San Mateo County Regional Assessment of Fair Housing

San Mateo County and Participating Partners

FINAL REPORT

Final Report

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San Mateo Regional Assessment of Fair Housing

Prepared for
San Mateo County and Participating Partners

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SECTION I.

Cover Sheet

SECTION II.

Executive Summary

SECTION II.
EXECUTIVE SUMMARY

This section summarizes the main findings from the San Mateo County Regional Assessment of Fair Housing (AFH). Pursuant to HUD's requirements, this Executive Summary:

- Summarizes the primary fair housing issues, significant contributing factors, and goals, and
- Provides an overview of the process and analysis used to reach goals.

It begins with a brief background on the AFH and continues to an overview of the process.

What is an AFH?

An Assessment of Fair Housing, or AFH, is a new approach to identifying fair housing challenges in a city and region. This document differs from the formerly required Analysis of Impediments to Fair Housing Choice (AI) in that it embraces a more comprehensive planning process, focusing on economic, as well as housing, barriers. The AFH is required by the U.S. Department of Housing and Urban Development (HUD) of communities that accept federal housing and community development funding.[1]

The overall goal of the AFH approach is to help communities analyze challenges to fair housing choice and establish their own goals and priorities to address fair housing barriers in their communities. A secondary goal is to help communities move toward an "access to opportunity philosophy" when making planning and housing policy decisions.

The "access to opportunity" focus of the AFH is rooted in the text of the 1968 Fair Housing Act (FHA). According to the July 2015 Final Rule establishing the AFH, "The Fair Housing Act not only prohibits discrimination, but, in conjunction with other statutes, directs HUD's program participants to take significant actions to overcome historical patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination." [2] Many court decisions have supported this interpretation of the FHA.

Jurisdiction v. region terminology. The "jurisdiction" as defined by the AFH is the city or county or groups of cities and counties that receive HUD block grant funds directly from HUD. The cities participating in this AFH are Daly City, Redwood City, the City of San Mateo, and South

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[11] It is important to note that a jurisdiction can be found in violation of the Federal Fair Housing Act independent of receiving HUD funding. While the obligation to further fair housing is a condition of receiving federal housing and community development funds, all other provisions in the Fair Housing Act apply to all residents, businesses, and state and local governments.

[2] https://www.huduser.gov/portal/affht_pt.html#final-rule.

San Francisco. The lead entity is San Mateo County. The Housing Authority of San Mateo County is also a participating partner, along with the Housing Authority of South San Francisco.

For the purposes of the AFH, the "region" used in comparative analysis is the Core Based Statistical Area, or CBSA. CBSA boundaries are set by the U.S. Office of Management and Budget (OMB) and include both metropolitan and micropolitan (smaller consolidated cities) areas. In addition to San Mateo County, the San Francisco CBSA includes Alameda County, Contra Costa County, San Francisco County, and Marin County. San Mateo County makes up about 17 percent of the region's population.

Consistent with the terminology used in the AFFH maps, the CBSA will be referred to as the "region" in this document.

Fair Housing Law and Enforcement

The Fair Housing Act (FHA) was part of the federal Civil Rights Act of 1968. The original language in the FHA prohibited discrimination in the sale, rental and financing of dwellings in housing-related transactions based on race, color, national origin and religion. The FHA was amended twenty years later, in 1988, to prohibit discrimination on the basis of disability or familial status, and to require accessible units in multifamily developments built after 1991.

Developments exempted from the FHA include: housing developments for seniors, housing strictly reserved for members of religious organizations or private clubs, and multifamily housing of four units or less with the owner occupying one unit.

San Mateo County residents are fortunate to have a number of local organizations active in fair housing law. These include Project Sentinel, Legal Aid of San Mateo County, and Community Legal Services. The San Francisco Fair Housing and Equal Opportunity (FHEO) office of HUD and the State of California Department of Fair Employment and Housing also investigate fair housing violations. Contact information for each of these organizations is shown below.

Figure II-1.
Local Resources for Fair Housing Information and Complaints

Name	URL	Phone Number
Project Sentinel	www.housing.org	888-FAIR-HOUSING (888-324-7468)
Legal Aid Society of San Mateo County	http://www.legalaidsmc.org/housing-resources.html	650-558-0915
Community Legal Services of East Palo Alto	http://clsepa.org/	650-326-6440
California Department of Fair Employment and Housing	www.dfeh.ca.gov	
Federal Department of Housing and Urban Development	https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp	

Community Participation Process

The San Mateo County Regional AFH's community participation process resulted in meaningful engagement of more than 4,000 residents and stakeholders representing local organizations and coalitions.

Methods of engagement. The regional AFH engagement methods included opportunities for residents and opportunities for stakeholders to participate in the development of the AFH. Resident opportunities included:

- **Resident survey.** The resident survey was available in online and postage-paid printed formats. Residents could take the survey in English, Spanish, Chinese and Tagalog.

- **Resident focus groups.** BBC facilitated four resident focus groups—one in Spanish; one with Filipino residents; a group with Section 8 voucher holders, including Moving to Work participants; and a focus group with residents with disabilities. Project Sentinel staff facilitated a focus group with African American residents. Refreshments and interpreters were provided and children were welcome to attend. (A search for a child care provider to attend the Spanish language focus group was not successful.) Focus groups were held at locations on days of the week and times of day recommended by local stakeholders who recruited and hosted the groups. Community Legal Services of East Palo Alto (CLESPA) provided $20 grocery gift cards to participants in the Spanish language, Filipino and Section 8 focus groups.

  The study team would like to sincerely thank the Center for Independence of Individuals with Disabilities in San Mateo County, Legal Aid of San Mateo County, Community Legal Services in East Palo Alto, Pilipino Bayanihan Resource Center, Faith in Action Bay Area and El Comité de Vecinos for recruiting and hosting the resident focus groups, identifying locations and referring the team to child care providers and interpreters.

- **Open house community meetings.** Two open house community meetings—one in Daly City and one in North Fair Oaks—were held on Saturday, June 17, 2017. The events were a drop-in open house format featuring a scrolling presentation of information about the AFH and the HUD AFFH-T maps; activities for telling residents' housing stories and an exercise to prioritize desired outcomes of increased fair housing choice and access to opportunity in the region. Interpreters for Spanish, Mandarin and Tagalog speakers were available. Child care and food were provided. Project Sentinel and Legal Aid Society of San Mateo County staffed information tables and provided information about their services. Project Sentinel supplied a door prize given away to a randomly selected attendee in a drawing.

- **Public hearing.** On July 25, 3017, prior to the release of the draft AFH on August 1, 2017, San Mateo County, as the lead jurisdiction, held a public hearing before the Board of County Supervisors that included a detailed presentation of the AFH process, results, fair housing issues identified, and contributing factors.

- **Town hall.** On September 12, 2017 Supervisors Warren Slocum and David Canepa of the San Mateo County Board of Supervisors organized and hosted an event in North Fair Oaks

in order to hear directly from residents about their fair housing issues. Approximately 60 residents attended the evening meeting and shared their experiences and concerns with the Supervisors and their staff. Interpretation services were provided in Spanish as many of the residents were native Spanish-speakers. Snacks and childcare were also provided.

Stakeholder consultation. Stakeholder consultation to developing the draft AFH took several forms, including:

- Advising the AFH team on the planned community engagement process, focus group scheduling and logistics through a series of conference calls;
- Providing feedback on the resident survey instrument;
- Hosting and recruiting focus group participants;
- Using Community Engagement in a Box materials to promote resident community engagement opportunities, share AFFH-T maps with residents, distribute resident surveys and facilitate AFH discussions with residents to supplement jurisdiction outreach efforts;
- Participating in in-depth interviews and providing the study team with program data and studies to inform the AFH elements;
- Ongoing written communications to the lead agency to advise the AFH team of pertinent issues, recommendations for analysis;
- Participating in a kickoff meeting open to all interested stakeholders which included facilitated discussion of fair housing issues and focus groups facilitated by San Mateo County for landlords and affordable housing developers;
- Participating in the community open house meetings;
- Participating in a briefing for housing developers, providers and industry on July 18 on the AFH preliminary findings and goals facilitated by San Mateo County on July 18;
- Participate in a briefing for community organizations, advocates and coalitions on the AFH preliminary findings and goals facilitated by San Mateo County on July 19; and
- Attending the July 25 public hearing before the San Mateo County Board of Supervisors.

The California Apartment Association's Tri-County Division developed and deployed a survey to rental property owners and managers in San Mateo County to support development of the AFH; 150 participated in the survey and CAA Tri-County shared the results with the AFH team.

Community Engagement in a Box. BBC developed a Community Engagement in a Box tool for use by stakeholders to build capacity to engage their clients, consumers and coalition members in the AFH process through promoting and distributing the resident survey, facilitating AFH conversations and focus groups, sharing the AFFH-T maps and using all of the community engagement tools available to AFH participating jurisdictions. Interested stakeholders could

request a Box which included printed surveys in each of the four languages; flyers promoting the online survey, a booklet of AFFH-T maps and instructions for interpreting the maps; and a community conversations discussion guide. BBC facilitated a webinar for participating stakeholders and mailed CE Boxes to 10 organizations.

Findings from this outreach, in addition to the quantitative analysis conducted for the study, were used in the formation of impediments and highest priority fair housing issues.

Summary of AFH Findings

The AFH completed for San Mateo County and participating partners shows the county as a very high opportunity community. The County is diverse racially and ethnically, has few concentrated areas of poverty and segregation, and has a good distribution of quality schools, employment opportunities, and access to transportation.

Yet not all residents have equal access to opportunity and gaps in opportunity are likely to be exacerbated with continued housing market challenges. The primary housing challenges—and who is most affected by the challenges—are described below and summarized in the matrix that follows.

What are the primary fair housing issues in San Mateo County?

Housing affordability is the overriding challenge in the County and affects nearly all residents. Certain residents are more likely to be affected due to historical discrimination, inability to build wealth over time, lower incomes, need for special accommodations (e.g., accessible housing), and large household sizes.

The primary fair housing issues in the County and residents most affected include:

- Segregation although relatively low overall, is highest for African Americans, who were historically discriminated against and originally settled in East Palo Alto.
- HUD data show that African American and Hispanic residents have the highest rates of housing problems (50-60% of households experience housing problems, largely cost burden).[3]
- African American and Hispanic households have almost half the homeownership rate of Whites and Asians.
- The areas that are most integrated have traditionally been the most affordable, have access to low poverty environments, and boast the highest homeownership rates among African Americans. These are also the areas that are changing and undergoing gentrification (Daly City, South San Francisco) and/or are expected to change (East Palo Alto).

[3] Other housing problems captured in this proportion include overcrowding and living in substandard housing, although these make up a very small number of the problems.

- African American and persons with disabilities are overrepresented in public housing, even after adjusting for income. Yet public housing is very limited in the County.
- Hispanic households are overrepresented as voucher holders. The effectiveness of vouchers is limited by extremely tight rental market. Vouchers are concentrated in and around East Palo Alto, where landlords appear more willing to accept vouchers.
- Housing for families—both privately provided and publicly-supported—is very limited, especially large families.
- The survey conducted for this study suggests that Spanish-speaking and large households are disproportionately likely to be displaced from their housing, after controlling for income. The primary reason for displacement is rent increases, followed by "personal reasons" and being evicted.
- African American and Hispanic residents are disproportionately likely to be affected by evictions (both No Cause and Just Cause) according to an analysis of evictions by race conducted by Legal Aid. The threat of eviction can have a "silencing" effect on residents who fear being evicted (undocumented, LEP, foreign-born); they tolerate very poor housing conditions remain housed.
- African American and Hispanic residents also report higher rates of denial for housing and housing discrimination than renters overall.
- African American and Hispanic children have lower access to quality schools.
- Overall, 30 percent of disabled households are living in housing that does not meet their needs. This varies widely by jurisdiction: 53% in East Palo Alto, 45% in South San Francisco, 41% in Daly City, 31% in Redwood City, 24% in the City of San Mateo, and 27% in the unincorporated County.

Positive conditions. There are also many positives about housing conditions in San Mateo County. Compared to the region, the County has far fewer concentrated areas of poverty, better access to employment and good quality schools, and very little segregation, especially relative to its diversity. Compared to other metropolitan areas, San Mateo County, and the region overall, has less concentrated affordable housing—leading to a higher opportunity environment overall.

Contributing Factors to Primary Fair Housing Issues

Contributing factors affecting segregated housing conditions:

- Low overall and lower than the region. Trends suggest movement to moderate for African Americans and Hispanics in some jurisdictions, likely to due to affordability pressures

Contributing factors affecting disproportionate housing needs:

- Lack of a "level playing field" for African Americans who faced decades of discrimination that prevented wealth-building
- "Spillover" effect of severe housing constraints in both San Francisco and Silicon Valley. Challenges associated with fitting a suburban scale landscape into urban scale housing pressures

- Employment growth that significantly outpaces housing development
- Development of an investor-driven market
- Increasing wage gap between workers—those who work in high wage fields (e.g., tech sector) and those working in lower wage fields like the service industry
- Displacement of residents due to market pressures (gap between supply and demand)
- Renting and buying require an unprecedented level of negotiation, economic influence, and flexibility—writing letters to landlords and sellers; leaving jobs to apply for properties, cash offers/overbidding price. Not all home seekers have these skills, particularly if they were raised by parents who didn't have the need to learn such skills.
- Potential discrimination in the rental market based on self-reported denial and discrimination rates of survey respondents; these rates are highest for African Americans and Hispanic residents.
- Rapid onset of crisis. Lack of private sector interest, commitment, and response in addressing housing crisis.

Contributing factors affecting NIMBYism, fair housing enforcement:

- Lack of capacity and effectiveness at the state level; limited funding from some jurisdictions.
- Very limited support for adding density, affordable housing
- Fear of displacement discourages filing of complaints

Contributing factors affecting disability and access:

- Limited first and last mile connections, making public transit inaccessible; limited SamTrans operating hours
- Lack of accessible, affordable housing

Contributing factors affecting disparities in access to opportunity:

- Historical concentration and lack of funding for schools attended by students of color in majority racial or ethnic minority neighborhoods
- Difficulty living near jobs due to high housing costs

The following matrix provides more detail on the primary fair housing challenges and contributing factors, by jurisdiction, and in comparison to the region.

Figure II-2.
Fair Housing Challenges and Contributing Factors

Fair Housing Challenge	Daly City	Redwood City	City of San Mateo	South San Francisco	San Mateo County	Region	Contributing factors	Prioritization
Segregated Housing Conditions (measured by Dissimilarity Index. Only primary factors shown.)								
Non-White/White						Moderate, stable		
African American/White			Significant decline, from moderate to low		Significant decline; approaching moderate	Moderate-high, stable	Decline could be related to loss of both Black and White residents	
Asian/White		Low yet increasing; approaching moderate		Significant decline, from moderate to low		Moderate, trending upward	Lack of housing affordability and housing options throughout county	
Hispanic/White	Low yet increasing; approaching moderate			Low yet increasing; approaching moderate		Moderate, trending upward	Lack of housing affordability and housing options throughout county	
Note: For the DI, lower is less segregation and a decline is a positive trend.								
Disproportionate Housing Needs								
Gaps in Homeownership								
White-African American	15%	49%	36%	33%	34%	28%	Historic lack of access to credit; high housing prices	High. Important to preserve ownership opportunties in Daly City where gap is smallest.
White-Asian	-3%	-5%	3%	-2%	5%	3%		
White-Hispanic	18%	32%	28%	32%	29%	20%	Historic lack of access to credit; high housing prices	High. Important to preserve ownership opportunties in Daly City where gap is smallest.
Denial of Housing - Rental or Ownership								
Residents denied housing to rent or buy in San Mateo County. Denial did not necessarily occur within current community. (% of renters who seriously looked for housing in past 5 years)								
African American	50%	N/A	25%	50%	36%		Income too low	Low; driven by income
Asian	40%	43%	27%	49%	14%		Income too low	Low; driven by income
Hispanic	40%	31%	50%	42%	26%		Income too low	Low; driven by income
White	8%	32%	27%	38%	21%		Income too low	Low; driven by income
Disability	32%	55%	33%	55%	37%		Income too low	Low; driven by income
LEP	N/A	24%	62%	N/A	24%		Income too low	Low; driven by income
Housing Problems (% with problems)								
African American	54%	58%	56%	62%	54%	56%	High housing costs	High
Asian	55%	38%	42%	44%	43%	45%	High housing costs	High
Hispanic	62%	70%	64%	58%	61%	59%	High housing costs	High
White	41%	39%	39%	31%	36%	38%	High housing costs	High
Small families	49%	43%	38%	36%	36%	39%	High housing costs	High
Large families	73%	78%	71%	67%	63%	63%	High housing costs	High
Non-family (roommate, living alone)	53%	47%	47%	49%	45%	48%	High housing costs	High

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Figure II-2.
Fair Housing Challenges and Contributing Factors (Cont'd.)

Fair Housing Challenge	Daly City	Redwood City	City of San Mateo	South San Francisco	San Mateo County	Region	Contributing factors	Prioritization (recommendation)
Housing Problems (% with severe problems)								
African American	27%	27%	22%	35%	28%	33%	Generally better than the region due to historically lower housing costs in some San Mateo areas.	High; critical need to add to the publicly subsidized housing stock to alleviate high cost burden.
Asian	33%	17%	21%	23%	24%	25%	Good access to ownership in Daly City, but need to stretch to own	High; critical need to add to the publicly subsidized housing stock to alleviate high cost burden.
Hispanic	39%	48%	44%	35%	42%	38%		High; critical need to add to the publicly subsidized housing stock to alleviate high cost burden.
White	22%	19%	19%	14%	17%	19%	Better long term access to capital and wealth building	High; critical need to add to the publicly subsidized housing stock to alleviate high cost burden.
Precariously Housed								
Staying with friends or family (not on lease or property title)	13%	15%	6%	17%	11%	19%	Generally more affordable than the region.	
Staying in shelter/transitional housing	2%	5%	3%	6%	2%	4%		
Face NIMBY challenges								
Support for low income housing (general)	Low	Best support (although still low)	Low	Low	Low	Better than in county/cities		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for apartments	Low	Best support (although still low)	Low	Best support (although still low)	Lowest	Better than in county/cities		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for residential treatment facility	Very low	Very low	Very low	Very low	Very low	Better than in county/cities		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for housing for persons with disabilities	Low	Low	Low	Low	Low	Consistent with county and cities		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for neighbors of different races/ethnicities	Lowest	Moderate	Moderate	Lowest	Moderate	Higher NIMBYism		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for neighbors of different religion	Lowest	Moderate	Moderate	Moderate	Moderate	Higher NIMBYism		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Support for neighbors based on sexual orientation	Lowest	Moderate	Moderate	Moderate	Moderate	Consistent with county and cities		High. Educational initiatives and partnerships with employers will be critical to reducing continued NIMBYism.
Renter Displacement								
Current renters who experienced displacement in past 5 years in San Mateo County. Displacement did not necessarily occur within current community. (% of renters)	25%	43%	30%	42%	38%	32%	Very low rental vacancies, growth employment, increasing rents	High, especially in addressing evictions in remaining affordable areas in the county.
Primary reason for displacement (% displaced respondents)	Rent increased more than I could pay	Rent increased more than I could pay	Rent increased more than I could pay	Rent increased more than I could pay	Rent increased more than I could pay	Rent increased more than I could pay	Very low rental vacancies, growth employment, increasing rents	High, especially in addressing evictions in remaining affordable areas in the county.
Incidence of displacement due to eviction (no cause + just cause)	Slightly more than 1 in 10	Slightly more than 1 in 10	Less than 1 in 10	Less than 1 in 20	Less than 1 in 10	About 1 in 20	Very low rental vacancies, growth employment, increasing rents	High, especially in addressing evictions in remaining affordable areas in the county.

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Figure II-2.
Fair Housing Challenges and Contributing Factors (Cont'd.)

Fair Housing Challenge	Daly City	Redwood City	City of San Mateo	South San Francisco	San Mateo County	Region	Contributing factors	Prioritization (recommendation)
Self-Reported Housing Discrimination in San Mateo County								
African American	21%	47%	44%	61%	29%	N/A	Discrimination based on race, disability	High
Asian	9%	15%	9%	15%	10%	N/A	Discrimination based on race, disability	Moderate
Hispanic	27%	28%	31%	25%	16%	55%	Discrimination based on ethnicity, familial status, disability	High
White	8%	10%	14%	10%	10%	19%	Discrimination based on familial status, disability	Moderate
Disability	26%	54%	34%	38%	26%	43%	Discrimination based on disability	High
LEP	N/A	24%	44%	33%	8%	N/A	Discrimination based on ethnicity, language	High
Disability and Access								
Home does not meet accessibility needs	41%	31%	24%	45%	25%		Lack ofaffordable, accessible housing; insufficient resources for home modification	High, especially for Daly City and South San Francisco
First and last mile connections					Countywide		Incomplete sidewalk routes; inaccessible sidewalks	Moderate; very dependent on funding
Transportation challenges					Countywide		SamTrans paratransit pickup wait times	Moderate; very dependent on funding
Access to Opportunity								
Low poverty neighborhoods								
African Americans	High access, even if living in poverty	Moderate access, even if living in poverty	High access, even if living in poverty	Moderate access, even if living in poverty	Moderate access, even if living in poverty	Moderate for all; low for African Americans living in poverty	Lack of concentrated poverty in county overall compared to the region	
Asian residents	High access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	High acces, even if living in poverty	High for all; moderate for Asians living in poverty	Good access to housing in high opportunty environments. Generally good access to housing in high opportunity areas.	
Hispanic residents	High access, even if living in poverty	Moderate access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	Moderate-high, even if living in poverty	Moderate for all; low for Hispanics living in poverty	Good access to housing in high opportunty environments. Generally good access to housing in high opportunity areas.	
White residents	High access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	High access, even if living in poverty	High for all	Good access to housing in high opportunty environments. Generally good access to housing in high opportunity areas.	
High quality schools								
African American children	Moderate-high access, even for low income children	Low-moderate despite income level	Moderate-high access, except for low income children (low-moderate)	Moderate-high; lowest for African American children in poverty	Low-moderate despite income level	Low-moderate despite income level	School access is generally better in county than region except for in a few neighborhoods in Redwood City	
Asian children	Moderate-high access, even for low income children	High, even for low income	Moderate-high access, even for low income children	Moderate-high access, even for low income children	High, even for low income children	Moderate despite income level	School access is generally better in county than region except for in a few neighborhoods in Redwood City	
Hispanic children	Moderate-high access, even for low income children	Low-moderate despite income level	Moderate-high access, even for low income children	Moderate-high access, even for low income children	Moderate despite income level	Low-moderate despite income level	School access is generally better in county than region except for in a few neighborhoods in Redwood City	
White children	Moderate-high access, even for low income children	Low-moderate despite income level	Moderate-high access, even for low income children	Moderate-high access, even for low income children	High, even for low income children	Moderate-high despite income level	School access is generally better in county than region except for in a few neighborhoods in Redwood City	

Figure II-2.
Fair Housing Challenges and Contributing Factors (Cont'd.)

Fair Housing Challenge	Daly City	Redwood City	City of San Mateo	South San Francisco	San Mateo County	Region	Contributing factors	Prioritization (recommendation)
Transportation (access to low cost)	Very high access for all residents	Very high access for all residents	Very high access for all residents	Very high access for all residents	Very high access for all residents	Very high access for all residents	Very good transportation systems in region	
Job centers	Low access for all residents	Low-moderate except for African Americans (high access)	Moderate except for African Americans (high access)	Low-moderate for all residents	Moderate across races and income levels	Moderate across races and income levels	In some communities, employment opportunities are lacking and workers must commute outside of the city	
Labor market engagement, skills, education	Moderate-high for all residents, even for low income residents	Moderate-high for all residents; highest for Asian and White residents	Moderate-high for all residents, even for low income residents	Moderate-high for all residents; highest for Asian and White residents	Highest for Whites, second highest for Asians, moderate for African Americans and Hispanics	Highest for Whites, second highest for Asians, low-moderate for African Americans and Hispanics	Workers who can afford to live in San Mateo County and relatively employable	

Note: Challenges shaded in grey are greater than the region and relatively high; those in light blue are lower (better) than the region.
Asian includes Pacific Islander.
Source: BBC Research & Consulting.

Goals and Strategies

To address the fair housing challenges, San Mateo County and the participating jurisdictions will do the following:

FAIR HOUSING PLAN - San Mateo County

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Continue to dedicate Affordable Housing Fund (Measure K) dollars to the development of publicly-supported affordable housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Gap in homeownership rate for African American and Hispanic households; Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; High rates of denial of housing for African American and Hispanic households	San Mateo County Department of Housing and Board of Supervisors	Allocate $32.5M in County Measure K funds over two years to the Department of Housing for the creation or preservation of below market rent, deed restricted affordable housing units.	FY 18 and FY 19
Goal No. 2. Continue to support the addition of publicly supported housing units - housing with affordability restrictions - to the market.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing and Board of Supervisors	Begin construction on 600 units of County-subsidized, affordable housing throughout the county. Units will typically serve households earning up to 60% of AMI. Units will typically be income-restricted for a period of 55 years. Ensure that recipients of funds have strong affirmative marketing plans.	By end of FY 19
Goal No. 3. Continue to support the addition of publicly supported affordable housing units located near transit	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing	Include preference criteria within funding NOFAs that favor projects a) sited within easy walking distance of services, amenities, and transit; and/or b) submitting applications for Affordable Housing and Sustainable Communities (AHSC) funds	Through FY 22
Goal No. 4. Support the development of larger publicly-supported affordable housing units (2 - and 3- bedroom units, or larger)	Limited housing for families	Disproportionate housing needs	San Mateo County DOH and Housing Authority of San Mateo County	Include units for larger families (two- and three bedroom units, or larger) in the Preference Criteria for San Mateo County's Affordable Housing Fund allocations. Prioritize the development of family-sized units in the Request for Proposal for Midway/Bayshore Redevelopment Project.	FY 17-18
Goal No. 5. Continue to support the development of publicly-supported housing for County Clients - residents with special needs (experiencing homelessness, frail elderly, mental health issues, substance abuse issues)	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing, Health Plan, Behavioral Health and Recovery Services, and Probation, Human Service Agency	5% of units receiving County subsidy in FY 18 and FY 19 will be targeted towards County Clients	FY 18 and FY 19
Goal No. 6. Continue to support the development of publicly-supported housing for Extremely Low Income Households	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for low income housing	San Mateo County Department of Housing	10% of units receiving County subsidy in FY 18 and FY 19 will be targeted towards extremely low income households (earning up to 30% of AMI)	FY 18 and FY 19
Goal No. 7. Support the development of publicly-supported affordable housing for Transition-Aged Youth	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Human Services Agency	HSA to provide DOH with $1.3M in Measure A/K funds to finance the creation of up to 18 units of permanent affordable housing targeted towards transition-aged youth. Funds to be allocated to a developer via Notice of Funding Availability.	FY 18 and FY 19
Goal No. 8. Continue to support the development of publicly-supported affordable housing for Behavioral Health Recovery Services Clients	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Behavioral Health and Recovery Services	BHRS to provide DOH with ~$1M in Measure A/K funds to finance the creation of up to 6 units of permanent affordable housing targeted towards BHRS clients. Funds to be allocated to a developer via Notice of Funding Availability.	FY 18 and FY 19
Goal No. 9. Continue to support the development of publicly-supported affordable housing for CA Mental Health Services Act-eligible households	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Behavioral Health and Recovery Services and CA HCD	Develop plan for CA HCD No Place Like Home funds and release corresponding NOFA	FY 18 - develop plan. FY 19 - Release NOFA
Goal No. 10 Support the development of workforce housing	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	HEART, Home for All, San Mateo County DOH, County Manager's Office	Provide HEART with $5M in Measure K seed funds and technical assistance to 1) leverage County commitment with investment from additional jurisdictions and other investor partners 2) Support development of affordable and workforce housing through predevelopment, acquisition, preservation, bridge, and construction loans	FY 17-19

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 11. Explore a multifamily rehabilitation and accessibility improvement program using CDBG revolving loan or other public funds to provide an incentive for landlords to participate in the HCV program.	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities	HACSM and San Mateo DOH and Daly City	Complete analysis and determine program feasibility	FY 18
Goal No. 12. Research and implement best practices around supporting naturally occurring affordable rental housing.	Loss of affordable housing; Displacement of residents	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	San Mateo County DOH and 21 Elements	21 Elements to release final report on Displacement and Displacement prevention tactics which includes a discussion of "tenants' right of first refusal" in the No Net Loss Policy section. Jurisdictions to review, discuss, and implement as appropriate.	Release report FY 18. Discussion and Implementation to follow report release.
Goal No. 13. Research and implement best practices around subsidy loan terms for publicly-supported affordable rental housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing, Board of Supervisors	DOH staff to review current loan terms, research best practices, and make recommendations to revise terms as seen fit. Example: review of requirements around restrictive covenants on CDBG funding.	Through FY 22
Goal 14. Begin planning and determine site assembly process for publicly-owned land. Establish criteria for development (for inclusion of RFPs).	High housing costs due to land costs	Disproportionate housing needs: Lack of accessible housing for persons with disabilities; high rates of denial of housing for African American and Hispanic households	San Mateo County Department of Housing, City of Redwood City, and San Mateo County Manager's Office, South San Francisco, San Mateo County Planning and Building Dept, Real Property Services	Issue RFPs and select developers for two County-owned sites - Midway Village and Middlefield Junction - for development of affordable housing units. Issue RFQ/P for master planner to evaluate additional site(s) for appropriateness of housing development.	FY 18
Goal No 15. Support Affirmatively Further Fair Housing throughout the entire county regardless of HUD entitlement status.	Disparate efforts to address critical housing needs	Regional housing planning	San Mateo County DOH and urban county jurisdictions	Prepare and execute a new Cooperative Agreement between the County and the non-entitlement cities within the County to add additional language (per HUD) compelling jurisdictions to abide by the Fair Housing Act and affirmatively further fair housing	FY 17-18
Goal No. 16. Continue to fund and support outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs: Gap in homeownership rate for African American and Hispanic households; Displacement due to rent increases for Spanish speaking and large households	San Mateo County DOH	Support five public service organizations that serve approximately 2,200 household per year. Provide funding up to $200,00 annually	Annual contingent on continued HUD funding allocation
Goal No. 17. Provide additional funding to support outreach services for renters at risk of losing their homes and/or having disputes with their landlords	Disproportionate housing needs; Displacement of residents	San Mateo County Board of Supervisors and DOH	San Mateo County Board of Supervisors and DOH	Support public service organizations that serve vulnerable low-income households by providing referrals, "rapid rehousing", fair housing counseling, and other services. Provide up to $977,000 over two years to supplement support services funded by HUD.	FY17-19
Goal No. 18. Continue and strengthen regional affordable housing planning.	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	Home For All, San Mateo County Housing and Planning Departments, 21 Elements, Housing Leadership Council	Home for All to update local housing policy status tracker on Home For All website. Home for All to launch RHNA sharing pilot legislation for San Mateo County. 21 Elements to support Decision Maker Events with coordination from Home for All and Housing Leadership Council to educate decision makers about housing issues.	Decision Maker Events: twice a year, during housing leadership day and affordable housing week. Housing policy tracker: June 2017 RHNA sharing pilot legislation: February 2018
Goal No. 19. Continue efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	County Manager's Office, Home For All, San Mateo County DOH, and County Library, 21 Elements	Launch Community Engagement Pilot Projects to test out new approaches to community engagement on housing. Launch County Library American Conversations Project which will include conversations regarding housing. 21 Elements to produce handout "How Housing Fits" on that presents a continuum of housing design, types, and density ranges that inform strategies to increase housing stock.	Community Engagement Pilot Projects: Fall 2017 American Conversations Project: October 2017 How Housing Fits handout: Spring 2018
Goal No. 20. Continue efforts to foster collaboration among jurisdictions regarding local challenges to housing, community engagement strategies, encouraging new housing development	Disparate efforts to address critical housing needs	Regional housing planning	County Manager's Office, Home For All, San Mateo County DOH, 21 Elements	Home for All launches bi-monthly Learning Network, bringing together elected officials and staff from all 21 County jurisdictions for information sharing, pilot project updates, research, best practices, and other learning opportunities. The group will discuss challenges and successes around group-identified pressing topics such as ADU's, reducing parking impacts of new housing, and partnering with school districts to evaluate the possibility of using surplus school district land for future housing development.	FY 17-18 meeting calendar set. Future meeting dates to be determined.

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 21. Continue regional efforts to develop program to encourage and assist with construction of new, permitted ADUs to increase supply of naturally occurring affordable housing (NOAH)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	San Mateo County Department of Planning and Buildings, Department of Housing, County Manager's Office, Home For All, 21 Elements	Present final ADU ordinance for adoption by the Board of Supervisors. Complete extensive marketing and outreach to public. Share ordinance and outreach best practices with other 20 County jurisdictions via 21 Elements and Home for All. Work with lenders to develop ADU loan product for construction of new ADUs.	Board adoption of ordinance in FY 18
Goal No. 22. Continue regional efforts to develop ADU certification program targeted toward owners of non-permitted accessory dwelling units (ADUs) to improve the quality of naturally occurring affordable housing (NOAH)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	San Mateo County Department of Planning and Buildings, Department of Housing, County Manager's Office, Home For All, 21 Elements	Develop and roll out ADU Certificate program. Select loan program administrator via RFP, develop and roll out loan program. Complete extensive marketing and outreach to public. Share Certificate and Loan Program Best practices with other 20 County jurisdictions via 21 Elements and Home for All.	FY 18 and FY 19
Goal No. 23. Explore strategic partnerships with CDFI's, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units.	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	San Mateo County DOH and HEART	Creation of leverage, acquisition, or other appropriate fund	Through FY 22
Goal No. 24. Improve access to high quality education opportunities for vulnerable students, particularly Latino and black children	Disparities in education for Latino and African American children	Access to high proficiency schools	Peninsula Partnership Leadership Council (includes San Mateo County Superintendent of Schools and Board of Supervisors, Silicon Valley Community Foundation, other partners) and ~300 funders	A) Pilot "Big Lift" initiative focused on improving educational attainment for pre-K through 3rd graders by focusing on: (1) sending kids to kindergarten who are ready to learn, (2) making sure they attend school regularly, (3) supporting learning at home, and (4) providing enriching summer experiences so they don't fall behind. Fulfill fundraising campaign of $50M (currently at $28M raised), complete proof of concept phase, evaluate continuation and expansion. B) Administer the Summer Learning Challenge program through the library system in order to a halt the "summer slide," or the loss in some of the achievement gains students made during the school year. The summer slide disproportionately affects students from families with low incomes.	FY 17-22
Goal No. 25. Caltrain as an independent agency will assume jurisdictional leadership in partnership with other agencies in the furtherance of the implementation of goals and objectives of Caltrain Strategic Plan FY 15-24	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain	Improve multimodal station access: 1) Develop a station access plan based on the Caltrain Access Policy Statement; 2) Reduce the incidence of "bike bumps" by complementing the bikes onboard program with improved capacity information and wayside improvements (e.g. secure parking and expanded bikeshare); 3) Pursue strategies that enhance first- and last-mile connections to stations. Improve connectivity to local and regional transportation systems: 1) Explore mutually beneficial ways to plan and coordinate services with local transit providers; 2) Prioritize partnerships and efforts related to key intermodal stations including the Transbay Transit Center, Millbrae and San Jose Diridon; 3) Improve physical, electronic and web-based intermodal way finding and transfer information; 4) Participate in and influence regional initiatives related to the integration of fares and payment, information systems and marketing	FY 24
Goal No. 26. Continue to convene meetings between SamTrans and disability advocates to discuss how to address barriers to transit access. Explore partnerships with private providers of transportation services to better address the transportation needs of persons with disabilities.	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Party: SamTrans, SamTrans Board, Citizens Advisory Committee, Paratransit Coordinating Council	The Citizens Advisory Committee and the Paratransit Coordinating Council will continue monthly reporting to the SamTrans Board regarding concerns raised during formal and informal meetings with the disability community. Needs of the disabled community will continue to be incorporated into all service and development planning.	Ongoing
Goal No. 27. Encourage transit-supportive development at and around transit and explore preferring or requiring development within Priority Development Areas (PDAs). Any transit agencies listed as a responsible party will assume jurisdictional leadership in partnership with other agencies in the furtherance of the goal(s).	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain, San Mateo County DOH, SamTrans, SMTA	Caltrain to: 1) Adopt a transit-oriented development policy; 2) Participate in and influence local station area planning efforts along the corridor; 3) Develop JPB real estate assets in a way that supports the system financially and operationally with local land use goals; 4) Develop land use policy. DOH to: 1) require that all developments eligible for County funding be located near transit and 2) Research including a requirement or preference for DOH-funded development projects to be located within a PDA, incorporating into future funding NOFAs if appropriate. SamTrans to develop land near the San Carlos Caltrain station as a mixed-used TOD with 202 dwelling units and commercial space.	Caltrain metrics: FY 15-24. DOH metrics: FY 17-18. SamTrans metrics FY 22.

