2015-2019



Overcrowding

Overcrowding of residential units, in which there is more than one person per room, can be a potential indicator that households are experiencing economic hardship and are struggling to afford housing. According to ACS data from 2013-2017, at least 8.6 percent of renter households and 2.5 percent of owner households are overcrowded (Figure 40). Figure 30 shows the trends of overcrowded households in the county and most tracts in the county are less than or equal to the statewide average of 8.2 percent. However, there are higher rates of overcrowding in the unincorporated areas north and south of the City of Sacramento (the South Sacramento, Arden Arcade and North Highlands communities) and east and west of the City of Galt the same areas where persons experience increased poverty levels and are overpaying for rent.

Figure 40: Overcrowded Housing



Displacement Risk

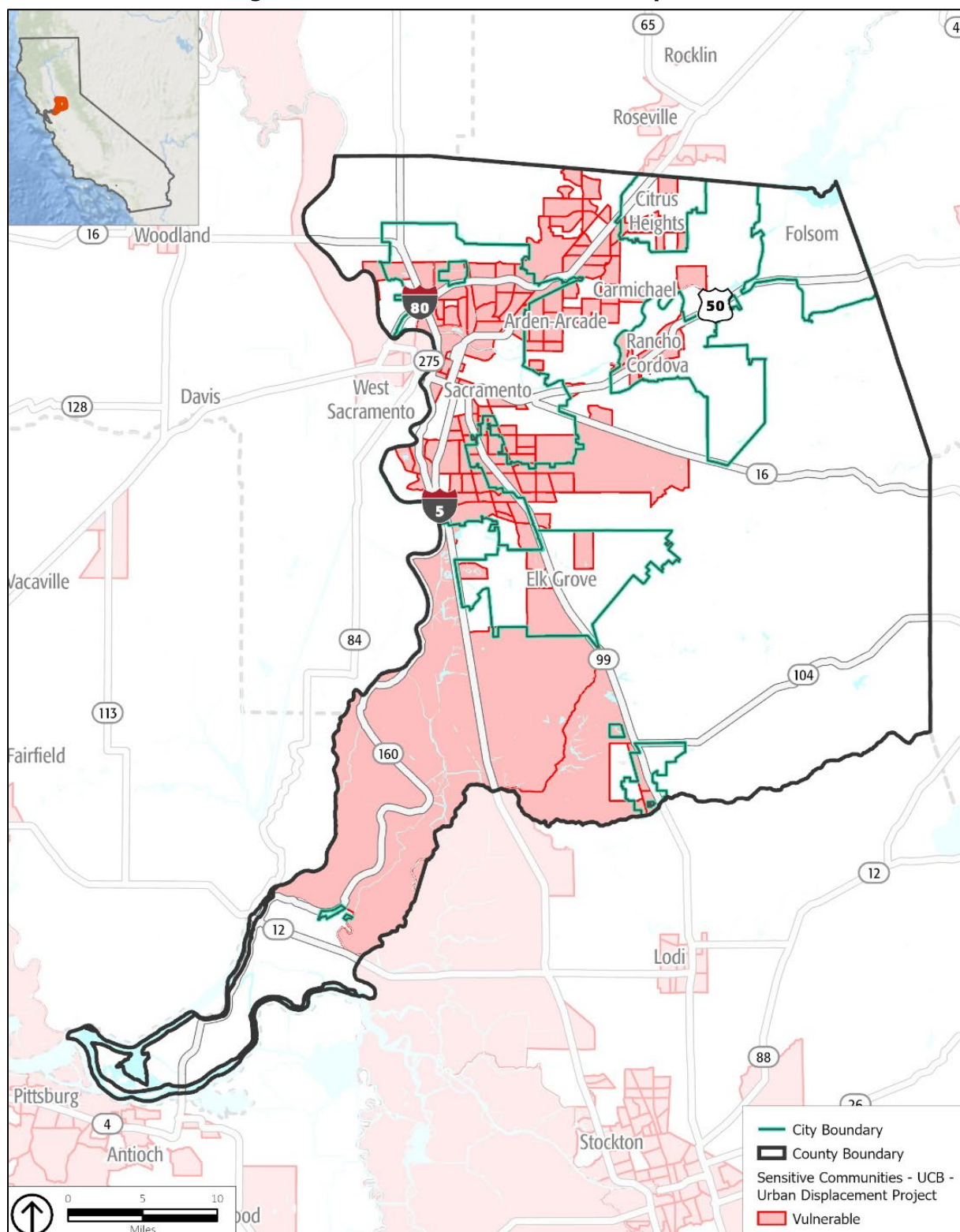
The rising cost of housing is becoming an increasingly important housing security issue in the Greater Sacramento region, especially for renters. Gentrification, or the influx of capital and higher-income residents into working-class neighborhoods, is often associated with displacement, which occurs when housing costs or neighborhood conditions force people out and drive rents so high that lower-income people are excluded from moving in. As determined in the AI, 28 percent of unincorporated Sacramento County respondents had been displaced from a housing situation in the Sacramento Valley in the past five years. The most common reasons for displacement—rent increased more than I could pay, personal reasons, landlord selling home, and living in unsafe conditions. African American, Hispanic, and Native American respondents, large families, households with children, and respondents whose household includes a member with a disability all experienced higher displacement rates than regional survey respondents overall.

According to the UC Berkeley Urban Displacement Project, a census tract was flagged as a sensitive community if it met the following criteria as both vulnerable and experiencing market-based displacement pressure:

1. Proportion of very low-income residents was above 20 percent in 2017; and
2. The census tract meets two of the following criteria:
 - a. Share of renters is above 40 percent in 2017;
 - b. Share of people of color is above 50 percent in 2017;
 - c. Share of very low-income households (50 percent AMI or below) that are also severely rent burdened households is above the county median in 2017; or
 - d. Nearby areas have been experiencing displacement pressures.

Areas identified as sensitive contain populations that could be particularly susceptible to displacement in the face of exacerbated market-based pressures at the neighborhood-level. According to these metrics, several census tracts in the unincorporated county are susceptible to displacement partly because of the high proportion of households that are renters and/or low to moderate income. Susceptible census tracts are largely located along the Interstate-80 corridor of the county, around the North Highlands area, and south of the City of Sacramento (generally South Sacramento, Arden Arcade, Carmichael, and the Delta communities) (Figure 41). The Housing Element sites inventory provides for numerous sites in the South Sacramento, North Highlands and Florin area that are sensitive to displacement and have high concentrations of poverty in order to increase the amount of affordable housing and reduce the susceptibility to displacement.

Figure 41: Communities Sensitive to Displacement



OTHER RELEVANT FACTORS

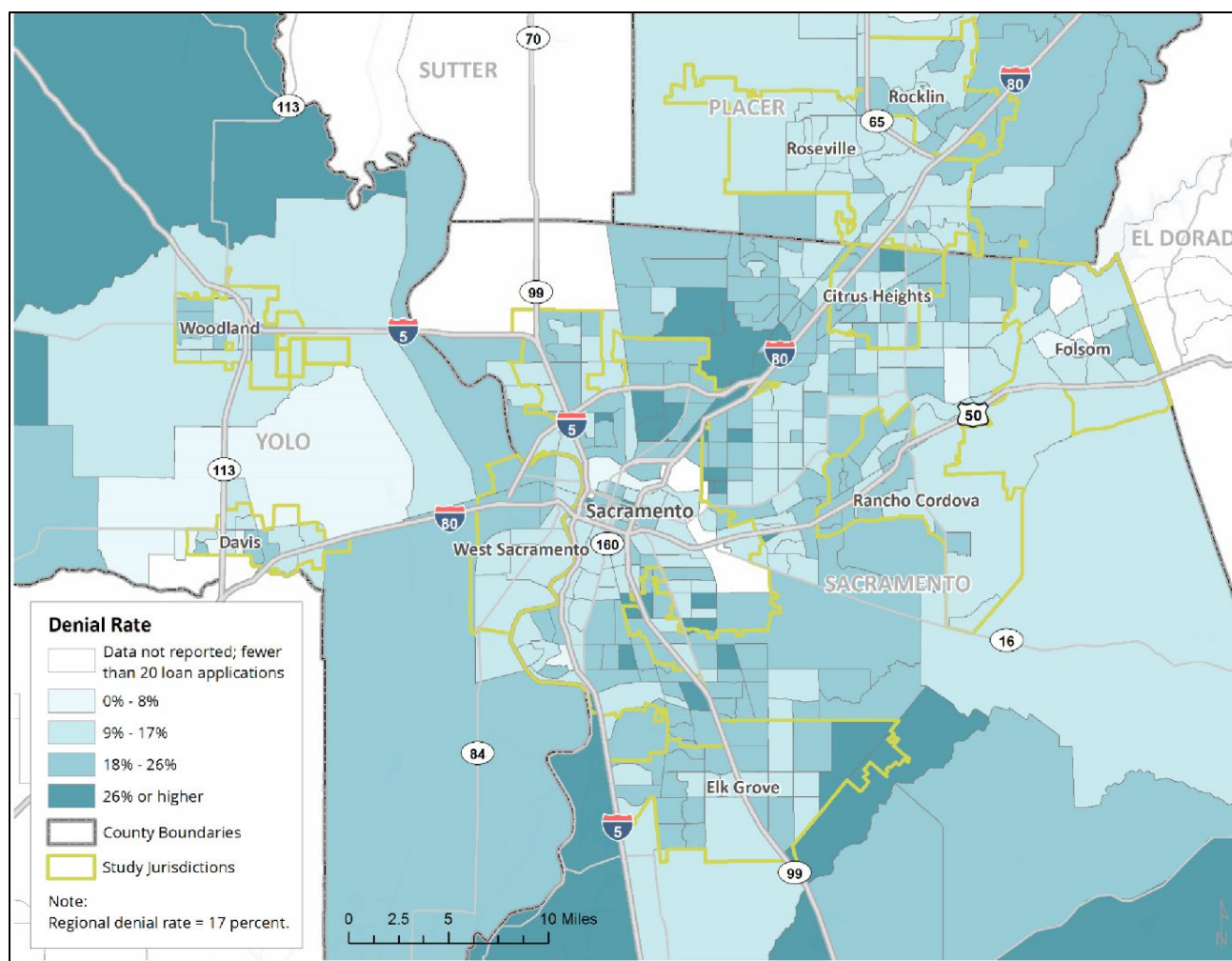
Regional Rates of Homeownership and Loan Denial

Rates of home ownership often vary widely by race and ethnicity, both within local jurisdictions and throughout larger regions. As shown in the AI, the homeownership gap for People of Color in Sacramento County is 36 percentage points for Black ownership, 21 percentage points for Hispanic ownership, and 9 percentage points for Asian ownership. The regional AI also identified that while all groups of color throughout the region generally experience higher rates of mortgage loan denials than non-Hispanic White applicants for each loan purpose (i.e., home improvement, purchase, or refinance), the average denial rate for the county was 17 percent.

In 2017, there were 89,838 loan applications filed in the Sacramento region for owner-occupied homes, 4.7 percent of loans were subprime, which is slightly higher than the national rate of 4 percent. There was a regional denial rate of 17 percent. These denial rates varied substantially by individual census tract. Figure 32 shows the region's denial rate by census tract.

The AI found that Hispanic households are more likely than any other group to receive a subprime loan. Subprime mortgages are a type of housing loan most often given to individuals that have weak credit history. Subprime mortgages carry higher interest rates, and thereby are more expensive, because there is a pre-determined higher risk of default. In Sacramento County, 10 percent of loans originated with Hispanic borrowers as well as non-Asian People of Color were subprime. This is twice the subprime rates of non-Hispanic White borrowers and Asian borrowers. Despite efforts to reform long-standing practices of discrimination in the housing credit system, patterns of inequality still exist. The Great Recession and housing crisis brought to light the unusually high concentration of non-White residents with subprime mortgages and property foreclosures across the country.