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 28 Strengthen ties between Housing and Transportation Agencies	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	San Mateo County DOH, C/CAG, MTC, County Manager's Office, Home for All, SamTrans, 21 Elements	County to convene Quarterly funding and pipeline meetings to discuss strategic partnerships	FY 18
Goal No. 29 Caltrain as an independent agency will assume jurisdictional leadership in partnership with other agencies to complete the Caltrain Business Plan	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain, VTA, MUNI, SAMTRANS, MTC, Bay Area Council, Samceda, SVLG, and key local business leaders	The Caltrain Business Plan will form the framework for a 2020 ballot measure that seeks to resolve funding deficiencies at the railroad and will answer the following questions: * What infrastructure is needed to support that service ? * How much funding will be needed? * How should Caltrain be governed to successfully meet the region's need for expanded rail service? address the following issues: * How much service should Caltrain provide to accommodate our regional needs?	kickoff Workshop 9/20/2017. Complete by end of FY 19
Goal No. 30. SamTrans as an independent agency will assume jurisdictional leadership in partnership with other agencies to complete the SamTrans Business Plan	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	SamTrans	The SamTrans Business Plan will form the framework for a ballot measure in 2018 to address funding deficiencies the agency is facing, particularly with respect to the need for new and more effective paratransit models. The plan will: 1) Build upon the SamTrans Strategic Plan and the SamTrans Short Range Transit Plan (SRTP) to enhance and complement them. 2. Incorporate the fundamentals of being a mobility manager, including everyday matters such as service planning and organizational management. 3. Encourage the agency to embrace an attitude of innovation as a mobility manager as it responds to a changing marketplace. This includes being open to: o Experimenting to find the right mix and type of services. o Exploring organizational improvements to position the District as a mobility manager.	Draft Plan to be submitted to Board in January 2018
Goal No. 31 Explore relevance of past and feasibility of future air quality studies	Poor air quality in many areas of the County	Access to environmentally healthy neighborhoods	County Office of Sustainability, Bay Area Air Quality Management District	County to meet with the Bay Area Air Quality Management District regarding past and future studies of air quality at Highway 101 and other congested roadways. Explore the feasibility and soundness of completing a study on this issue.	By end of FY 2018

FAIR HOUSING PLAN - Housing Authority of the County of San Mateo

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Maintain high voucher utilization rate	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	•Collaborate with affordable housing developers to secure additional project-based units, up to 35% of HACSM's voucher allocation. •Outreach to landlord community on an ongoing basis and host landlord event at least annually. •Allocate $250,000 for the Leasing Success Program to support housing locator services and landlord incentives. •Continue to host Renting Success workshops for voucher holders to prepare them in their housing search. •Continue to analyze subsidy calculation methodology	35% of HACSM's voucher allocation to be achieved by 2022.
Goal No. 2. Maintain high level of customer service	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	•Continue to work with program partners to provide resource assistance and guidance for customers. •Analyze survey data from the AFH to evaluate internal processes in order to provide more efficient services to voucher holders experiencing difficulty.	9/30/2018
Goal No. 3. Increase the subsidy calculation for Section 8 vouchers	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	HACSM implemented a new subsidy table effective 8/1/17. The new table increased subsidy amounts in all unit and income categories, averaging $309 per household, or 13.25% higher than the previous amounts.	8/1/2017

FAIR HOUSING PLAN - Daly City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more ownership housing with affordability restrictions to the supply of housing.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs; Gap in homeownership rate for African American and Hispanic households; Risk of losing ownership advantage for African American and Hispanic households as city gentrifies. Although Daly City has the smallest gap, there is a risk that the gap will increase if affordable ownership opportunities are not sustained	DCHCD (Daly City Housing & Community Development Division)	1. Enter into affordable housing agreements, per the City's Affordable Housing Ordinance, to require market rate developments of ownership housing to set aside and deed restrict up to 20% of the units for households at 120% AMI. 2. Develop up to 8 units with Habitat for Humanity affordable to households at 80% AMI.	1. 1-5 years; 2. 1-3 years
Goal No. 2. Add more rental housing with affordability restrictions to the supply of housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; High rates of denial of housing for African American and Hispanic households	DCHCD	Provide at least $2 million in City affordable housing funds to develop 50 rental units affordable to lower income households.	5 years
Goal No. 3. Preserve homeownership access. Daly City offers more equity in ownership across races than any other city.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs: Risk of losing ownership advantage for African American and Hispanic households as city gentrifies	DCHCD	Downpayment assistance, silent second loans.	1-3 years
Goal No. 4. Fund rehabilitation and accessibility improvements for low income homeowners (< 80% AMI).	Lack of accessible housing; Housing built in period where split level, stairs, and small hallways were common	Disproportionate housing needs: 41% of residents with a household member with a disability need acessibility improvements	DCHCD	Rehab and provide accessibility improvements annually to 15 low income homeowners.	Annually during the next Consolidated Plan period; 75 households total
Goal No.5. Adopt zoning policies that incentivize lot mergers to facilitate residential developments.	Lack of flexibility in zoning code	Disproportionate housing needs	DC Planning	Lot merger incentive allowance incorporated into Zoning Ordinance	Completed by 2021
Goal No. 6 . Develop rental acquisition program.	Loss of affordable rentals; Lack of affordable housing supply; Displacement of low income residents due to rent increases; Conversion of existing naturally occurring affordable rentals to investment properties	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	DCHCD	Working with public and private sector partners, explore creation of a loan fund for rental property acquisition. Time the fund to take advantage of the properties owned by small, "mom and pop" landlords, who are aging.	Determination of feasibility completed in 2019
Goal No. 7 (regional). Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program and those willing to offer naturally occurring affordable rental housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	HACSM and San Mateo DOH and Daly City	Complete analysis and determine program feasibility	2018
Goal No.8 (regional). Continue efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	DCHCD, San Mateo County, Home for All	Participation in regional workshops and conferences to address barriers to affordable housing.	Annually
Goal No. 9. Maintain funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	DCHCD	Provide legal assistance annually to low income homeowners facing eviction. Provide fair housing counseling to 10 persons annually.	1-5 years

FAIR HOUSING PLAN - Daly City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal. No. 10 (regional). Strengthen utilization of Section 8 program. Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of Daly City staff	Collaborate with County Housing Authority and other local jurisdiction staff to review current practices and potential options. Complete analysis and determine program feasibility .	Ongoing
Goal No. 11. Consider implementation of fair housing audit program	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: displacement of residents	City of Daly City staff	Collaborate with other jurisdictions and evaluate costs and benefits of a fair housing audit program	Submit fiindings to City Council by September 2018.

FAIR HOUSING PLAN - Redwood City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. (also regional) Add affordable housing to the market. Prioritize housing that accommodates families (larger units).	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City, San Mateo County	Implement polices that produce estimated 50 affordable housing units from sources such as Affordable Housing Fund, CDBG and HOME Funds on an annual basis.	Estimated completion by December 2020
Goal No. 2. Support the development of affordable senior housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City	Produce 100 units of affordable housing for very-low income seniors.	Estimated completion by December 2021
Goal No. 3. Prioritize acquisition and new construction of special needs housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City	Produce 50 units of affordable housing for low income disabled adults.	Estimated completion by September 2018
Goal 4. Continue to fund rehabilitation and accessibility improvements for low income homeowners to preserve existing affordable housing.	Lack of accessible housing	Disproportionate housing needs: 30% of residents with a household member with a disability need accessibility improvements.	City of Redwood City, nonprofit organizations	Continue to fund the City's Home Improvement Loan Program that assists low-income homeowners and property owners. Assist no less than 10 units annually with rehabilitation and improvements through the City program and/or minor home repair programs.	Annual contingent on continued HUD funding allocations
Goal 5 (regional) .Continue supporting organization(s) that provide outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of Redwood City, San Mateo County	City to provide referrals and continue to support organizations that provide legal assistance, landlord tenant mediation and outreach, education and fair housing audits. Collaborate to collect data on displacements.	1-5 years
Goal 6. Ensure affirmative marketing of City assisted affordable housing is targeted to all segments of the community.	Lack of awareness of effective affirmative marketing strategies	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of Redwood City	Continue to collaborate with developers of affordable housing projects during final phase of construction to develop effective affirmative marketing plans. Encourage marketing in Spanish.	Varies with project.
Goal 7. (regional) Support and engage in efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of Redwood City, San Mateo County, Home for All, Housing Leadership Council	Apply to County Community Engagement Pilot Program and participate in Countywide Home For All "Learning Network" to share best practices. Participation in regional workshops and conferences to address barriers to affordable housing.	Submit application to County program by Summer 2017 and ongoing with Learning Network.
Goal 8. (regional) Encourage development of Accessory Dwelling Units (ADU) to increase lower cost housing in the community.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	City of Redwood City	Review Accessory Dwelling Units production annually and continue collaboration with 21 Elements to develop programs to encourage production of units.	Ongoing
Goal 9. (regional) Minimize displacement of low income renters, and increase units available to them. Regional: Analyze lessons learned from pilot programs regarding successes and challenges of preserving rental housing at risk of redevelopment and rent increases.	Loss of affordable housing; Displacement of residents	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	City of Redwood City, County of San Mateo	Continue efforts to develop polices for displacement, such as minimum lease terms, first right to refusal and relocation assistance. Explore programs to incentivize Section 8 landlords.	Ongoing

FAIR HOUSING PLAN - San Mateo City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more City supported housing with affordability restrictions to the market.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	1) Bay Meadows Project-68 units 30-50% AMI 2)Select developer to provide a range of affordable housing units as part of mixed use/income project on City owned Downtown former RDA sites.	1) Bay Meadows completion by December 2019. (17 large family units, 12 disabled veterans units) 2) Downtown site completion by December 2021.
Goal No.2. Attempt to distribute affordable housing units throughout the City and encourage mixed income developments.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Community Development	Require all new housing projects in excess of 11 units provide affordable inclusionary units scattered within project.	Affordability agreement executed as condition of building permit.
Goal 3. Ensure affirmative marketing of City assisted affordable housing is targeted to all segments of the community.	Lack of awareness of effective affirmative marketing strategies	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	Develop Marketing Plan with developers of affordable housing projects during final phase of construction. Focus outreach to those least likely to apply based on racial make-up of neighborhood. Include Spanish marketing materials and ensure bilingual interpration services are available.	Varies with project.
Goal No. 4. Prioritize acquisition and new construction of housing that accommodates families (larger units) when possible.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	City of San Mateo Housing Division	1) Bay Meadows Project-requires 25% 3 BR units (17 units) 2)Review City Council Resolution to establish Community Priority for large bedroom units, which allows developer to provide fewer BMR units in exchange for units with more bedrooms.	1) Bay meadows completion by December 2018. 2) Annual Council BMR resolution adopted upon publication of California median income
Goal 5. Fund minor home repairs and accessibility improvements for low and moderate income homeowners. Allow accessiblity improvements on rental properties with owner permission.	Lack of accessible housing	Disproportionate housing needs: Percent of residents with a household member with a disability needing accessibility improvements is lowest in San Mateo City; this hopes to preserve that.	Sub contractors to City of San Mateo (CIID, Rebuilding Together, El Conciio)	Annual Goal: 10 Accessible units and 32 Minor Home Repair units.	Annual Goal completed each year by June 30.
Goal 6. Adopt additional development review practices that facilitate housing creation including streamlining reviews.	Challenges with development approval process; Lack of support for affordable housing creating barriers to approval	Disproportionate housing needs	City of San Mateo Building Division	Draft guidelines for concurrent Planning Plan Check and Buidling Permit Check process to speed up approval process to begin construction.	Complete Guidelines by December 2017.
Goal 7. (regional) Support and engage in efforts to education community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of San Mateo Community Development Department	1)Continue Community engagement process for Downtown Specific Plan Update. 2) Develop Coummunity Engagement process for General Plan update. 3) Participate in Countywide Home For All "Learning Network" to share best practices	1) Continue Downtown outreach efforts throuugh December 2017. 2) Discuss project scope and timeline at Council Study Session by December 2017. 3) TBD as
Goal 8 (regional).Strengthen utilization of Section 8 program. Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing	1) Collaborate with County Housing Authority staff to review current practices and potential options. Complete analysis and determine program feasibility . 2) Explore Section 8 nondiscrimination policy.	1) Ongoing 2) Submit findings to City Council by June 2018.
Goal 9. Assist with the retention of special needs housing that is at risk of expiring affordability requirements.	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	City of San Mateo Housing	Outreach and negotiate with Mateo Lodge for affordability extenisons for Humboldt House (9 units)	Execute extension by January 2020.
Goal 10. (regional) Continue funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	Sub Contractors to City of San Mateo (Project Sentinel, Legal Aid)	Annual Fair Housing Activity Goals: Investigate 23 cases, Provide R & I 45 individuals, Public Education/ Outreach 100 individuals. Annual legal assistance to renters: 125 individuals	Annual Goal completed each year by June 30.

FAIR HOUSING PLAN - San Mateo City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal 11. Continue implementation of City Reasonable Accommodation Policy to allow for relaxation of City zoning codes on residential properties used by persons with disabilities.	Lack of flexibility in zoning code	Disproportionate housing needs: Lack of accessible housing for persons with disabilities	City of San Mateo Planning	Review requests for Reasonable Accommodations as they are submitted.	Ongoing
Goal 12. (regional) Encourage development of Accessory Dwelling Units (ADU) and Junior Accessory Dwelling Units (JADU) to increase lower cost housing in the community.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	City of San Mateo Planning	1)Review pilot ADU/JADU fee reduction after one year. 2)Continue collaboration with 21 Elements to develop programs to encourage production of ADU's.	1) Review June 2018 2) Ongoing
Goal 13. Minimize tenant displacement. Explore programs to preserve properties with under market rents at risk of redevelopment and rent increases.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	Collaborate with other countywide jurisdictions. Complete analysis and determine feasiblity.	Submit findings to City Council by December 2018.
Goal 14. Gather data regarding local rents and rent increases.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: displacement of residents	City of San Mateo Housing Division	Evaluate gaps in current rental data and determine approach to collect that data.	Submit fiindings to City Council by September 2018.

FAIR HOUSING PLAN - South San Francisco City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more publicly supported housing--housing with affordability restrictions--to the market. Prioritize housing that accommodates families (larger units)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	The City shall implement zoning to ensure there is an adequate supply of land to meet its 2014 to 2022 ABAG Regional Housing Needs Allocation (RHNA) of 565 very low income units, 281 low income units, 313 moderate income units, and 705 above moderate income units.	Zoning implemented with in the 2014 Housing Element. Upcoming project in the City includes the Rotary Project for Senior Housing with 80 units. City will continue to look for opportunities to support additional units, including units suitable for families.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies		Vacant and Underutilized Land Inventory: The City shall periodically update its inventory of vacant and underutilized parcels identified in this Housing Element. The City shall also conduct a periodic review of the composition of the housing stock, the types of dwelling units under construction or expected to be constructed during the following year, and the anticipated mix, based on development proposals approved or under review by the City, of the housing to be developed during the remainder of the period covered by the Housing Element. This analysis will be compared to the City's remaining 2014-2022 Regional Housing Needs Allocation (RHNA) to determine if any changes in land use policy are warranted.	The land inventory was completed with adoption of the 2014 Housing Element, and will be revisited and updates prior to 2023. The City will continue to annually evaluate and report to the State on the number of new units built and how many units meet the criteria for lower income RHNA.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development/Planning	The City shall continue to implement the Inclusionary Housing Ordinance. Inclusionary Housing Ordinance: The City shall continue to implement the Inclusionary Housing Ordinance, in accordance with State law, requiring new for sale residential development over four units to provide a minimum of twenty (20) percent low- and moderate-income housing. Inclusionary Housing Ordinance Review: The City shall periodically review the success of the Inclusionary Housing Ordinance, SSFMC 20.380, to determine if the objectives of the ordinance are being met. Consideration shall be made to revising provisions of the ordinance to ensure that a range of housing opportunities for all identifiable economic segments of the population, including households of low-and moderate incomes, are provided.	Ongoing. The City requires all new development to include a minimum of 20 percent low and moderate housing. The City will assess the Inclusionary Ordinance performance as part of the annual Housing Element report, and will evaluate if revisions are needed at that time.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	As feasible, the City will investigate new sources of funding for the City's affordable housing programs. Investigate Commercial and Housing Linkage Fee: Through participation in the 21 Elements group, the City will investigate the feasibility of commercial and housing linkage fees to support affordable housing.	Ongoing: The City will continue exploring opportunities to support affordable housing. By 2022 City expects to investiage the feasibility of including commercial and housing linkage fees and will evauate any necessary updates.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division and Planning Division; Planning Commission; City Council	The City shall work with for-profit and non-profit developers to promote the development of housing for extremely low-, very low-, and lower-income households. Site Acquisition: The City shall work with for-profit and nonprofit housing developers to acquire sites that are either vacant or developed with underutilized, blighted, and/or nonconforming uses for the development of affordable housing. As needed, the City will meet with developers to discuss and identify development opportunities and potential funding sources. Support and Pursue Funding Applications for Affordable Housing: Consistent with existing practice, the City shall continue to support funding applications	Ongoing: The City actively explores opportunities to cooperate with for-profit and non-profit developers and will continue to support funding applications.

FAIR HOUSING PLAN - South San Francisco City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal 2. Fund minor home repairs and accessibility improvements for low and moderate income homeowners. Allow accessiblity improvements on rental properties with owner permission.	Lack of accessible housing; Loss of naturally occurring affordable housing	Disproportionate housing needs; Displacement; Percent of households in SSF that need accessibility improvements is 45%	Department of Economic and Community Development	Encourage reinvestment in older residential neighborhoods and rehabilitation of housing, especially housing for very low-, low- and moderate-income households. As appropriate, the City shall use local, State, and Federal funding assistance to the fullest extent these subsidies exist to facilitate housing rehabilitation. Minor Home Repair: The City will provide funds to non-profit organizations providing free minor home repairs to assist extremely low- to low-income homeowners to bring houses into a good state of repair and maintain them as viable units in the local housing stock. Funding Prioritization: The City shall continue to give housing rehabilitation efforts high priority in the use of Community Development Block Grant (CDBG) funds. Funds shall be targeted towards older housing stock and to families earning less than 80 percent of AMI. Low Interest Loans for Housing Rehabilitation: The City shall provide low-interest loans for rehabilitation of single-family and multi-family housing by supporting the City's Housing Rehabilitation Program with continued CDBG funding.	Ongoing: Take goals out of Action Plan - Take carry this on through action plan.. Got providers
Goal 3. Preserve opportunity to meet transitional and emergency housing needs through SRO housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	Financial Assistance for SROs: The City shall provide financial assistance, when feasible, for physical improvements to existing boarding rooms and Single Room Occupancies in the Downtown area.	Ongoing: The City continues to coordinate with the Continuum of Care (COC) to engage with the community and look for opprotunities for financial assistance opportunities to help SRO development. The City shall coordinate with the County on such opportunities throughout the year.
Goal 4 (regional). Prevent displacement of households.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Displacement	Department of Economic and Community Development	The City shall support the preservation of public affordable housing stock. Support SSF Public Housing Authority (PHA): The City shall support the South San Francisco PHA in its continued operation and rental of 80 units of public housing. Examine Displacement of Affordable Housing and Lower-Income Households: The City shall coordinate with other jurisdictions in San Mateo County, under the umbrella of work to be undertaken by 21 Elements, to quantify, develop and evaluate potential strategies to address displacement of lower income residents. The City will use this analysis, in addition to other analysis, to develop potential measures and programs and the City will implement those programs, as it considers and deems appropriate, to address the risk of displacement of existing lower income residents. Displacement might be direct, caused by the redevelopment of sites with existing residential properties, or indirect, caused by increased market rents as an area becomes more desirable. The City shall monitor any such implemented programs annually for effectiveness and make adjustments as necessary.	The City will continue to support the SSF PHA to reserve public affordable housing stock. The City will participate, as feasible, with the San Mateo County regional housing displacement analysis and strategies, throught the 21 Elements.
Goal No. 5. Facilitate development of secondary units.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Lack of flexibility in zoning code	Disproportionate housing needs; Displacement		The City shall support and facilitate the development of second units on single-family designated and zoned parcels. Continue to support the development of secondary dwelling units and educate the community about this program: Actively promote community education on second units, as permitted in SSFMC 20.350.035, by posting information regarding second units on the City's website and providing brochures at the public counter in the Centralized Permit Center.	Ongoing. The City will review current planning and zoning ordinances to make sure they comply with current state ADU regulations. The City w ill track and explore opportunities to encourage additional development. Information will be available at the Public Counter and online.

FAIR HOUSING PLAN - South San Francisco City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 6. (regional). Participate in and support regional efforts to address housing needs.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	Department of Economic and Community Development - Economic Development and Housing Division	THE CITY OF SOUTH SAN FRANCISCO WILL TAKE NECESSARY STEPS TO REMOVE GOVERNMENT AND PUBLIC INFRASTRUCTURE CONSTRAINTS TO HOUSING DEVELOPMENT THROUGH ADMINISTRATIVE SUPPORT, INTERGOVERNMENTAL COOPERATION, PUBLIC-PRIVATE PARTNERSHIPS, AND PERMIT STREAMLINING. The City shall continue to cooperate with other governmental agencies and take an active interest in seeking solutions to area-wide housing problems. The City supports efforts such as the San Mateo County Sub RHNA effort, which seeks to bring the 21 jurisdictions of San Mateo County together to address common housing and planning needs. Support regional funding programs: The City shall continue to participate with other government agencies to support regional funding programs, such as participating with San Mateo County in its Housing Revenue Bond and Mortgage Credit Certificate programs.	Ongoing: The City will continue to participate with the San Mateo 21 Elements to address common housing and planning needs. Will continue to participate and cooperate and explore opportunities with the MCCP.
Goal No. 7. Promote equity in housing choice.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; discrimination in the housing market	Department of Economic and Community Development - Economic Development and Housing Division	SOUTH SAN FRANCISCO VALUES DIVERSITY AND STRIVES TO ENSURE THAT ALL HOUSEHOLDS HAVE EQUAL ACCESS TO THE CITY'S HOUSING RESOURCES. The City will work to eliminate on a citywide basis all unlawful discrimination in housing with respect to age, race, sex, sexual orientation, marital or familial status, ethnic background, medical condition, or other arbitrary factors, so that all persons can obtain decent housing. Support Equal Housing Opportunity Laws: The City shall require that all recipients of locally-administered housing assistance funds and other means of support from the City acknowledge their understanding of fair housing law and affirm their commitment to the law. The City shall provide materials to help with the understanding of and compliance with fair housing law.	Ongoing. The City continues to support fair housing entities such as Project Sentinel, Legal Aid and other groups to help ensure fair housing practices on a city wide basis. The CIty will work with fair housing entities to educate tenants, landlords, and the community on fair housing practicies through workshops and classes.
Goal No. 8. Continue funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	Department of Economic and Community Development - Economic Development and Housing Division	The City shall provide fair housing information and referrals regarding fair housing complaints, tenant-landlord conflicts, habitability, and other general housing assistance. Legal Counsel and Advocacy Assistance: The City shall support non-profits providing legal counseling and advocacy assistance concerning fair housing laws, rights, and remedies to those who believe they have been discriminated against. Persons requesting information or assistance related to housing discrimination are referred to one or more fair housing groups for legal services. Consistent with existing practice, brochures providing information on fair housing and tenants' rights are available at City Hall, public libraries and on the City's website. The brochures are also available at nonprofit organizations serving low-income residents. The brochures are available in English and Spanish. As funding allows, the City shall provide funding assistance to organizations that provide fair housing, tenant/landlord, and habitability counseling and other general housing assistance.	Ongoing. The City continues to support fair housing entities such as Project Sentinel, Legal Aid and other groups to help ensure fair housing practices on a city wide basis. The CIty will work with fair housing entities to educate tenants, landlords, and the community on fair housing practicies through workshops and classes.
Goal No. 9. Collaborate with other jurisdictions to explore the development of a database for rentals, track displacement and evaluate the benefits of implementing fair housing audits.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; discrimination in the housing market	Department of Economic and Community Development - Economic Development and Housing Division	The City understands the importance of collecting data on displacement and the need for tracking rental data . However it currently does not have the resources to implement this effort and will work with other jurisidctions on exploring and partnering on such a database and evaluating the benefits implementing fair housing audits. .	Ongoing
Goal No. 10. Explore ways to retain under below-market rental units.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division	The City shall monitor its supply of subsidized affordable housing to know of possible conversions to market rate, including taking the following actions: a. Publicize existing State and federal notice requirements to nonprofit developers and property owners of at-risk housing. b. Respond to any federal and/or State notices including Notice of Intent to Pre-Pay, owner Plans of Action, or Opt-Out Notices filed on local projects.	Ongoing
Goal No. 11. The City will explore and evaluate the merits and effectiveness of rent stabilization and just cause policy in South San Francisco.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division	The City will identify and complete a process to evaluate the merits and effectiveness of a rent stabilization and just cause policy in South San Francisco.	Ongoing

FAIR HOUSING PLAN - South San Francisco City Housing Authority

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. To Promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination and violence.	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the City of South San Francisco (HASSF)	•Replaced failed windows in 18 units, replaced 8 damaged sprinklers, 2 timeclocks, 3 valves, annually prune and fertilize property trees since 2015. •Inspect all units annually.	•30% of the Goals and Objectives have been achieved for our 5-Year Plan.

RESOLUTION NO. 075455

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

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RESOLUTION APPROVING THE DEPARTMENT OF HOUSING FAIR HOUSING GOALS AND PUBLIC COMMENT RESPONSES TO BE INCLUDED IN THE FINAL SAN MATEO COUNTY REGIONAL ASSESSMENT OF FAIR HOUSING PURSUANT TO THE AFFIRMATIVELY FURTHERING FAIR HOUSING FINAL RULE, PUBLISHED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT IN JULY 2015

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") published a final rule on Affirmatively Furthering Fair Housing (24 C.F.R. § 5.154) ("AFFH") in July 2015 to establish a process for recipients of HUD funding to help them meet their long-standing obligations to affirmatively further fair housing by performing an Assessment of Fair Housing ("AFH"); and

WHEREAS, the AFH refers to the analysis undertaken pursuant to the AFFH Rule that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and that must be conducted and submitted to HUD using the AFFH Assessment Tool; and

WHEREAS, the County of San Mateo, the Housing Authority of the County of San Mateo, the Housing Authority of the City of South San Francisco, and the Cities of Daly City, Redwood City, San Mateo and South San Francisco are subject to the AFFH Final

Rule and entered into an agreement to prepare an AFH for the entire San Mateo County region in compliance with the AFFH Final Rule; and

WHEREAS, the County contracted with BBC Research and Consulting to prepare the Regional AFH, including completing the analysis of HUD-provided data and local data, engaging in extensive community outreach, and presenting the draft AFH at a public hearing before the Board of Supervisors on July 25, 2017; and

WHEREAS, some of the primary fair housing issues identified in the draft AFH included: a severe lack of affordable housing, a dearth of housing for families – both privately provided and publicly supported, African American Hispanic households with almost half the home ownership rate of White and Asian households, higher rates of denial and housing discrimination for African American and Hispanic residents, highest rate of segregation for African Americans, and less access for African American and Hispanic children to quality schools; and

WHEREAS, DOH has since revised the draft AFH to incorporate feedback and comments received from the public since the hearing on July 25, 2017;

WHEREAS, DOH intends to use the goals identified for the Final AFH as guidelines for defining policy priorities and allocating future agency funding;

WHEREAS, DOH presents these Fair Housing Goals and Public Comment Responses to the Board of Supervisors for its approval because the Final AFH will be incorporated into the County's Consolidated Plan, which will then be adopted by the Board, and DOH must submit its endorsement of the Final Regional AFH to HUD by October 4, 2017; and

NOW THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors, County of San Mateo, State of California, hereby adopts this resolution: approving the Department of Housing Fair Housing Goals and Public Comment Responses to be included in the San Mateo County Regional Assessment of Fair Housing pursuant of the Affirmatively Furthering Fair Housing Final Rule, published by the U.S. Department of Housing and Urban Development in July 2015.

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RESOLUTION NUMBER: 075455

Regularly passed and adopted this 26th day of September, 2017

AYES and in favor of said resolution:

Supervisors: *DAVE PINE*

CAROLE GROOM

DON HORSLEY

WARREN SLOCUM

DAVID J. CANEPA

NOES and against said resolution:

Supervisors: *NONE*

President, Board of Supervisors
County of San Mateo
State of California

Certificate of Delivery

I certify that a copy of the original resolution filed in the Office of the Clerk of the Board of Supervisors of San Mateo County has been delivered to the President of the Board of Supervisors.

Deputy Clerk of the Board of Supervisors

RESOLUTION NO. 075456

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA, ACTING AS THE GOVERNING BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO

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RESOLUTION APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO FAIR HOUSING GOALS AND PUBLIC COMMENT RESPONSES TO BE INCLUDED IN THE SAN MATEO COUNTY REGIONAL ASSESSMENT OF FAIR HOUSING PURSUANT TO THE AFFIRMATIVELY FURTHERING FAIR HOUSING FINAL RULE, PUBLISHED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT IN JULY 2015

RESOLVED, by the Board of Commissioners for the Housing Authority of the County of San Mateo, State of California, that

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") published a final rule on Affirmatively Furthering Fair Housing (24 C.F.R. § 5.154) ("AFFH") in July 2015 to establish a process for recipients of HUD funding to help them meet their long-standing obligations to affirmatively further fair housing by performing an Assessment of Fair Housing ("AFH"); and

WHEREAS, the AFH refers to the analysis undertaken pursuant to the AFFH Rule that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and that must be conducted and submitted to HUD using the AFFH Assessment Tool; and

WHEREAS, the County of San Mateo, the Housing Authority of the County of San Mateo (HACSM), the Housing Authority of the City of South San Francisco, and the Cities of Daly City, Redwood City, San Mateo and South San Francisco are subject to the AFFH

Final Rule and entered into an agreement to prepare an AFH for the entire San Mateo County region in compliance with the AFFH Final Rule; and

WHEREAS, the County of San Mateo contracted with BBC Research and Consulting to prepare the Regional AFH, including completing the analysis of HUD-provided data and local data, engaging in extensive community outreach, and presenting the draft AFH at a public hearing before the County of San Mateo Board of Supervisors on July 25, 2017; and

WHEREAS, some of the primary fair housing issues identified in the draft AFH included: a severe lack of affordable housing, a dearth of housing for families – both privately provided and publicly supported, African American Hispanic households with almost half the home ownership rate of White and Asian households, higher rates of denial and housing discrimination for African American and Hispanic residents, highest rate of segregation for African Americans, and less access for African American and Hispanic children to quality schools; and

WHEREAS, HACSM has since revised the draft AFH to incorporate feedback and comments received from the public since the hearing on July 25, 2017; and

WHEREAS, HACSM intends to use these goals identified for the Final AFH as guidelines for defining policy priorities and allocating future agency funding; and

WHEREAS, HACSM presents these Fair Housing Goals and Public Comment Responses to the Board of Commissioners for the Housing Authority of the County of San Mateo for its approval because these goals and public comment responses will be

incorporated into the Final AFH and County must submit its endorsement of the Final Regional AFH to HUD by October 4, 2017; and

NOW THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Commissioners for the Housing Authority of the County of San Mateo, State of California, hereby adopts this resolution: approving The Housing Authority of the County of San Mateo Fair Housing Goals and Public Comment Responses to be included in the San Mateo County Regional Assessment of Fair Housing pursuant of the Affirmatively Furthering Fair Housing Final Rule, published by the U.S. Department of Housing and Urban Development in July 2015.

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RESOLUTION NUMBER: 075456

Regularly passed and adopted this 26th day of September, 2017

AYES and in favor of said resolution:

Supervisors: *DAVE PINE*

CAROLE GROOM

DON HORSLEY

WARREN SLOCUM

DAVID J. CANEPA

NOES and against said resolution:

Supervisors: *NONE*

President, Board of Supervisors
County of San Mateo
State of California

Certificate of Delivery

I certify that a copy of the original resolution filed in the Office of the Clerk of the Board of Supervisors of San Mateo County has been delivered to the President of the Board of Supervisors.

Deputy Clerk of the Board of Supervisors

SECTION III.

Community Participation Process

SECTION III.
Community Participation Process

Section III of the AFH follows the organization of the Community Participation Process requirement of HUD's AFH Tool. It describes outreach activities, methods to encourage and broaden meaningful community participation in the AFH, organizations consulted and describes residents' participation in the AFH.

1. *Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.*

2. *Provide a list of organizations consulted during the community participation process.*

3. *Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?*

Outreach Activities

The San Mateo County Regional AFH's community participation process resulted in meaningful engagement of more than 4,000 residents and stakeholders representing local organizations and coalitions.

Methods of engagement. The regional AFH engagement methods included opportunities for residents and opportunities for stakeholders to participate in the development of the AFH. Resident opportunities included:

- **Resident survey.** The resident survey was available in online and postage-paid printed formats. Residents could take the survey in English, Spanish, Chinese and Tagalog.

- **Resident focus groups.** BBC facilitated four resident focus groups—one in Spanish; one with Filipino residents; a group with Section 8 voucher holders, including Moving to Work participants; and a focus group with residents with disabilities. Project Sentinel staff facilitated a focus group with African American residents. Refreshments and interpreters were provided and children were welcome to attend. (A search for a child care provider to attend the Spanish language focus group was not successful.) Focus groups were held at

locations on days of the week and times of day recommended by local stakeholders who recruited and hosted the groups. Community Legal Services of East Palo Alto (CLESPA) provided $20 Target gift cards to participants in the Spanish language, Filipino and Section 8 focus groups.

The study team would like to sincerely thank the Center for Independence of Individuals with Disabilities in San Mateo County, Legal Aid of San Mateo County, Community Legal Services in East Palo Alto, Pilipino Bayanihan Resource Center, Faith in Action Bay Area and El Comité de Vecinos for recruiting and hosting the resident focus groups, identifying locations and referring the team to child care providers and interpreters.

- **Open house community meetings.** Two open house community meetings—one in Daly City and one in North Fair Oaks—were held on Saturday, June 17, 2017. The events were a drop-in open house format featuring a scrolling presentation of information about the AFH and the HUD AFFH-T maps; activities for telling residents' housing stories and an exercise to prioritize desired outcomes of increased fair housing choice and access to opportunity in the region. Interpreters for Spanish, Mandarin and Tagalog speakers were available. Child care and food were provided. Project Sentinel and Legal Aid Society of San Mateo County staffed information tables and provided information about their services. Project Sentinel supplied a door prize given away to a randomly selected attendee in a drawing.

- **Public hearing.** On July 25, 2017, prior to the release of the draft AFH on August 1, 2017, San Mateo County, as the lead jurisdiction, held a public hearing before the Board of County Supervisors that included a detailed presentation of the AFH process, results, fair housing issues identified, and contributing factors.

- **Fair Housing Subcommittee Town Hall.** On September 12, 2017, Supervisors Slocum and Canepa hosted a Town Hall meeting attended by 60 residents, including many Spanish speakers. On September 12, 2017 Supervisors Warren Slocum and David Canepa of the San Mateo County Board of Supervisors organized and hosted an event in North Fair Oaks in order to hear directly from residents about their fair housing issues. Approximately 60 residents attended the evening meeting and shared their experiences and concerns with the Supervisors and their staff. Interpretation services were provided in Spanish as many of the residents were native Spanish-speakers. Snacks and childcare were also provided.

  The meeting focused on gathering resident input on four key questions: 1) In the past five years, have you ever felt you were treated unfairly when you tried to rent or buy a home? 2) Has your neighborhood changed in the last five years? What changed? How do you feel about the change? 3) Do you feel safe in your neighborhood? and 4) What is the biggest housing challenge?