According to the AI, low-income households and those receiving Section 8 housing choice vouchers were most likely to experience being denied housing to rent or buy. African American (53 percent), Native American (49 percent), and Hispanic respondents (42 percent) were more likely than non-Hispanic White (27 percent) or Asian survey respondents (21 percent) to have experienced denial of housing to rent or buy. Large families, households that include a member with a disability, and households with children under age 18 all experienced housing denial at rates higher than the region overall. Common reasons for being denied housing among survey respondents included income (including type of income), credit, and eviction history.

Figure 42: Loan Denial Rates by Census Tract, 2017

Source: FFIEC HMDA Raw Data, 2017; Root Policy Research, 2020.

SITES INVENTORY

Communities

Unincorporated Sacramento County is very diverse in its land uses. It has areas dominated by large parcels utilized for agricultural purposes, suburban single-family areas, and denser urban areas with uses ranging from apartments to mansions. This variation in development has led to the 14 community areas within the County.

Antelope is a residential community at the northeastern edge of the County identified as Moderate Resource. It became a focus of development in 1985 and was considered an affordable community for young families to buy their first house. Barrett Ranch, the largest remaining undeveloped property, was entitled in 2017 with several major homebuilders currently building the site out with new homes. This development also includes multi-family sites identified for affordable development. Antelope has some larger undeveloped parcels that are identified as candidate rezone sites and are in the county-wide rezone program ([See Table C-32 in Appendix C and Appendix E for more information on the Countywide Rezone Program outcomes for these sites and others.](#)).

Arden Arcade is one of the most fully developed communities in Sacramento County and offers the most diverse range of housing types, everything from apartments to mansions. This community area includes neighborhoods within all of the resource types. Portions of this community are predominately non-White and lower to moderate income with 30-40 percent below the poverty line. Conversely, in close proximity are other portions of this community that are greater than 50 percent White and earn greater than the Area Median Income (AMI). Arden Arcade is the only community in the County with a Concentrated Area of Affluence. Developing affordable housing in this community presents a challenge due to the lack of adequately sized vacant parcels.

Carmichael/Old Foothill Farms is a fully developed community 10 miles northeast of downtown Sacramento. It contains low, moderate and high resource areas. Fair Oaks Boulevard is subject to a corridor plan that actively promotes multi-family and mixed-use developments. The Fair Oaks Boulevard Corridor, Manzanita Avenue and Auburn Boulevard are Moderate Resource areas and a focus of the countywide rezone effort. The highest resource area, along the American River Parkway, is developed with single family residences on larger suburban lots and has limited bus service and in some areas less proximate access to commercial or other amenities typically required to compete for affordable housing funding making it difficult to site affordable housing.

Cordova is situated in the geographic center of the County and was split in half by incorporation of Rancho Cordova in 2003. This community is largely Moderate Resource with Low Resource and High Segregation and Poverty areas along Folsom Boulevard. This community is home to the former Mather Air Force Base, with the former airfield primarily used for cargo transportation. Portions have also been extensively mined for sand and gravel, especially in the area of Kiefer and Bradshaw Roads. Large master plans, such as Easton, Glenborough and Mather South, are located in this community and account for a number of affordable sites in the County's inventory. The County has also identified affordable sites near the light rail corridor in this community.

Cosumnes is located in the central eastern portion of the County with the rural communities of Sloughouse, Wilton, and Rancho Murieta. This area is primarily used for agricultural purposes and has extensive biological resources such as vernal pools and oak woodlands. While Cosumnes is considered High and Highest Resource, it is largely outside the Urban Policy Area (UPA) and lacks infrastructure making it infeasible to identify sites compliant with Government Code section 65583.2. The Cordova Hills Master Plan and Rancho Murieta have limited sites that are included in the lower income inventory.

Delta is one of the most fertile and picturesque regions of the County, with agriculture and tourism being the prominent activities. It contains the legacy communities of Locke, Ryde, Courtland, Freeport, Hood and Walnut Grove. While some communities have infrastructure, it is outside the UPA and transit service is limited. Due to these constraints, only moderate and above-moderate sites are identified in this community.

Fair Oaks is a mix of suburban and semi-rural neighborhoods identified as Moderate and High Resource. Multi-family development tend to be clustered along the Sunrise, Fair Oaks and Madison Corridors. Access to a consistent bus route is limited to the Sunrise and Hazel corridors presenting a challenge to find sites that are in a Moderate or High Resource area while meeting the siting criteria of Government Code section 65583.2.

Natomas is located in the northwest portion of the County. Large portions of unincorporated Natomas are outside the UPA and are not expected to receive urban services in the foreseeable future making it unlikely to develop with affordable housing. There are two master plans in the entitlement process proposing affordable sites, but these require an expansion of the USB and UPA and are not anticipated to see

development of units during the Housing Element cycle. Sites for above-moderate housing are included in the housing inventory.

North Highlands/Foothill Farms is identified as High Segregation and Poverty and Low Resource. This community is home to the McClellan Business Park at the former air base that is primarily used for industrial and logistic type businesses. The North Watt Corridor Plan for Watt Avenue will provide for higher density multi-family and mixed-use developments along this corridor. A focus of the County is funding infrastructure improvements along this corridor to facilitate development as this plan has the capacity for more than 5,000 units. The focus for affordable units in this community is the Watt, Walerga, and Roseville corridors, which still contain vacant parcels. Additional infill multifamily housing units are moving forward on land within the McClellan Field site as either naturally occurring affordable housing or at moderate income levels.

Orangevale is a suburban and semi-rural community that is identified as Moderate and High Resource. This is a desirable community for affordable housing, but finding appropriate sites presents a challenge in part because bus service is only provided along the Hazel, Greenback and Madison corridors. The area north of Oak Avenue contains larger parcels outside the UPA lacking water and sewer infrastructure. This limits the areas for available affordable multi-family development to portions of Hazel, Greenback and Madison corridors, which have limited vacant parcels.

Rio Linda/Elverta contains two large rural residential areas and an active equestrian community, in addition to typical suburban and multi-family housing types. It is identified as Moderate and Low Resource community. The Rio Linda core has been the focus for siting lower income housing sites because of the access to bus service, infrastructure and amenities. The Downtown Rio Linda SPA identifies RD-20 zoned sites that are candidate rezone parcels. The area north of Elverta Road is identified as Moderate Resource; however, it cannot accommodate affordable sites due to the lack of infrastructure in the area. Affordable sites in the Elverta Specific Plan in the previous Housing Element cycle were removed due to the infrastructure uncertainty.

South Sacramento is the most densely populated and diverse of the County's communities. This community is majority Hispanic and Asian. It is also a community with high segregation and poverty with some areas having 30-40 percent of the population below the poverty line. Much of the County's efforts to provide affordable housing are in this community due to the availability of larger undeveloped parcels, acquisition of such sites by affordable builders, the benefits of investments to improve neighborhoods that can come from publicly funded affordable projects, and a focus on reducing displacement and rent over payment. This community has received public infrastructure improvements in an effort to improve multi-modal transportation opportunities for residents. Stockton Boulevard has been identified by both the County and the City as an area with potential for higher density multi-family and mixed-use developments. The County currently has grant funding to explore ways to increase the development potential along the County portions of Stockton Boulevard.

Southeast has little commercial and no urban development. Rural residential development, vineyards and pasture dominate this area. While this community is identified as High Segregation and Poverty and High and Highest Resource, affordable units cannot be placed in this community because it lacks infrastructure, transportation and amenities; therefore, Southeast is assumed to accommodate only above-moderate inventory.

Vineyard has the potential to accommodate significant development, as it has been the focus of several master plans to create new neighborhoods. These plans include the Vineyard Springs Comprehensive Plan, the North Vineyard Station Specific Plan, and the Florin Vineyard Gap Comprehensive Plan. Of these three

plans, only the Vineyard Springs area has seen significant development. This community is considered Low, Moderate and High Resource. Given development is largely greenfield, road and water and sewer infrastructure are provided by large residential developers at a greater cost than infill development. The County has taken steps to facilitate development in the North Vineyard Station Specific Plan by amending development triggers. The community has numerous candidate rezones sites and additional affordable units will be provided by developers through a combination of land dedication and fees [\(See Table C-32 in Appendix C and Appendix E for more information on the Countywide Rezone Program outcomes for these sites and others.\)](#).

Resource Categories

The County has land area in all of the categories (High Segregation & Poverty to Highest Resource), as identified on the TCAC/HCD Opportunity Map. About 49 percent of the land area countywide is considered High or Highest Resource. Most of the land area classified as Highest Resource category is located in the Cosumnes, Southeast and Delta portions of the County. These areas are rural and do not comply with the AB 1397 criteria for lower-income sites as they lack sewer and water infrastructure, bus service, and proximity to commercial services. One site in the community of Rancho Murieta is included in the lower-income sites inventory. However, the remaining sites in these areas are on the above-moderate income level inventory and do not provide sites for the lower-income inventory. The High Resource category also presents a challenge for identifying lower-income sites. The land in this classification is located in the Southeast, Vineyard, Fair Oaks and Orangevale areas of the County. These areas have less access to bus service, water and sewer infrastructure and commercial services than the lower resource areas of the County making it difficult to comply with the AB 1397 criteria for lower-income sites.

The areas of the County with larger, vacant sites available for multi-family development are located in communities of South Sacramento, Vineyard, North Highlands, Antelope, and to a lesser extent Rio Linda/Elverta and Carmichael/Old Foothill Farms. These areas are categorized as High Segregation and Poverty, Low Resource and Moderate Resource. Some adopted Master Plans (Mather South, NewBridge, Easton, Glenborough, and Cordova Hills) are located in the Moderate and High Resource category and will include affordable housing, expanding access to employment opportunities, transportation, and other amenities for lower-income households.

Figure 38 shows the TCAC/HCD Opportunity Map in relation to the County's Urban Policy Area (UPA), i.e. the area expected to receive urban services within the time-frame of the current General Plan (2005-2030). Areas outside the UPA, especially the Delta, Cosumnes, Southeast, portions of Natomas, Rio Linda-Elverta and Orangevale lack public sewer and water, making these areas noncompliant with the AB 1397 criteria for siting lower income housing sites. This map identifies the portions of the County that are expected to have urban services during the Housing Element period and presents a more realistic view of where potential development will occur in the County.

Table 69 shows the more realistic percentages of land when narrowed down to areas within the urban area (within the UPA) and also compares that to the percentage of total land based on the TCAC opportunity map. When considering the land area within the UPA, the Highest Resource area is only 8 percent of the County's urban land area as compared to 31 percent of all land. The High Resource category is 20 percent of the urban land area as compared to 18 percent of total land area. The Moderate Resource area is 30 percent of the urban land area as compared to 13 percent of total land area. Table 69: Resource Areas Within the Total County and UPA below compares the land area within each TCAC opportunity category for the entire County and the area inside the UPA.

Table 69: Resource Areas Within the Total County and UPA				
Resource Category	Percent of Total County	Percent of County Inside UPA	Change	

High Segregation & Poverty	7 percent	11 percent	+3 percent
Low Resource	28 percent	26 percent	-2 percent
Moderate Resource	13 percent	30 percent	+17 percent
High Resource	18 percent	20 percent	+2 percent
Highest Resource	31 percent	8 percent	-23 percent

Source: 2021 TCAC Opportunity Maps

Potential Effect on Access to Opportunity as compared to the Entire County Land Area

Figure 43 shows the distribution of the County's sites inventory against the TCAC/HCD Opportunity Map. Figure 46 and Figure 47 identify the percent of the lower-income, moderate-income, and above moderate-income sites in each opportunity category and the percent of the County land area in each opportunity category. The majority of the lower-income units are located in the Moderate Resources area, followed by High Segregation and Poverty and Low Resource areas. Similarly, the majority of the candidate rezone sites (Figure 45) are located in Low Resource and High Segregation and Poverty areas. Completion of Program A1 (the Countywide Rezone Program) resulted in a slightly different make-up of rezone sites then depicted in Figure 45; nevertheless, the outcome was similar with the majority of sites located in Low Resource areas followed by High Segregation and Poverty areas. For reference, a figure and analysis showing the actual outcomes of Program A1 is included in the Countywide Rezone AFFH analysis in Appendix E. The majority of moderate- and above-moderate income units are located in the Moderate Resource area, followed by Low Resource and Highest Resource areas. The Highest Resource category has the most land area in the County at 31.1 percent, but one of the lowest percentage of lower-income units (14.3 percent) for the reasons provided above. Conversely, 21.2 percent of the above moderate-income units are located in the Highest Resource category. The County has a disproportionately high percentage of lower-income units (24.7 percent) in the High Segregation and Poverty versus the land area (6.7 percent).