Stakeholder consultation. Stakeholder consultation to developing the draft AFH took several forms, including:

- Advising the AFH team on the planned community engagement process, focus group scheduling and logistics through a series of conference calls;

- Providing feedback on the resident survey instrument;
- Hosting and recruiting focus group participants;
- Using Community Engagement in a Box materials to promote resident community engagement opportunities, share AFFH-T maps with residents, distribute resident surveys and facilitate AFH discussions with residents to supplement jurisdiction outreach efforts;
- Participating in in-depth interviews and providing the study team with program data and studies to inform the AFH elements;
- Ongoing written communications to the lead agency to advise the AFH team of pertinent issues, recommendations for analysis;
- Participating in a kickoff meeting open to all interested stakeholders which included facilitated discussion of fair housing issues and focus groups facilitated by San Mateo County for landlords and affordable housing developers;
- Participating in the community open house meetings;
- Participating in a briefing for government officials and housing staff on the AFH preliminary findings and goals facilitated by San Mateo County on July 18;
- Participating in a briefing for County Housing and Community Development Committee on the AFH preliminary findings and goals facilitated by San Mateo County on July 18;
- Participating in a briefing for community organizations, advocates and coalitions on the AFH preliminary findings and goals facilitated by San Mateo County on July 19;
- Participating in a briefing for real estate professionals on the AFH preliminary findings and goals facilitated by San Mateo County on July 20; and
- Attending the July 25 public hearing before the San Mateo County Board of Supervisors.

The California Apartment Association's Tri-County Division developed and deployed a survey to rental property owners and managers in San Mateo County to support development of the AFH; 150 participated in the survey and CAA Tri-County shared the results with the AFH team.

Community Engagement in a Box. BBC developed a Community Engagement in a Box tool for use by stakeholders to build capacity to engage their clients, consumers and coalition members in the AFH process through promoting and distributing the resident survey, facilitating AFH conversations and focus groups, sharing the AFFH-T maps and using all of the community engagement tools available to AFH participating jurisdictions. Interested stakeholders could request a Box which included printed surveys in each of the four languages; flyers promoting the online survey, a booklet of AFFH-T maps and instructions for interpreting the maps; and a community conversations discussion guide. BBC facilitated a webinar for participating stakeholders and mailed CE Boxes to 10 organizations.

Public outreach. To promote the resident survey, BBC provided participating jurisdictions with public relations and social media tools—press release, social media posts and outreach email content—that could be adapted to a broad range of audiences. In addition to regionwide media relations led by San Mateo County, each participating jurisdiction conducted resident and stakeholder outreach activities.

San Mateo County outreach activities. In addition to leading regional public relations and social media, San Mateo County:

- Developed and hosted the regional AFH informational website (http://housing.smcgov.org/assessment-fair-housing) with information about how to get involved, participating agencies, HUD maps and data and the draft AFH;
- Developed Assessment of Fair Housing Informational one-sheet promoting the resident survey and community open house events;
- Outreach email and survey promotion to the San Mateo County Department of Housing Partner listserv. List members include nearly 300 affordable housing and housing and community development stakeholder organizations, agencies and alliances;
- Asked County department administrative staff to post survey flyers in reception areas;
- Distributed paper surveys and survey fliers to all County library branches;
- Distributed resident survey and open house fliers to County Boards and Commissions;
- Social media posts on San Mateo County Nextdoor;
- Social media posts on San Mateo County Department of Housing's Facebook page; and
- Staffed an AFH information table at Project Sentinel's annual fair housing symposium;

Daly City outreach activities. In addition to supporting regional public relations and social media, Daly City:

- Arranged the Filipino focus group in partnership with the Pilipino Bayanihan Resource Center;
- Staffed an AFH community engagement table, where resident surveys were distributed and AFFH-T maps were shared with attendees at a Daly City Cultural and Resource Fair called District 5 Together organized by Supervisor David Canepa.

Redwood City outreach activities. In addition to supporting regional public relations and social media, Redwood City:

- Promoted the AFH on its website and social media.

San Mateo City outreach activities: In addition to supporting regional public relations and social media, San Mateo City:

- Educated City Hall front desk staff about the AFH process and distributed resident surveys and flyers at the front desk;
- Distributed AFH process information and materials to the Community Relations Commissioners and led a presentation to the Commission on March 15, 2017;
- AFH process and resident survey notification promoted to all City employees through the employee newsletter CityGram;
- San Mateo City Hall Facebook posts;
- Citywide NextDoor social media posts; and
- Outreach to the City of San Mateo NAACP and AARP chapters and African American and Tongan churches. AARP of Northern California posted the survey to its Facebook page targeting followers living in San Mateo County.

South San Francisco City outreach activities. In addition to supporting regional public relations and social media, South San Francisco City:

- Promoted the AFH on its website and social media.

Housing Authority of the County of San Mateo outreach activities[1]:

- Sent emails promoting the resident survey to Moving to Work applicants (voucher waitlist);
- Sent emails promoting the survey to rental assistance program participants; and
- Sent emails promoting the survey to voucher holders in the process of their housing search.

Partner outreach. Local stakeholders, including organizations, agencies and coalitions, promoted the AFH survey directly to their members, residents, consumers and clients. Using the Community Engagement in a Box tools, stakeholder outreach to traditionally underrepresented populations, particularly residents with limited English proficiency, was extremely effective. As described above, local partners hosted and recruited focus groups ensuring that the most difficult to reach populations had a voice in the AFH development.

Figure III-1 contains a log of communication efforts between DOH and stakeholders and residents throughout the AFH.

[1] Note that since Midway Village converted from Public Housing to Project-Based Vouchers, the HACSM Resident Advisory Board has been defunct. Only 30 units of Public Housing remain (El Camino Village), and these are soon to be converted to Project-Based Vouchers through the Rental Assistance Demonstration program.

Figure III-1.
Correspondence Log

Initial Date	Correspondence Between	And	Topic
Mar-17	San Mateo County Health System	e-newsletter recipients	Survey and Community Meetings
29-Mar-17	Communications and Intergovernmental Affairs	DOH	Outreach Strategies and publicizing Project Sentinel Annual Housing Symposium
10-Apr-17	Communications and Intergovernmental Affairs	DOH	Survey Fliers and Community Meetings Outreach
11-Apr-17	San Mateo County Libraries	DOH	Survey Fliers
18-Apr-17	DOH Partner List	DOH	Survey Fliers and AFH Resources
18-Apr-17	San Mateo County Board, Commission, and Councilmembers	DOH	Survey Fliers and AFH Resources
18-Apr-17	San Mateo County Department Heads and Executive Assistants	DOH	Community Meeting Fliers and Survey Outreach Content
18-Apr-17	Participating Jurisdictions	DOH and BBC	Marketing Strategies
19-Apr-17	San Mateo County Board, Commission, and Councilmembers	DOH	Survey Fliers and AFH Resources
19-Apr-17	DOH Systems Analyst	DOH	DOH Website and Facebook Outreach
20-Apr-17	City of San Mateo	DOH and BBC	AFH Outreach Efforts
4-May-17	Housing Advocates	DOH	Community Meetings: volunteer sign-up
11-May-17	Supervisor Pine's Office	DOH	Community Meeting Fliers
17-May-17	San Mateo County Libraries	DOH	Community Meetings and fliers
22-May-17	Project Sentinel	DOH	Focus Group Tabling
22-May-17	Housing Advocates	DOH	Memo on Community Meetings and Community Meeting Fliers
7-Jun-17	San Mateo County Department Heads and Executive Assistants	DOH	Community Meetings and fliers
7-Jun-17	San Mateo County Housing Authority	DOH	Community Meeting Fliers to Section 8 Waitlist Listserv
8-Jun-17	Legal Aid Society of San Mateo County	DOH and BBC	Community Meetings, fliers, and tabling
8-Jun-17	Daly City	DOH	Community Meeting Fliers and Outreach
8-Jun-17	HCDC	DOH	Community Meeting Fliers and Outreach
8-Jun-17	Housing Leadership Council	DOH	Community Meetings and Fliers
19-Jun-17	San Mateo County Libraries	DOH	BOS Public Hearing and Public Comment Fliers
19-Jun-17	Communications and Intergovernmental Affairs	DOH	Response to Community Concerns
29-Jun-17	Housing Advocates	DOH	BOS Public Hearing and Public Comment Period Fliers
5-Jul-17	Communications and Intergovernmental Affairs	DOH	BOS Public Hearing and Public Comment Period Outreach
14-Jul-17	Housing Advocates	DOH	Draft AFH: link to draft
14-Jul-17	Participating Jurisdictions	DOH	Draft AFH: link to draft
26-Jul-17	Participating Jurisdictions	DOH	Additional Public Hearing Request for Information
27-Jul-17	Daly City	DOH	Daly City Outreach: fliers, newsletters, and tabling
28-Jul-17	HCDC	DOH	Public Comment Period Fliers and Draft AFH: link to draft
28-Jul-17	Housing Advocates	DOH	Public Comment Period Fliers and Draft AFH: link to draft
28-Jul-17	Participating Jurisdictions	DOH	Public Comment Period Fliers and Draft AFH: link to draft
31-Jul-17	DOH Systems Analyst	DOH	Draft AFH Upload to Website
2-Aug-17	DOH Systems Analyst	DOH	DOH Facebook Outreach: Public Comment Period
2-Aug-17	DOH Partner List	DOH	Public Comment Period Fliers and Draft AFH: link to draft
2-Aug-17	San Mateo County Libraries	DOH	Public Comment Period Fliers and Draft AFH: link to draft
2-Aug-17	Rental Housing Industry	DOH	Public Comment Period Fliers and Draft AFH: link to draft
2-Aug-17	21 Elements	DOH	21 Elements Fair Housing Outreach
3-Aug-17	DOH Systems Analyst	DOH	DOH Website Outreach: Public Comment Period
3-Aug-17	San Mateo County Department Heads and Executive Assistants	DOH	Public Comment Period Fliers and Draft AFH: link to draft
3-Aug-17	San Mateo County Board, Commission, and Councilmembers	DOH	Public Comment Period Fliers and Draft AFH: link to draft
6-Apr-17	Communications and Intergovernmental Affairs	DOH	Outreach Strategies
12-Apr-17	Project Sentinel 9th Biannual Symposium	Project Sentinel and DOH	Community Engagement and Fair Housing
20-Apr-17	21 Elements	DOH	Presentation about AFH and Outreach
6-Jun-17	Participating Jurisdictions	DOH and BBC	Preliminary Report Workshop
29-Jun-17	Housing Advocates	DOH	Data to be Considered in AFH
18-Jul-17	Elected Officials from San Mateo County, Daly City, City of San Mateo, Redwood City, and representatives from Participating Jurisdictions	DOH and BBC	Policy Marker Briefing: San Mateo County Regional Assessment of Fair Housing
18-Jul-17	HCDC	DOH and BBC	Assesment of Fair Housing Draft Review
19-Jul-17	Housing Advocates	DOH and BBC	Assesment of Fair Housing Draft Review
20-Jul-17	Rental Housing Industry	DOH and BBC	Assesment of Fair Housing Draft Review
29-Jun-17	Housing Advocates	DOH	Data to be Considered in AFH
12-Sep-17	North Fair Oaks Meeting	Supervisors Slocum and Canepa	Additional Community Outreach

Source: Compiled by DOH staff.

Stakeholder Consultation Summary

Figure III-2 recognizes the organizations, agencies and coalitions that participated in making the regional AFH community participation process a success. In addition to lending their subject-matter expertise to the AFH development, participating organizations promoted resident engagement opportunities to their clients, consumers and coalition members; tirelessly distributed surveys; recruited focus group participants; and encouraged residents to attend the community open house events. Not all organizations that contributed to resident outreach are recognized in Figure III-1; participating organizations were identified through sign-in sheets, webinar participants, and other communications.

Figure III-2.
Participating Stakeholder Organizations

Stakeholder Consultation Participating Organizations	
AFT Local 1481	Migrante-Northern San Mateo County
AFT Local 3267	National Hispanic Organization of Real Estate Associates
Bay Area Legal Aide	National Housing Law Project
Brilliant Corners	North Fair Oaks
California Apartment Association Tri-County Division	Peninsula Conflict Resolution Center
Center for Independence of Individuals with Disabilities	Project Sentinel
Community Legal Services of East Palo Alto	Public Advocates
Community Overcoming Relationship Abuse	Rebuilding Together Penninsula
El Comité de Vecinos	Samiritan House
Faith in Action	San Mateo County Union Community Alliance
Habitat for Humanity Greater San Francisco	San Mateo County Health System
HELP	Urban Habitat
HIP Housing	VA Palo Alto
Home and Hope	Woodland Park Communities
Housing Leadership Council	Youth United for Community Action
Legal Aid of San Mateo County	

Note: Participating organizations were identified through stakeholder kickoff meeting sign-in sheets, receipt of Community Engagement in a Box materials or webinar participation, participation in conference calls, focus group hosts or recruiting support and as signatories to communications providing guidance for the community engagement process. As such, some organizations that participated in the AFH development may not be recognized in Figure III-1.

Source: BBC Research & Consulting.

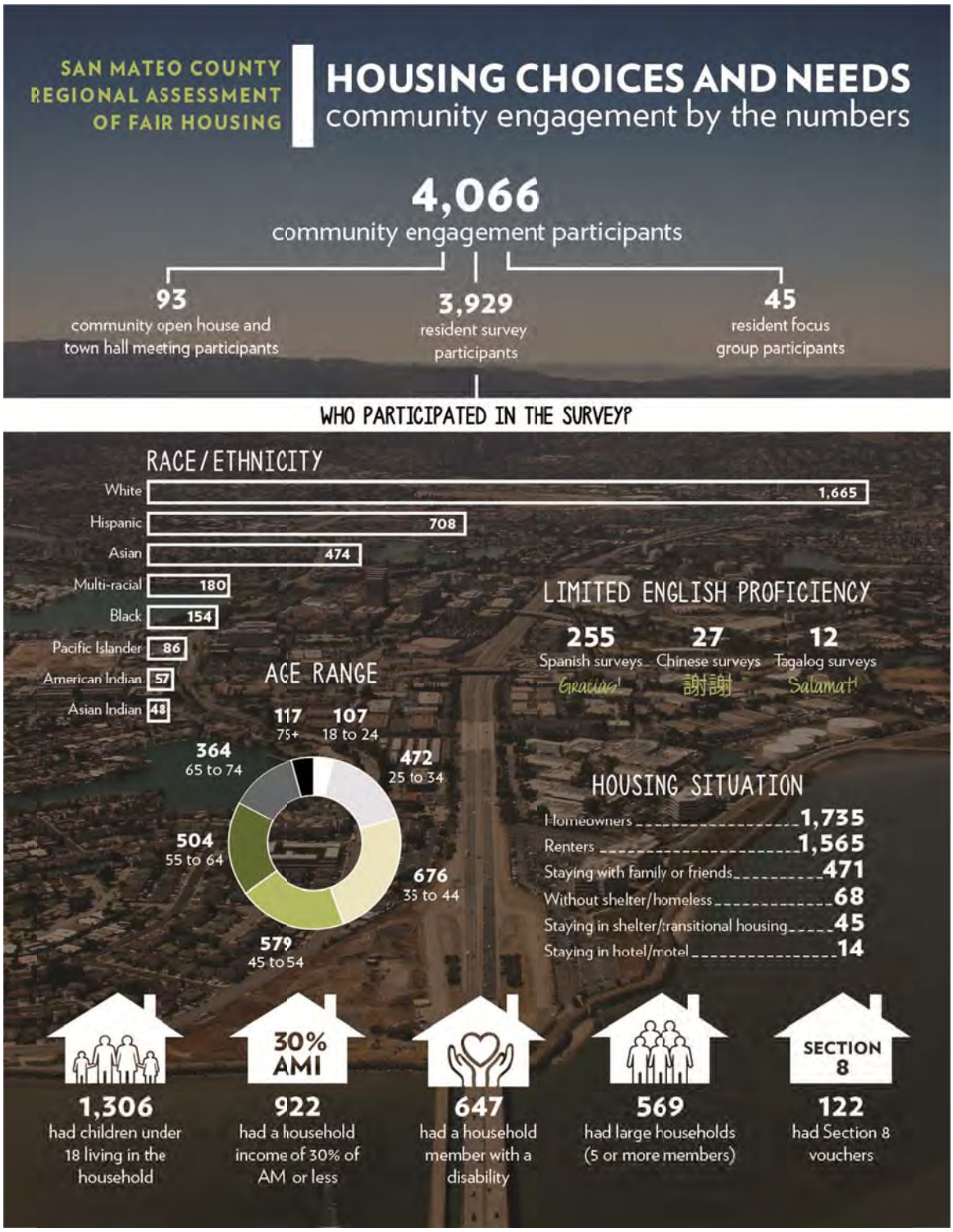
Resident Public Participation Summary

More than 4,000 residents participated in the AFH community engagement process. Figure III-3 summarizes the successful AFH community participation process which engaged traditionally underserved residents in the development of the AFH. Some highlights of community engagement include participation by:

- More than 1,700 people of color;
- More than 300 people with limited English proficiency who participated in Spanish, Chinese or Tagalog;
- More than 900 households with incomes less than 30 percent of AMI;

- Nearly 570 large families;
- More than 647 households that include a member with a disability;
- More than 1,300 families with children under the age of 18; and
- More than 100 Section 8 voucher holders.

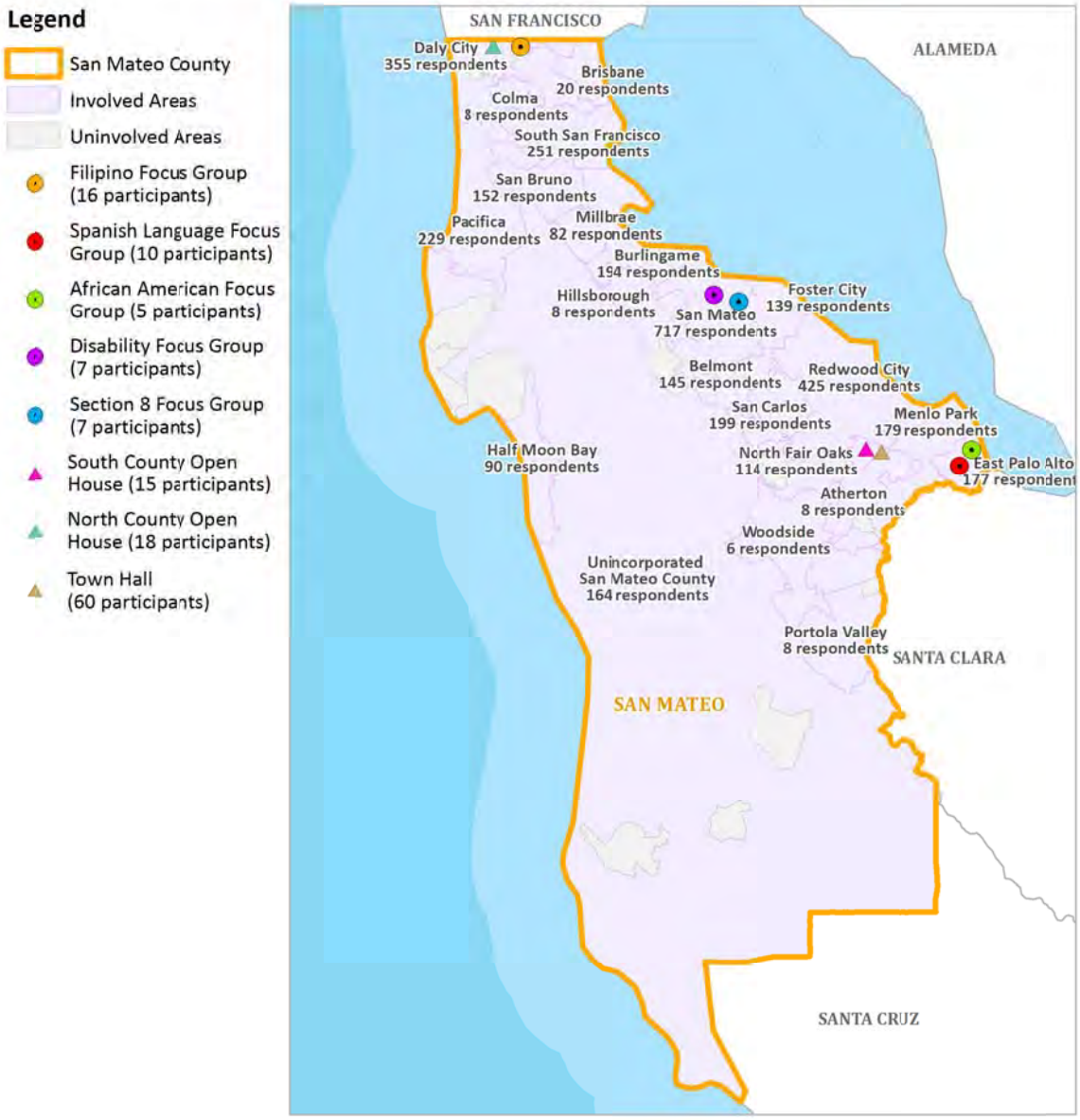
Figure III-3.



Source: BBC Research & Consulting from the Regional AFH Resident Survey, resident focus groups and Community Open House meetings.

Figure III-4 shows the number and place of residence of survey respondents and focus group and community open house locations.

Figure III-4.
Summary of San Mateo County Resident Participation



Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey and focus group and open house sign-in sheets.

Public Hearings and Public Comment Period

The public comment period for the draft regional AFH began August 1, 2017. Public hearings held to receive comments on the draft AFH included:

- **City of Daly City**—public hearing held with City Council on July 24, 2017.
- **San Mateo County**—public hearing held with County Supervisors on July 25, 2017.
- **Redwood City**—public hearing held with Housing and Human Concerns Committee on July 25, 2017.
- **City of San Mateo**—public hearing held by the Community Resources Commission on August 16. Final plan submitted to City Council on September 5, 2017.
- **City of South San Francisco**—public hearing with City Council on September 6, 2017.

Summary of Comments from Public Hearing, July 25, 2017. Fifty people were in attendance, excluding members of the Board of Supervisors.

The Board of Supervisors contributed the following concerns, experiences, and recommendations relating to the Assessment of Fair Housing:

- Recommendations for continued outreach, particularly to protected classes
- Recommendations to collaborate with North Fair Oaks Forward for further outreach
- Concern regarding the number of surveys competed in Chinese, Tagalog, and Spanish—that the number of surveys completed in these languages was not representative of the County's population
- Concerns regarding the Assessment of Fair Housing (AFH) findings regarding the high quality of public schools in San Mateo County
- Concerns regarding insufficient housing accommodations for large families in San Mateo County
- Concerns regarding the inclusion of rent stabilization and Just Cause Evictions into the goals of the AFH

Advocates and community members contributed the following concerns, experiences, and recommendations relating to the Assessment of Fair Housing:

- Section 8 voucher terms and amounts
- Multiple recommendations to include rent stabilization, renter protections, and Just Cause Evictions into the goals of the AFH
- Personal stories of no-cause evictions
- Multiple concerns regarding the increasing cost burden of renters
- Multiple concerns regarding the displacement of community members

- Personal stories of displacement and the increasing cost burden
- Personal stories of racial discrimination in efforts to seek rental housing
- Concerns regarding homelessness due to the high cost of rents
- Multiple recommendations to build more affordable housing in San Mateo County
- Recommendations to go beyond the HUD data analysis (the AFH) when considering issues of displacement, particularly the displacement of people of color
- Concerns regarding the quality of public schools in San Mateo County
- Recommendations for the AFH to include goals to develop affordable housing in areas where there are few affordable housing projects
- Recommendations not to consider rent stabilization or Just Cause Evictions for the AFH goals
- Personal stories of lack of funds to make capital improvements due to rent stabilization

Supervisors approved a motion to form an Assessment of Fair Housing Subcommittee comprised of Supervisor Warren Slocum and David Canepa.

Summary of public comments received and how addressed. In addition to the above verbal comments, letters were received during the development of the AFH and during the public comment period.

Letters received during the development of the AFH were taken into account as the research on the AFH progressed. For example, the development of the Community Engagement in a Box concept arose out of interest by organizations representing residents most likely to experience housing and economic opportunity barriers. These organizations helped increase participation of residents in the AFH through distribution of survey instruments and community conversations.

Letters received during the public comment period were considered as the goals and strategies were finalized. The figure below summarizes the fair housing issue described in the letters and how the goals and strategies were adjusted to address the fair housing issues.

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Rent Stabilization	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17, Faith in Action Bay Area 09/12/2017, Project Sentinel 09/14/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, YUCA 09/14/2017, One San Mateo 09/15/2017	All Jurisdictions	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
Just Cause	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17, Faith in Action Bay Area 09/12/2017, Project Sentinel 09/14/2017, Housing Leadership Council 09/15/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, YUCA 09/14/2017, One San Mateo 09/15/2017	All Jurisdictions	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
Promote Rent Stabilization and Just Cause throughout the County	Fair Rents 4 Pacifica, 08/25/17	San Mateo County	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
Data Collection on Displacement	Public Advocates, 08/23/17, CLSEPA 09/15/2017, One San Mateo 09/15/2017	All Jurisdictions	Yes	Goal No. 12. Research and implement best practices around supporting naturally occurring affordable rental housing: 21 Elements to release final report on Displacement and Displacement prevention tactics which includes a discussion of "tenants' right of first refusal" in the No Net Loss Policy section. Jurisdictions to review, discuss, and implement as appropriate. Jurisdictions to review, discuss, and implement as appropriate	Yes		

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Tenants' First Right of Refusal	Public Advocates, 08/23/17, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017	All Jurisdictions	No		Yes	21 Elements to release final report on Displacement and Displacement prevention tactics which includes a discussion of "tenants' right of first refusal" in the No Net Loss Policy section. All 21 jurisdictions - including the County - will review, discuss, and implement as appropriate.	
Relocation Assistance	Public Advocates, 08/23/17, Faith in Action 09/12/2017, Housing Leadership Council 09/15/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, One San Mateo 09/15/2017	All Jurisdictions, except RWC	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
Section 8 nondiscrimination	Public Advocates, 08/23/17, Fiath in Action 09/12/2017, Project Sentinel 09/14/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, One San Mateo 09/15/2017	All Jurisdictions	No		No		While the County has no explicitly stated goal to eliminate Section 8 discrimination, HACSM has included a goal to maintain high voucher utilization rate. One metric of this goal is outreach to the landlord community on an ongoing basis and host annual landlord events.
Preventing and Minimizing Displacement	Public Advocates, 08/23/17	San Mateo County, City of San Mateo	Yes	Goal Nos. 2, 6, 7, 8, 9, 11, 12, 16, 17			
Promote Anti-Displacement Policies throughout the County	Public Advocates, 08/23/17	San Mateo County	Yes		Yes	Goal No. 12	
Reduce land use and zoning barriers to affordable multifamily housing	Public Advocates, 08/23/17	All Jurisdictions	No		Yes	Goal No 15. Support Affirmatively Further Fair Housing throughout the entire county regardless of HUD entitlement status.	
Reduce land use and zoning barriers to affordable multifamily housing throughout the County	Public Advocates, 08/23/17	San Mateo County	No		Yes	Goal No 15. Support Affirmatively Further Fair Housing throughout the entire county regardless of HUD entitlement status.	
Increase operating funding for public transit	Transportation Letter, 09/07/17	San Mateo County	No		Yes	Goal No. 30 The Caltrain Business Plan will form the framework for a 2020 ballot measure that seeks to resolve funding deficiencies and Goal No. 31 The SamTrans Plan will form the framework for a ballot measure in 2018 to address funding deficiencies the agency is facing.	

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Address serious problems in paratransit services	Transportation Letter, 09/07/17	San Mateo County	No		Yes	Goal No. 28 County to continue to provide funding for paratransit and Goal No. 31 The SamTrans Plan will form the framework for a ballot measure in 2018 to address funding deficiencies the agency is facing, particularly with respect to the need for new and more effective paratransit models	
Ensure that significant numbers of affordable units are preserved or constructed in PDAs	Transportation Letter, 09/07/17	San Mateo County	No		Yes	Goal 27	DOH to research including a requirement or preference for DOH-funded development projects to be located within a PDA, incorporating into future funding NOFAs if appropriate.
Ensure that PDAs are adequately served by affordable, high frequency transit that reaches a range of important destinations	Transportation Letter, 09/07/17		No		Yes		Goal Nos. 27, 30, and 31 SamTrans and Caltrain will each complete respective Business Plans to research infrastructure and service needs as well as the funding requirements to meet those needs. Caltrain to adopt a transit-oriented development policy.
Ensure that significant numbers of affordable units are preserved or constructed in Priority Development Areas (PDAs).	Transportation Letter, 09/07/17	San Mateo County	No		Yes		Goal No. 27 Research including a requirement or preference for DOH-funded development projects to be located within a PDA, incorporating into future funding NOFAs if appropriate.
Study air quality impacts of mobile sources on protected classes	Transportation Letter, 09/07/17	San Mateo County	No		Yes		Goal No. 32 Explore relevance of past and feasibility of future air quality studies
Increase Section 8 Subsidy Tables to be commensurate with increases in market rents	Public Comment 08/03/17 , Legal Aid Society 09/15/2017	HACSM	No		Yes	HACSM to increase subsidy table. Increase in subsidies allows HACSM to continue providing subsidies for all households on the program; if HACSM were to provide subsidies in alignment with increases in market rents or maintain tenant rents at a certain percentage level, we could not assist as many households nor could we sustain adequate funding levels over time.	
Address ubiquitous purchase of local properties by international buyers	Public Comment, 09/08/17	All Jurisdictions	No		No		Under California Law, non-citizens have the same property rights as citizens and restrictions on residential and commercial real estate purchases based on buyer nationality are prohibited.
Data collection of rent increases and evictions, including penalties for landlords that fail to provide information.	Faith in Action 09/12/2017	All Jurisdictions	No		No		As stated in Goal No. 12, County will research and implement best practices around supporting naturally occurring affordable rental housing including several displacement prevention tactics.
Support Fair Housing Audits	Project Sentinel 09/14/2017	All Jurisdictions	No		No		While the County recognizes the importance of of fair housing audits, given limited funding, County has committed to support public service organizations that serve vulnerable low-income households by providing referrals, "rapid rehousing", fair housing counseling, and other services. Up to $977,000 in local funding will be provided over two years to supplement support services funded by HUD.
Increase funding to support fair housing education and outreach services by allocating Measure K funds to service providers.	Project Sentinel 09/14/2017	San Mateo County	No		No		While the County recognizes the importance of of fair housing outreach and education services, given limited funding, County has committed to support public service organizations that serve vulnerable low-income households by providing referrals, "rapid rehousing", fair housing mediation, and other services. Up to $977,000 in local funding will be provided over two years to supplement support services funded by HUD.

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Support education efforts and incentives relating to land use policy in small, non-Entitlement Jurisdictions like Millbrae and Menlo Park to affirmatively further fair housing in those areas.	Housing Leader Council 09/15/2017	San Mateo County	No		Yes	Goal No. 20. Continue efforts to foster collaboration among jurisdictions regarding local challenges to housing, community engagement strategies, encouraging new housing development	
Require landlords to submit information regarding rent increases and evictions	Migrante & LAYA 09/15/2017	San Mateo County, Daly City, South San Francisco	No		No		As stated in Goal No. 12, County will research and implement best practices around supporting naturally occurring affordable rental housing including several displacement prevention tactics.
Self-Sufficiency enrollment and Hardship Policy: consider a permanent voucher status option for elderly and disabled voucher holders	Legal Aid Society 09/15/2017	HACSM					
Evaluate the success of the Landlord Incentive Program	National Housing Law Project 09/15/2017	HACSM					
Address timeliness of repairs by landlords in those units occupied by Section 8 voucher holders	National Housing Law Project 09/15/2017	HACSM					
Data collection on voucher holders who chose to leave the County	National Housing Law Project 09/15/2017	HACSM, South San Francisco HA					
Include goals that are specifically attributable to SSF HA	Legal Aid Society 09/15/2017	South San Francisco HA					
Include goals that specifically address the contributing factor identified	CLSEPA 09/15/2017	HACSM					
Broaden the scope of analysis to include data that is more disaggregated and include additional local data on segregation	Migrante & LAYA 09/15/2017	San Mateo County	Yes	Section V in the draft AFH; Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)	No		The segregation analysis conducted for the AFH exceeded HUD requirements
Include a definite analysis of land use and zoning practices in each of the twenty-one jurisdictions of the county	Public Advocates 08/23/17	San Mateo County	Yes	Section V in the draft AFH	No		HUD provides limited direction on the extent of the land use and zoning analysis. The AFH land use and zoning analysis relied on the 21 Elements analysis that had been previously conducted for the county and all jurisdictions within the county.
Include more analysis on the disparate access to quality transportation among protected classes	Transportation Letter, 09/07/17	San Mateo County	Yes	Section V in the draft AFH; Disparities in Access to Opportunity	No		Transportation analysis meets HUD's requirement

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Self-Sufficiency enrollment and Hardship Policy: consider a permanent voucher status option for elderly and disabled voucher holders		HACSM					HACSM has hardship policy in place to address the time-limited feature of its Moving-To-Work program. Elderly/disabled households may request extension of their subsidy at their recertification.
Evaluate the success of the Landlord Incentive Program		HACSM					HACSM has the landlord incentives tracking in place.
Address timeliness of repairs by landlords in those units occupied by Section 8 voucher holders		HACSM					HACSM has procedures in place to address landlord repairs. When a unit failed Housing Quality Standards, HACSM is required by regulations to abate the Housing Assistance Payments and may eventually terminate the Housing Assistance Payments Contract.
Include goals that specifically address the contributing factor identified		HACSM					

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Rent Stabilization	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17, Faith in Action Bay Area 09/12/2017, Project Sentinel 09/14/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, YUCA 09/14/2017, One San Mateo 09/15/2017	City of Redwood City	No		No		The City Council has adopted a set of priorities that include housing policy and related issues as key strategies for achieving the City's core purpose "Building a Great Community Together". During the past year Redwood City (Community, Housing and Human Concerns Committee, City Council) held several community meetings to discuss and consider alternative tenant protection policies that could be approved and implemented in the short term. These included minimum lease terms, a relocation policy and a strategy for the use of Affordable Housing Funds generated from the City's new Housing Impact Fee. The City adopted the Affordable Housing Impact Fee program to collect fees for affordable housing in new developments. Many developers choose to provide onsite affordable housing units instead of paying the fee, which has brought more affordable units online quicker. In 2016, the City amended the Downtown Precise Plan to reserve 375 units for affordable housing. The City is committed to exploring additional opportunities to address the affordable housing crisis in the coming years.
		City of Daly City	No		No		Daly City understands that increasing rents create hardships for tenants and believes that current activities are the most effective way to address housing affordability. The City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the city that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. After significant community input, the City adopted a Housing Element in 2014. Policy HE-5B of the Housing Element establishes the CIty's commitment to reduce or eliminate the impacts to residents deplaced by new construction
		City of San Mateo	No		No		During the Housing Element adoption process in 2014-15 the City received significant community input regarding rising rents and subsequent tenant displacement. As a result, the City Council held 6 Council meetings from summer 2015 to summer 2016 on affordable housing including a Housing Forum, and two emergency ordinance proposals that did not pass. The Council appointed a Housing Task force that met 7 times from November 2015 to March 2016 to provide recommendations for Council consideration, which included a comprehensive report on its findings. There was no consensus on rent stabilization. A Rent Stabilization measure (Measure Q) was then put on the November 2016 ballot and voted down.

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Just Cause	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17, Faith in Action Bay Area 09/12/2017, Project Sentinel 09/14/2017, Housing Leadership Council 09/15/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, YUCA 09/14/2017, One San Mateo 09/15/2017	City of Redwood City	No		No		The City Council has adopted a set of priorities that include housing policy and related issues as key strategies for achieving the City's core purpose "Building a Great Community Together". During the past year Redwood City (Community, Housing and Human Concerns Committee, City Council) held several community meetings to discuss and consider alternative tenant protection policies that could be approved and implemented in the short term. These included minimum lease terms, a relocation policy and a strategy for the use of Affordable Housing Funds generated from the City's new Housing Impact Fee. The City adopted the Affordable Housing Impact Fee program to collect fees for affordable housing in new developments. Many developers choose to provide onsite affordable housing units instead of paying the fee, which has brought more affordable units online quicker. In 2016, the City amended the Downtown Precise Plan to reserve 375 units for affordable housing. The City is committed to exploring additional opportunities to address the affordable housing crisis in the coming years.
		City of Daly City	No		No		Daly City understands that increasing rents and evictions are devastating for tenants and believes that current activities are the most effective way to address housing affordability. The City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. After significant community input, the City adopted a Housing Element in 2014. Policy HE-5B of the Housing Element establishes the CIty's commitment to reduce or eliminate the impacts to residents deplaced by new construction
		City of San Mateo	No		No		
Promote Rent Stabilization and Just Cause throughout the County	Fair Rents 4 Pacifica, 08/25/17						
Data Collection on Displacement	Public Advocates, 08/23/17, CLSEPA 09/15/2017, One San Mateo 09/15/2017	City of Daly City	No		No		The City does not intend to implement a displacement data-collection effort at this time, finding this concept administratively and financially infeasible.
		City of San Mateo	No		Yes	Added Goal 14 to include evaluation of gaps in current rental data and determine approach to collect data.	
Tenants' First Right of Refusal	Public Advocates, 08/23/17, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017	City of Redwood City	No		Yes	Revised Goal 9 to include Tenant First Right of Refusal as a subject to minimize tenant displacement.	
		City of Daly City	No		No		Daly City understands that increasing rents create hardships for tenants and believes existing programs are the most effective way to address affordable housing challenges, including displacement due to the sale of a building. The City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. After significant community input, the City adopted a Housing Element in 2014. Policy HE-5B of the Housing Element establishes the CIty's commitment to reduce or eliminate the impacts to residents deplaced by new construction. Policy HE9.2 envisions amendment of the condominium regulations to include a first right of refusal program for tenants wishing to purchase a unit subject to conversion.
		City of San Mateo	No		Yes	Added Goal 13 to minimize tenant displacement by exploring ways to retain under market rental units. This may or may not include a Tenant First Right of Refusal.	

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Relocation Assistance	Public Advocates, 08/23/17, Faith in Action 09/12/2017, Housing Leadership Council 09/15/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, One San Mateo 09/15/2017	City of Daly City	No		No		Daly City understands that increasing rents create hardships for tenants and believes existing programs are the most effective way to address affordable housing challenges, including relocation. The City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. After significant community input, the City adopted a Housing Element in 2014. Policy HE-5B of the Housing Element establishes the CIty's commitment to reduce or eliminate the impacts to residents deplaced by new construction. Policy HE9.2 envisions amendment of the condominium regulations to include standards for a relocation program necessitated by condominium conversion .
		City of San Mateo	No		No		During the Housing Element adoption process in 2014-15 the City received significant community input regarding rising rents and subsequent tenant displacement. The City Council held 6 Council meetings from summer 2015 to summer 2016 on affordable housing including a Housing Forum, and an emergency ordinance to establish tenant relocation payments that did not pass. The Council appointed a Housing Task force that met 7 times from November 2015 to March 2016 to provide recommendations for Council consideration. There was no consensus on tenant relocation payments. This was included in the rent stabilization ballot measure in November 2016 ballot and voted down.
Section 8 nondiscrimination	Public Advocates, 08/23/17, Fiath in Action 09/12/2017, Project Sentinel 09/14/2017, Migrante & LAYA 09/15/2017, CLSEPA 09/15/2017, One San Mateo 09/15/2017	City of Redwood City	No		Yes	Revised Goal 9 to include exploring ways to incentivize landlords to participate in the program.	
		Daly City	No		No		The City will continue to collaborate with County Housing Authority and other local jurisdications to expand utilization of Section 8 programs through education and incentives.
		City of San Mateo	No		Yes	Revised Goal 8 to expand utilization of Section 8 program to include researching Section 8 Source of Income policy in addition to landlord incentives to participate in program.	
Preventing and Minimizing Displacement	Public Advocates, 08/23/17	City of San Mateo	Yes	This is addressed in Goals 7, 8,9 10 and 13.			
Promote Anit-Displacement Policies thoughout the County	Public Advocates, 08/23/18						
Reduce land use and zoning barriers to affordable multifamily housing	Public Advocates, 08/23/17	City of Daly City	No		No		Daly City's Housing Element memorializes the City's commitment to reducing land use and zoning barriers to affordable housing and identifies specific actions the City has or will take to streamline the permitting process
		City of San Mateo	Yes	This is addressed in Goal 6.			
Reduce land use and zoning barriers to affordable multifamily housing thoughout the County	Public Advocates, 08/23/17						
Increase operating funding for public transit	Transportation Letter, 09/07/17						
Address serious problems in paratransit services	Transportation Letter, 09/07/17						
Ensure that significant numbers of affordable units are preserved or constructed in PDAs	Transportation Letter, 09/07/17						

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Ensure that PDAs are adequately served by affordable, high frequency transit that reaches a range of important destinations	Transportation Letter, 09/07/17						
Ensure that significant numbers of affordable units are preserved or constructed in Priority Development Areas (PDAs).	Transportation Letter, 09/07/17						
Study air quality impacts of mobile sources on protected classes	Transportation Letter, 09/07/17						
Increase Section 8 Subsidy Tables to be commensurate with increases in market rents	Public Comment, 08/03/17, Legal Aid Society 09/15/2017						
Address ubiquitous purchase of local properties by international buyers	Public Comment, 09/08/17	City of Redwood City	No		No		Under California Law, non-citizens have the same property rights as citizens and restrictions on residential and commercial real estate purchases based on buyer nationality are prohibited.
		City of Daly City	No		No		Under California Law, , non-citizens have the same property rights as citizens and restrictions on residential and commercial real estate purchases based on buyer nationality are prohibited.
Data collection of rent increases and evictions, including penalties for landlords that fail to provide information.	Faith in Action 09/12/2017	City of Redwood City	No		Yes	Revised Goal 5 to include data collection on displacement.	
Support Fair Housing Audits	Project Sentinel 09/14/2017	City of Redwood City	No		Yes	Revised Goal 5 to include fair housing audits.	
		City of Daly City	No		Yes	Added Goal - Consider implementation of fair housing audit program	
		City of San Mateo	Yes	Goal 10			Although the Goal 10 doesn't specifiy the technique/procedure used to investigate complaints, our current contract with Proj Sentinel includes the use of audits to investigate the 23 cases per year as identified in this goal.
Increase funding to support fair housing education and outreach services by allocating Measure K funds to service providers.	Project Sentinel 09/14/2017						
Support education efforts and incentives relating to land use policy in small, non-Entitlement Jurisdictions like Millbrae and Menlo Park to affirmatively further fair housing in those areas.	Housing Leader Council 09/15/2017						
Require landlords to submit information regarding rent increases and evictions	Migrante & LAYA 09/15/2017						
Self-Sufficiency enrollment and Hardship Policy: consider a permanent voucher status option for elderly and disabled voucher holders	Legal Aid Society 09/15/2017						
Evaluate the success of the Landlord Incentive Program	National Housing Law Project 09/15/2017						
Address timeliness of repairs by landlords in those units occupied by Section 8 voucher holders	National Housing Law Project 09/15/2017						
Data collection on voucher holders who chose to leave the County	National Housing Law Project 09/15/2017						
Include goals that are specifically attributable to SSF HA	Legal Aid Society 09/15/2017						
Include goals that specifically address the contributing factor identified	CLSEPA 09/15/2017						

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Rent Stabilization	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17	All Jurisdictions	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
		City of Daly City	no		yes	Daly City understands that increasing rents create hardships for tenants. To address this issue, the City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. The City will identify and complete a process to evaluate the merits and effectiveness of a rent stabilization policy in Daly City	
		City of San Mateo	No		No		During the Housing Element adoption process in 2014-15 the City received significant community input regarding rising rents and subsequent tenant displacement. As a result, the City Council held 6 Council meetings from summer 2015 to summer 2016 on affordable housing including a Housing Forum, and two emergency ordinance proposals that did not pass. The Council appointed a Housing Task force that met 7 times from November 2015 to March 2016 to provide recommendations for Council consideration, which included a comprehensive report on its findings. There was no consensus on rent stabilization. A Rent Stabilization measure (Measure Q) was then put on the November 2016 ballot and voted down.
		City of SSF	No		Yes	The City of South San Francisco recognizes the difficulties facing the community with housing affordability. The City will identify and complete a process to evaluate the merits and effectiveness of a rent stabilization policy in South San Francisco.	
Just Cause	Public Advocates, 08/23/17, Fair Rents 4 Pacifica, 08/25/17	All Jurisdictions	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
		City of Daly City	No		Yes	Daly City understands that increasing rents and evictions are devastating for tenants. To address this issue, the City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. The City will identify and complete a process to evaluate the merits and effectiveness of a just cause policy in Daly City	
		City of San Mateo	No		No		During the Housing Element adoption process in 2014-15 the City received significant community input regarding rising rents and subsequent tenant displacement. The City Council held 6 Council meetings from summer 2015 to summer 2016 on affordable housing including a Housing Forum, and an emergency ordinance to establish Just Cause policy that did not pass. The Council appointed a Housing Task force that met 7 times from November 2015 to March 2016 to provide recommendations for Council consideration. There was no consensus on just cause. This was included in the rent stabilization ballot measure in November 2016 ballot and voted down.
		City of SSF	No		Yes	The City of South San Francisco recognizes the difficulties facing the community with housing affordability. The City will identify and complete a process to evaluate the merits and effectiveness of a just cause policy in South San Francisco.	

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Promote Rent Stabilization and Just Cause throughout the County	Fair Rents 4 Pacifica, 08/25/17	San Mateo County	No		No		The County understands that increasing rents create hardships for tenants. To address this issue, in 2015, the Board of Supervisors asked staff to draft a white paper on the range of tenant protections and services. The white paper was presented to the Board at a public study session. After reviewing all the options and hearing public comment, the Board decided to address housing affordability through a combination of financial support for new affordable housing projects – over $60 million has been committed to date - along with a suite of tenant assistance services. The tenant services, which have been operating for over two years, include multi-lingual tenant's rights workshops, printed materials and a hot line through a contract with Project Sentinel, an enhanced apartment inspection program operated countywide by the Environmental Health Division, legal clinics and court representation provided by the Legal Aid Society and an extensive array of other types of tenant assistance provided by the Human Services Agency.
Data Collection on Displacement	Public Advocates, 08/23/19	All Jurisdictions					
		City of Daly City	NO		Yes	Added Goal ___ to include collaborate with other juridictions and evaluate gaps in current rental data	
	One San Mateo 9-5-17	City of San Mateo				Added Goal 14 to include evaluation of gaps in current rental data and determine approach to collect data.	
		City of SSF			Yes	Added Goal - The City understands the importance of collecting data on displacement and the need for tracking rental data . However it currently does not have the resources to implement this effort and will work with other jurisidctions on exploring and partnering on such a database.	
Tenants' First Right of Refusal	Public Advocates, 08/23/20	All Jurisdictions	No				
		City of Daly City	No		Yes	Added Goal - to minimize tenant displacement by exploring ways to retain under market rental units. This may or may not include a Tenant First Right of Refusal.	
		City of San Mateo			Yes	Added Goal 13 to minimize tenant displacement by exploring ways to retain under market rental units. This may or may not include a Tenant First Right of Refusal.	
		City of SSF			Yes	Added Goal - to minimize tenant displacement by exploring ways to retain under market rental units. This may or may not include a Tenant First Right of Refusal.	
Relocation Assistance	Public Advocates, 08/23/21	All Jurisdictions, except RWC					
		City of Daly City	no		yes	Daly City understands that increasing rents create hardships for tenants. To address this issue, the City has adopted an Affordable Housing Ordinance whose goal is to ensure that all new housing development generates either new affordable housing units or pays an impact fee to the CIty that can be used to subsidize the development of new affordable housing. In addition, the City provides funding to tenant assistance programs and participates in a variety of regional efforts to develop and implement policies that support affordable housing development and tenant protections. The City will identify and complete a process to evaluate the merits and effectiveness of a tenant relocation policy in Daly City. Goal ___ has been added to the AFH.	
		City of San Mateo	No		No		During the Housing Element adoption process in 2014-15 the City received significant community input regarding rising rents and subsequent tenant displacement. The City Council held 6 Council meetings from summer 2015 to summer 2016 on affordable housing including a Housing Forum, and an emergency ordinance to establish tenant relocation payments that did not pass. The Council appointed a Housing Task force that met 7 times from November 2015 to March 2016 to provide recommendations for Council consideration. There was no consensus on tenant relocation payments. This was included in the rent stabilization ballot measure in November 2016 ballot and voted down.
		City of SSF	No		No		Relocation Assistance is not fiscally feasible at this time and the City will coordinate with San Mateo County Housing Authority to better evaluate voucher use and opportunities.

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Increase funding to support fair housing education and outreach services by allocating Measure K funds to service providers.		San Mateo County					
Support education efforts and incentives relating to land use policy in small, non-Entitlement Jurisdictions like Millbrae and Menlo Park to affirmatively further fair housing in those areas.		San Mateo County					
Require landlords to submit information regarding rent increases and evictions		San Mateo County, Daly City, South San Francisco	No		No		See Data Collection above.
Self-Sufficiency enrollment and Hardship Policy: consider a permanent voucher status option for elderly and disabled voucher holders		HACSM					
Evaluate the success of the Landlord Incentive Program		HACSM					
Address timeliness of repairs by landlords in those units occupied by Section 8 voucher holders		HACSM					
Data collection on voucher holders who chose to leave the County		HACSM, South San Francisco HA	No		Yes	See comment above regarding data collection.	
Include goals that are specifically attributable to SSF HA		South San Francisco HA	No		No		The SSF Housing Authority was created in 1977 for the operation of one specific 80 unit public housing project. It does not manage vouchers, nor does it perform any of the other HA duties outside of the management of the one specific project. The SSF HA is monitored annual by HUD for compliance with all HUD regulations, including the requirement to Affirmatively Further Fair Housing. All of the SSF HA resources and capacity are dedicated to the sole project. The City of SSF supports the HA, and has partnered with other jurisdicitons in the region to identify fair housing goals and metrics.
Include goals that specifically address the contributing factor identified		HACSM					

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Increase funding to support fair housing education and outreach services by allocating Measure K funds to service providers.		San Mateo County					
Support education efforts and incentives relating to land use policy in small, non-Entitlement Jurisdictions like Millbrae and Menlo Park to affirmatively further fair housing in those areas.		San Mateo County					
Require landlords to submit information regarding rent increases and evictions		San Mateo County, Daly City, South San Francisco	No		No		See Data Collection above.
Self-Sufficiency enrollment and Hardship Policy: consider a permanent voucher status option for elderly and disabled voucher holders		HACSM					
Evaluate the success of the Landlord Incentive Program		HACSM					
Address timeliness of repairs by landlords in those units occupied by Section 8 voucher holders		HACSM					
Data collection on voucher holders who chose to leave the County		HACSM, South San Francisco HA	No		Yes	See comment above regarding data collection.	
Include goals that are specifically attributable to SSF HA		South San Francisco HA	No		No		The SSF Housing Authority was created in 1977 for the operation of one specific 80 unit public housing project. It does not manage vouchers, nor does it perform any of the other HA duties outside of the management of the one specific project. The SSF HA is monitored annual by HUD for compliance with all HUD regulations, including the requirement to Affirmatively Further Fair Housing. All of the SSF HA resources and capacity are dedicated to the sole project. The City of SSF supports the HA, and has partnered with other jurisdicitons in the region to identify fair housing goals and metrics.
Include goals that specifically address the contributing factor identified		HACSM					

Recommendation Topic	Source of Comment	To which Jurisdiction does this Recommendation Pertain?	Is this Recommendation included in the draft already?	If yes, where?	Have we Accepted these Comments?	If yes, how have we revised the AFH?	If no, why are we choosing to reject these comments?
Include goals that are specifically attributable to SSF HA	National Housing Law Project, 09/15/17	South San Francisco HA	NO		Yes	Goal No. 1. To Promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination and violence.	

SECTION IV.

Assessment of Past Goals, Actions and Strategies

SECTION IV.
Assessment of Past Goals, Actions and Strategies

This section describes how San Mateo County and the participating partners have addressed the fair housing impediments identified in the last fair housing analysis, conducted five years ago.

2012 Impediments, Actions and Accomplishments

The matrix below summarizes the impediments, prioritization ("Need for Action"), and actions and objectives in the 2012 Analysis of Impediments to Fair Housing Choice.

Figure IV-1.
Past AI Goals Matrix

2012 Analysis of Impediments - San Mateo County

Impediment	Source									Protected Classes Most Affected								Need for Action	Actions and Objectives	Notes
	Census Data	Review of Housing Structure	Literature/Case Review	HMDA Data	CRA Data	Housing Complaint Review	Fair Housing Survery	Fair Housing Forums	Other	Disability	Age	Familial Status	Religion	Race	Color	National Origin	Sex			
Private Sector																				
Discriminatory terms, conditions, privileges, or services and facilities in the rental markets						X	X			X	X	X	X	X	X	X	X	Med	Action: Enhance testing and enforcement activies; document outcomes. Objective: Increase number of testing and enforcement activities. Action: Educate landlords and property management companies about fair housing law. Objective: Increase number of outreach and education activities. Action: Educate housing customers in fair housing rights. Objective: Increase number of outreach and education activities.	
Discriminatory refusal to rent or negotiate for rental						X				X	X	X	X	X	X	X	X	Low	Action: Enhance testing and enforcement activies; document outcomes. Objective: Increase number of testing and enforcement activities. Action: Educate landlords and property management companies about fair housing law. Objective: Increase number of outreach and education activities. Action: Educate housing customers in fair housing rights. Objective: Increase number of outreach and education activities.	Most common complaint filed with Project Sentinel; second most common complaint filed with HUD.
Failure to make reasonable accommodation or modification						X	X			X								Med	Action: Enhance testing and enforcement activies; document outcomes. Objective: Increase number of testing and enforcement activities. Action: Educate housing providers about requirements for reasonable accomodation or modification. Objective: Increase number of training sessions.	
Statement of preferences in advertising for rental properties			X			X					X	X	X					Med	Action: Enhance testing and enforcement activies; document outcomes. Objective: Increase number of testing and enforcement activities. Action: Educate landlords and property management companies about fair housing law. Objective: Increase number of outreach and education activities.	
Discriminatory patterns in home purchase loan denials				X										X	X	X	X	Low	Action: Educate buyers through credit counseling and home purchase training. Objective: Increase number of outreach and education activities.	HMDA data indicated higher denial rates among racial and ethnic minorities and women, even when correcting for income.
Discriminatory patterns in predatory lending				X			X							X	X	X		Med	Action: Educate buyers through credit counseling and home purchase training. Objective: Increase number of outreach and education activities.	HDMA data indicated higher rates of subprime loans among black, American Indian, and Hispanic applicants.
Steering in residential real estate market							X							X	X	X		Low	Action: Conduct education, outreach, and enforcement with real estate agents. Objective: Increase number of enforcement, outreach, and education activities.	
Unequal distribution of small business loans					X					X	X	X	X	X	X	X	X	Low	Action: Monitor Community Reinvestment Act lending practices. Objective: Increase number of monitoring activities. Action: Explore ways to engage investment community and encourage the development of a countywide investment approach that benefits protected classes. Objective: Increase number of discussions held. Objective: Develop plan or approach. Objective: Increase number of incentives or other tools offered by jurisdictions.	CRA data indicated that small business loans in the County went disproportionately to areas with more than 80 percent of the median family income.

Figure IV-1 (Cont'd).
Past AI Goals Matrix

Public Sector																				
Lack of 2012 HUD funding for Project Sentinel		X								X	X	X	X	X	X	X	X	Low	Action: Work with Project Sentinel to identify and evaluate causes of HUD funding denial in 2012. Objective: Increase number of causes identified and resolved.	Funding has increased from $28,000 in FY 2012/13 to $35,000 in FY 2016/17
Ineffective fair housing outreach and education efforts by Project Sentinel							X			X	X	X	X	X	X	X	X	Low	Action: Work with Project Sentinel to evaluate current fair housing outreach and education efforts and identify improvements to make efforts more effective. Objective: Increase number of improvements identified and implemented. Action: Enhance fair housing outreach and education activities. Objective: Increase number and quality of activities. Objective: Increase outreach and education in a variety of languages and formats to increase availability.	Project Sentinel has continued internal collaboration with Landlord-Tenant services, which has resulted in comprehensive landlord-tenant and Fair Housing services being more accessible to San Mateo County residents. They have been widely publicizing the Landlord-Tenant hotline number, which has made it easier for San Mateo County residents to access all of their services, including their Fair Housing services.Funding has increased from $28,000 in FY 2012/13 to $35,000 in FY 2016/17
Failure to adequately document fair housing activities done by Project Sentinel							X	X	X	X	X	X	X	X	X	X	X	High	Action: Work with Project Sentinel to improve documentation of activities such as testing and enforcement and focus on sensitive populations. Objective: Increase number of activities documented. Objective: Improvements in documentation quality.	The County has worked with Project Sentinel to greatly improve the manner in which PS reports their activities through our reporting service, City Data Services. This documentation challenge was largely due to the novelty of CDS as a reporting service for Project Sentinel.
Insufficient commitment by some local governments to affirmatively further fair housing choice							X		X	X	X	X	X	X	X	X	X	Med	Action: Review, create, enhance, or improve fair housing ordinance, resolution, policy, or other commitment to affirmatively furthering fair housing. Objective: Present policies and methods to Board of Supervisors. Action: Educate local government staff about fair housing regulations and the agency's jurisdiction-wide commitment. Objective: Increase number of education activities. Action: Increase monitoring and enforcement of policies that affirmatively further fair housing choice. Objective: Increase number of monitoring and enforcement activities.	In review of the five jurisdictions' planning policies, no clear, official fair housing statements could be found outside of the jurisdictions' housing elements or housing departments.
Land use policies that may lead to racial and ethnic segregation	X						X		X	X	X	X	X	X	X	X	X	Med	Action: Perform a neighborhood analysis of the current locations of affordable, assisted, and multi-family housing to identify the overconcentration of racial and ethnic minorities. Objective: Increase number of analyses conducted. Action: Evaluate and implement policies that consider the racial and socio-economic impacts of affordable housing placement. Objective: Increase number and quality of policies implemented.	Census Bureau data illustrated that disproportionate shares of racial and ethnic groups existed in particular parts of the County.
Unequal access to public services such as public transit							X		X	X	X	X	X	X	X	X	X	Med	Action: Evaluate planning decisions in relation to placement and availability of government services. Objective: Increase number of decisions and policies reviewed. Action: Create and implement policies that respond to community needs and serve protected classes equitably. Objective: Increase number of policies and services.	Fair Housing Survey respondents indicated that employment services were limited and difficult to access with public transportation, and geographic analysis of transit routes showed limited availability in certain areas.

Source: San Mateo County.

As detailed above, many of the objectives involved fair housing education and enforcement. These were accomplished with assistance from the County's partners—Project Sentinel, Legal Aid Society, and Community Legal Services of East Palo Alto. Specifically, since 2012, the County has provided funding for the following:

Project Sentinel, $149,920, 2012-present, $160,000 of local Measure K funds 2016-2018

Project Sentinel provides comprehensive fair housing services including complaint investigation, community outreach and education to San Mateo County residents. Project Sentinel designed and administers a program to educate and inform landlords and tenants in San Mateo County about their rights and responsibilities, provide conflict resolution and prevent miscommunication and rental-related conflicts that contribute to the housing crisis for renters in San Mateo County.

During the five-year period since the 2012 AI, Daly City provided $37,500 for Project Sentinel to conduct a minimum of five (5) fair housing investigations annually in response to fair housing complaints; conduct fair housing education and outreach activities, provide fair housing information and referral through a housing hotline (415-HOUSING).

The City of San Mateo also provided financial support for fair housing education and outreach; this support totaled $70,000 over the five-year period.

Legal Aid Society of San Mateo County, $116,325, 2012-present

Legal assistance to people threatened with losing their homes or living in substandard conditions with the goals of keeping people in their homes; preventing homelessness through the enforcement of legal rights, in and out of court; and remedying substandard living conditions through advocacy.

Daly City contributed $60,000 for Legal Aid's Homesavers Program. The Homesavers Program provides legal advising, counseling, and representation to low income renters facing eviction. The City of San Mateo also provided financial support for this program; $85,500 to Legal Aid during the five-year planning period.

Community Legal Services in East Palo Alto (CLSEPA), $116,323, 2012-present

CLSEPA helps tenants who are facing evictions or rent increases, living in unhealthy or unsafe homes, experiencing discrimination or harassment by landlords.

Home for All

The County also worked to increase education and outreach by establishing the Home for All policy working group and website, http://homeforallsmc.com/. Sixteen of the 21 jurisdictions found in the County have adopted the Home for All resolution.

The Home for All working group and website:

- Provides a clear statement of the County's commitment to addressing housing needs;

- Is an information resource for local government staff about how to expand local toolkits to address housing needs;

- Helps evaluate planning decisions in the context of their effect on reducing housing and economic gaps among protected classes.

Home for All is a relatively new effort. Future work will focus on implementation of best practices and policies, many of which are discussed in the Goals and Strategies section of this AFH.

Additional Efforts and Selection of Current Goals

As housing challenges in the County have become more acute, it has become more important to focus on goals and strategies that do more than enhance education and outreach, or provide a more holistic and inclusive planning framework.

San Mateo County. Before this AFH was developed, the County had begun to address the housing crisis by:

- Providing more than $45 million in County funding for new affordable housing development and preservation. These funds were leveraged to create $480 million in total development cost. Many of the units developed or in the pipeline will benefit protected classes in the most challenging housing situations and/or benefit protected classes with disproportionate housing needs (i.e., residents experiencing or at-risk of homelessness, with special needs);

- Creating and preserving (some still in process) 900 affordable units;

- Establishing a pilot preservation fund of $10 million (Measure A funding) in June 2016;

- Allocating $7.5 million for a farmworker housing;

- Allocating $98,000 to Accessory Dwelling Unit Program initiative;

- Assisting nonprofits owning and operating housing for residents with substance abuse challenges with mortgage loans;

- Assisting a nonprofit that serves low-income individuals seeking affordable housing and homeowners struggling to make mortgage payments; and

- Implementing or revising ordinances: impact fees, mobile home park conversion moratorium, inclusionary zoning, second unit amnesty program (in progress), County employee downpayment assistance program.

It is imperative that the goals and strategies developed from this AFH focus on producing and preserving affordable housing to preserve the County's unique position as a county of opportunity for residents of all incomes and protected class characteristic. These efforts are detailed in Section VI.

Daly City's efforts to address housing challenges included:

- As mentioned above, provided funding to Project Sentinel and Legal Aid for fair housing investigation, education, and outreach.
- Funded HIP Housing for its Homesharing program ($60,000) to assist low income households to provide or seek housing. The Homesharing program matches households with rooms to share (providers) with households looking for housing (seekers). HIP Housing also provides information and referral for finding affordable housing.
- Funded Center for Independence of Individuals with Disabilities (CIID) $83,901 for its Housing Accessibility Modification (HAM) Program. The HAM program provides accessibility modifications (i.e., ramps and grab bars) to households with disabilities.
- Facilitated the sale of 23 Below Market Rate deed-restricted single family housing targeted to households at 120 percent AMI. Required completion of homebuyer education.
- Funded MidPeninsula The Farm to develop 51 units of affordable rental housing for households at 30-60 percent AMI. Construction began in 2015 and was completed in 2017. Funding included: HOME: $1,494,997; DCHDFA: $2,420,000 (value of land)
- Participated in 21 Elements as part of ongoing collaboration with other County jurisdictions to share in planning discussions relating to housing (i.e., ADU policy, short term rental policy, Housing Element).

The City of San Mateo:

- Adopted Reasonable Accommodation Ordinance in June 2014 to allow zoning and land use exceptions on residential properties occupied by persons with disabilities.
- Adopted Commercial Linkage Fee for Affordable Housing Ordinance in September 2016.
- Adopted Zoning Code Amendment for Accessory Dwelling Units in March 2017 to streamline requirements and establish reduced fee pilot program for one year.
- Established a Housing Task Force from November 2015 to March 2016. Report published in April 2016 evaluated options to increase affordability and minimize tenant displacement.
- In August 2016, adopted a minimum wage ordinance to increase minimum wage in annual increments to $15 per hour by 2019.
- Put forth a ballot measure to establish Rent Stabilization and Just Cause policies; however, it was rejected by voters in November 2016 election.
- As mentioned above, had annual contracts with Project Sentinel for Fair Housing services: annual Fair Housing workshops or symposiums, bi lingual outreach in community, test cases when warranted, ongoing information and referral.

- Annual contracts with Legal Aid "Home Savers" program that provides legal issues related to housing, mostly tenant evictions.
- Annual contracts with HIP Housing to facilitate home sharing, a total of $85,500 over the five-year planning period.
- Contracts (four years) with Ombudsman Services of San Mateo County, providing oversight and investigations of nursing home care facilities and reports regarding abuse and management issues, totaling $60,500 in five years.
- Assisted developer with HUD refinance to prevent expiring affordability covenants for 200 senior units at Lesley Towers in 2015.
- Completed 209 minor home repairs to very low income homeowners, including accessibility modifications through CIID.
- Deed restricted rental and ownership affordable units constructed: 106 serving 0-50 percent AMI, 55 serving 50-80 percent AMI, 102 serving 80-120 percent AMI.

SECTION V.

Fair Housing Analysis

SECTION V.
Fair Housing Analysis

Section V of the AFH follows the organization of the Fair Housing Analysis requirement of HUD's AFH Tool. It includes the following subsections:

A. Demographic Summary

B. General Issues

i. Segregation/Integration

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

iii. Disparities in Access to Opportunity

iv. Disproportionate Housing Needs

C. Publicly Supported Housing Analysis

D. Disability and Access Analysis

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

Jurisdiction v. region terminology. The "jurisdiction" as defined by the AFH is the city or county or groups of cities and counties that receive HUD block grant funds directly from HUD. The cities participating in this AFH are Daly City, Redwood City, the City of San Mateo, and South San Francisco. The lead entity is San Mateo County. The Housing Authority of San Mateo County is also a participating partner, along with the Housing Authority of South San Francisco.

For the purposes of the AFH, the "region" used in comparative analysis is the Core Based Statistical Area, or CBSA. CBSA boundaries are set by the U.S. Office of Management and Budget (OMB) and include both metropolitan and micropolitan (smaller consolidated cities) areas. In addition to San Mateo County, the San Francisco CBSA includes Alameda County, Contra Costa County, San Francisco County, and Marin County. San Mateo County makes up about 17 percent of the region's population.

Consistent with the terminology used in the AFFH maps, the CBSA will be referred to as the "region" in this document.

The data and analysis in this section focus on those incorporated areas that make up the "jurisdiction" (called participating partners) and San Mateo County. Trends in the jurisdiction are compared to the region. Trends and conditions of non-participating partners (e.g., East Palo Alto) are discussed when relevant to overall housing challenges in the County and region.

Demographic Summary

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

San Mateo County and the broader San Francisco region have experienced dramatic change since the 1990s. The 1990s was a decade of very strong population growth. The 2000s were marked by a slowing of growth with the Great Recession, followed by the current rebound.

According to analysis completed by the Association of Bay Area Governments (ABAG), during the 1990s and 2000s, population growth was concentrated in the region's suburban and rural markets. This is consistent with a national shift in the housing market toward larger, luxury homes in suburban and ex-urban markets.

Growth patterns shifted after 2010 with resurgence in urban living, largely driven by the large cohort of Millennials reaching housing independence. ABAG notes that Santa Clara, Alameda, and San Francisco Counties, the three largest counties in the region, had the fastest rate of population growth between 2010 and 2014.

As shown in the figure below, San Mateo County exhibits the roller coaster growth the region experienced during the past 20 to25 years, yet the patterns differ by city. During the 1990s, population in East Palo Alto grew by 26 percent, followed by Redwood City at 14 percent. The City of San Mateo grew by a relatively low 8 percent. In the 2000s, East Palo Alto and Daly City experienced population losses.

Figure V-1.
Population Growth and Percent Change, San Mateo County and Region, 1990, 2000, and 2010

	1990	2000	2010	2015 estimate	% change 1990-2000	% change 2000-2010	% change 1990-2015
Daly City	92,311	103,625	101,123	104,930	12%	-2%	14%
Redwood City	66,072	75,402	76,815	81,342	14%	2%	23%
San Mateo City	85,486	92,482	97,207	101,335	8%	5%	19%
South San Francisco City	54,312	60,552	63,632	66,217	11%	5%	22%
East Palo Alto	23,451	29,506	28,155	29,198	26%	-5%	25%
San Mateo County	649,623	707,163	718,451	748,731	9%	2%	15%
Region (CBSA)	3,686,592	4,123,742	4,335,391	4,528,894	12%	5%	23%
Alameda County	1,279,182	1,443,741	1,510,271	1,584,983	13%	5%	24%
Contra Costa County	803,732	948,816	1,049,025	1,096,068	18%	11%	36%
San Francisco County	723,959	776,733	805,235	840,763	7%	4%	16%
Marin County	230,096	247,289	252,409	258,349	7%	2%	12%

Note: East Palo Alto is not a participating partner. The city is shown in the table to demonstrate how its growth compares with participating partners' growth.

Source: www.21elements.com.

ABAG projects that East Palo Alto will be one of the fastest growing areas in the County between 2010 and 2020. The city's location, relatively affordable housing, and redevelopment activity position it for more growth. This small city is located near Facebook's new headquarters, the site

of many venture capital firms, and Palo Alto/Stanford University. Because of these factors, this city, in particular, has a high risk of resident displacement, which is discussed in latter parts of this section.

The HUD Demographic Trends tables below show demographic trends between 1990 and 2010 for the County, the region, and participating partners.

Overall, the County has grown more diverse in many ways. The County is currently about 51 percent White, non-Hispanic, compared with 68 percent in 1990. This shift is largely due to growth in Hispanic residents (34,000 increase) and Asian residents (43,000), as well as a loss in White, non-Hispanic residents (decline of 41,000). The County also lost African American residents over this period (decline of 9,500).

These trends are consistent with the region overall, although, in the region, growth in Hispanic and Asian residents far outpaced the decline in White non-Hispanic and African American residents (about 3 to 1).

The County also gained about 40,000 foreign-born residents and 20,000 residents with Limited English Proficiency (LEP).

The County's shift in age distribution was modest and the proportion of families with children increased very slightly. This is also consistent with the region.

Figure V-2.
Demographic Trends, San Mateo County and Region, 1990, 2000, and 2010

	(San Mateo County, CA CDBG, ESG) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	241,223	68.44%	222,774	59.20%	196,642	51.67%	200,489	51.01%
Black, Non-Hispanic	20,021	5.68%	15,249	4.05%	12,424	3.26%	10,497	2.67%
Hispanic	50,513	14.33%	70,338	18.69%	81,784	21.49%	84,310	21.45%
Asian or Pacific Islander, Non-Hispanic	38,775	11.00%	62,448	16.60%	86,325	22.68%	82,179	20.91%
Native American, Non-Hispanic	1,201	0.34%	1,939	0.52%	1,791	0.47%	593	0.15%
National Origin								
Foreign-born	70,772	20.15%	99,860	26.59%	105,253	27.72%	110,318	29.05%
LEP								
Limited English Proficiency	34,550	9.83%	52,071	13.87%	51,517	13.57%	54,389	14.32%
Sex								
Male	174,517	49.56%	185,317	49.24%	192,616	49.01%	192,616	49.01%
Female	177,633	50.44%	191,075	50.77%	200,435	50.99%	200,435	50.99%
Age								
Under 18	76,225	21.65%	90,038	23.92%	90,611	23.05%	90,611	23.05%
18-64	232,896	66.14%	239,621	63.66%	247,861	63.06%	247,861	63.06%
65+	43,030	12.22%	46,733	12.42%	54,579	13.89%	54,579	13.89%
Family Type								
Families with children	39,005	43.08%	35,118	46.70%	45,512	45.89%	45,512	45.89%

	(San Francisco-Oakland-Hayward, CA) Region							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	2,157,395	58.65%	2,025,815	49.12%	1,840,372	42.45%	1,840,372	42.45%
Black, Non-Hispanic	411,437	11.19%	418,830	10.16%	392,843	9.06%	349,895	8.07%
Hispanic	16,266	0.44%	30,058	0.73%	938,794	21.65%	938,794	21.65%
Asian or Pacific Islander, Non-Hispanic	578,189	15.72%	876,048	21.24%	1,119,174	25.81%	1,024,377	23.63%
Native American, Non-Hispanic	505,217	13.74%	733,049	17.78%	27,459	0.63%	10,657	0.25%
National Origin								
Foreign-born	778,388	21.17%	1,127,959	27.35%	1,264,467	29.17%	1,310,790	30.23%
LEP								
Limited English Proficiency	449,197	12.21%	667,712	16.19%	719,857	16.60%	735,980	16.98%
Sex								
Male	1,808,731	49.18%	2,037,408	49.41%	2,137,801	49.31%	2,137,801	49.31%
Female	1,868,981	50.82%	2,086,329	50.59%	2,197,590	50.69%	2,197,590	50.69%
Age								
Under 18	806,480	21.93%	953,037	23.11%	920,636	21.24%	920,636	21.24%
18-64	2,434,697	66.20%	2,687,478	65.17%	2,868,275	66.16%	2,868,275	66.16%
65+	436,536	11.87%	483,222	11.72%	546,480	12.61%	546,480	12.61%
Family Type								
Families with children	410,719	45.97%	357,466	47.23%	459,242	45.61%	459,242	45.61%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

Daly City is the most diverse of the participating partners: 56 percent of its residents are Asian and another 24 percent are Hispanic. Strong growth in the city's Asian population has driven its growing diversity. Just 13 percent of residents are White, non-Hispanic. More than half of Daly City's residents are foreign-born. Unlike the County overall, since 1990, Daly City has experienced a decline in families with children (48% in 1990 to 39% currently).