Potential Effect on Access to Opportunity (Within the Urbanized Land Area (UPA))

As described above, focusing on the areas of the County served by infrastructure tells a more accurate story. Only 8% of land within the urban area or UPA is categorized as Highest Resource with an additional 20% of land in the High Resource area; and much of the land is either built out or has been subdivided for single family homes. Figure 48 shows the distribution of the County's sites inventory in relation to the TCAC/HCD Opportunity Map showing the opportunity areas within the UPA. Figure 46 and Figure 47 identify the percent of the lower-income, moderate-income, and above moderate-income sites in each opportunity category and the percent of the County's UPA land area in each opportunity category.

Transitioning to a comparison of the relationship of the land inventory to the Resource areas further refines the analysis. The majority of the lower income units are still located in the Moderate Resource area (30 percent) followed by High Segregation and Poverty (17.4 percent) and Low Resource areas (11 percent). However, it should be noted that the percentage of units in the Highest Resource area increased to eight percent. The majority of moderate- and above-moderate income units are located in the Moderate Resource area, followed by Low Resource and Highest Resource areas. ~~The majority of moderate- and above-moderate income units are located in the Moderate Resource area, followed by Low Resource and Highest Resource areas.~~

The County understands the need for the rezone program to not contribute to disparities in access to opportunity and to instead improve that access. Policy HE 7.1.3 commits the County to rezone parcels in both the Highest and High Resource areas as well as targeting Moderate Resource areas. This is intended to increase the supply of affordable sites in these areas to affirmatively further fair housing choice. The County's rezone program will accommodate an additional 2,884,215 lower-income units by both rezoning existing multifamily zoned sites at 20 units per acre (RD-20) to meet State density requirements (e.g. RD-

30) and by identifying sufficient new sites to meet the minimum requirements and also providing some oversupply.

Several factors are at play related to the County's ability and approach to focusing new sites in the Highest and High Resource areas. First, as previously noted, a significant portion of the rezone program includes rezoning existing sites from 20 units per acre to 30 units per acre. Because these are existing sites, they cannot be relocated into a higher Resource Area. In addition, appropriate sites (e.g. vacant, comply with AB 1397 criteria, etc.) tend to be scarcer in the Highest and Higher Resource areas.

For example, the largest Highest Resource area within the UPA is a portion of the Arden Arcade area including Sierra Oaks, Wilhaggan, Del Dayo, Mariemont/Gordon Heights and surrounding neighborhoods. This area is developed with single family homes and is not well served by transit. Other High Resource areas include portions of Carmichael/Old Foothill Farms and Fair Oaks. These areas are also largely situated between Fair Oaks Boulevard and the American River outside the Fair Oaks Boulevard Corridor Plan in areas developed with large single family homes that are not served by transit. The High Resource areas in Orangevale are north of Oak Avenue which is outside the UPA and adjacent to the City of Folsom. This area is developed with a mix of suburban and rural estate (ag-res) properties including for keeping of horses and other hobby livestock. The area east of Hazel Avenue and north of Greenback Lane lacks access to consistent transit service and commercial services, in general.

Most of the land within the High and Highest Resource categories are largely developed or lack access to infrastructure or consistent transportation services (e.g. do not meet the AB 1397 criteria). **Figure 34** illustrates the location of transit services and the County-wide rezone effort sites will be within the area that is served by transit, which further limits the areas for affordable inventory sites.

Therefore, Program A1 specifies that at least 30 percent of the remaining lower-income RHNA will be sited in Highest, ~~and~~ High, and Moderate resource areas. While specific rezone sites have not been identified, the rezone will focus on identifying sites in the Communities of Antelope, Carmichael/Old Foothill Farms, Cordova, Fair Oaks, and Orangevale that are inside the UPA and comply with the AB 1397 criteria. [See Appendix E for a full description and analysis of the outcomes of Program A1. Included in Appendix E is a AFFH assessment for the rezone program.](#)

Finally, a number of the County's key sites most likely to be funded and built as deed-restricted affordable project projects are within several adopted Master Plans and Specific Plans (due to requirements in those adopted Plans for sites to be dedicated to SHRA with payment of fees to facilitate affordable housing construction.) While these new master plans may not be currently within mapped Highest and High Resource areas, the County will be ensuring the buildout of complete communities with a mix of housing types and amenities including affordable housing as part of the design of the new community. This range of housing types, including multifamily, commercial services, and expanded transit is designed to reduce disparities in access to opportunity (Program A4).

Those Housing Element programs intended to address the barriers to fair housing choice identified by the regional AI are included below in the Fair Housing Barriers and Contributing Factors section. However, there are several priority programs that are particularly intended to address inequitable access to opportunities, patterns of segregation, and disproportionate housing needs. These programs are programs A1 Countywide Rezone Program, A4 Master Plans and Multi-Family Housing, B8 Missing Middle Housing (or Naturally Occurring Affordable Housing), B11 Rezones, Consolidations/Mergers, E5 Mortgage Credit Certificate Allocations, and E6 Down Payment Assistance and Homebuyer Education and Counseling. The Housing Action Plan Chapter includes a program called Missing Middle Housing or Naturally Occurring Affordable Housing (program B8), which requires the County to explore Zoning Code amendments to allow for more missing middle housing types in single family zoning districts. The objective of the program is to develop 400 unit of missing middle housing in High and Moderate Resource areas. The Housing Action Plan Chapter also proposes a Rezones, Consolidations/Mergers program (program B11) intended to facilitate affordable housing development on small parcels or parcels with different zoning districts that may provide

naturally occurring affordable housing in commercial or single-family areas that may otherwise remain undeveloped. The Housing Action Plan Chapter also includes Mortgage Credit Certificate Allocations (program E5) and Down payment Assistance (program E6). During the planning period, these programs will provide down payment assistance to 360 moderate- and lower-income households and will be actively promoted in the Environmental Justice Communities of the County.

In addition to these programs, the Constraints Chapter of this element describes current efforts by the County through the SB 2 Planning Grants Program to expand residential uses in single family zoning districts. Some of these efforts include considering changes to the setbacks for multifamily residential development adjacent to single-family development; and considering reducing the hearing authority for certain residential projects through creation of a staff level Special Development Permit.

Figure 43: Inventory Distribution by TCAC Opportunity Area

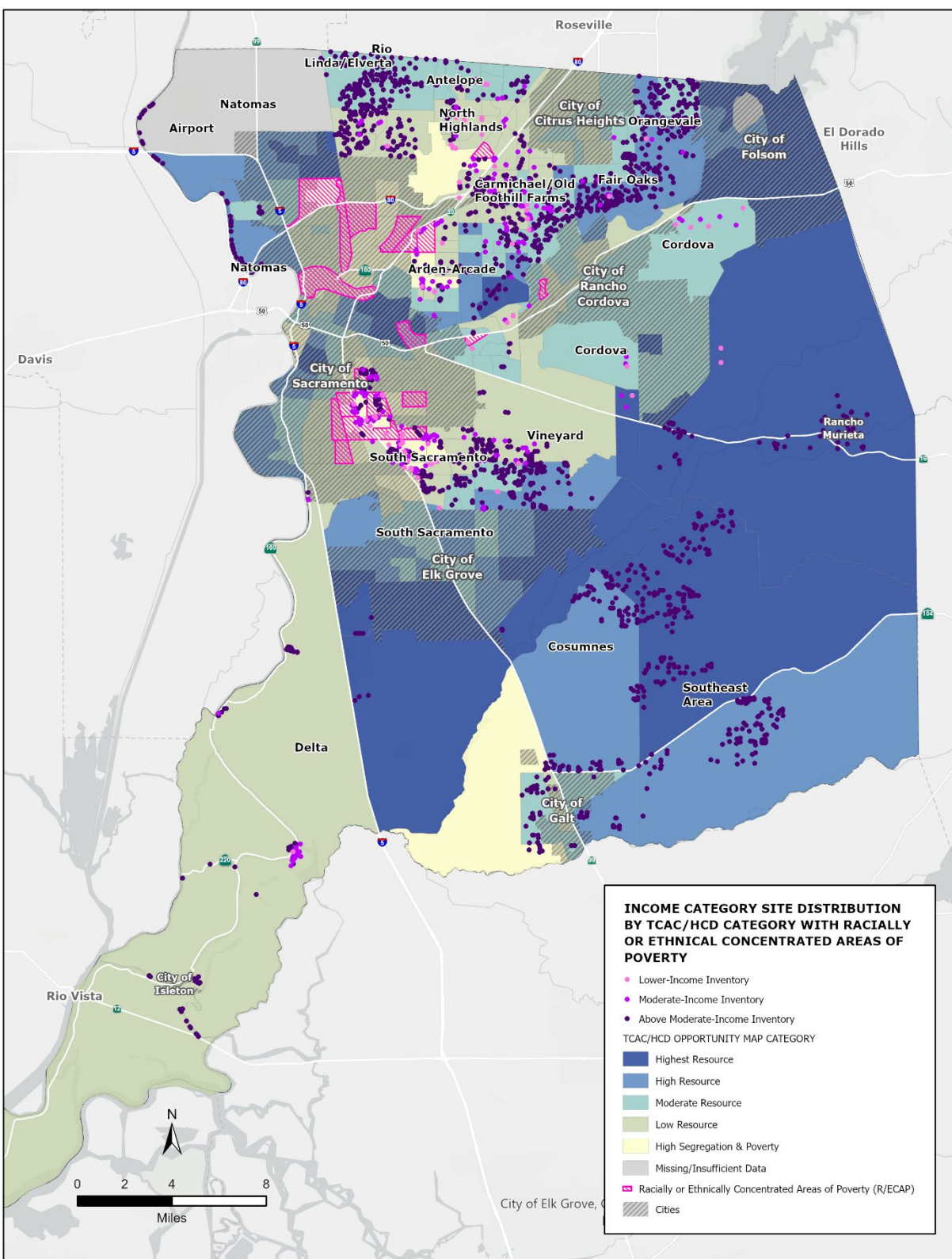


Figure 44: Lower Income Site Distribution by TCAC/HCD Opportunity Category

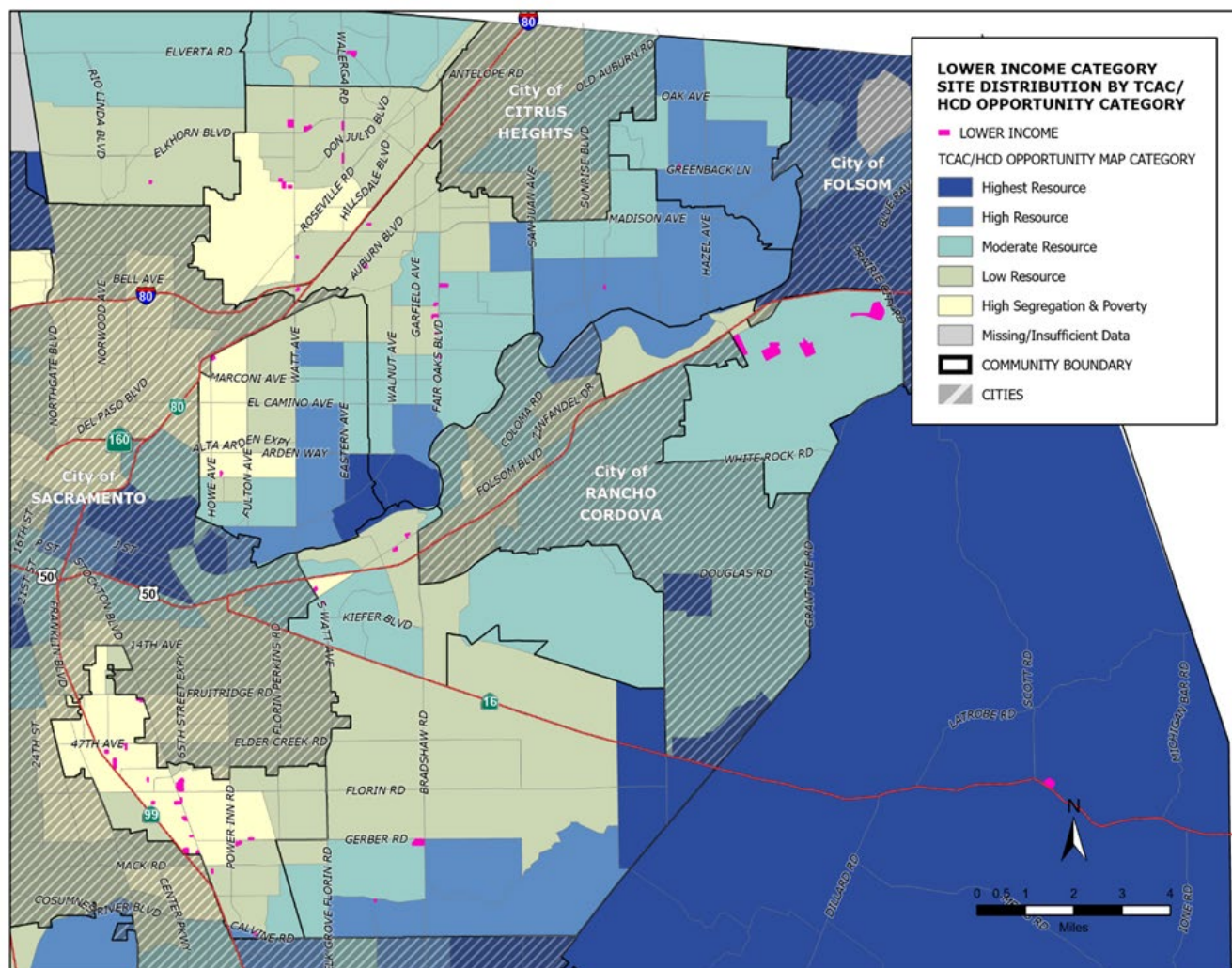


Figure 45: Candidate Rezone Sites by TCAC Opportunity Area

(Note: An update to this figure, depicting the outcomes of the Countywide Rezone Program is located in Appendix E)

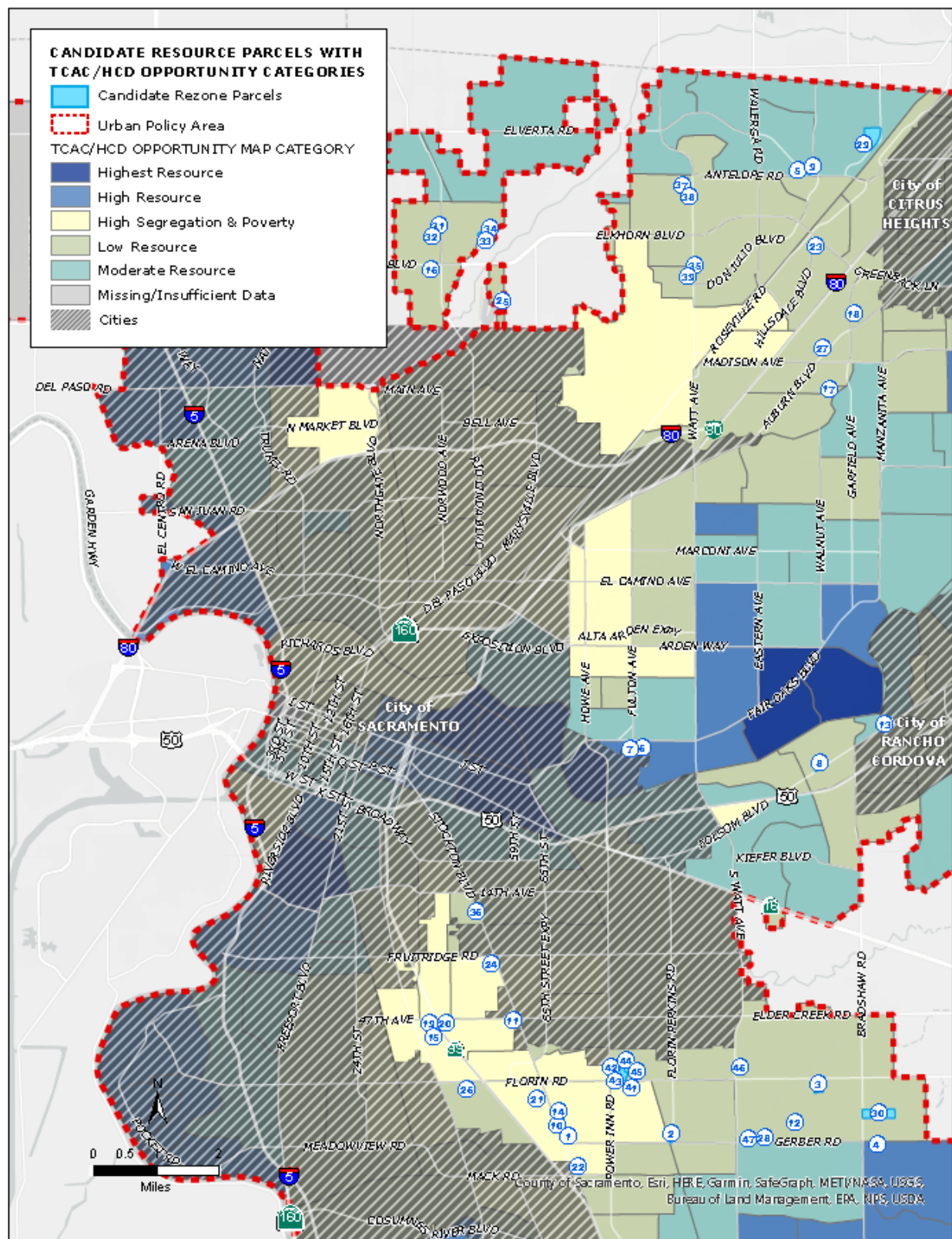


Figure 46: Lower, Moderate and Above-Moderate-Income Unit Distribution by TCAC Opportunity Area

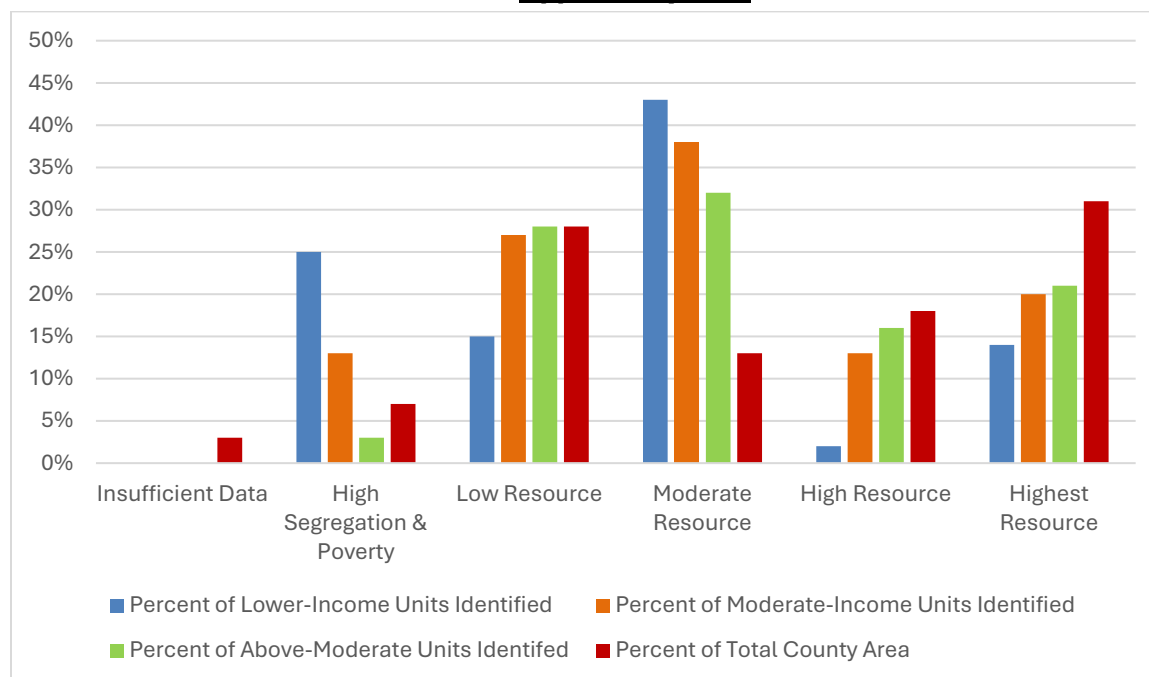


Figure 47: Lower, Moderate and Above – Moderate Income Unit Distribution by TCAC Opportunity Area Inside the UPA