South San Francisco is also very diverse, with 22 percent of residents White, non-Hispanic, 34 percent Hispanic, and 38 percent Asian. Since 1990, foreign born and LEP residents have grown and families with children have declined slightly.

In contrast, the proportion of families with children in Redwood City has increased (24% to 32%). The city has also grown more diverse, mostly due to growth in Hispanic residents and decline of White non-Hispanic residents.

The City of San Mateo has the largest White, non-Hispanic resident population at 46 percent of all residents—although these residents have declined since 1990, offset by growth in Hispanic and Asian residents. The city's proportion of families with children has grown from 40 to 45 percent. Residents who are foreign born and LEP have also increased.

All of the cities have lost African American and White non-Hispanic residents since 1990. The largest loss in African Americans occurred between 1990 and 2000.

Numerically, the largest decline in African Americans occurred in Daly City (3,600). The largest decline in White non-Hispanic residents occurred in the City of San Mateo and Daly City (around 13,000 each).

Figure V-3.
Table 2 - Demographic Trends, Daly City

	(Daly City, CA CDBG, HOME) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	25,302	27.67%	18,372	17.85%	14,050	13.93%	12,192	13.26%
Black, Non-Hispanic	6,656	7.28%	5,074	4.93%	3,964	3.93%	3,036	3.30%
Hispanic	20,208	22.10%	22,680	22.03%	23,636	23.44%	21,740	23.64%
Asian or Pacific Islander, Non-Hispanic	38,783	42.41%	55,038	53.47%	58,301	57.81%	51,875	56.42%
Native American, Non-Hispanic	260	0.28%	446	0.43%	312	0.31%	102	0.11%
National Origin								
Foreign-born	41,309	45.02%	54,099	52.42%	52,689	52.13%	53,500	52.93%
LEP								
Limited English Proficiency	21,848	23.81%	28,633	27.75%	28,625	28.32%	29,497	29.18%
Sex								
Male	44,787	48.95%	50,553	49.11%	45,387	49.36%	45,387	49.36%
Female	46,712	51.05%	52,383	50.89%	46,561	50.64%	46,561	50.64%
Age								
Under 18	21,697	23.71%	23,689	23.01%	17,755	19.31%	17,755	19.31%
18-64	60,003	65.58%	66,801	64.90%	61,886	67.31%	61,886	67.31%
65+	9,799	10.71%	12,445	12.09%	12,307	13.38%	12,307	13.38%
Family Type								
Families with children	10,333	47.80%	8,466	44.88%	7,998	38.86%	7,998	38.86%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

Figure V-4.
Table 2 - Demographic Trends, Redwood City

	(Redwood City, CA CDBG, HOME) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	43,006	65.62%	40,303	53.78%	33,694	43.95%	31,379	43.05%
Black, Non-Hispanic	2,233	3.41%	2,065	2.76%	2,143	2.80%	1,595	2.19%
Hispanic	15,931	24.31%	23,511	31.37%	29,784	38.85%	28,905	39.66%
Asian or Pacific Islander, Non-Hispanic	3,950	6.03%	8,126	10.84%	10,299	13.43%	8,434	11.57%
Native American, Non-Hispanic	261	0.40%	424	0.57%	387	0.50%	138	0.19%
National Origin								
Foreign-born	15,664	23.82%	22,635	30.15%	24,369	31.72%	24,883	32.39%
LEP								
Limited English Proficiency	9,926	15.09%	14,021	18.68%	14,109	18.37%	15,588	20.29%
Sex								
Male	32,988	50.27%	37,698	50.31%	36,331	49.84%	36,331	49.84%
Female	32,633	49.73%	37,230	49.69%	36,557	50.16%	36,557	50.16%
Age								
Under 18	14,358	21.88%	17,667	23.58%	17,425	23.91%	17,425	23.91%
18-64	43,831	66.80%	49,927	66.63%	47,921	65.75%	47,921	65.75%
65+	7,431	11.32%	7,334	9.79%	7,542	10.35%	7,542	10.35%
Family Type								
Families with children	7,760	47.52%	7,510	50.45%	8,829	51.06%	8,829	51.06%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

Figure V-5.
Table 2 - Demographic Trends, City of San Mateo

	(San Mateo, CA CDBG) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	58,168	67.76%	52,323	56.60%	45,164	46.56%	44,364	46.21%
Black, Non-Hispanic	2,952	3.44%	2,604	2.82%	2,666	2.75%	2,098	2.19%
Hispanic	13,213	15.39%	18,938	20.48%	25,767	26.57%	25,699	26.77%
Asian or Pacific Islander, Non-Hispanic	11,083	12.91%	17,076	18.47%	22,542	23.24%	19,920	20.75%
Native American, Non-Hispanic	256	0.30%	534	0.58%	426	0.44%	140	0.15%
National Origin								
Foreign-born	20,518	23.82%	27,843	30.08%	31,429	32.33%	32,491	33.42%
LEP								
Limited English Proficiency	11,035	12.81%	14,682	15.86%	16,730	17.21%	17,690	18.20%
Sex								
Male	42,033	48.93%	45,177	48.93%	46,871	48.82%	46,871	48.82%
Female	43,875	51.07%	47,158	51.07%	49,133	51.18%	49,133	51.18%
Age								
Under 18	15,930	18.54%	19,364	20.97%	20,050	20.88%	20,050	20.88%
18-64	56,074	65.27%	59,034	63.94%	62,231	64.82%	62,231	64.82%
65+	13,903	16.18%	13,937	15.09%	13,723	14.29%	13,723	14.29%
Family Type								
Families with children	8,749	40.04%	8,889	43.65%	10,433	45.13%	10,433	45.13%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

Figure V-6.
Table 2 - Demographic Trends, South San Francisco

	(South San Francisco, CA CDBG) Jurisdiction							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	24,356	44.76%	18,553	30.63%	14,059	22.19%	12,697	21.59%
Black, Non-Hispanic	2,053	3.77%	1,929	3.18%	1,857	2.93%	1,427	2.43%
Hispanic	14,681	26.98%	19,210	31.71%	21,532	33.99%	20,038	34.07%
Asian or Pacific Islander, Non-Hispanic	12,882	23.67%	19,564	32.30%	25,237	39.84%	22,288	37.90%
Native American, Non-Hispanic	285	0.52%	422	0.70%	335	0.53%	131	0.22%
National Origin								
Foreign-born	16,502	30.19%	23,679	38.93%	25,484	40.05%	27,075	42.55%
LEP								
Limited English Proficiency	8,848	16.18%	13,016	21.40%	13,207	20.75%	14,866	23.36%
Sex								
Male	26,785	49.19%	30,006	49.54%	29,073	49.43%	29,073	49.43%
Female	27,662	50.81%	30,565	50.46%	29,741	50.57%	29,741	50.57%
Age								
Under 18	13,076	24.02%	14,988	24.74%	12,732	21.65%	12,732	21.65%
18-64	35,226	64.70%	37,792	62.39%	38,460	65.39%	38,460	65.39%
65+	6,145	11.29%	7,791	12.86%	7,622	12.96%	7,622	12.96%
Family Type								
Families with children	6,592	47.64%	5,365	47.09%	6,041	42.76%	6,041	42.76%

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS.

Patterns in tenure. *Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.*

As shown in the figure below, except for Redwood City, homeownership has declined modestly in all jurisdictions and in the County since 2000. Daly City and South San Francisco had the greatest declines in homeownership (4% and 3%, respectively). East Palo Alto had a significant increase in household size, on top of an already high average household size. These trends are due to demographic shifts—growth in residents with larger family sizes and younger residents tend to rent—as well as decreasing affordability and, consequently, increased overcrowding.

Figure V-7.
Tenure and Average Household Size, 2000 and 2011

	2000			2011			Change 2000-2011		
	Renters	Owners	Average Household Size	Renters	Owners	Average Household Size	Renters	Owners	Average Household Size
Daly City	40%	60%	3.30	44%	56%	3.21	4%	-4%	-0.09
Redwood City	47%	53%	2.60	47%	53%	2.66	0%	0%	0.06
San Mateo City	46%	54%	2.40	47%	53%	2.52	1%	-1%	0.12
South San Francisco City	37%	63%	3.10	40%	60%	2.96	3%	-3%	-0.14
East Palo Alto	57%	43%	4.20	58%	42%	4.40	1%	-1%	0.20
San Mateo County	39%	61%	2.70	41%	59%	2.70	2%	-2%	0.00

Source: 21housingelements.com.

As shown in the table below, there is a significant variation in homeownership rates by race and ethnicity. The overall homeownership rate is about 60 percent. By race and ethnicity:

- White, non-Hispanic residents exceed the County homeownership rate overall at 68 percent;
- Asian homeownership rate is a little above the County average (63%);
- African American, Hispanic, and Native American households have homeownership rates of about two thirds of White or Asian residents (34-39%).
- The region has a smaller gap in ownership for African American and Hispanic households, with the exception of Daly City. The gap in White/African American ownership is 28 percentage points (v. 6 percentage points higher than for the County overall) and the White/Hispanic gap is 20 percentage points (v. 29 percentage points).

Figure V-8.
Table 16 - Homeownership and Rental Rates by Race/Ethnicity, Jurisdictions and Region

	(Daly City, CA CDBG, HOME) Jurisdiction				(Redwood City, CA CDBG, HOME) Jurisdiction				(San Mateo, CA CDBG) Jurisdiction				(South San Francisco, CA CDBG) Jurisdiction				(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction				(San Francisco-Oakland-Hayward, CA) Region			
	Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White	3,810	60%	2,490	40%	9,795	62%	5,880	38%	13,090	60%	8,615	40%	4,265	70%	1,835	30%	77,540	68%	35,959	32%	513,295	61%	328,315	39%
Black	510	45%	625	55%	75	13%	520	87%	215	24%	675	76%	165	27%	455	73%	1,943	34%	3,730	66%	47,205	33%	93,885	67%
Hispanic	2,830	42%	3,960	58%	2,355	30%	5,495	70%	2,075	32%	4,390	68%	2,320	38%	3,735	62%	12,675	39%	20,195	61%	101,040	41%	147,765	59%
Asian or Pacific Islander	10,295	63%	5,935	37%	2,040	67%	1,000	33%	4,550	57%	3,490	43%	5,555	72%	2,145	28%	26,424	63%	15,594	37%	200,525	58%	146,485	42%
Native American	4	10%	35	90%	50	50%	50	50%	25	71%	10	29%	4	21%	15	79%	89	36%	158	64%	1,904	39%	2,945	61%
Other	260	36%	470	64%	235	44%	305	56%	440	47%	500	53%	220	43%	295	57%	2,375	52%	2,214	48%	18,140	41%	25,620	59%
Total Household Units	17,715	57%	13,515	43%	14,540	52%	13,245	48%	20,395	54%	17,685	46%	12,535	60%	8,480	40%	121,060	61%	77,859	39%	882,115	54%	745,010	46%

Note: Data presented are numbers of households, not individuals.
Refer to the Data Documentation for details (www.hudexchange.info).

Source: CHAS.

Although the decline in homeownership in the County since 2000 is small (2 percentage points), changes in ownership are not uniform across neighborhoods. The following maps show how tenure shifted between 2000 and 2015. The first set of maps show neighborhoods with the highest and lowest homeownership rates and how these have changed. The second set shows how rentership has changed. The maps use a highest/lowest ownership and rentership framework to make changes easier to see.

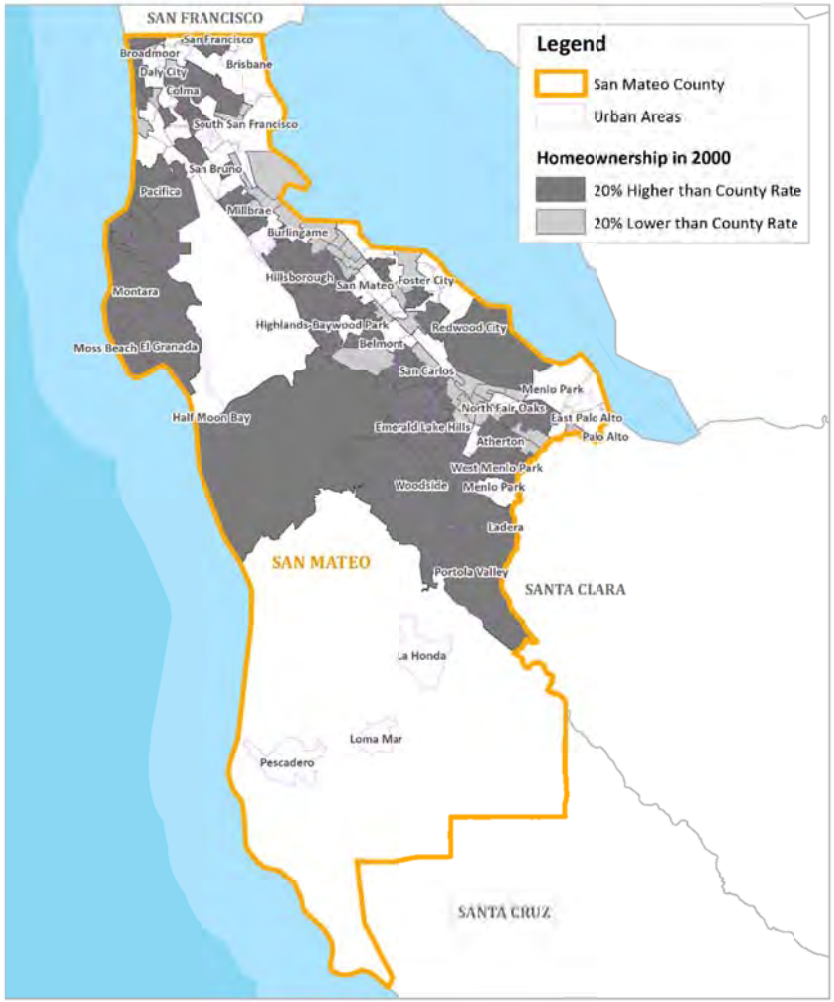
The most striking changes between 2000 and 2015 include:

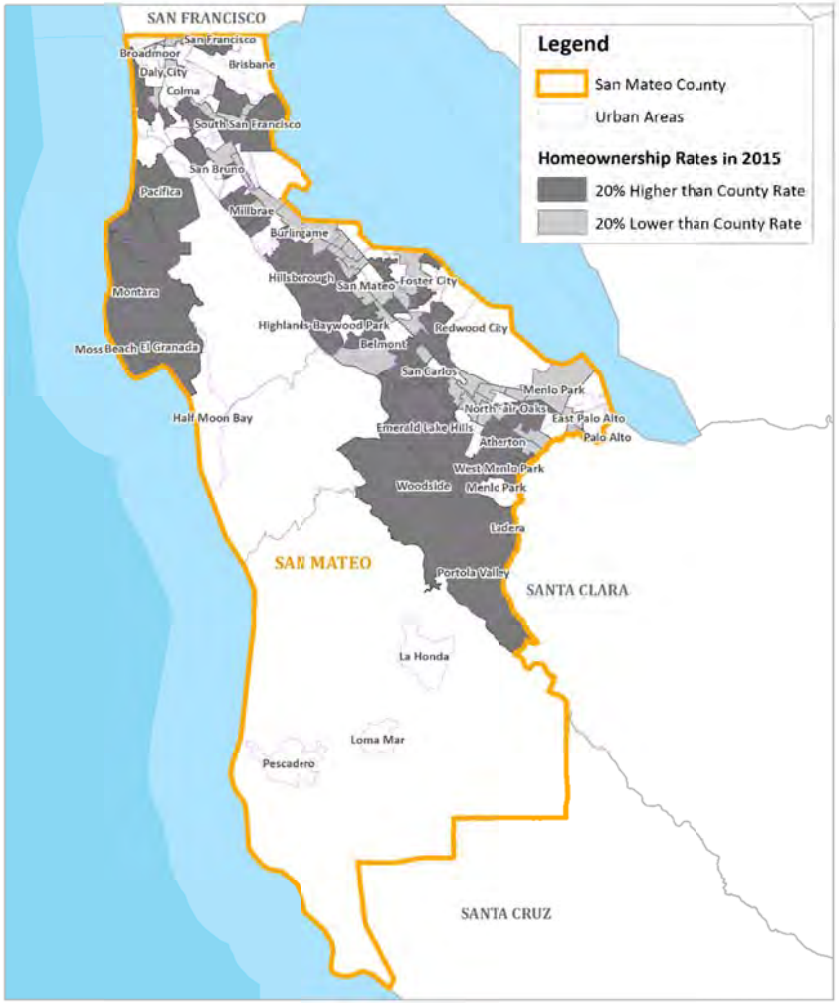
- Neighborhoods in the Broadmoor/Daly City area fell from the highest ownership category.
- Areas around East Palo Alto moved into the higher rentership category, as did a neighborhood in the City of San Mateo.
- Neighborhoods in and around South San Francisco increased ownership.

A number of factors may cause movement away from homeownership into rentership. An increase in rentership may be a positive trend if it increases the inventory of affordable units. However, it can also indicate displacement of low income households and a loss of overall affordable inventory, if units are converted to higher priced rentals.

Increases in ownership may be due to residents leaving higher priced neighborhoods to find affordable ownership opportunities. Ironically, such market activity can result in rising home prices, prompting redevelopment, investment, and further displacement.

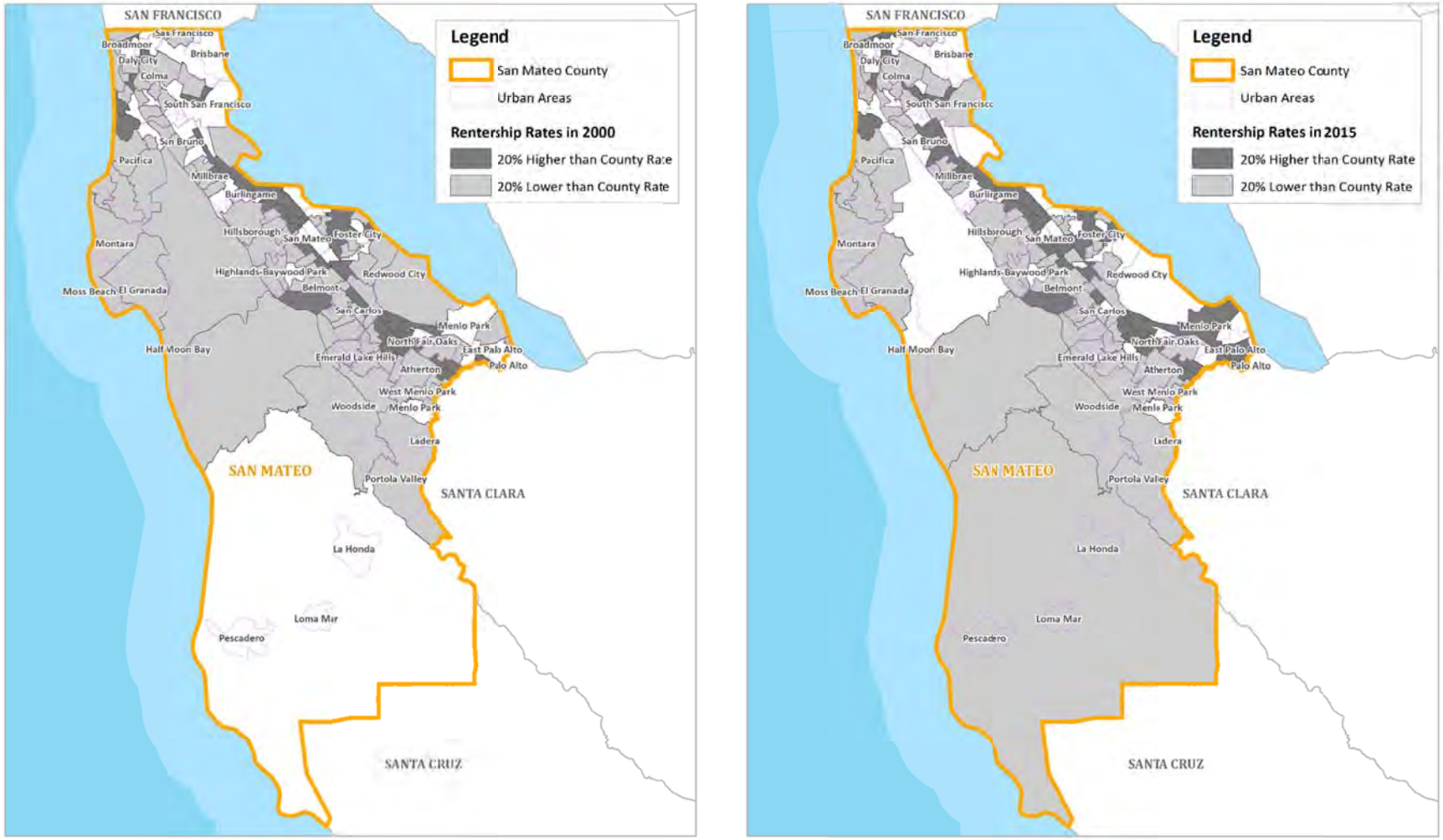
Figure V-9.
Homeownership 20 Percent Higher and 20 Percent Lower than County Homeownership Rate, 2000 and 2015





Source: 2000 Census, 2015 5-year ACS, BBC Research & Consulting, TIGER/Line, ESRI.

Figure V-10.
Rentership 20 Percent Higher and 20 Percent Lower than County Rentership Rate, 2000 and 2015



Source: 2000 Census, 2015 5-year ACS, BBC Research & Consulting, TIGER/Line, ESRI.

General Issues

This section addresses additional demographic patterns, which fall under the heading of "General Issues" in the AFH Tool. These include:

- *Segregation and Integration;*
- *Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs);*
- *Disparities in Access to Opportunity—Education, Employment, Transportation, Low Poverty Environments, and Environmentally Healthy Neighborhoods; and*
- *Disproportionate Housing Needs.*

Segregation/Integration

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

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

c. *Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).*

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

e. *Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.*

Segregation levels and patterns. The Dissimilarity Index, or DI, is a common tool that measures segregation in a community. The DI in an index that measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.

It is important to note that the DI that HUD provides for AFH completion uses White, non-Hispanic residents as the primary comparison group. That is, all DI values compare a particular racial group's distribution in the County against the distribution of White, non-Hispanic residents.

Table 3, below, shows the DI for the participating partners, including trends from 1990.

African Americans are the only racial group facing consistently high segregation in San Mateo County. This segregation, as measured by the DI, has decreased over time and was approaching a moderate level according to the most recent Census survey. African American/White segregation decreased or was stable in all participating partners.

In contrast, Hispanic and Asian residents are more segregated (relative to White, non-Hispanic residents) today than in 1990. These groups have also experienced the strongest growth in the County. Residential settlement patterns of these two groups during the past 25 years appear to have influenced segregation.

Figure V-11.
Table 3 - Racial/Ethnic Dissimilarity Trends, San Mateo County and Cities

	(Daly City, CA CDBG, HOME) Jurisdiction				(Redwood City, CA CDBG, HOME) Jurisdiction				(San Mateo, CA CDBG) Jurisdiction				(South San Francisco, CA CDBG) Jurisdiction				(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	21.42	24.81	24.48	24.85	42.13	42.44	40.51	39.99	29.15	28.39	26.70	30.37	29.99	28.69	23.68	26.64	42.06	42.27	40.66	43.86
Black/White	27.84	27.16	25.36	26.62	45.76	43.63	38.84	45.84	46.52	37.43	31.33	36.48	40.04	37.98	29.59	36.90	64.58	58.70	49.75	56.78
Hispanic/White	31.37	35.50	34.85	36.65	50.01	54.89	53.20	50.18	34.69	39.32	36.98	39.74	27.10	29.99	30.56	35.86	44.44	51.30	49.36	52.36
Asian or Pacific Islander/White	22.08	24.58	24.02	25.30	24.06	32.01	30.23	36.60	24.78	21.23	18.37	22.44	40.87	33.87	24.83	31.98	38.73	38.80	39.70	42.17

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census.

In general, Table 3 reveals that the County is relatively well integrated—particularly given its racial and ethnic diversity.[1] Compared to the region DI (see below), San Mateo County has lower or similar levels of segregation as measured by the DI.

[1] More diverse communities usually have higher dissimilarity indices—and less diverse communities, lower indices. This is due to a number of factors, including settlement patterns and formation of ethnic enclaves, historical practices and policies leading to segregation, and limited housing choices.

Figure V-12.
Table 3 - Racial/Ethnic Dissimilarity Trends, San Francisco Region

Racial/Ethnic Dissimilarity Index	(San Francisco-Oakland-Hayward, CA) Region			
	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	44.67	44.68	43.10	45.89
Black/White	66.72	63.71	59.29	63.49
Hispanic/White	43.56	49.67	49.59	51.24
Asian or Pacific Islander/White	45.55	44.94	44.33	48.21

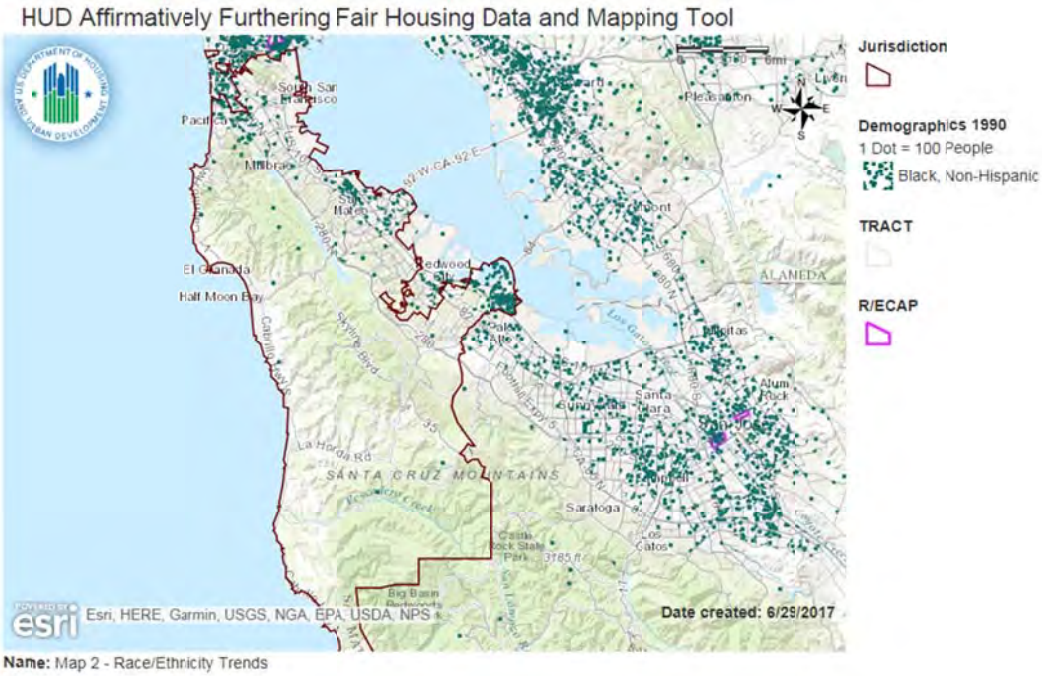
Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census.

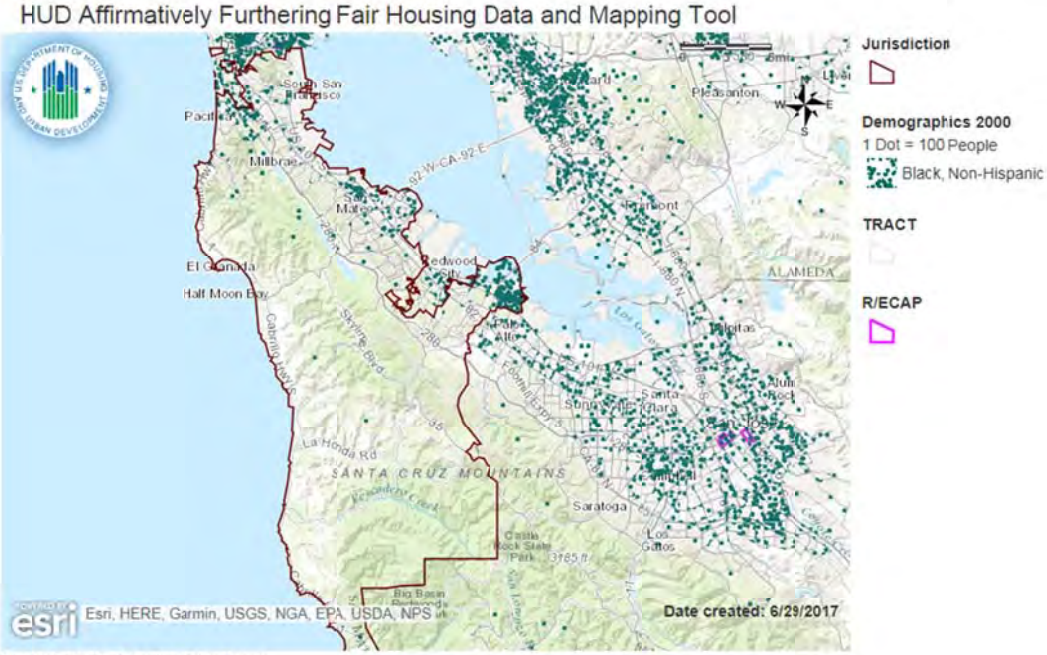
The following maps compare racial and ethnic distribution patterns in the County in 1990, 2000, and 2010. It is important to note that all of the maps are set to the same dot renderer (1 dot = 100 people) to allow an equal comparison among racial and ethnic categories. The maps reveal:

- A decline in African American residents between 2000 and 2010;
- Lower dispersion—and, thus, growing concentrations—of Asian and Hispanic residents in 2010 than in 2000 (despite strong growth among these groups); and
- A decline in White, Non-Hispanic residents.

Figure V-13a.
Map 2 – Race/Ethnicity Trends: African American, 1990 & 2000



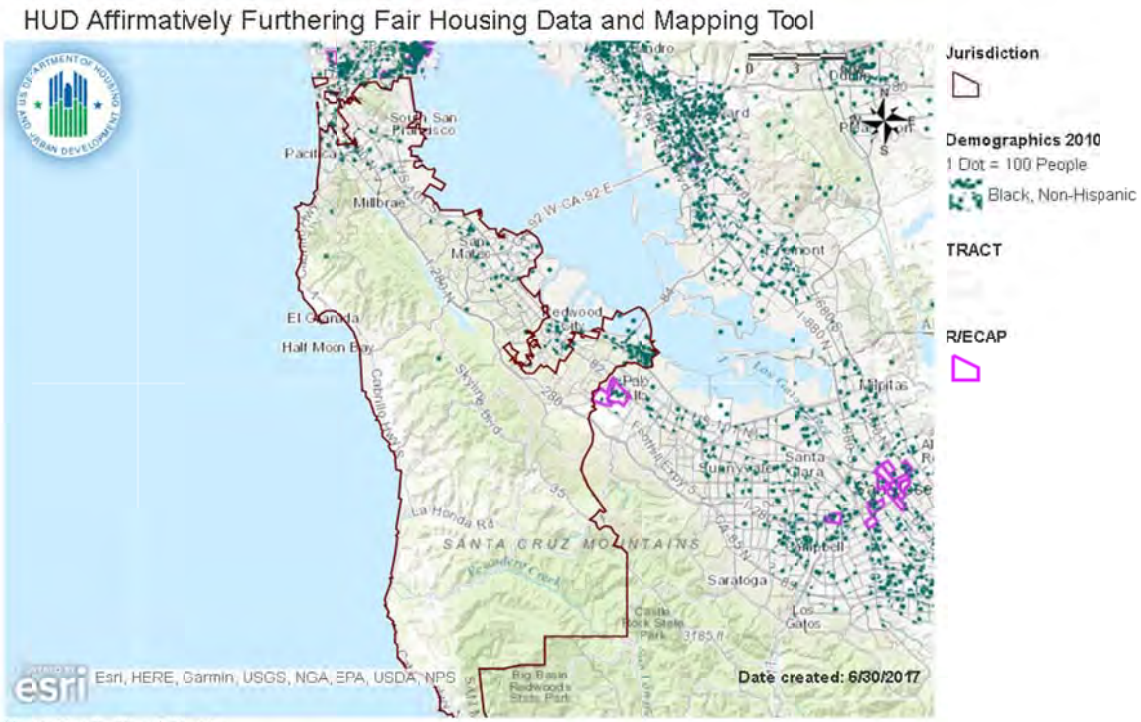
Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-13b.
Map 1 – Race/Ethnicity: African American, 2010



Name: Map 1 - Race/Ethnicity

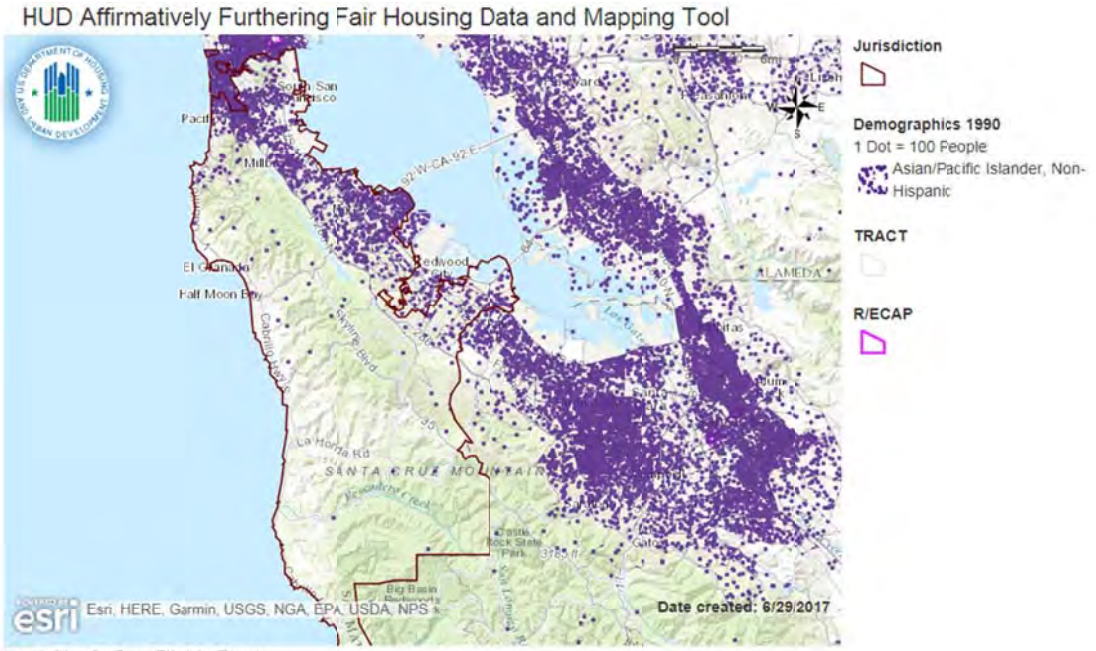
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

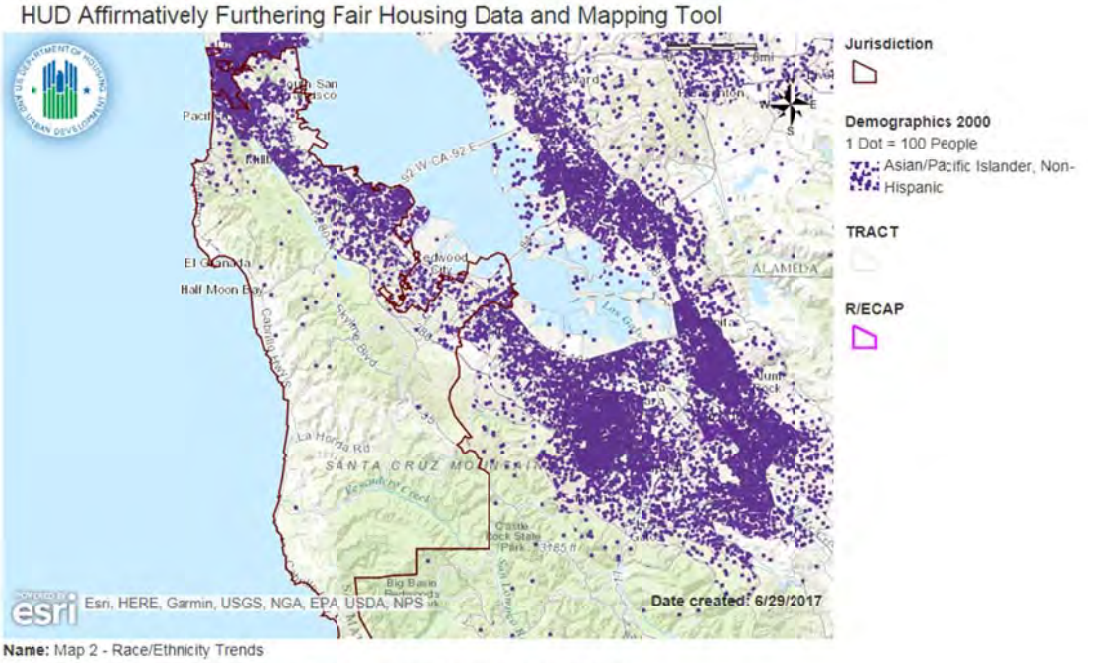
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-14a.
Map 2 – Race/Ethnicity Trends: Asian, 1990 & 2000



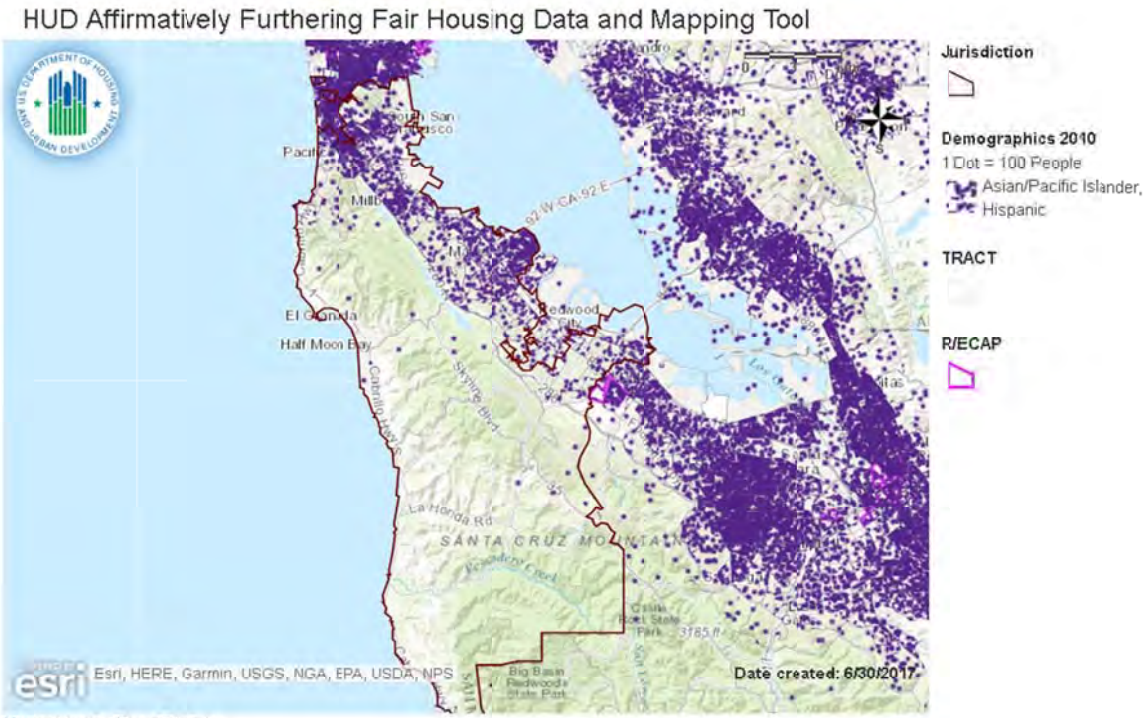
Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-14b.
Map 1 – Race/Ethnicity: Asian, 2010



Name: Map 1 - Race/Ethnicity

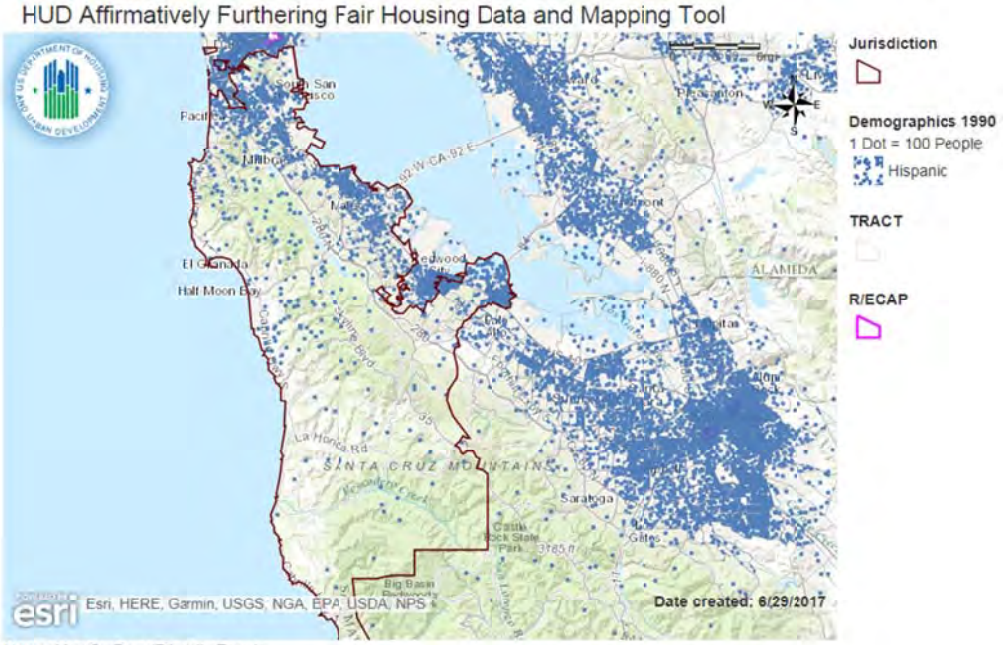
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

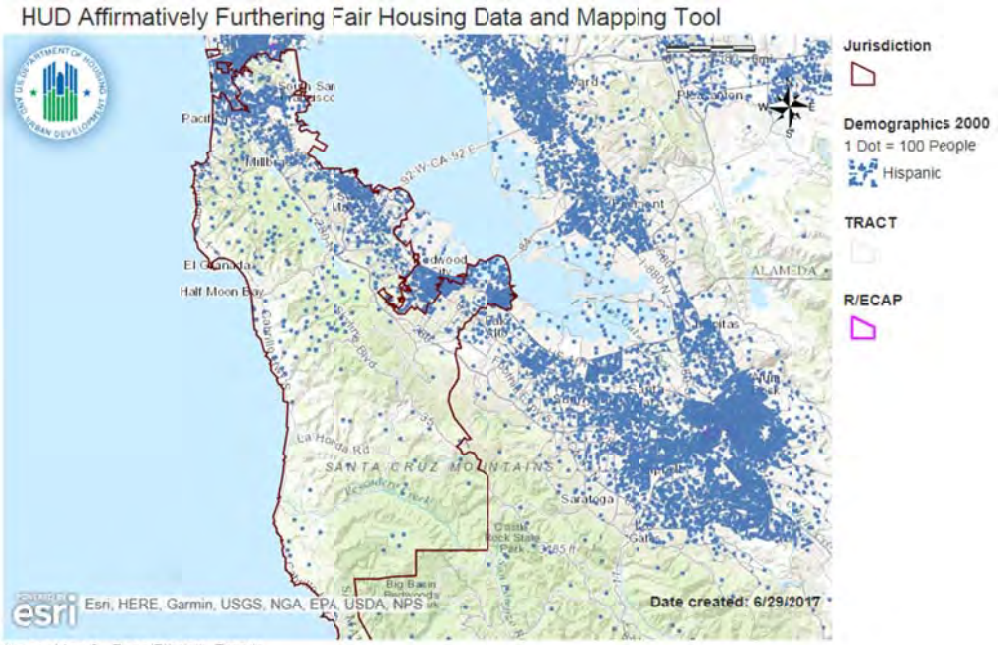
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-15a.
Map 2 – Race/Ethnicity Trends: Hispanic, 1990 & 2000



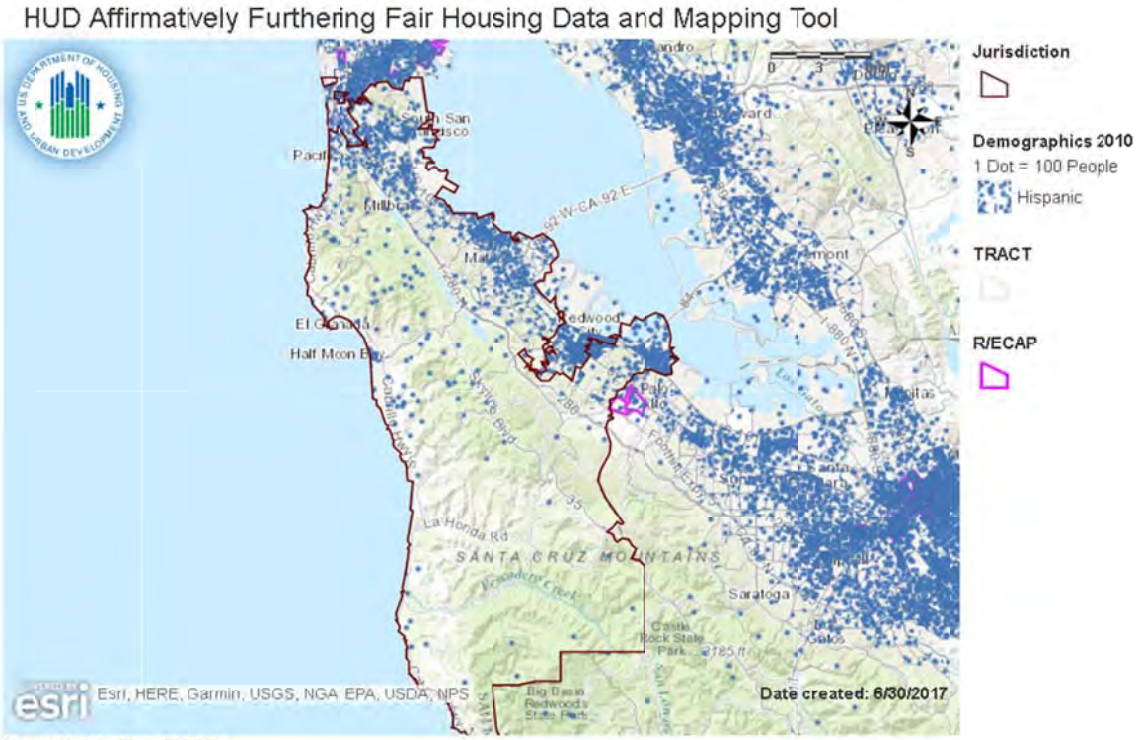
Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-15b.
Map 1 – Race/Ethnicity: Hispanic, 2010



Name: Map 1 - Race/Ethnicity

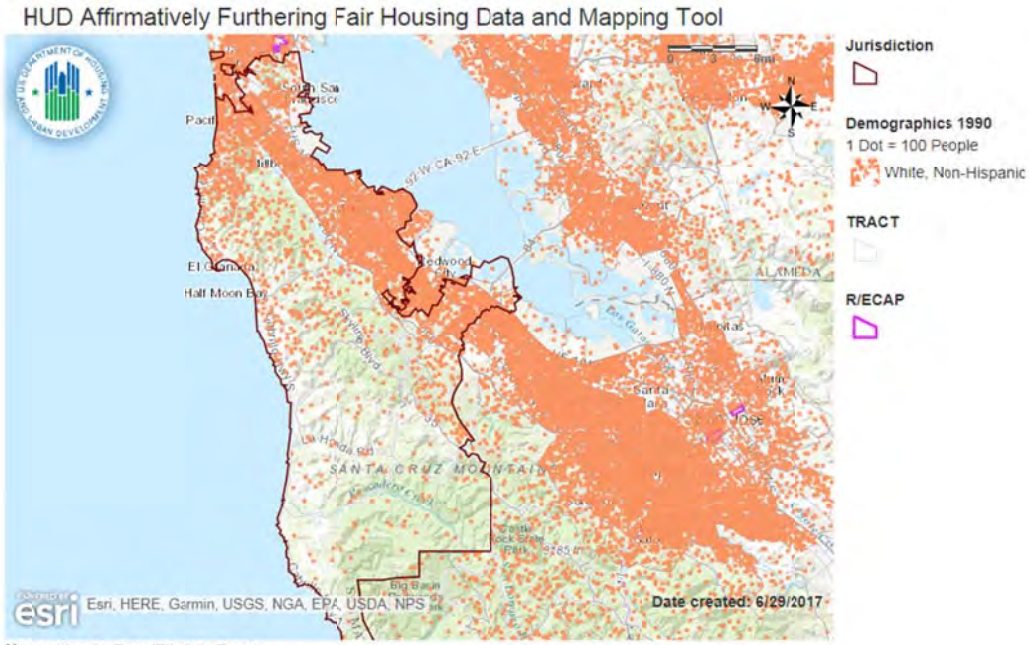
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

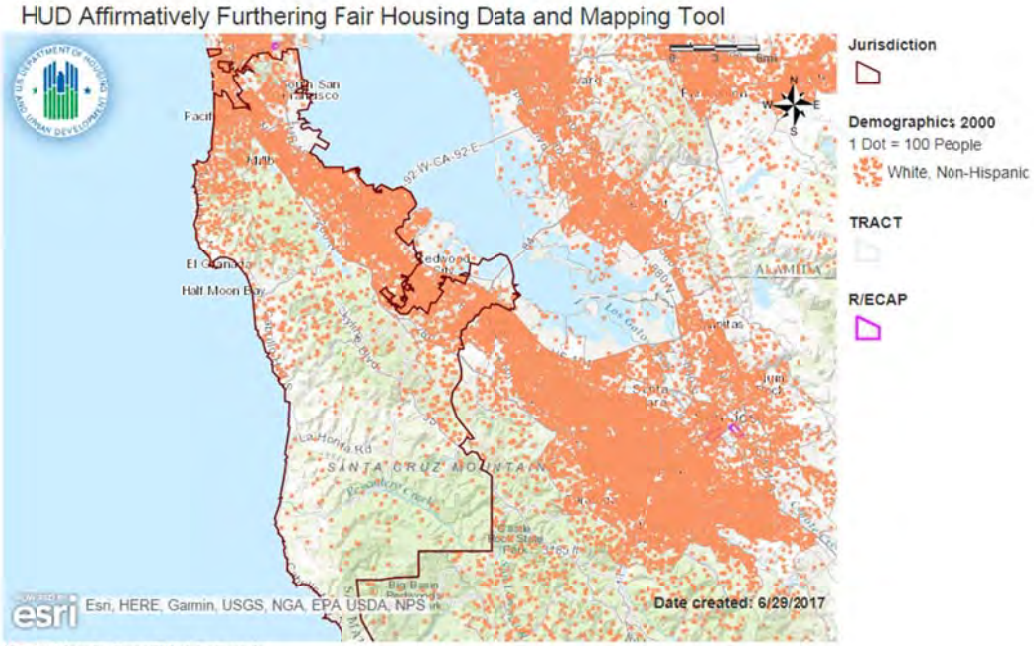
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-16a.
Map 2 – Race/Ethnicity Trends: White, Non-Hispanic, 1990 & 2000



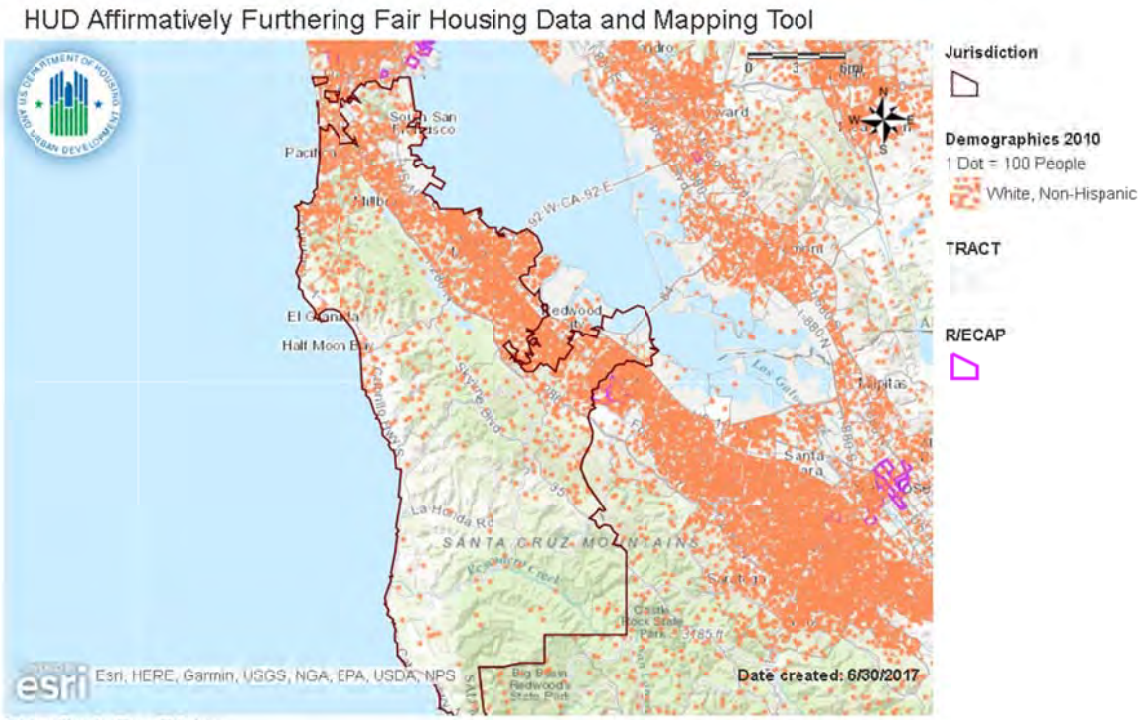
Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-16b.
Map 1 – Race/Ethnicity: White, Non-Hispanic,2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

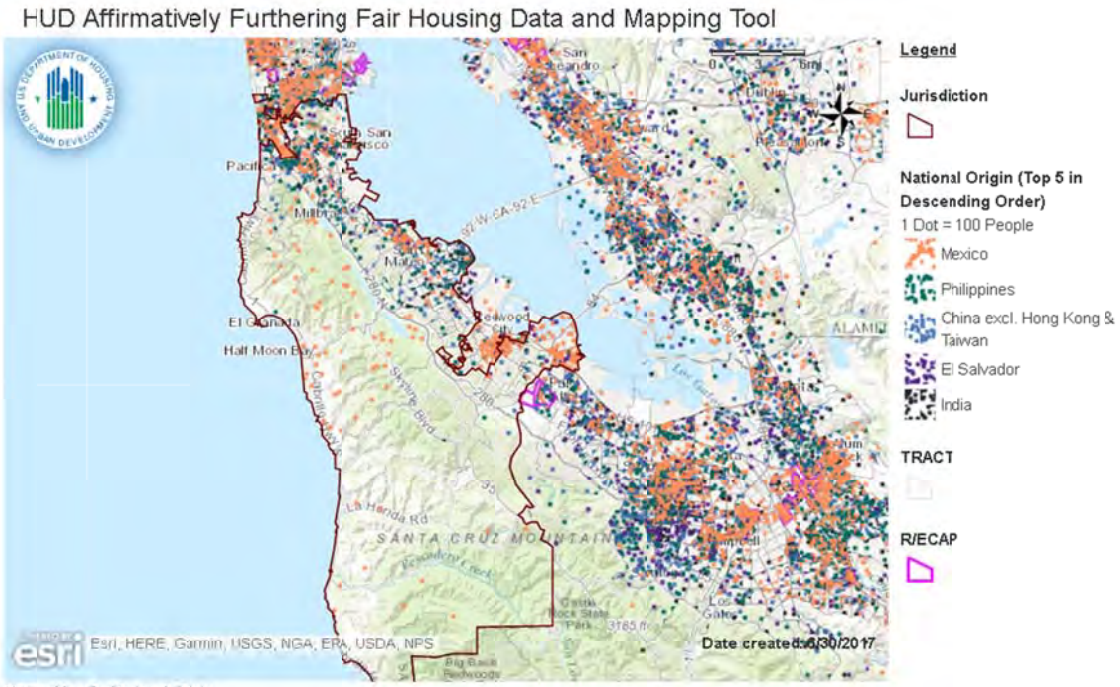
The geospatial patterns shown in the maps suggest growing clustering of Asian residents in the northern portion of San Mateo County, consistent with growth in the southern portion of San Francisco—and possibly movement from San Francisco into San Mateo County to seek more diverse and affordable housing options.

These trends are less pronounced for Hispanic residents, who appear to have become more concentrated within San Francisco. As discussed earlier, San Mateo experienced a loss of African American residents (as well as White residents) between 1990 and 2010; this is exhibited by the slightly lower density of African American residents in the map.

Maps 3 and 4 show concentrations of residents by National Origin and Limited English Proficiency, respectively, in 2010.[2] The maps reveal clusters of foreign-born residents from Mexico in and around the Redwood City, East Palo Alto and City of San Mateo communities; these are also areas where LEP residents who speak Spanish live. Residents from the Philippines and China also exhibit some clustering, although less pronounced and more widespread throughout the County.

[2] 1990 and 2000 trend data are not available for these maps.

Figure V-17.
Map 3 – National Origin, San Mateo County, 2010



Name: Map 3 - National Origin

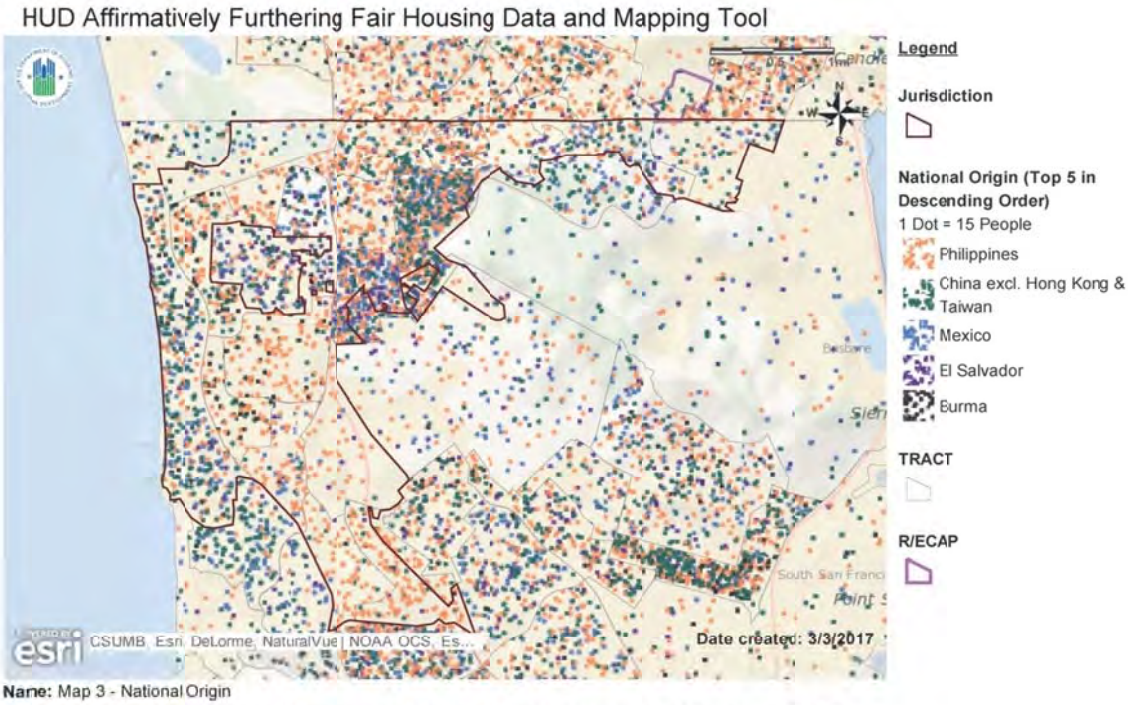
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-18.
Map 3 – National Origin, Daly City, 2010



Name: Map 3 - National Origin

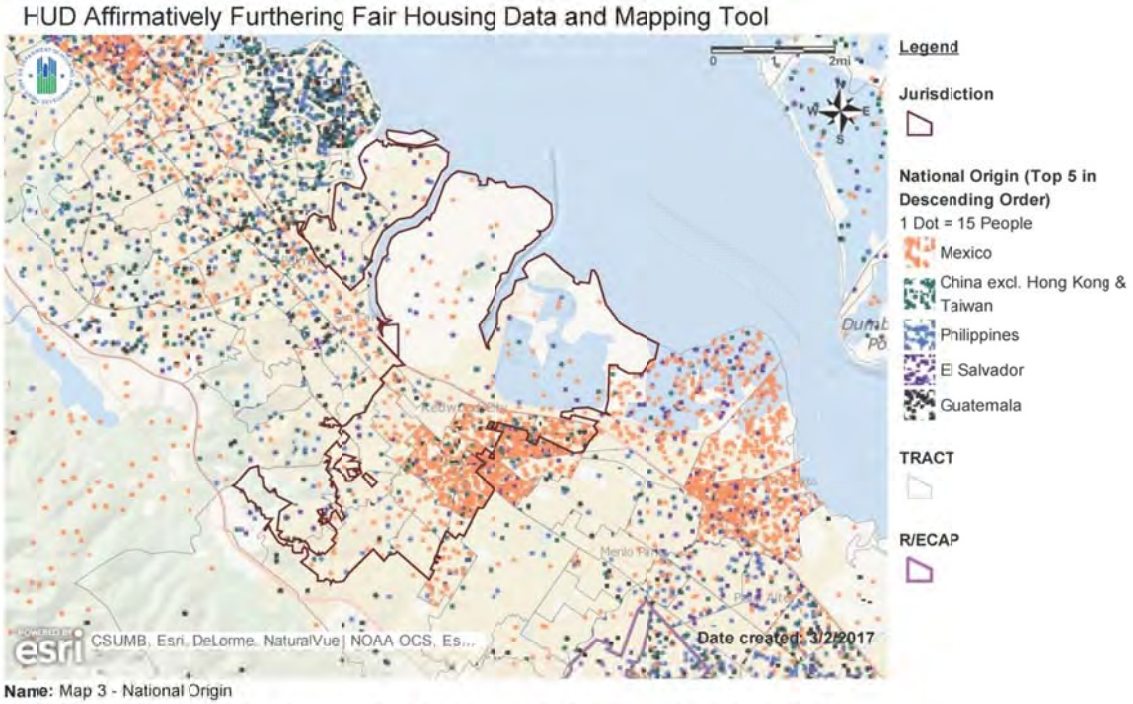
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Daly City (CDBG, HOME)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

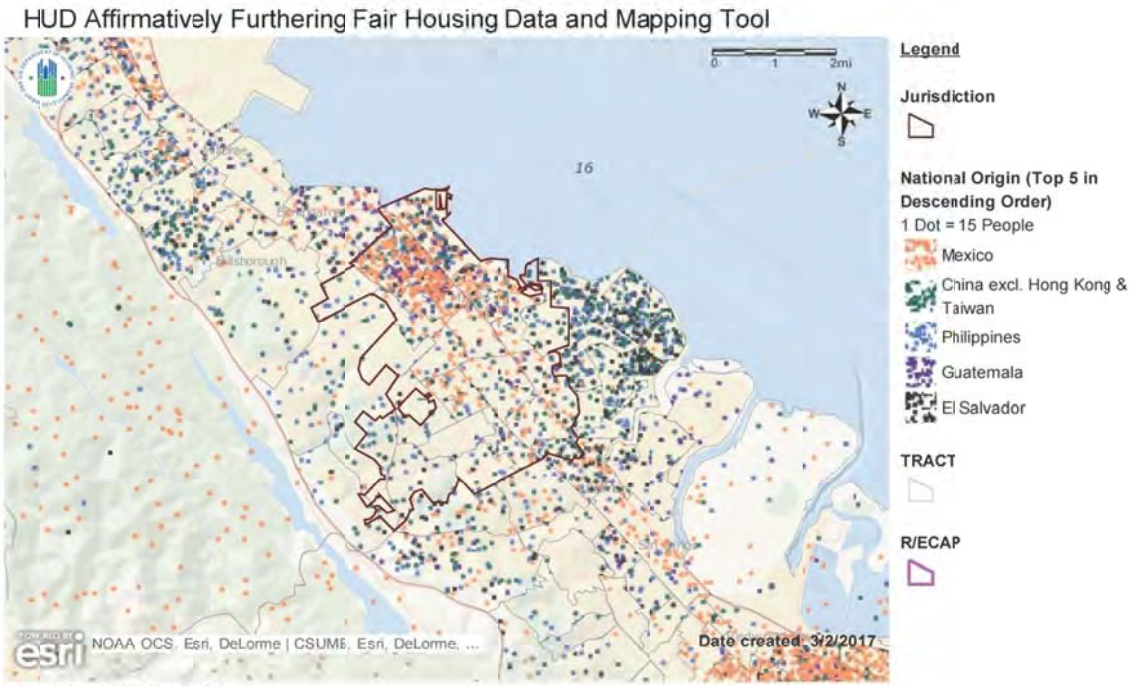
Figure V-19.
Map 3 – National Origin, Redwood City, 2010



Name: Map 3 - National Origin
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Redwood City (CDBG, HOME)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-20.
Map 3 – National Origin, San Mateo City, 2010



Name: Map 3 - National Origin

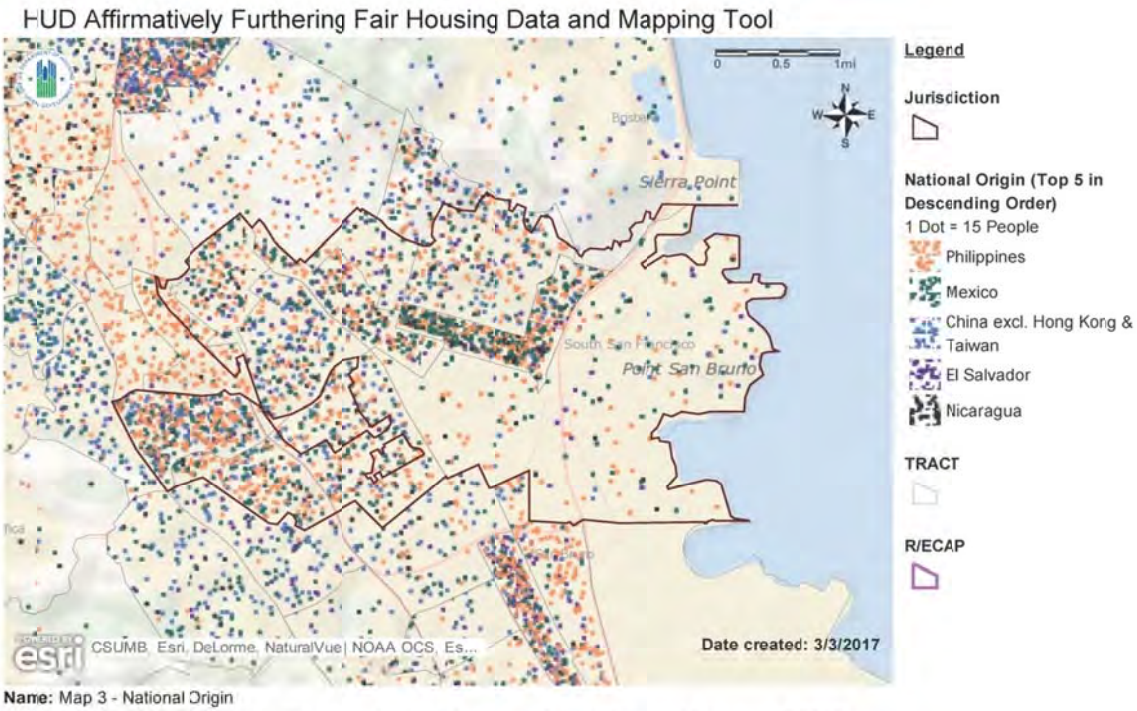
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo (CDBG)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-21.
Map 3 – National Origin, South San Francisco, 2010



Name: Map 3 - National Origin

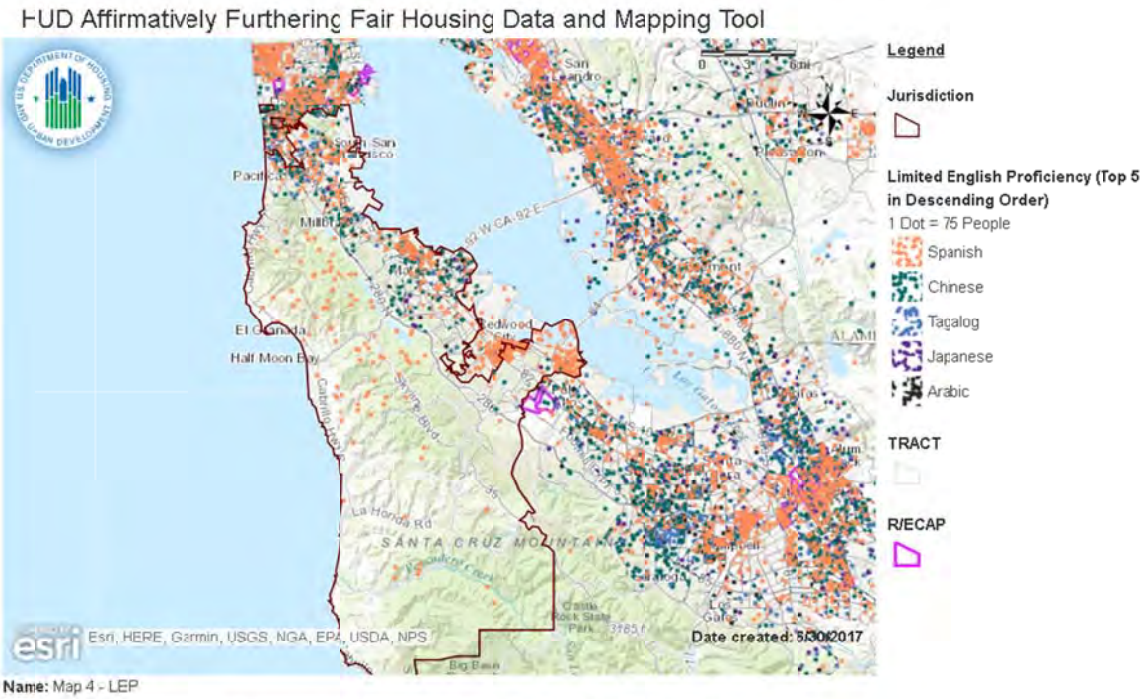
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: South San Francisco (CDBG)