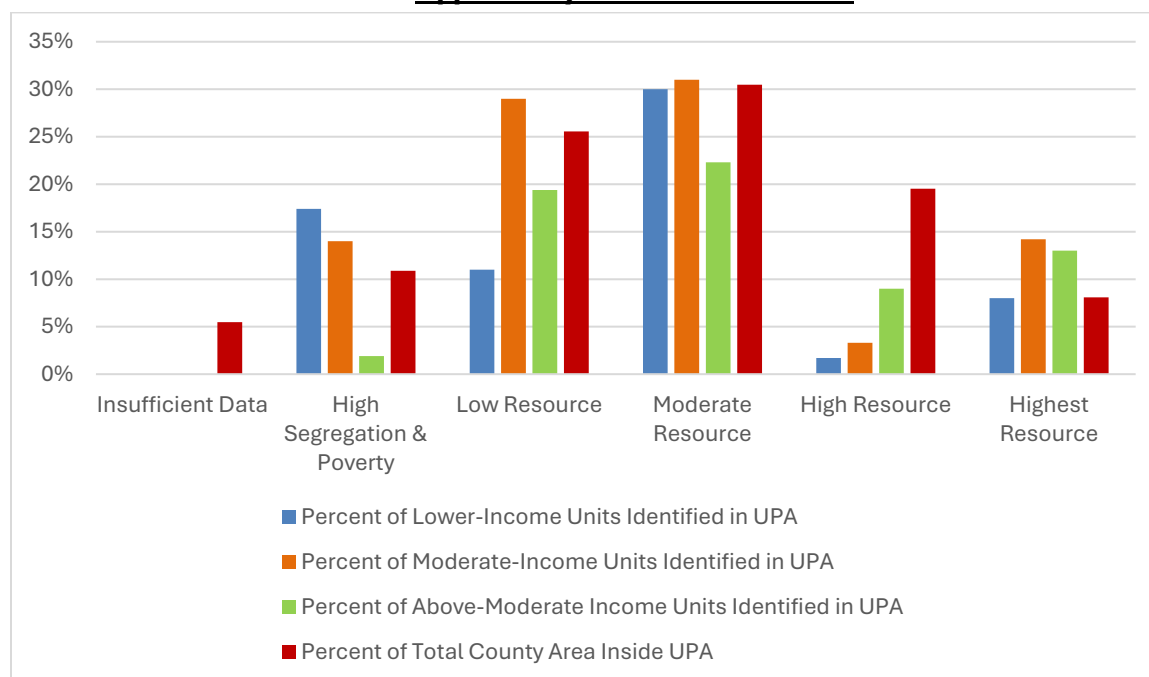
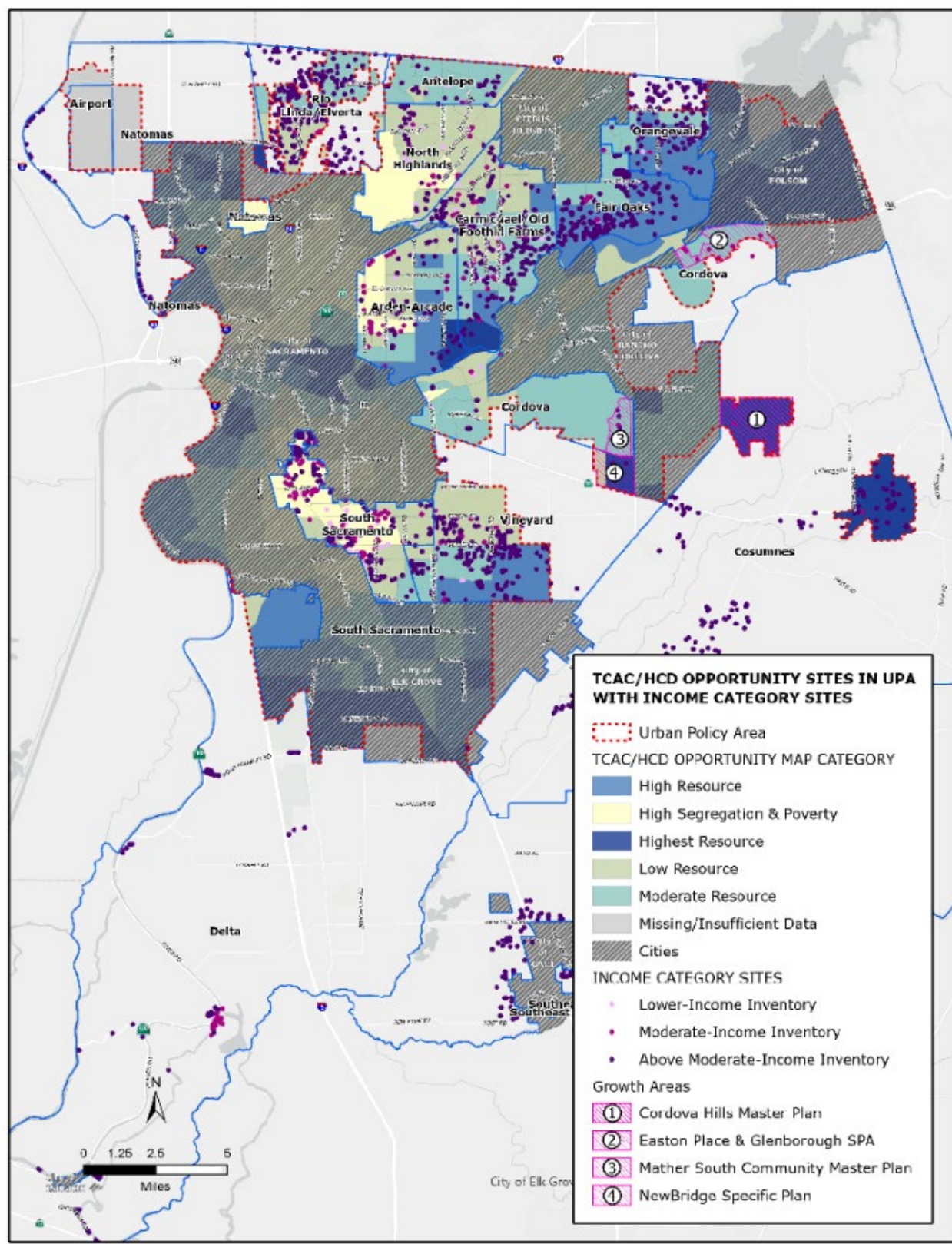


Figure 48: TCAC/HCD Opportunity Sites in UPA with Income Category Sites



Potential Effect on Patterns of Segregation

Figure 49 overlays the inventory on a map of the percent of residents that are non-white by census block group. The inventory has the potential to contribute to existing patterns of segregation as many lower-and moderate-income sites are located in areas identified as greater than 41 percent non-white and many above moderate-income sites are located in areas identified as 40 percent or less non-white.

Similarly, as shown in Figure 50, many lower-income and moderate income sites are in areas of the County where 75 percent or more of the population is already at a low- or moderate-income level.

Program A1 will ameliorate this impact by adding additional lower-income sites in High and Moderate Resource areas, which coincide with predominately White census block groups and areas with higher incomes ([See Appendix E for the AFFH assessment and outcomes of Program A1 Countywide Rezone effort.](#)). Program B8 may also result in more naturally occurring affordable housing products in single-family zoning districts. As discussed earlier in this chapter, single-family zoning districts coincide with historically segregated areas. In addition, through program E3, the County has committed to evaluating the Affordable Housing Ordinance and pursuing a feasibility study related to revising the inclusionary provisions. Inclusionary housing provisions have the potential to create integrated, mixed-income communities and to introduce lower-income residents to areas of opportunity.

Figure 49: Income Category Site Distribution by Racial Demographics

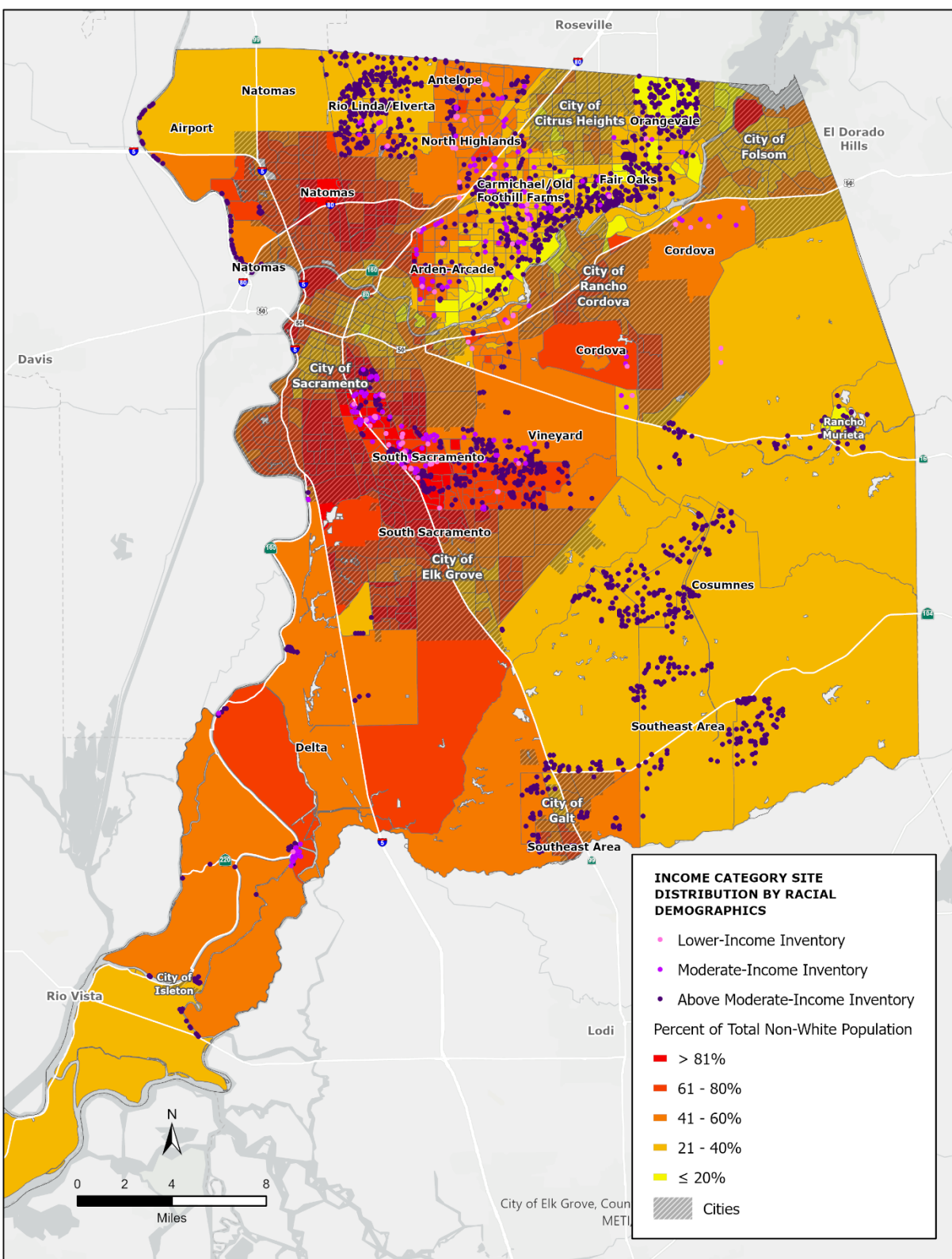
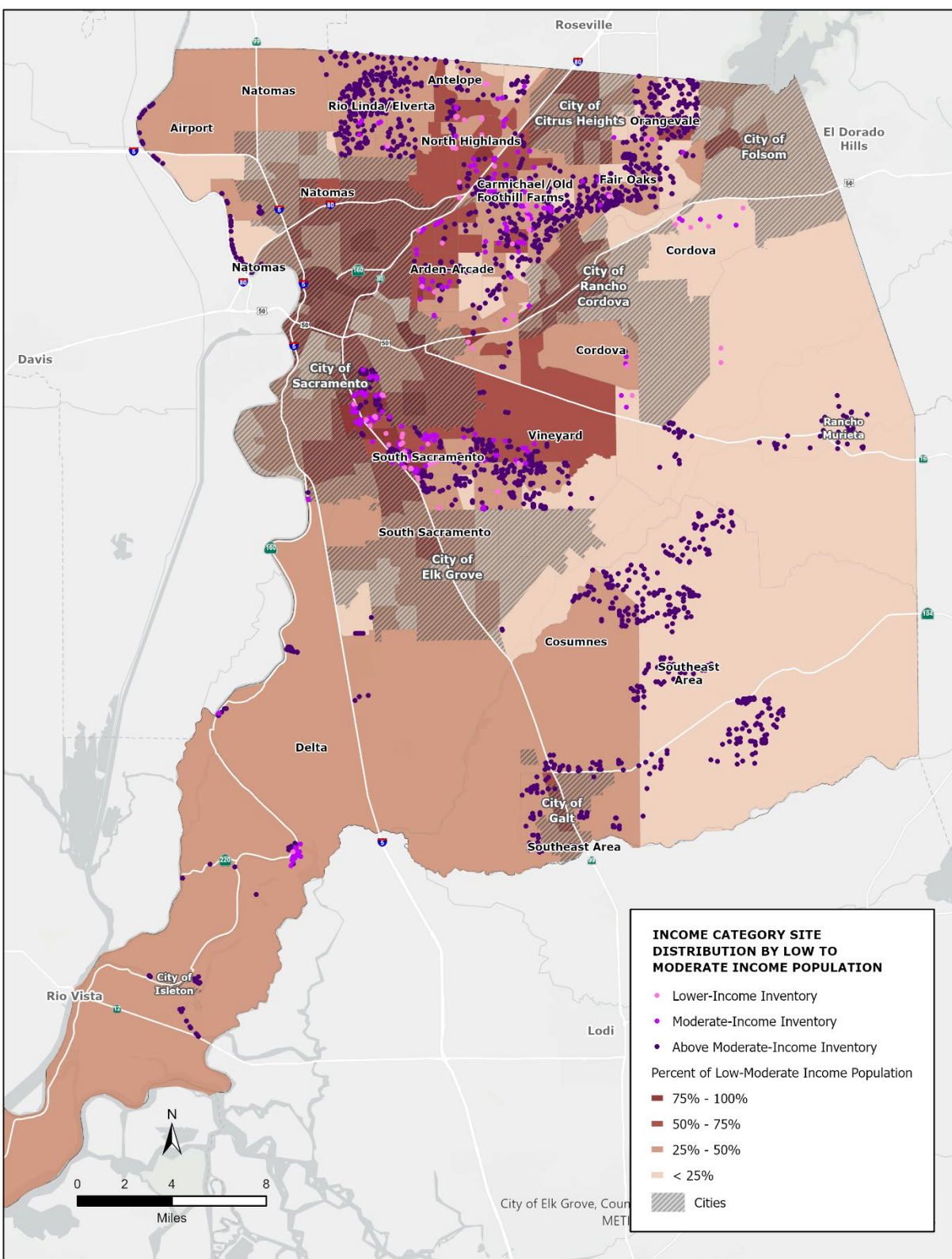