Region: San Francisco-Oakland-Hayward, CA

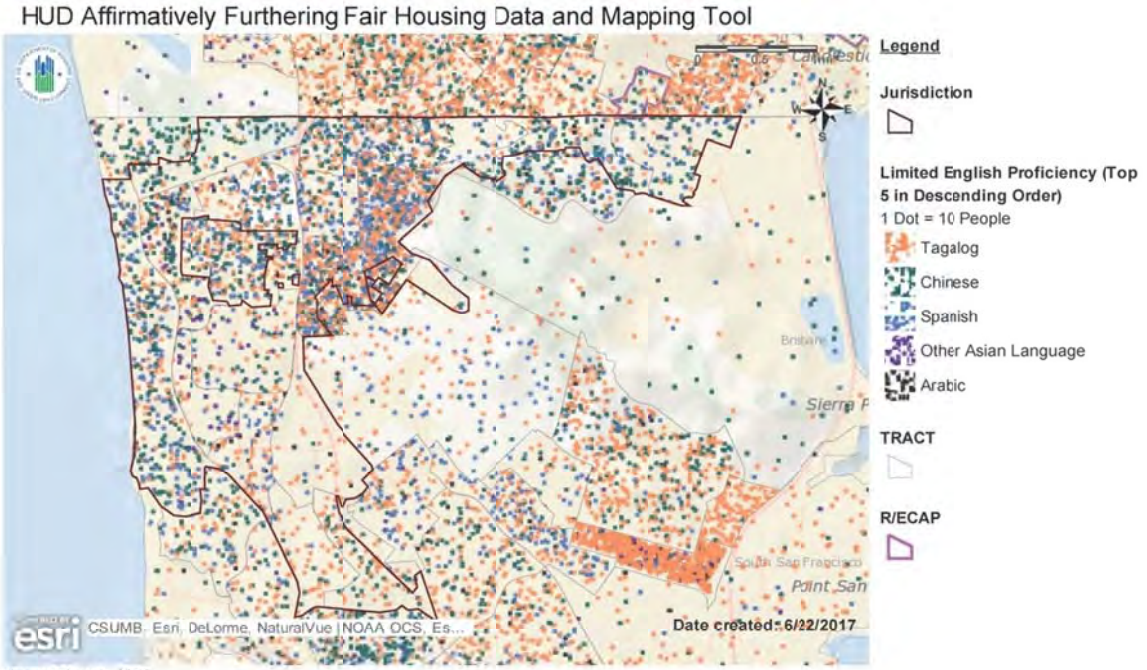
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-22.
Map 4 – LEP, San Mateo County, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

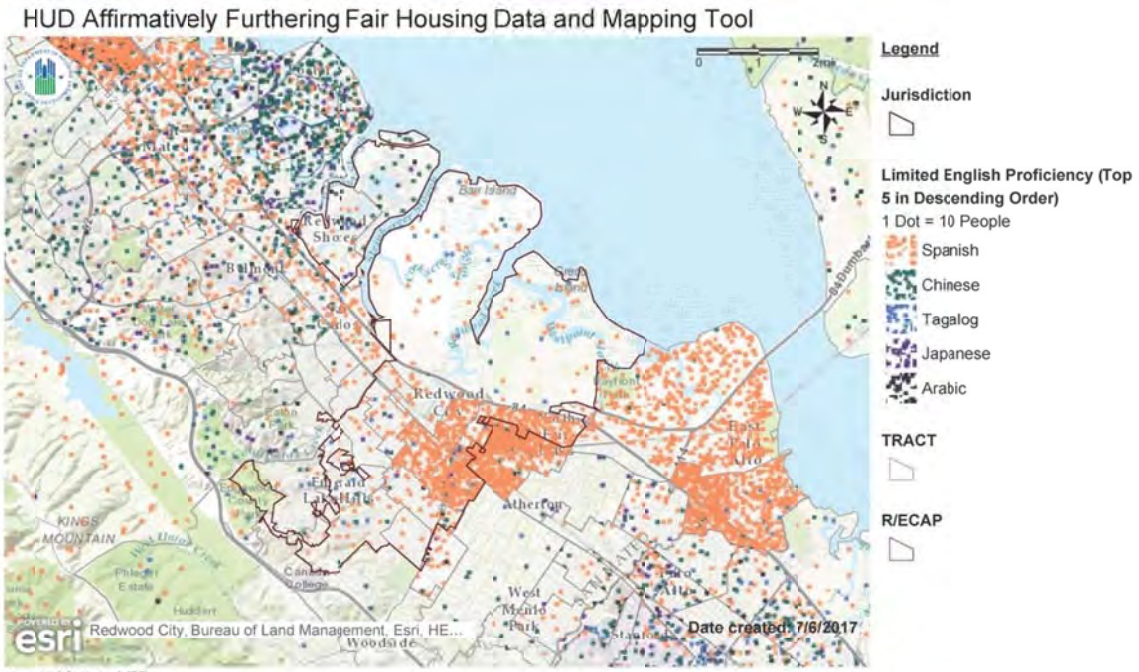
Figure V-23.
Map 4 – LEP, Daly City, 2010



Name: Map 4 - LEP
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs
Jurisdiction: Daly City (CDBG, HOME)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-24.
Map 4 – LEP, Redwood City, 2010



Name: Map 4 - LEP

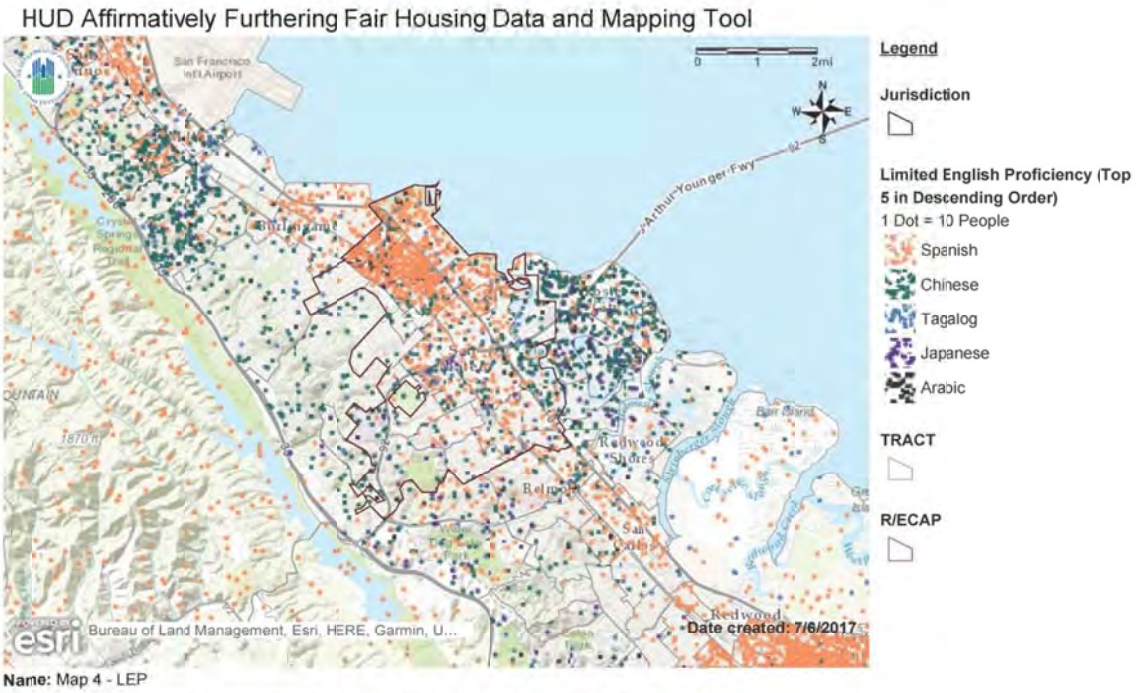
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Redwood City (CDBG, HOME)

Region: San Francisco-Cakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-25.
Map 4 – LEP, San Mateo City, 2010



Name: Map 4 - LEP

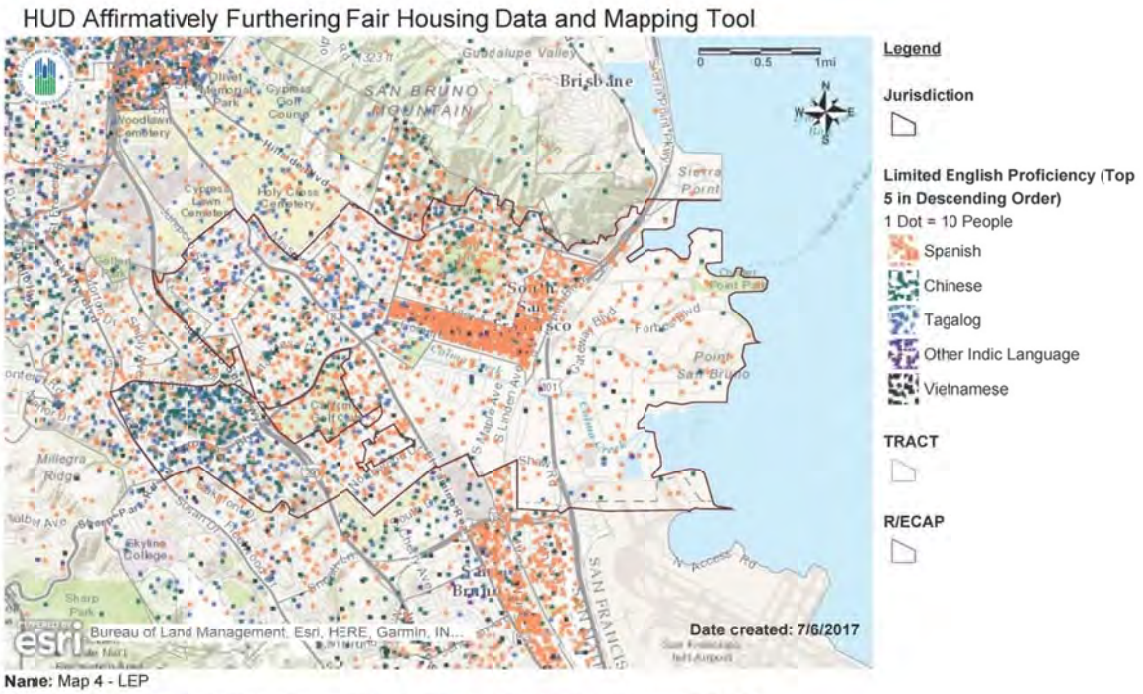
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: San Mateo (CDBG)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-26.
Map 4 – LEP, South San Francisco, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

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

Researcher Richard Rothstein's recent book, *The Color of Law*, chronicles how the public sector contributed to the segregation that exists today. His first chapter is dedicated to segregation in the San Francisco area. Rothstein highlights several significant developments in the region that played a large role in where San Francisco's non-White residents settled.

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

For example:

The City of Richmond, in nearby Contra Costa County, experienced very rapid population growth between 1940 and 1945. Employment in war-related high-growth industries, like shipping, required that jobs be offered to more than White men—including African American workers. The federal government quickly constructed public housing to support this growth. Housing to accommodate White workers was constructed near existing White neighborhoods; housing for African American workers was located near lower valued shipbuilding areas. These segregated housing conditions put in place settlement patterns that are apparent today.

Locally, the police department and housing authority forbade integrated recreational activities and social programs, partially justifying this as based on racial preferences.

As housing needs grew, the federal government contracted with a major housing developer to create a suburb of single family homes near Richmond. The federal government provided construction financing as long as none of the homes were sold to African Americans. This, combined with private discrimination, led to a larger dependence by African Americans on public housing. It also prevented African Americans from building wealth through homeownership. This considerable economic disadvantage is still seen today in the low rates of homeownership among African Americans.

The shortage of housing opportunities for African Americans extended beyond the Richmond area. Housing other than public housing became very difficult to find, resulting in overcrowded conditions for African American residents. Even if housing developers were willing to construct and/or sell homes to African Americans, the Federal Housing Administration (FHA) refused to insure the units and, without insurance, banks would not lend.

Pre-civil rights San Mateo County also faced resistance to racial integration, yet it was reportedly less direct, taking the form of "blockbusting" and "steering" or intervention by public officials. These local discriminatory practices were exacerbated by actions of the FHA.

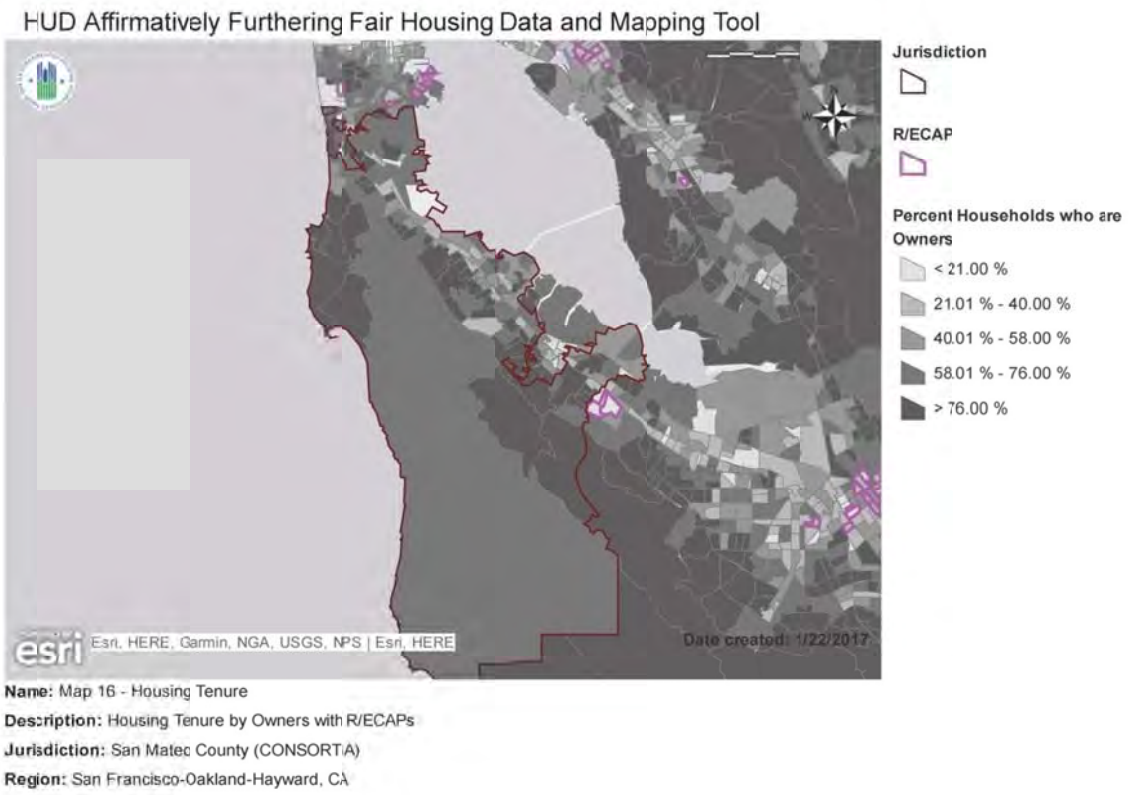
East Palo Alto is another example: After a White family sold their home to an African American family in 1954, the then president of the California Real Estate Association set up an office in East Palo Alto to scare White families into selling their homes ("for fear of declining property values") to agents and speculators. These agents then sold these homes at over-inflated prices to African American buyers, some of whom had trouble making their payments. Within six years, East Palo Alto became 82 percent African American. The FHA prevented re-integration by refusing to insure mortgages held by White buyers residing in East Palo Alto.

Neighborhood associations and city leaders also intervened to thwart integration of communities. Although some neighborhood residents supported integration, most did not, and it was not unusual for neighborhood associations to require acceptance of all new buyers. Builders with intentions to develop for all types of buyers (regardless of race) found that their development sites were rezoned by planning councils, required very large minimum lot sizes, and\or were denied public infrastructure to support their developments.

Tenure and segregation. Limiting the ability of certain residents to own homes—particularly in fast-growing and high-demand markets—prevents wealth creation and widens economic gaps. These limitations also prevent residents from accessing neighborhoods with high quality schools and other community amenities (e.g., recreational facilities and parks), because these are often funded by builders and homeowners' associations as part of master development agreements and/or fees paid by owners.

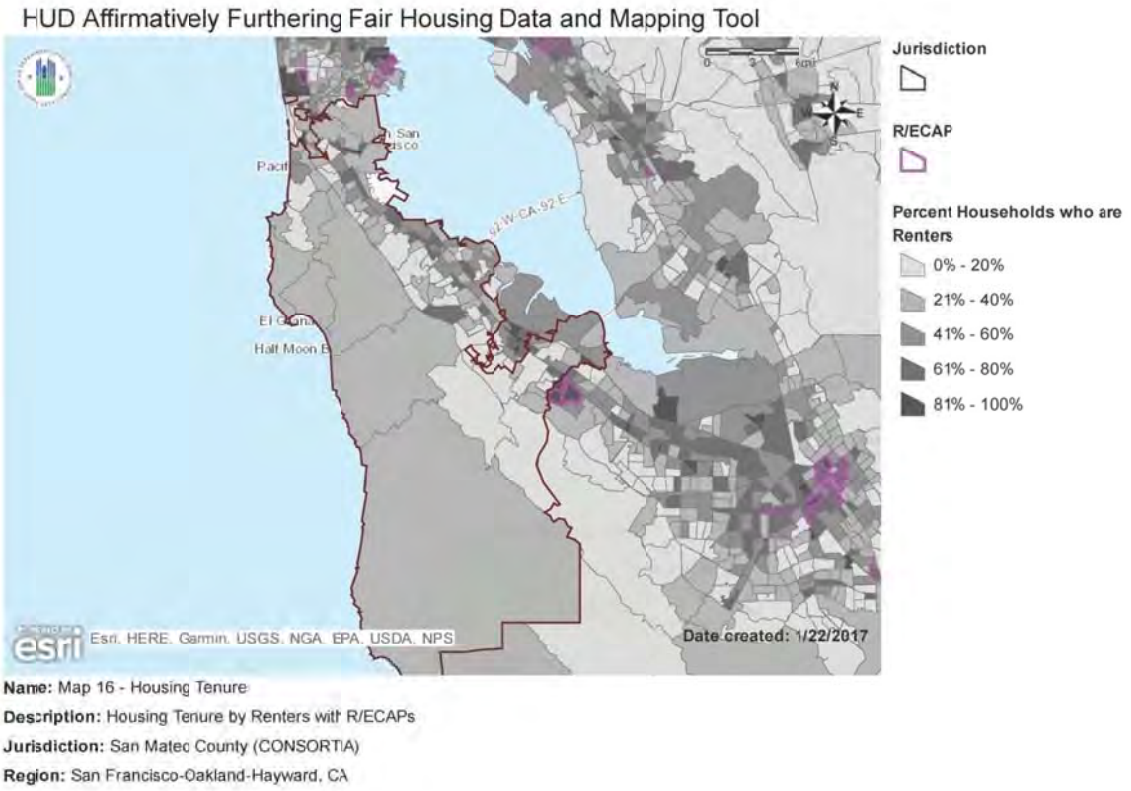
The maps below show the location of owner and renter occupied housing in San Mateo County. The areas with the highest rental rates—and, inversely, lowest ownership rates—are some of the same areas in which African American residents are most concentrated, particularly in the R/ECAP on the southern border of the County and within East Palo Alto. This is somewhat true for Hispanic residents, although the patterns of association are less clear. The distribution of Asian residents relative to housing tenure more closely represents that of White, non-Hispanic residents—a stronger association with density than tenure—except for in an around Daly City.

Figure V-27.
Map 16 – Housing Tenure, Owners, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-28.
Map 16 – Housing Tenure, Renters, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Future trends that could affect segregation. The San Francisco region is one of the least affordable housing markets in the U.S. Except for very high income households and households who have owned in the area for decades, all types of households have difficulty finding affordable housing. Households that are very low income and not occupying publicly supported rentals, need units of a certain size, need housing in certain locations to accommodate jobs or schools, and/or need housing with special features, face greater challenges securing affordable housing. To the extent that employment continues to expand in the region, larger households and households with special needs are likely to experience greater housing pressures than households with fewer housing needs. This could lead to greater segregation of certain households if housing accommodating a variety of residents is not available.

A recent report analyzing historical trends in segregation concluded that overall, segregation in the San Francisco region has remained relatively stable since 1990—despite the region's substantial growth and increase in housing prices.[3] As discussed above and similar to San Mateo County, this is not true for all races and ethnicities. The African American population has decreased in both San Mateo County and the greater San Francisco region, particularly in San

[3] *Toward Opportunity: Fair Housing and Equity Assessment of the San Francisco Bay Area,* completed by the Association of Bay Area Governments (ABAG), March 2015.

Francisco and Oakland. This is offset by growth in the African American population in northeast Contra Costa County and southern Solano County, where housing is more affordable. White households have also declined, as well as family households in some areas.

A complementary analysis completed by the Center for Community Innovation at UC Berkeley found that loss of low income households in a neighborhood is highly correlated with increases in rent and loss of naturally occurring affordable housing.[4]

In sum, in the County and greater region, continued growth and demand for housing—especially naturally occurring affordable rental housing—could lead to increased segregation. This segregation is most likely to occur outside of the County of San Mateo and Cities of San Francisco and Oakland, in surrounding areas where affordable housing can still be found. It is logical to assume that residents with the lowest incomes, special needs households, and larger household sizes will be most affected.

Contributing Factors of Segregation. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. As discussed above, segregation in the County is low to moderate—with indications of increasing segregation for Asian and Hispanic residents. Historically, segregation has been highest for African Americans yet has declined since the 1990s. The decline in segregation between 1990 and 2000 is a factor of a decrease in the County's African American population.

Two primary factors contribute to segregation in San Mateo County: 1) Historical discrimination against African Americans and, to a lesser extent, Asians and Hispanics; and 2) Lack of housing options for and growth in Asian and Hispanic residents leading to doubling up and concentrations in more affordable areas (north County and Redwood City/East Palo Alto) and movement of African Americans and Whites out of the County.

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

1. *Analysis*

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

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

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

A Racially Concentrated Area of Poverty or an Ethnically Concentrated Area of Poverty (R/ECAP) is a neighborhood with a poverty rate of 40 percent and a racial and ethnic concentration.

[4] http://www.urbandisplacement.org/

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

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

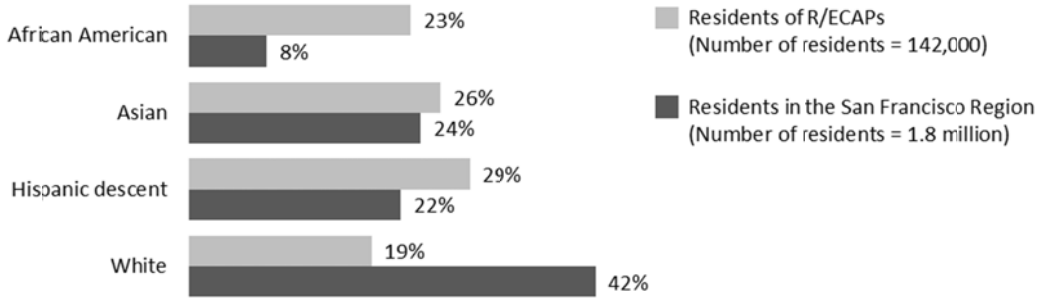
- A census tract that has a non-white population of 50 percent or more (majority-minority) or, for non-urban areas, 20 percent, AND a poverty rate of 40 percent or more; OR
- A census tract that has a non-white population of 50 percent or more (majority-minority) AND the poverty rate is three times the average tract poverty rate for the County, whichever is lower.

According to HUD, there are no Census tracts within San Mateo County that qualify as R/ECAPs. The closest R/ECAPs are located just outside of County boundaries near Palo Alto, the location of Stanford University. These two Census tracts (511608 and 513000) are almost 100 percent rental housing occupied by students. 94 percent of residents in Census tract 511608 are between the ages of 15 and 24; 85 percent of residents in 513000 are aged 15 to 34.

The 2015 report *Toward Opportunity: Fair Housing and Equity Assessment of the San Francisco Bay Area,* completed by ABAG, examines R/ECAPs in the San Francisco region. Thirty-three exist, and most are in areas that ABAG defines as "Communities of Concern" due to high poverty and concentrations of households with special needs. The 372,000 people in the Bay Area living in R/ECAPs represent 5 percent of all residents.

HUD data on the region's R/ECAPs report a smaller population, 142,500 residents. Residents living in the region's R/ECAPs are most likely to be Hispanic (29%), Asian (26%), and African American (23%) and originating in Mexico (10%) and China (8%). Compared to the region overall, African Americans are much more likely to live in R/ECAPs than expected (23% live in R/ECAPs compared to just 8% of residents in the region overall). Conversely, White residents are under-represented in R/ECAPs (19% in R/ECAPs v. 42% of residents overall). Hispanic and Asian residents are also slightly overrepresented in R/ECAPs, but only slightly.

Figure V-29.
Demographics of Residents Living in R/ECAPs in the San Francisco Region



Note: This graphic represents the region only because no R/ECAPs are identified for San Mateo County only.

Source: HUD AFFH Tables 1 and 4.

Contributing Factors of R/ECAPs. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. There are no R/ECAPs in San Mateo County.

Disparities in Access to Opportunity

The Access to Opportunity framework in the AFH expands the fair housing analysis beyond housing. It examines barriers that more broadly affect economic opportunity.

How does economic opportunity relate to fair housing? The Federal Fair Housing Act requires that HUD programs and activities be administrated in a manner that affirmatively furthers (AFFH) the policies of the Fair Housing Act. Federal courts have interpreted this to mean doing more than simply not discriminating: The AFFH obligation also requires recipients of federal housing funds to take meaningful actions to overcome historic and current barriers to accessing housing *and economically stable communities*.

Recent research has demonstrated that fair housing planning has benefits beyond complying with federal funding obligations:

- Dr. Raj Chetty's well known Equality of Opportunity research found economic gains for adults who moved out of high poverty neighborhoods when they were children. The gains were larger the earlier the children were when they moved.[5]
- A companion study on social mobility isolated the neighborhood factors that led to positive economic mobility for children: lower levels of segregation, lower levels of income inequality, high quality education, greater community involvement ("social capital"), greater family stability.
- A 2016 study by the National Bureau of Economic Research (NBER) found positive economic and social outcomes for children raised in publicly subsidized housing, regardless of the poverty level of the neighborhood.[6]

This has been articulated by HUD as: "the obligations and principles embodied in the concept of fair housing are fundamental to healthy communities…and…actions in the overall community planning and development process lead to substantial positive change."

This segment of the AFH examines Access to Opportunity in education, employment, transportation, low poverty environments, and environmentally healthy neighborhoods. It draws from data and maps provided by HUD, the Fair Housing and Equity Assessment of the Bay Area, and findings from the community engagement process.

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[5] http://www.equality-of-opportunity.org and http://www.equality-of-opportunity.org/images/mto_exec_summary.pdf

[6] http://www.nber.org/papers/w19843.pdf

AFH requirements:

Education

1. *For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.*

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

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

Employment

1. *For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.*

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

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

Transportation

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

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

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

Access to Low Poverty Neighborhoods

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

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

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

Access to Environmentally Healthy Neighborhoods

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

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

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

Patterns in Disparities in Access to Opportunity

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

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

To facilitate the Assess to Opportunity analysis, HUD provides a table that measures access to opportunity by an index. This table is shown below. The index allows comparison of opportunity indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and to the region. These tables are referenced in the opportunity indicators discussions that follow.

To interpret the indices in the tables, use the rule that a higher number is always a better outcome. The index should not be thought of as a percentage—but as an "opportunity score."

Figure V-30.
Table 12 — Opportunity Indicators, by Race/Ethnicity, San Mateo County and Region (Consortia)

(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	80.24	70.20	83.04	82.67	88.59	48.70	36.26
Black, Non-Hispanic	63.61	50.14	61.90	87.23	90.95	46.07	22.76
Hispanic	63.48	51.28	64.86	86.13	91.68	48.99	24.60
Asian or Pacific Islander, Non-Hispanic	77.26	67.27	76.85	86.62	90.61	44.42	31.16
Native American, Non-Hispanic	73.52	62.05	73.87	84.46	90.28	47.16	36.41
Population below federal poverty line							
White, Non-Hispanic	74.92	70.80	79.82	84.80	90.24	47.62	31.49
Black, Non-Hispanic	53.75	38.86	51.41	88.21	91.49	48.36	14.20
Hispanic	52.61	45.52	58.10	86.75	92.03	49.98	19.56
Asian or Pacific Islander, Non-Hispanic	75.19	68.26	76.14	87.59	91.88	45.07	27.40
Native American, Non-Hispanic	61.64	44.06	56.17	87.12	91.24	40.14	22.32
(San Francisco-Oakland-Hayward, CA) Region	**Low Poverty Index**	**School Proficiency Index**	**Labor Market Index**	**Transit Index**	**Low Transportation Cost Index**	**Jobs Proximity Index**	**Environmental Health Index**
Total Population							
White, Non-Hispanic	72.99	67.08	76.51	84.82	83.37	49.68	27.36
Black, Non-Hispanic	46.10	39.03	46.70	88.00	85.41	48.61	13.86
Hispanic	52.70	43.92	51.62	87.15	85.36	46.05	17.30
Asian or Pacific Islander, Non-Hispanic	67.02	61.66	67.89	88.22	86.05	45.86	17.84
Native American, Non-Hispanic	58.27	52.17	57.84	86.50	84.28	48.74	19.67
Population below federal poverty line							
White, Non-Hispanic	62.44	57.57	68.29	87.54	86.55	53.27	21.68
Black, Non-Hispanic	34.86	32.15	39.12	90.09	88.13	51.38	12.01
Hispanic	38.75	35.67	42.33	88.95	87.14	47.30	14.38
Asian or Pacific Islander, Non-Hispanic	52.36	53.32	59.01	91.54	90.97	54.52	11.99
Native American, Non-Hispanic	44.15	38.93	49.37	89.93	89.73	50.46	13.27

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Figure V-31.
Table 12 — Opportunity Indicators, by Race/Ethnicity, Daly City

(Daly City, CA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	75.87	54.93	68.91	87.50	91.84	36.83	39.93
Black, Non-Hispanic	69.46	50.81	65.77	89.86	93.14	37.13	33.45
Hispanic	68.46	49.75	63.11	90.38	93.92	39.38	27.48
Asian or Pacific Islander, Non-Hispanic	73.68	53.40	67.03	89.08	92.29	35.27	36.52
Native American, Non-Hispanic	67.35	52.60	65.07	90.47	93.24	28.12	31.78
Population below federal poverty line							
White, Non-Hispanic	63.54	52.37	64.79	90.97	94.81	39.04	30.15
Black, Non-Hispanic	71.04	53.29	67.66	93.03	94.79	22.01	29.03
Hispanic	67.72	43.91	64.58	90.65	94.15	37.14	25.58
Asian or Pacific Islander, Non-Hispanic	66.00	47.35	63.26	88.80	92.15	37.27	36.44
Native American, Non-Hispanic	72.66	49.11	71.34	91.65	94.82	37.22	23.35

(San Francisco-Oakland-Hayward, CA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	72.99	67.08	76.51	84.82	83.37	49.68	27.36
Black, Non-Hispanic	46.10	39.03	46.70	88.00	85.41	48.61	13.86
Hispanic	52.70	43.92	51.62	87.15	85.36	46.05	17.30
Asian or Pacific Islander, Non-Hispanic	67.02	61.66	67.89	88.22	86.05	45.86	17.84
Native American, Non-Hispanic	58.27	52.17	57.84	86.50	84.28	48.74	19.67
Population below federal poverty line							
White, Non-Hispanic	62.44	57.57	68.29	87.54	86.55	53.27	21.68
Black, Non-Hispanic	34.86	32.15	39.12	90.09	88.13	51.38	12.01
Hispanic	38.75	35.67	42.33	88.95	87.14	47.30	14.38
Asian or Pacific Islander, Non-Hispanic	52.36	53.32	59.01	91.54	90.97	54.52	11.99
Native American, Non-Hispanic	44.15	38.93	49.37	89.93	89.73	50.46	13.27

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Figure V-32.
Table 12 — Opportunity Indicators, by Race/Ethnicity, Redwood City

(Redwood City, CA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	77.99	42.67	80.05	87.09	91.05	43.99	27.42
Black, Non-Hispanic	57.03	41.11	59.58	87.49	94.37	62.66	14.58
Hispanic	51.00	36.55	59.90	90.22	94.73	51.67	14.02
Asian or Pacific Islander, Non-Hispanic	76.28	61.63	80.47	88.35	92.33	46.18	25.70
Native American, Non-Hispanic	57.62	39.89	60.29	88.52	93.94	49.32	16.72
Population below federal poverty line							
White, Non-Hispanic	65.17	38.66	70.67	87.94	92.40	49.95	21.74
Black, Non-Hispanic	53.30	31.43	50.00	90.71	94.10	51.35	6.17
Hispanic	40.18	38.45	55.66	91.59	95.90	51.92	10.79
Asian or Pacific Islander, Non-Hispanic	72.11	60.56	79.65	89.68	93.15	37.50	25.85
Native American, Non-Hispanic	55.83	46.14	46.32	89.54	94.11	43.53	8.78

(San Francisco-Oakland-Hayward, CA) Region	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	72.99	67.08	76.51	84.82	83.37	49.68	27.36
Black, Non-Hispanic	46.10	39.03	46.70	88.00	85.41	48.61	13.86
Hispanic	52.70	43.92	51.62	87.15	85.36	46.05	17.30
Asian or Pacific Islander, Non-Hispanic	67.02	61.66	67.89	88.22	86.05	45.86	17.84
Native American, Non-Hispanic	58.27	52.17	57.84	86.50	84.28	48.74	19.67
Population below federal poverty line							
White, Non-Hispanic	62.44	57.57	68.29	87.54	86.55	53.27	21.68
Black, Non-Hispanic	34.86	32.15	39.12	90.09	88.13	51.38	12.01
Hispanic	38.75	35.67	42.33	88.95	87.14	47.30	14.38
Asian or Pacific Islander, Non-Hispanic	52.36	53.32	59.01	91.54	90.97	54.52	11.99
Native American, Non-Hispanic	44.15	38.93	49.37	89.93	89.73	50.46	13.27

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Figure V-33.
Table 12 — Opportunity Indicators, by Race/Ethnicity, San Mateo City

(San Mateo, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	78.92	52.61	82.42	88.20	92.53	51.81	10.84
Black, Non-Hispanic	73.11	51.30	72.04	90.09	94.09	55.88	7.26
Hispanic	71.95	48.42	70.45	89.64	93.72	52.45	6.63
Asian or Pacific Islander, Non-Hispanic	76.58	50.53	78.41	88.74	93.05	53.10	10.12
Native American, Non-Hispanic	75.20	47.97	73.87	89.30	92.98	47.46	8.29
Population below federal poverty line							
White, Non-Hispanic	71.30	50.87	75.53	89.66	93.83	57.53	7.95
Black, Non-Hispanic	74.78	41.04	74.86	89.29	94.61	65.30	2.53
Hispanic	64.83	50.88	67.36	88.94	93.75	50.51	5.07
Asian or Pacific Islander, Non-Hispanic	79.56	54.07	80.99	90.12	94.14	57.35	10.84
Native American, Non-Hispanic	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(San Francisco-Oakland-Hayward, CA) Region	**Low Poverty Index**	**School Proficiency Index**	**Labor Market Index**	**Transit Index**	**Low Transportation Cost Index**	**Jobs Proximity Index**	**Environmental Health Index**
Total Population							
White, Non-Hispanic	72.99	67.08	76.51	84.82	83.37	49.68	27.36
Black, Non-Hispanic	46.10	39.03	46.70	88.00	85.41	48.61	13.86
Hispanic	52.70	43.92	51.62	87.15	85.36	46.05	17.30
Asian or Pacific Islander, Non-Hispanic	67.02	61.66	67.89	88.22	86.05	45.86	17.84
Native American, Non-Hispanic	58.27	52.17	57.84	86.50	84.28	48.74	19.67
Population below federal poverty line							
White, Non-Hispanic	62.44	57.57	68.29	87.54	86.55	53.27	21.68
Black, Non-Hispanic	34.86	32.15	39.12	90.09	88.13	51.38	12.01
Hispanic	38.75	35.67	42.33	88.95	87.14	47.30	14.38
Asian or Pacific Islander, Non-Hispanic	52.36	53.32	59.01	91.54	90.97	54.52	11.99
Native American, Non-Hispanic	44.15	38.93	49.37	89.93	89.73	50.46	13.27

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

Figure V-34.
Table 12 — Opportunity Indicators, by Race/Ethnicity, South San Francisco

(South San Francisco, CA CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	73.26	64.02	63.83	86.07	91.44	38.83	39.40
Black, Non-Hispanic	74.39	64.12	67.25	88.43	91.66	37.02	39.87
Hispanic	66.63	56.19	62.05	87.02	93.17	43.06	31.51
Asian or Pacific Islander, Non-Hispanic	75.78	67.34	68.66	87.27	90.81	38.84	43.70
Native American, Non-Hispanic	69.63	59.02	63.65	86.96	92.39	42.37	35.23
Population below federal poverty line							
White, Non-Hispanic	67.67	57.46	68.26	88.54	92.37	41.83	43.27
Black, Non-Hispanic	57.00	48.14	57.22	93.75	97.00	44.43	17.98
Hispanic	63.92	54.65	64.87	89.27	93.39	43.93	34.51
Asian or Pacific Islander, Non-Hispanic	67.99	65.28	67.79	88.99	93.47	47.55	37.06
Native American, Non-Hispanic	76.85	75.93	62.46	89.10	92.57	47.64	46.05
(San Francisco-Oakland-Hayward, CA) Region	**Low Poverty Index**	**School Proficiency Index**	**Labor Market Index**	**Transit Index**	**Low Transportation Cost Index**	**Jobs Proximity Index**	**Environmental Health Index**
Total Population							
White, Non-Hispanic	72.99	67.08	76.51	84.82	83.37	49.68	27.36
Black, Non-Hispanic	46.10	39.03	46.70	88.00	85.41	48.61	13.86
Hispanic	52.70	43.92	51.62	87.15	85.36	46.05	17.30
Asian or Pacific Islander, Non-Hispanic	67.02	61.66	67.89	88.22	86.05	45.86	17.84
Native American, Non-Hispanic	58.27	52.17	57.84	86.50	84.28	48.74	19.67
Population below federal poverty line							
White, Non-Hispanic	62.44	57.57	68.29	87.54	86.55	53.27	21.68
Black, Non-Hispanic	34.86	32.15	39.12	90.09	88.13	51.38	12.01
Hispanic	38.75	35.67	42.33	88.95	87.14	47.30	14.38
Asian or Pacific Islander, Non-Hispanic	52.36	53.32	59.01	91.54	90.97	54.52	11.99
Native American, Non-Hispanic	44.15	38.93	49.37	89.93	89.73	50.46	13.27

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA.