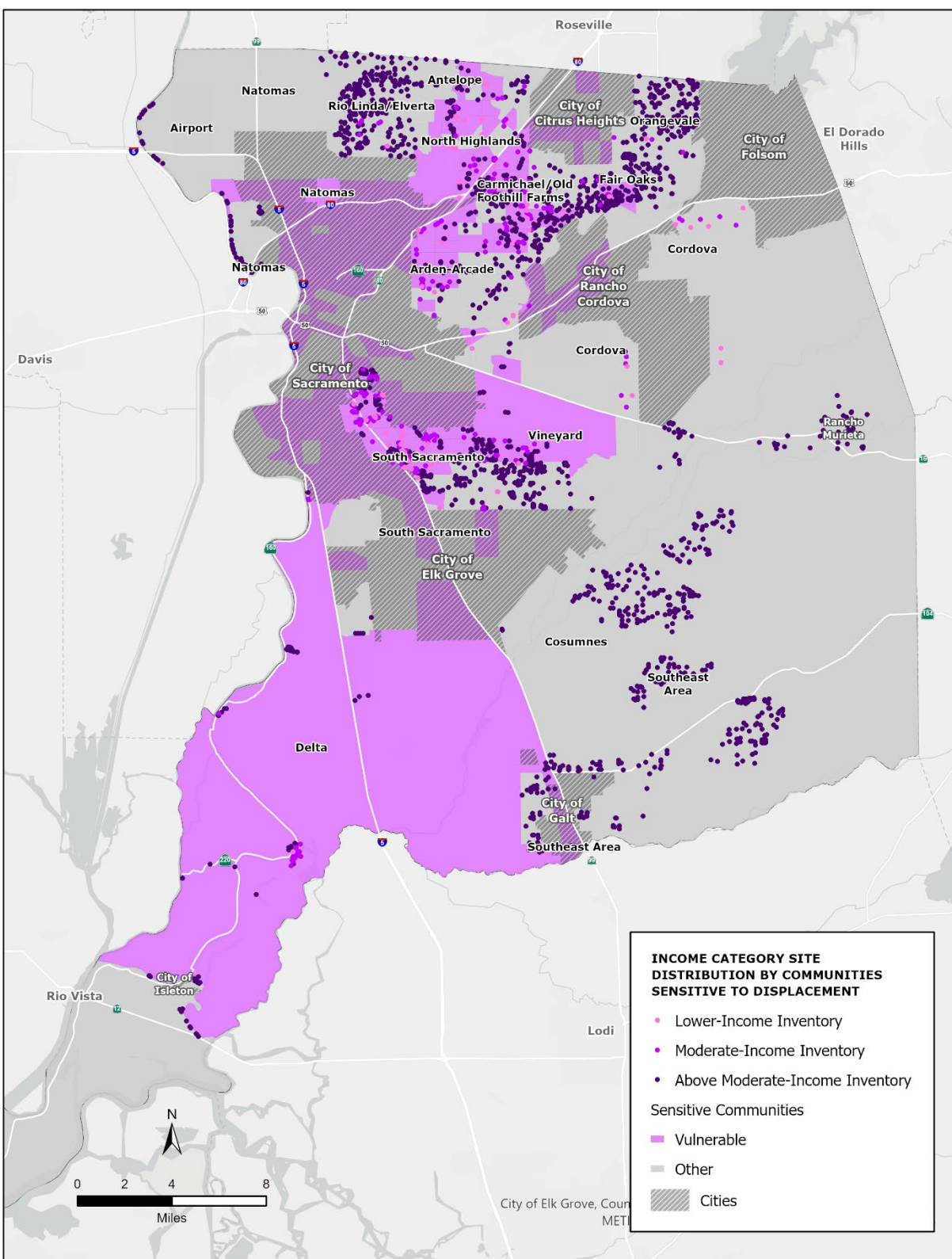
Figure 50: Income Category Site Distribution by Low to Moderate Income Population



Potential Effect on Disproportionate Housing Needs

Figure 51 overlays the inventory on a map of communities sensitive to displacement. Many of the same areas which are considered Low Resource areas or areas of High Segregation and Poverty also face disproportionate housing needs such as overpayment, overcrowding, and displacement risk. The County must, therefore, balance the need to create affordable housing opportunities in High and Moderate Resource areas with the need to create affordable housing opportunities in areas which are at risk of displacement and face overpayment and overcrowding. By providing lower-income sites in these areas, the inventory may help to ameliorate the impact of disproportionate housing needs.

Figure 51: Income Category Site Distribution by Communities Sensitive to Displacement



Racism as Public Health Crisis

The Board of Supervisors adopted a resolution declaring racism as a public health crisis in Sacramento County on November 17, 2020. The resolution celebrates the diversity of the County, points to a growing body of research demonstrating that racism is a social determinant of health, and commits the County to eliminating health disparities and achieving health equity for all residents. The resolution specifically commits the County to identifying and implementing solutions to eliminate institutional, structural and systemic racial inequity in all community services provided by the County including homelessness and housing, land use and environment. The approval of the resolution and acknowledgment of the County's responsibility for racial equity constitutes a first step to remedy the health crisis. In preparing this Housing Element, County staff has applied a racial equity lens and identified policies and programs to address barriers to housing choice that create and maintain segregated living patterns and health disparities.

Environmental Justice Element

In addition to providing opportunity for lower-income housing development in areas with more resources, higher income levels, and more positive environmental outcomes, the County must also act to improve areas with less resources, higher poverty rates, and less positive environmental outcomes. In order to meet this need, the Board of Supervisors adopted the Phase 2 Environmental Justice Element on December 17, 2019. The Environmental Justice Element identifies four Environmental Justice Communities (EJ Communities), including North Highlands, North Vineyard, South Sacramento, and West Arden Arcade. The Environmental Justice Element contains policies and implementation measures to address pollution exposure and air quality, access to public facilities, food access, safe and sanitary homes, promotion of physical activity, promotion of civic engagement, and crime prevention.

The Environmental Justice Element in concert with the Housing Element provides policies and programs that address the needs of EJ Communities. One of the keystone policies of the element, EJ-1, is intended to address systemic inequity and divestment by prioritizing EJ Communities for infrastructure and amenities, with the ultimate goal of transforming EJ Communities into areas of opportunity. In addition, policy EJ-2 of the Environmental Justice will result in a comprehensive Community Outreach Strategy in support of an equitable approach to public outreach for all aspects of County governance and delivery of service. This complements Housing Element policies HE 7.1.3 and HE 7.1.5 and is consistent with the Housing Element's goal to promote and affirmatively further fair housing opportunities for county residents.

The Environmental Justice Element also identified refugee and immigrant populations as needing special consideration in the Housing Element. The Housing Needs Assessment Chapter describes the needs of these populations in more detail. The Housing Action Plan chapter includes several programs that were developed for these populations such as the Refugee Academy and Options to Remove Barriers to Fair Housing Choice (programs G4 and G6).

FAIR HOUSING BARRIERS AND CONTRIBUTING FACTORS

The AI identified the primary housing barriers and the factors that contributed to those barriers. The AI found that Sacramento County residents are less likely to worry about rent and property taxes compared to respondents regionwide and none of the top housing challenges experienced by County residents are higher than those of the region overall.

- **Barrier:** The harm caused by segregation is manifest in disproportionate housing needs and differences in economic opportunity.
 - **Contributing factors:** Past actions that denied housing opportunities and perpetuated segregation have long limited opportunities for many members of protected classes. This continues to be evident in differences in poverty rates, homeownership, and access to economic opportunity throughout the region.
 - **Disproportionate impact:** Black and Hispanic families are more likely to live in and be persistently challenged by poverty. They also have much lower rates of homeownership and, as such, are denied wealth-building that for many decades was afforded to other

residents. Across the board, all People of Color experience higher rates of loan denial than non-Hispanic White applicants for each loan purpose (i.e., home improvement, purchase, or refinance).

- **Addressed by Strategy 1a** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Affordable rental options in the region are increasingly limited.
 - **Contributing factors:** 1) Growth in the region—particularly demand for rental housing—has increasingly limited the areas where low income households can live affordably, evidenced by the high rates of households with disproportionate housing needs. This perpetuates the limited economic opportunity that began with segregation. 2) Constraints on affordable housing development and preservation, ranging from lack of funding, the cost of development or preservation, public policies and processes⁴, and lack of adequate infrastructure for infill redevelopment, all constrain the affordable rental market. 3) Suburban areas in the Sacramento Valley are rarely competitive for state or federal affordable housing development funds, further straining the capacity for creation or preservation of affordable rental housing. 4) For residents participating in the Housing Choice or other housing voucher programs, too few private landlords accept vouchers⁵. This leads to concentration of vouchers in certain neighborhoods and lack of mobility for voucher holders.
 - **Disproportionate impact:** African American and Hispanic households are most likely to experience housing problems (e.g., cost burden, overcrowding, and homes in substandard condition). For those who have vouchers, they are more likely to live in Racially or Ethnically Concentrated Areas of Poverty (R/ECAP neighborhoods) or neighborhoods with lower access to economic opportunity.
 - **Addressed by Strategies 2b, 2d, 2e** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Residents with disabilities need for and lack of access to affordable, accessible housing.
 - **Contributing factors and disproportionate impact:** 1) Insufficient number of mobility and sensory accessible units affordable to people living on SSI/SSDI (i.e., ADA accessible market rate units are unaffordable to those who need them most). 2) Much of the naturally occurring affordable housing stock is older and not accessible to residents with mobility disabilities. 3) Lack of transit access outside of the downtown core further limits the pool of accessible, affordable housing options for transit-dependent residents.
 - **Addressed by Strategy 2c** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Stricter rental policies further limit options.
 - **Contributing factors and disproportionate impacts:** 1) “3x income requirements” for rental units have a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI), as well as renters who receive income from “unearned” sources such as child support. 2) Voucher tenants are not

⁴ Stakeholders discussed a range of public policies and processes that they believe contribute to a lack of affordable rental housing by making it more costly to develop rental housing. In some instances, public policies for environmental review or public comment are wielded by the public to prevent or decrease the density of development. These include CEQA, length of time required to navigate public permitting process (not specific to any jurisdiction; all considered about the same), loss of redevelopment agencies, and prevailing wage requirements.

⁵ Effective January 1, 2020, SB 329 and SB 322 require landlords to accept Section 8 Housing Choice vouchers, VASH vouchers, and other forms of rent assistance as part of the applicant’s source of income.

protected under California's source of income protections. 3) Onerous criminal background checks that do not take into account severity of a crime or time period in which it was committed disproportionately impact persons of color, persons with mental illness, and persons in recovery.

- Organizations representing the refugee and immigrant communities also identified this as barrier for these groups during additional stakeholder focus group outreach conducted to prepare this Element.
- **Addressed by Strategy 2a** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Disparities in the ability to access homeownership exist.
 - **Contributing factors:** 1) Past actions that have limited economic opportunity for certain residents (i.e., redlining, lending discrimination, other barriers to wealth). 2) Disparities in access to lending, including home improvement and refinance products.
 - **Disproportionate impact:** Analysis of lending data finds that denial rates for Hispanic applicants (24 percent) and other non-Asian minority groups (24 percent) were significantly higher than for non-Hispanic White applicants (15 percent), and gaps persist (albeit narrower) after controlling for income. Across the board, all minority groups experience higher rates of loan denial than non-Hispanic White applicants for each loan purpose (i.e., home improvement, purchase, or refinance).
 - **Addressed by Strategy 1a and 2f** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Public transportation has not kept up with growth.
 - **Contributing factors:** Outside of the downtown Sacramento "grid" public transportation has not kept up with regional growth and lacks inner and intra city connections. Costs are high, especially for very low income households.⁶
 - **Disproportionate impact:** A lack of access to affordable public transportation (e.g., routes, connections, days/hours of service) is the 2nd most frequently cited barrier to economic opportunity mentioned by members of protected classes. (Lack of affordable housing was consistently the top barrier identified by residents and stakeholders.)
 - **Addressed by Strategy 3a** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Educational inequities persist in the region.
 - **Contributing factors and disproportionate impacts:** 1) Housing prices near high performing schools and school districts are out of reach for many low and moderate income families. 2) In north and south Sacramento and in Woodland, children from predominantly African American and Hispanic neighborhoods are less likely to attend proficient schools. 3) Impact of 2013 education equity reforms (e.g., Local Control Funding Formula, Smarted Balanced Assessment System, educator prep standards) not yet fully realized. 4) Disparities in discipline/suspension rates of African American, Latino, and special needs children.
 - **Addressed by Strategy 2e** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).

⁶ Note that all community engagement and publicly available data on access to public transit was collected prior to SacRT Forward implementation on September 8, 2019. Implementation should be carefully monitored to assess impacts on members of protected classes and the extent to which this impediment is mitigated with implementation of SacRT Forward.

- **Barrier:** Disparities in labor market engagement exist.
 - **Contributing factors and disproportionate impact:** 1) Unequal school quality across the region disproportionately disadvantages low and moderate income families. 2) Lack of economic investment directed to building skilled earning capacity in communities of color. 3) Lower rates of educational attainment with persons of color. 4) Lack of market rate job opportunities for people with disabilities.
 - **Addressed by Strategy 3b** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).
- **Barrier:** Residents with disabilities lack access to supportive services and a spectrum of housing options to enable them, especially those with mental illness, to achieve and maintain housing stability.
 - **Contributing factors and disproportionate impact:** 1) Lack of affordable housing. 2) Significant state budget cuts since the 1990s with little progress toward funding restoration. 3) Lack of funding for case management, mentors, other peer-supported services to support navigating systems and independent living skill development. 4) Loss of naturally occurring affordable housing options, including boarding homes, other small group living environments.
 - **Addressed by Strategy 3c** (discussed further in the section below titled Regional Goals and Sacramento County Action Items).

Table 70: Regional Goals and Sacramento County Action Items

Assessment of Fair Housing Identified Issue/Barrier	Contributing Factor/Disproportionate Impact	Meaningful Actions/Metrics
Patterns of Segregation based on race and incomes perpetuated by R/ECAP's and Concentrated Areas of Affluence	Past actions that denied housing opportunities and perpetuated segregation (redlining, racially restrictive covenants) have long limited opportunities for many members of protected classes. This continues to be evident in differences in poverty rates, homeownership, and access to economic opportunity throughout the region. Black and Hispanic families are more likely to live in and be persistently challenged by poverty. They also have much lower rates of homeownership and, as such, are denied wealth-building that for many decades was afforded to other residents. Across the board, all People of Color experience higher rates of loan denial than non-Hispanic White applicants for each loan purpose (i.e., home improvement, purchase, or refinance).	Strategy 1a. Support development or resale of affordable homeownership opportunities through a variety of approaches, such as developer incentives, providing assistance and resources to support low-income homebuyers, continuing to administer existing down payment assistance loans, and affirmatively marketing to under-represented potential homeowners. Implement the Housing Incentive Program (HIP) to encourage the construction of affordable housing and housing for special needs groups as identified in State housing element law. The County will consider amendments to the program to further incentivize housing and to meet the housing needs of County residents. The County will also amend the Zoning Code to incorporate changes to State Density Bonus Law. The target for this program is 100 additional units. (Program E4). Mortgage Credit Certificate Allocations: The Sacramento Housing and Redevelopment Agency (SHRA) will seek Mortgage Credit Certificate (MCC) allocations from the State of California and funding from the California

Assessment of Fair Housing Identified Issue/Barrier	Contributing Factor/Disproportionate Impact	Meaningful Actions/Metrics
		Housing Finance Agency to provide low interest loans and down payment assistance for first-time low- and moderate-income homebuyers. The County will promote the MCC program to areas sensitive to displacement and the residents of the Environmental Justice Communities, who are most likely to have been historically excluded from homeownership by mortgage redlining practices. This program will assist 20 households annually (Program E5). Down Payment Assistance and Homebuyer Education and Counseling: The Sacramento Housing and Redevelopment Agency (SHRA) will continue to apply to State HCD for the CalHOME Program to provide down payment assistance. The County will promote the CalHome Program to areas at sensitive to displacement and the residents of the Environmental Justice Communities and who are most likely to have been historically excluded from homeownership by mortgage redlining practices. SHRA will also continue its contracts with approved housing counseling agencies that offer homebuyer education, counseling and post purchase counseling for all homebuyer programs administered by SHRA. Assist 25 households annually. Provide homebuyer education and counseling to 150 households annually. (Program E6.) In order to facilitate development of affordable housing units, the County will adopt amendments to the existing Affordable Housing Fee Deferral and Waiver Program. The County may also consider adopting additional fee waiver or deferral programs. The target is to defer or waive fees for 300 units annually (Program B10.) Master Plans and Multifamily Housing: The County will adopt master plans, including specific and comprehensive plans, which provide a variety of residential densities, including those densities that support multifamily housing. To facilitate the development of housing for lower-income households, master plan communities must:

Assessment of Fair Housing Identified Issue/Barrier	Contributing Factor/Disproportionate Impact	Meaningful Actions/Metrics
		Develop a minimum of 30 percent of the proposed dwelling units at a density of at least 30 dwelling units per acre (RD-30) or greater. Include multifamily zoned (RD-30+) parcels 3 to 10 acres in size. Pursuant to General Plan Policy LU-120 master plan contribute their "fair share" of adequate sites for the lower income inventory. Provide a variety of housing types and densities, including single-family homes, duplexes, triplexes, accessory dwelling units, townhomes, condominiums, apartments and similar multi-family units, in a variety of settings including both residential neighborhoods and mixed use nodes. (Program A4) Accessory Dwelling Unit Promotion and Compliance: The County will promote the production of ADU's/JADU's by providing the public a brochure on ADU/JADU standards and permitting requirements, as well as a technical manual on designing, building and renting accessory dwellings that will be available at the Building Assistance Center (BAC). This information will also be available on a webpage devoted to ADU/JADU on the County's website. Outreach to the Building Industry Association (BIA) will also occur to promote the development and production of ADU's/JADU's as part of residential developments. The County will track the creation of ADU's/JADU's and will determine if it is meeting production estimates by the planning period midpoint. Targeted outreach to promote ADU construction will also occur in moderate, high, and highest resource areas of the County. The County will review and ensure that the ADU ordinance is in full compliance with state law and amend the County's ordinance as necessary to ensure ongoing compliance. (Program E9) Environmental Justice Element and Place Based Strategies The Environmental Justice Communities are North Highlands, West Arden Arcade, South Sacramento, and North Vineyard. These communities correspond with areas identified in

Assessment of Fair Housing Identified Issue/Barrier	Contributing Factor/Disproportionate Impact	Meaningful Actions/Metrics
		the Housing Elements as being disproportionately segregated and lower income. The Environmental Justice Element contains Goals and Policies relating to: Increasing youth activities. Increasing job opportunities Increasing access to healthy foods Increase access to safe and sanitary homes These Goals and Policies intend to implement a place-based –strategy that affirmatively furthers fair housing in the High Segregation and Poverty and Low to improve these communities to provide greater access to quality, affordable housing.
Affordable rental options in the region are increasingly limited.	1) Growth in the region—particularly demand for rental housing—has increasingly limited the areas where low income households can live affordably, evidenced by the high rates of households with disproportionate housing needs. This perpetuates the limited economic opportunity that began with segregation. 2) Constraints on affordable housing development and preservation, ranging from lack of funding, the cost of development or preservation, public policies and processes⁷, and lack of adequate infrastructure for infill redevelopment, all constrain the affordable rental market. 3) Suburban areas in the Sacramento Valley are rarely competitive for state or federal affordable housing development funds, further straining the capacity for creation or	Strategy 2a. Encourage reasonable policies for tenant criminal history, rental history, and credit history. Educate landlords and developers who benefit from public funding and development incentives to adopt reasonable policies on tenant criminal history, and to consider applicants with poor rental/credit histories on a case-by-case basis, as detailed in the April 4, 2016 HUD Guidance on Criminal History⁹ Strategy 2b. Increase affordable housing opportunities. Implement strategies that improve progress in meeting the Regional Housing Needs Allocation (RHNA) in all four income levels (very low, low, moderate, above moderate) Strategy 2e. Encourage residential infill opportunities. Increase residential infill opportunities through changes in zoning and long range plans, including opportunities to add to the housing stock through “gentle density”

⁷ Stakeholders discussed a range of public policies and processes that they believe contribute to a lack of affordable rental housing by making it more costly to develop rental housing. In some instances, public policies for environmental review or public comment are wielded by the public to prevent or decrease the density of development. These include CEQA, length of time required to navigate public permitting process (not specific to any jurisdiction; all considered about the same), loss of redevelopment agencies, and prevailing wage requirements.

⁹ https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

Assessment of Fair Housing Identified Issue/Barrier	Contributing Factor/Disproportionate Impact	Meaningful Actions/Metrics
	preservation of affordable rental housing. 4) For residents participating in the Housing Choice or other housing voucher programs, too few private landlords accept vouchers⁸. This leads to concentration of vouchers in certain neighborhoods and lack of mobility for voucher holders. African American and Hispanic households are most likely to experience housing problems (e.g., cost burden, overcrowding, and homes in substandard condition). For those who have vouchers, they are more likely to live in Racially or Ethnically Concentrated Areas of Poverty (R/ECAP neighborhoods) or neighborhoods with lower access to economic opportunity.	(affordable attached homes and innovative housing solutions). Contract with fair housing service providers to provide the Renters Helpline (or an equivalent service), a telephone and web-based resources that provides fair housing education, landlord-tenant mediation, and legal guidance. The Renters Helpline refers complaints of housing discrimination to other fair housing providers and State/Federal agencies involved in fair housing. The County will continue to promote fair housing information and the Renters Helpline through the Fair Housing Information and Resources webpage. The target is for this program will help resolve at least 30 disputes for the County.(Program G3) Tenant Protections: The County will study just-cause eviction ordinances or other programs to help keep precariously housed tenants in their homes and present findings and recommendations to the Board of Supervisors. (Program G5.) Research Options to Remove Barriers to Fair Housing Choice. The County will study Fair Chance Housing Ordinances or other methods to limit the use of criminal records by property owners during the screening of prospective tenants. The County will study best practices for affordable alternatives to up-front payments of security deposits or other prepaid rent such as grants or a low- or no-interest loan to the tenant. The County will present best practices and recommendations to the Board of Supervisors. (Program G6.) Evaluate the effectiveness of the Affordable Housing Ordinance in producing affordable housing units by 2023 and consider amendments based on the evaluation. Increase the effectiveness of the Affordable Housing Ordinance by modifying the owner-builder exemption, which is costly for staff and the public to implement and reduces the amount of funds collected to build affordable housing. Ensure the

⁸ Effective January 1, 2020, SB 329 and SB 322 require landlords to accept Section 8 Housing Choice vouchers, VASH vouchers, and other forms of rent assistance as part of the applicant's source of income.

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		ordinance generates funds equivalent to 10 percent of the new units constructed in the County. (Program E3) Countywide Rezone Program: To accommodate the remaining lower-income RHNA of 2,884 units, the County will identify and rezone at least 164 acres of land to allow multifamily residential uses by-right, at a minimum density of 20 units per acre and a maximum density that allows at least 30 units per acre. The County will rezone sites equivalent to 30 percent of the remaining lower-income RHNA along commercial corridors in High and Highest and moderate resource areas to affirmatively further fair housing choice. (Program A1) Infill Program: The County will further work on a program to encourage infill development in the County that will ultimately increase and accelerate the production of housing by identifying and assessing infill sites and removing identified barriers through accomplishing the following tasks. Incentivizing infill in the moderate, high and highest opportunity areas will enhance housing mobility and affordability in high opportunity areas. Define infill sites. Assess/develop a comprehensive inventory of residential and commercial infill sites. Analyze existing regulations and codes to assess the impediments to development. Develop incentives/strategies to maximize infill opportunities in the unincorporated areas of Sacramento County, especially Environmental Justice Communities and Moderate, High, and Highest Resource areas of the County. Analyze and address disconnects between the Zoning Code and the Design Guidelines. Identify and provide incentives to develop Business Professional Office (BP), Limited Commercial (LC) and Shopping Center (SC) zoned properties with multi-family residential projects. This program targets development of 200 units during the planning period. (Program A6)

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		Grants for Infill Development: The County will continue to pursue grant opportunities that remove or reduce barriers to infill development. Apply for at least one grant per year. (Program A7) Missing Middle Housing (or Naturally Occurring Affordable Housing): The County will consider amendments to the Zoning Code to allow for more missing middle housing (or naturally occurring affordable housing) types in a broader range of zoning districts, including single family zoning districts, and amendments to development standards to accommodate these housing products. This program targets development of 400 missing middle housing units in moderate or high resource areas during the planning period. (Program B8) Rezones, Consolidations/Mergers: The County will consider reducing or eliminating fees for Rezone entitlements to RD-30 and above to facilitate developments where at least 20 percent of the units are affordable. The County will develop siting criteria for these projects. The County will also consider reducing or eliminating consolidation fees for multi-family developments where a consolidation is necessary to facilitate development of the parcels and at least 20 percent of the proposed units are affordable. If these fee reductions are not adopted, the County will implement other measures to streamline or incentivize rezones, consolidations or mergers for developments where at least 20 percent of the units are affordable. This program targets facilitating the development of 250 affordable units (Program B11). See also Programs D10 Tiny Homes and E9 ADU's.
Residents with disabilities need for and lack of access to affordable, accessible housing. Residents with disabilities lack access to supportive services and a spectrum of housing options to	1) Insufficient number of mobility and sensory accessible units affordable to people living on SSI/SSDI (i.e., ADA accessible market rate units are unaffordable to those who need them most). 2) Much of the naturally occurring affordable housing stock is older and	Strategy 2c. Increase housing units that are both accessible and affordable to people with disabilities. Identify strategies for increasing units that are accessible to people with mobility and/or sensory disabilities in housing elements. Increasing accessible opportunities for people with disabilities may include providing resources for accessibility modification of existing units.

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enable them, especially those with mental illness, to achieve and maintain housing stability.	not accessible to residents with mobility disabilities. 3) Lack of transit access outside of the downtown core further limits the pool of accessible, affordable housing options for transit-dependent residents. 1) Lack of affordable housing. 2) Significant state budget cuts since the 1990s with little progress toward funding restoration. 3) Lack of funding for case management, mentors, other peer-supported services to support navigating systems and independent living skill development. 4) Loss of naturally occurring affordable housing options, including boarding homes, other small group living environments.	Strategy 3c. Reduce housing instability by closing service gaps. Partner with mental health, recovery, and disability service providers to develop strategies for filling gaps in services and housing types to prevent housing instability and risk of reinstitutionalization. Financial Assistance for Emergency Repairs and Retrofitting of Homes: The Sacramento Housing and Redevelopment Agency (SHRA) will provide financial assistance for emergency repairs and disabled retrofitting for homes occupied by seniors and lower income residents designed to achieve neighborhood improvement objectives. Priority will be given to funding repairs in Environmental Justice Communities and those sensitive to displacement. Target repair of 432 homes for very low- and low-income households through Emergency Repair Grants and Retrofit Assistance Grants or similar grants. (Program C2) Universal Design: The County will convene a working group consisting of advocates and service providers for people with disabilities and seniors, the Building Industry Association, and other stakeholders to advise the County on a Universal Design program. The program will include an evaluation of the lack of new accessible units, incentives to encourage Universal Design concepts, and targeted outreach to developers. Target the development of 450 accessible units over the Housing Element period. (Program D1) Housing Incentive Program: The County will implement the Housing Incentive Program (HIP) to encourage the construction of affordable housing and housing for special needs groups as identified in State housing element law. The County will consider amendments to the program to further incentivize housing and to meet the housing needs of County residents. The County will also amend the Zoning Code to incorporate changes to State Density Bonus Law. Incentivize multifamily developers to increase the number of affordable units and/or units for special needs groups in their projects. This program targets developing 100 additional units during the Housing Element period. (Program E4)

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		In-Home Supportive Services: The County will continue to administer the In-Home Supportive Services program. This program serves aged, blind, or disabled persons what are unable to perform activities of daily living and cannot remain safely in their homes without help. Supportive Living Uses: The County will amend the Zoning Code related to supportive living uses, including boarding houses, transitional housing, scattered shelters, residential care homes, and nonconforming dwelling units to take a more comprehensive approach to supportive housing consistent with changes to State law to increase housing, especially for special needs groups, including people with developmental disabilities. The Zoning Code amendments are as follows: Amend the Zoning Code to add a definition of “family” and amend the definition of “single household” consistent with the County’s obligation to AFFH. Amend the Zoning Code to allow Low Barrier Navigation Center developments by right in mixed-use zones and nonresidential zones permitting multifamily uses. Amend the Zoning Code to allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater, to be allowed without a conditional use permit or other discretionary review in all zoning districts where multifamily and mixed-use development is permitted consistent with Government Code section 65651. Amend the Zoning Code to include methods to increase housing options for persons with disabilities that have tangible regulatory policies, as required by the U.S. Department of Housing and Urban Development (HUD). Amend the Zoning Code to expand the definition of the existing residential care home category, revise the boarding house category, and create new categories to address non-licensed recovery residences and skilled nursing in-home settings. Amend the Zoning Code to clearly define supportive and transitional housing and ensure

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		these housing types are permitted as a residential use in all zones allowing residential uses subject only to the restrictions that apply to residential dwellings of the same type in the same zone. Amend the Zoning Code requirement to clearly define scattered shelters and facilitate removal of barriers to better address the needs of our homeless population. Amend the Zoning Code to provide consistency with the corresponding regulations administered by the appropriate State agency, with the intention to provide for more efficient regulation of residential related uses. Review and amend the Zoning Code, as necessary, to ensure requirements for group homes of more than six persons are consistent with State law and fair housing requirements. (Program D9)
Stricter rental policies further limit options	1) "3x income requirements" for rental units have a discriminatory effect on persons with disabilities whose income is primarily Social Security and Disability Insurance (SSDI), as well as renters who receive income from "unearned" sources such as child support. 2) Voucher tenants are not protected under California's source of income protections. 3) Onerous criminal background checks that do not take into account severity of a crime or time period in which it was committed disproportionately impact persons of color, persons with mental illness, and persons in recovery.	Strategy 2a. Encourage reasonable policies for tenant criminal history, rental history, and credit history. Educate landlords and developers who benefit from public funding and development incentives to adopt reasonable policies on tenant criminal history, and to consider applicants with poor rental/credit histories on a case-by-case basis, as detailed in the April 4, 2016 HUD Guidance on Criminal History¹⁰. See programs G3. Renters Helpline and G5 Tenant Protections Research Options to Remove Barriers to Fair Housing Choice. The County will study Fair Chance Housing Ordinances or other methods to limit the use of criminal records by property owners during the screening of prospective tenants. The County will study best practices for affordable alternatives to up-front payments of security deposits or other prepaid rent such as grants or a low- or no-interest loan to the tenant. The County will present best

¹⁰ https://www.hud.gov/sites/documents/HUD_OGCGUIDAPPFHASTANDCR.PDF

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		practices and recommendations to the Board of Supervisors. (program G6)
Public transportation has not kept up with growth	Outside of the downtown Sacramento "grid" public transportation has not kept up with regional growth and lacks inner and intra city connections. Costs are high, especially for very low income households.¹¹ A lack of access to affordable public transportation (e.g., routes, connections, days/hours of service) is the 2nd most frequently cited barrier to economic opportunity mentioned by members of protected classes. (Lack of affordable housing was consistently the top barrier identified by residents and stakeholders.)	Strategy 3a. Improve infrastructure and public transportation access in disadvantaged communities (as applicable). Upgrade underground infrastructure that is required to develop residential units. Advocate for or improve the availability and frequency of public transportation to connect disadvantaged communities to jobs, schools and essential services. Seek and Attain Funding for Improved Public Infrastructure. The County will continue to seek and attain funding for improved public infrastructure and services, including water, sewer, curbs, gutter, sidewalks, landscaping, and lighting to revitalize commercial corridors as Notices of Funding Availability (NOFA) are released. Improvements will be prioritized in Environmental Justice Communities and areas sensitive to displacement based on identified needs. This program targets applying for two grants per year. (Program C8)
Educational inequities persist in the region	1) Housing prices near high performing schools and school districts are out of reach for many low and moderate income families. 2) In north and south Sacramento and in Woodland, children from predominantly African American and Hispanic neighborhoods are less likely to attend proficient schools. 3) Impact of 2013 education equity reforms (e.g., Local Control Funding Formula, Smarted Balanced Assessment System, educator prep standards) not yet fully realized. 4) Disparities in discipline/suspension rates of African American, Latino, and special needs children.	Strategy 2e. Encourage residential infill opportunities. Increase residential infill opportunities through changes in zoning and long range plans, including opportunities to add to the housing stock through "gentle density" (affordable attached homes and innovative housing solutions). See Programs A1. Countywide Rezone Program A6. Infill Program A7. Grants for Infill Development B8. Missing Middle Housing (or Naturally Occurring Affordable Housing) B11. Rezones, Consolidations/Mergers E 9. ADU's

¹¹ Note that all community engagement and publicly available data on access to public transit was collected prior to SacRT Forward implementation on September 8, 2019. Implementation should be carefully monitored to assess impacts on members of protected classes and the extent to which this impediment is mitigated with implementation of SacRT Forward.

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Disparities in labor market engagement exist.	1) Unequal school quality across the region disproportionately disadvantages low and moderate income families. 2) Lack of economic investment directed to building skilled earning capacity in communities of color. 3) Lower rates of educational attainment with persons of color. 4) Lack of market rate job opportunities for people with disabilities.	Strategy 3b. Connect low-income residents to job opportunities. Improve connections between low-income populations, especially Public Housing residents, and employment opportunities. This strategy will be implemented, in part, through SHRA's Section 3 program that requires SHRA to ensure that employment, recruitment, and training are directed to public housing residents and other low-income persons, to the greatest extent feasible.