The Fair Housing Equity Assessment completed by the ABAG included a slightly different, but complementary, analysis of access to opportunity. The map below shows the location of areas of Very High and High Opportunity, as well as Areas of Concern. These categories were based on 18 economic indicators:

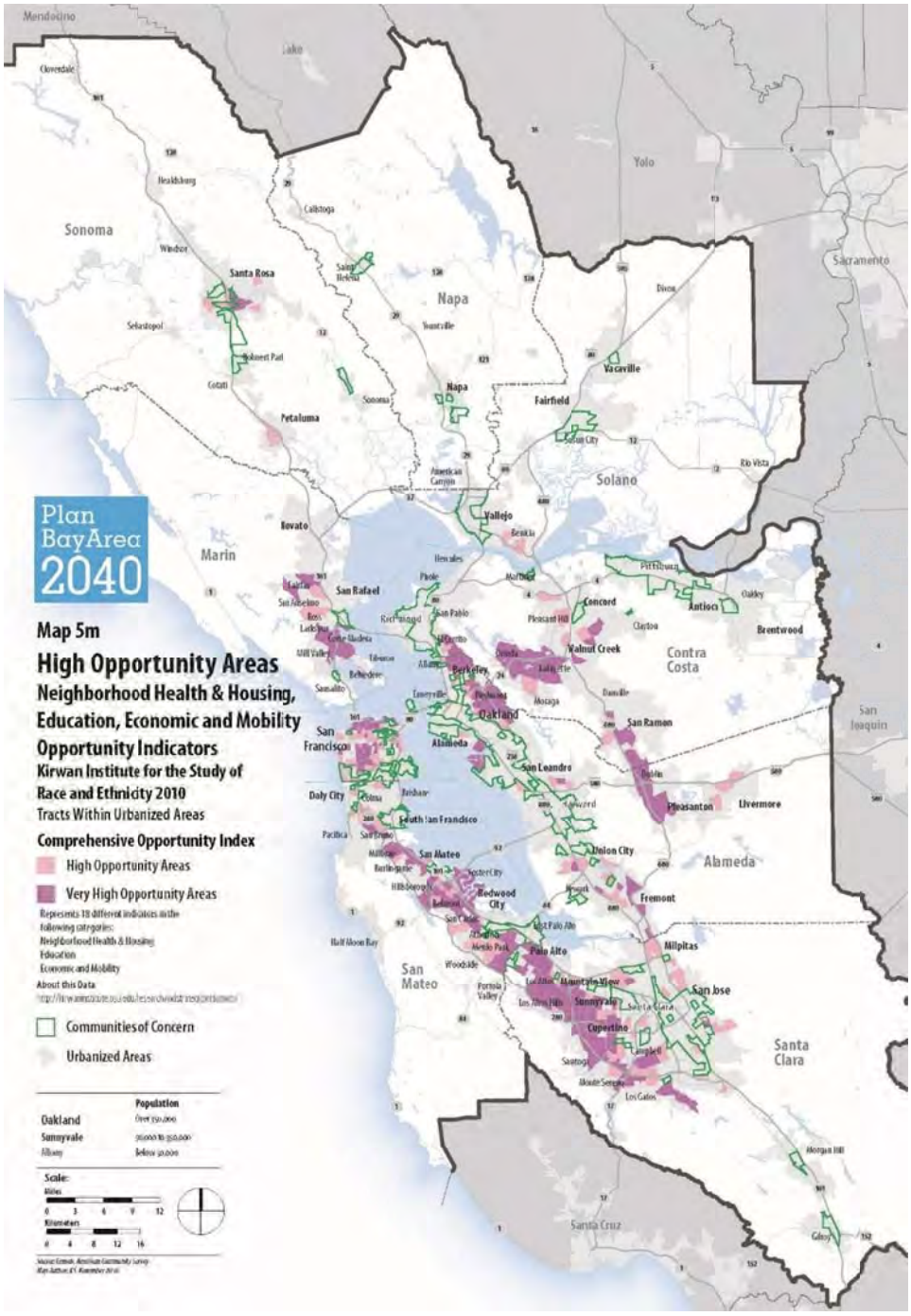
- **Education:** reading proficiency, math proficiency, student/teacher ratio, free and reduced lunch rate, adult educational attainment;
- **Employment:** Proximity to jobs within 5 miles, public assistance rate, unemployment rate;

- **Housing affordability:** Median home value, residential vacancy rate, median gross rent;
- **Neighborhood quality:** Crime risk, transit access, median commute time, neighborhood poverty;
- **Environmental health:** Proximity to toxic waste sites, toxic waste releases, parks and open space.

As demonstrated by the map, San Mateo County has far more opportunity areas than areas of concern. The County stands out in the region for its large number of Very High Opportunity neighborhoods.

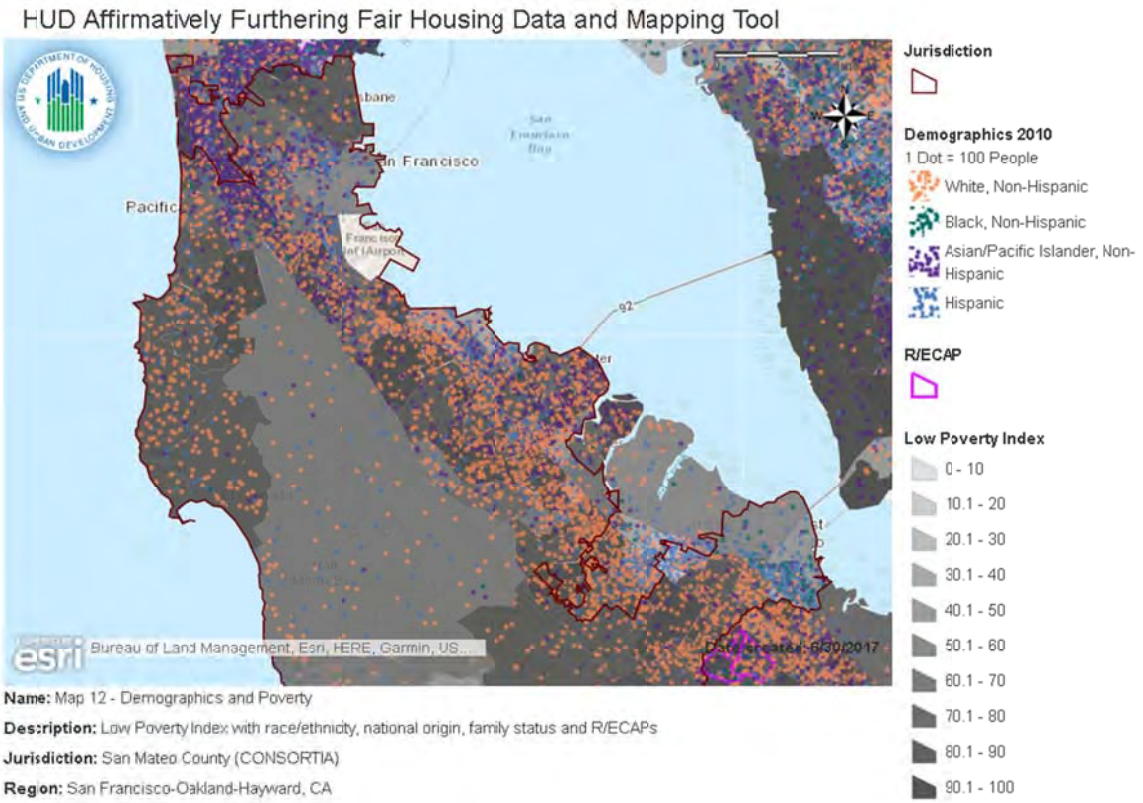
Figure V-35. High Opportunity Area Map

Source: PlanBayArea2040.



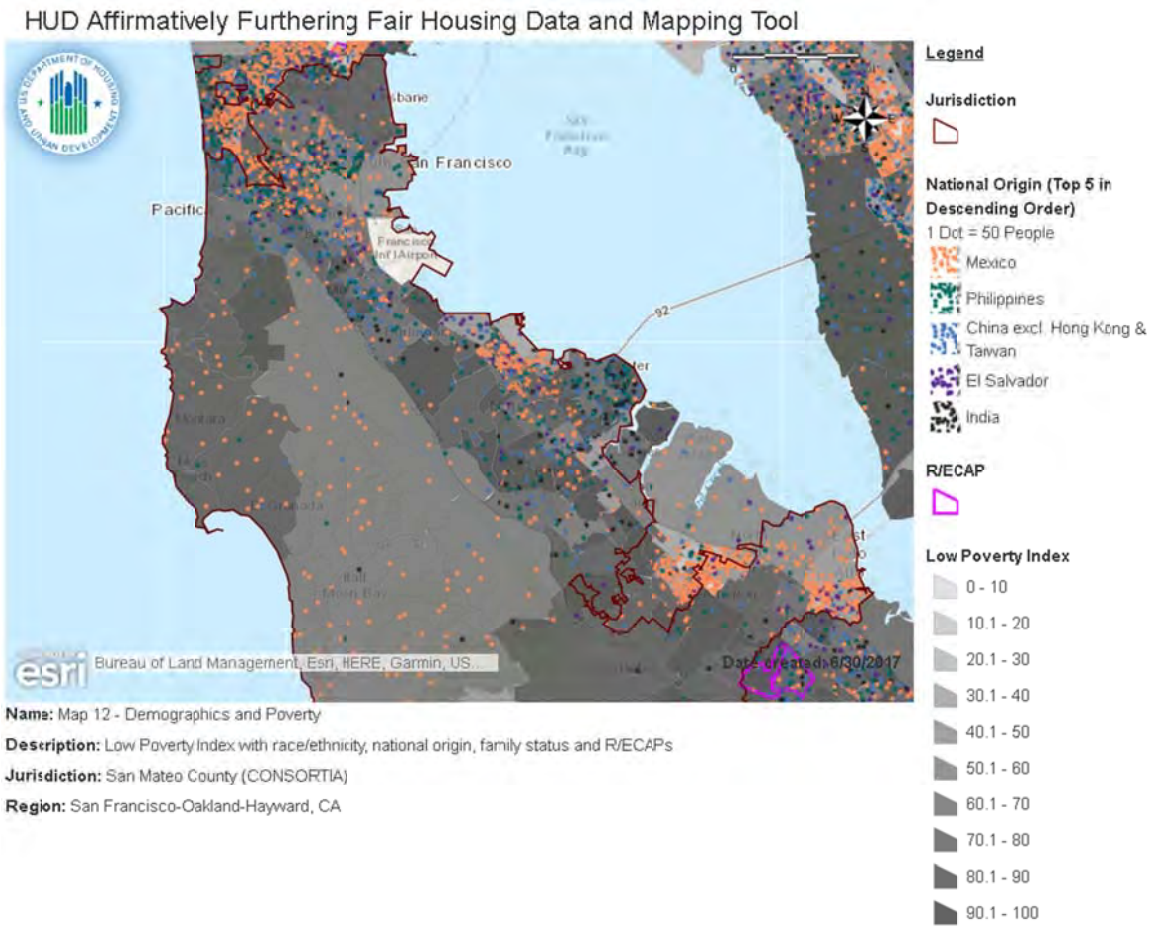
Access to Low Poverty Neighborhoods. As shown by the ABAG opportunity maps, San Mateo County has far more "opportunity" neighborhoods (i.e. areas of low poverty) than areas of concern. The HUD map below corroborates this finding. That said, neighborhoods with relatively low poverty indices (higher poverty areas) are also those where African American and Hispanic residents, including residents of Mexican origin.

Figure V-36.
Map 12 – Race/Ethnicity and Poverty, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-37.
Map 12 – National Origin and Poverty, 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

The poverty index shown in the Tables 12 above shows differing access to low poverty environments depending on the jurisdiction:

- **San Mateo County.** According to the Low Poverty Index in Table 12, African American and Hispanic residents have the lowest access to low poverty environments—although this opportunity score is much higher for these residents than for similar residents in the region. In fact, African American residents living in poverty in San Mateo County have a better chance of living in a low poverty environment than African American residents of all income levels in the region (score of 53.75 v. 46.10).

- **Daly City.** Daly City offers solid access to low poverty environments for all residents, including residents living below the poverty line. The score for African American residents compared to the region is most striking: In Daly City, the low poverty index for below-poverty African Americans' access to low poverty neighborhoods is 71.04—compared to 46.10 for all African Americans in the region.

- **Redwood City.** Of all of the jurisdictions, Redwood City's low poverty index is the lowest, especially for African American and Hispanic residents. It more closely represents the region's score, although it is higher.

- **City of San Mateo.** The Low Poverty Index in the City of San Mateo is very high across races and ethnicities, with no score lower than 70, even for persons living in poverty (the exception being Hispanics living in poverty).

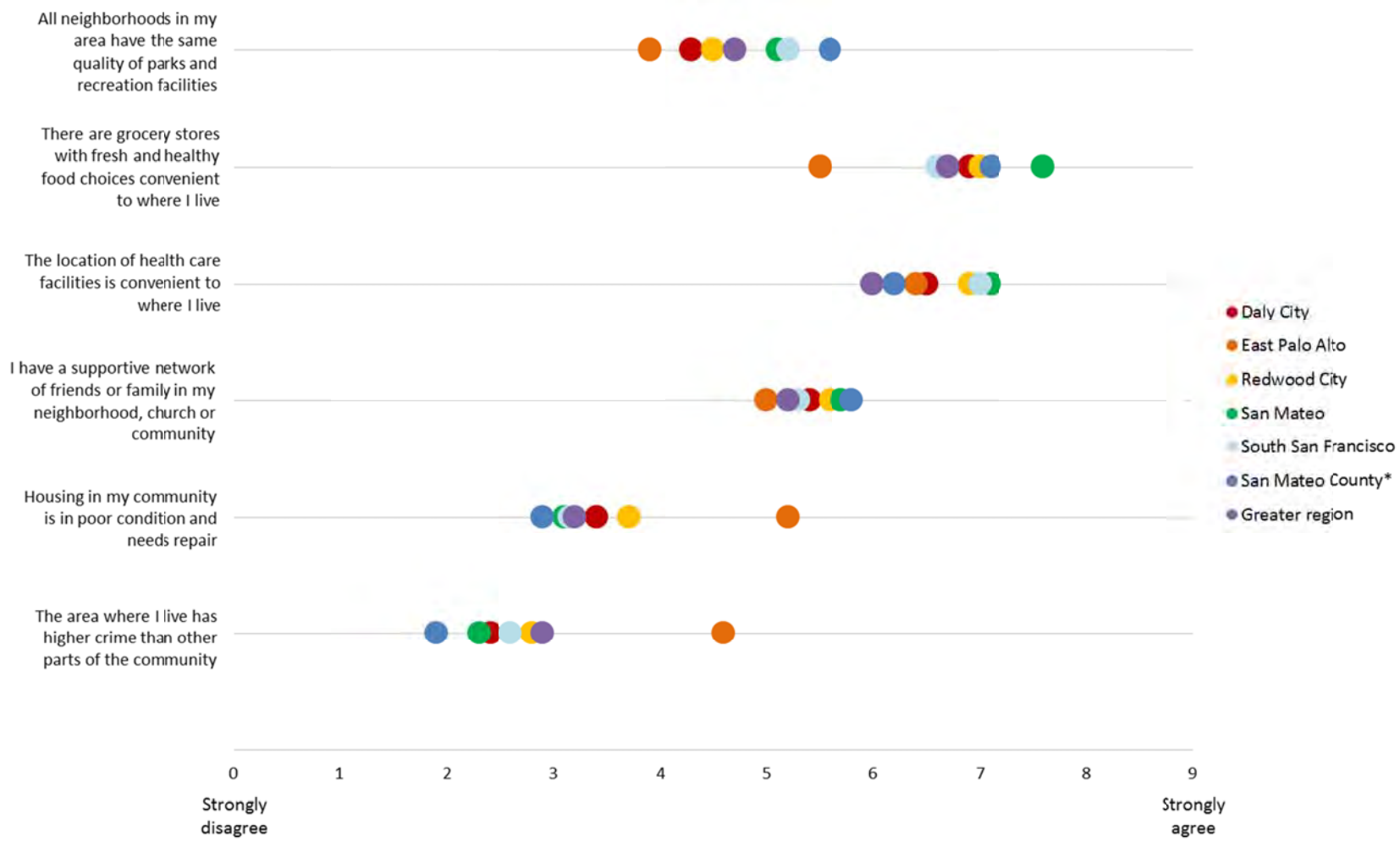
- **South San Francisco.** Similar to many of the San Mateo County jurisdictions, the Low Poverty Index varies little by race and ethnicity and shows much less variance than the region overall, where the low poverty score for African American and Hispanic residents is around 50—and lower than that of African American and Hispanic residents *living in poverty* in the County. This means that African American and Hispanic residents living in poverty in San Mateo County have better access to low-poverty neighborhoods than residents overall in the region.

Economic segregation. According to a recent Pew Research Study on income segregation, the San Francisco region is the17th of the 30 largest metropolitan areas in income segregation. Income segregation in the region increased very modestly between 1980 and 2010 as measured by the Pew index.[7] Because communities with high levels of income segregation also tend to have low rates of upward mobility, stabilization of economic segregation is an important component of reducing disparities in access to opportunity.

Resident perspectives on access to low poverty neighborhoods. The community engagement process solicited resident perspectives on key indicators of low poverty neighborhoods—access to grocery stores with fresh and healthy food, access to health care services, quality of neighborhood public park and recreation facilities, housing condition and crime, as well as a measure of social isolation. As shown in the figure below, residents' survey responses demonstrate that in general, their neighborhoods in the participating jurisdictions and San Mateo County provide access to fresh and healthy food, health care services, similar quality parks and recreation facilities as other neighborhoods, housing stock in good condition and levels of crime similar to other neighborhoods.

[7] http://www.pewsocialtrends.org/2012/08/01/the-rise-of-residential-segregation-by-income/

Figure V-38.
Resident Perspectives on Access to Low Poverty Neighborhood Indicators



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

In focus groups, residents generally confirmed the findings of survey respondents; San Mateo County is a place of opportunity, with access to quality public amenities (e.g., parks, libraries), fresh food, health care services and safe neighborhoods.

- **Daly City parks, libraries and beautification efforts.** Compared to the other jurisdictions, Daly City residents who responded to the survey were less likely to agree that the parks in their neighborhood have the same quality as other neighborhoods. In the Filipino focus group, Daly City residents made similar observations about differences in park conditions by neighborhood, particularly related to playground equipment. Several participants shared their experience that some libraries are of a higher quality than others (e.g., better selection of books) and noted that they believe city beautification efforts are targeted to areas where "new residents" are moving in.

- **Housing condition.** East Palo Alto survey respondents were more likely than residents of other jurisdictions to agree that housing in their community is in poor condition and needs repair. Spanish language focus group participants—most living in East Palo Alto—reinforced this perception. These participants shared that housing in their neighborhood is of poor quality or in bad condition with cockroaches, dilapidated kitchens, nonworking appliances, and that residents do not request repairs out of fear of rent increases or other retaliation. Some make or pay for repairs themselves rather than contacting the landlord or management company. Participants also discussed their perception that rent controlled units are less well maintained than units not covered by rent control.

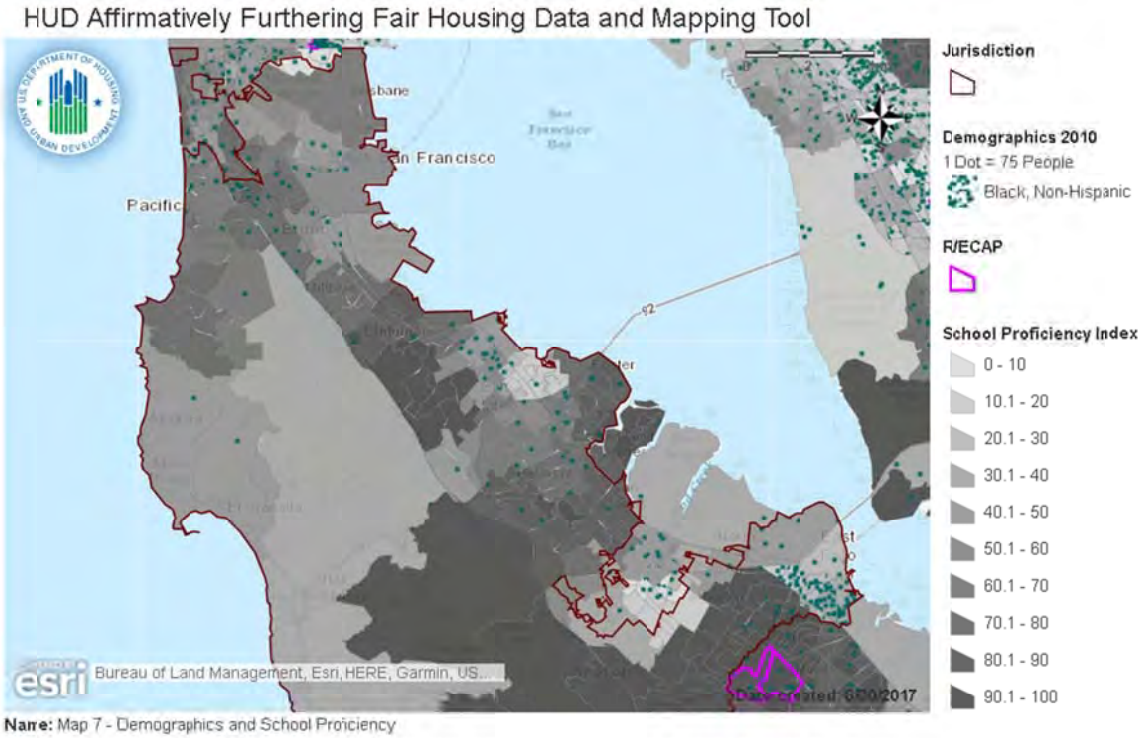
  Some Section 8 focus group participants also shared a reluctance to report condition issues out of fear of being displaced. They are willing to make do with broken ovens or furnaces rather than move. Others discussed needing to contact inspectors to motivate landlords to make necessary repairs. From the discussion, it seemed that these condition issues generally manifest after the tenant has occupied the unit.

Education. According to the equity analysis completed by ABAG, the majority of schools in San Mateo County are high performing, with a few exceptions. High performing schools are not located in racially concentrated areas of poverty.

HUD's school proficiency index indicates more variation. In the County overall, students who are White, non-Hispanic and Asian—even if living below the poverty line—are most likely to attend higher proficiency schools. This is much less true for the jurisdictions individually, where access to high proficiency schools is similar across races and ethnicities, although lower than for the County overall.

The HUD maps below show access to proficient schools separately for children of different races and ethnicities and national origin. As the maps demonstrate, African American children—largely because they are clustered in and around East Palo Alto—have lower access to high proficiency schools. This is also true for foreign-born residents from Mexico.

Figure V-39.
Map 7 – Demographics and School Proficiency: African Americans, 2010



Name: Map 7 - Demographics and School Proiciency

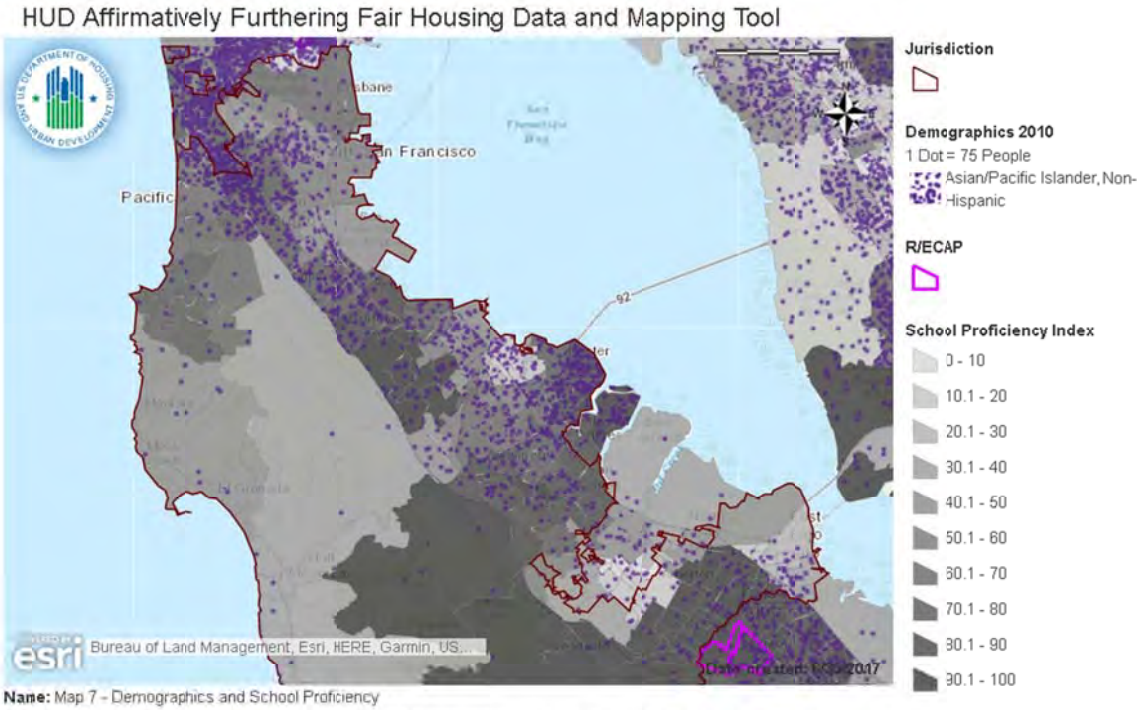
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-40.
Map 7 – Demographics and School Proficiency: Asian, 2010



Name: Map 7 - Demographics and School Proficiency

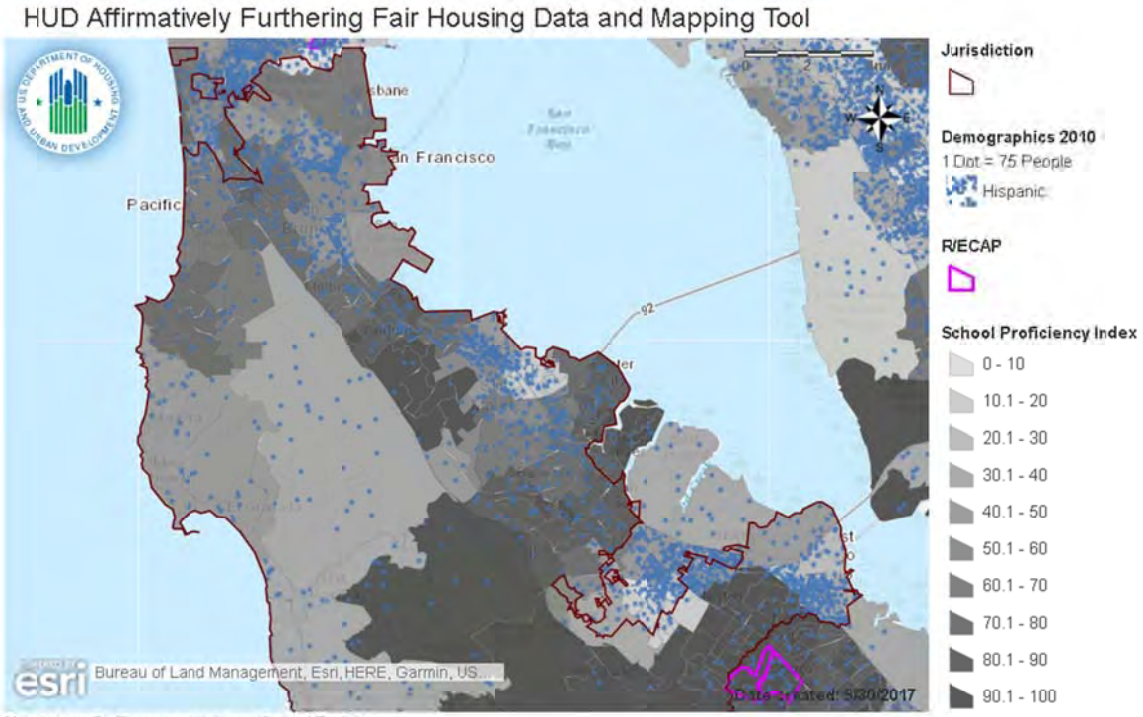
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-41.
Map 7 – Demographics and School Proficiency: Hispanic, 2010



Name: Map 7 - Demographics and School Proficiency

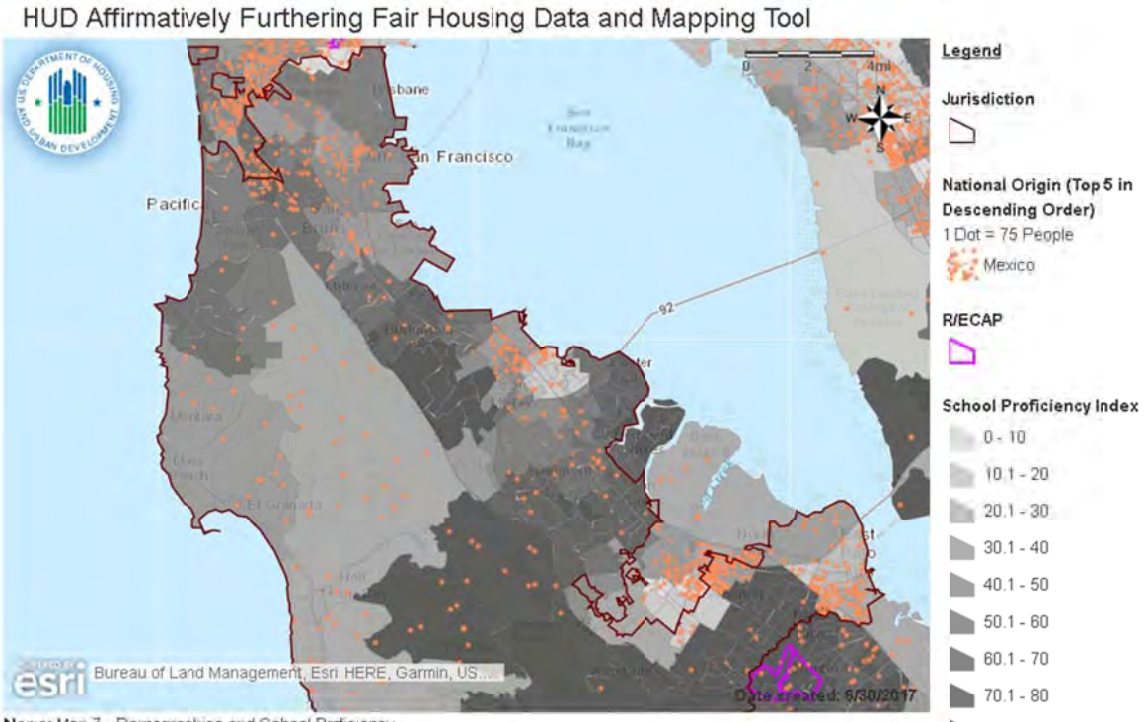
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-42.
Map 7 – Demographics and School Proficiency: Mexican, 2010



Name: Map 7 - Demographics and School Proficiency

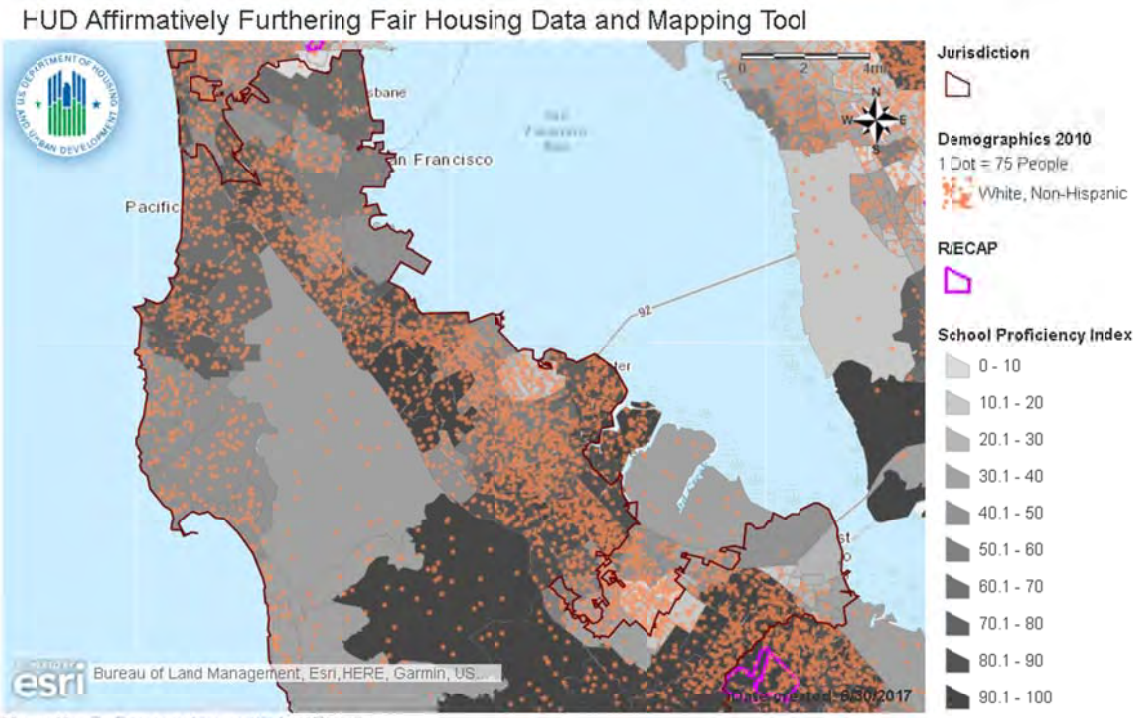
Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-43.
Map 7 – Demographics and School Proficiency: White, Non-Hispanic, 2010



Name: Map 7 - Demographics and School Proficiency

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

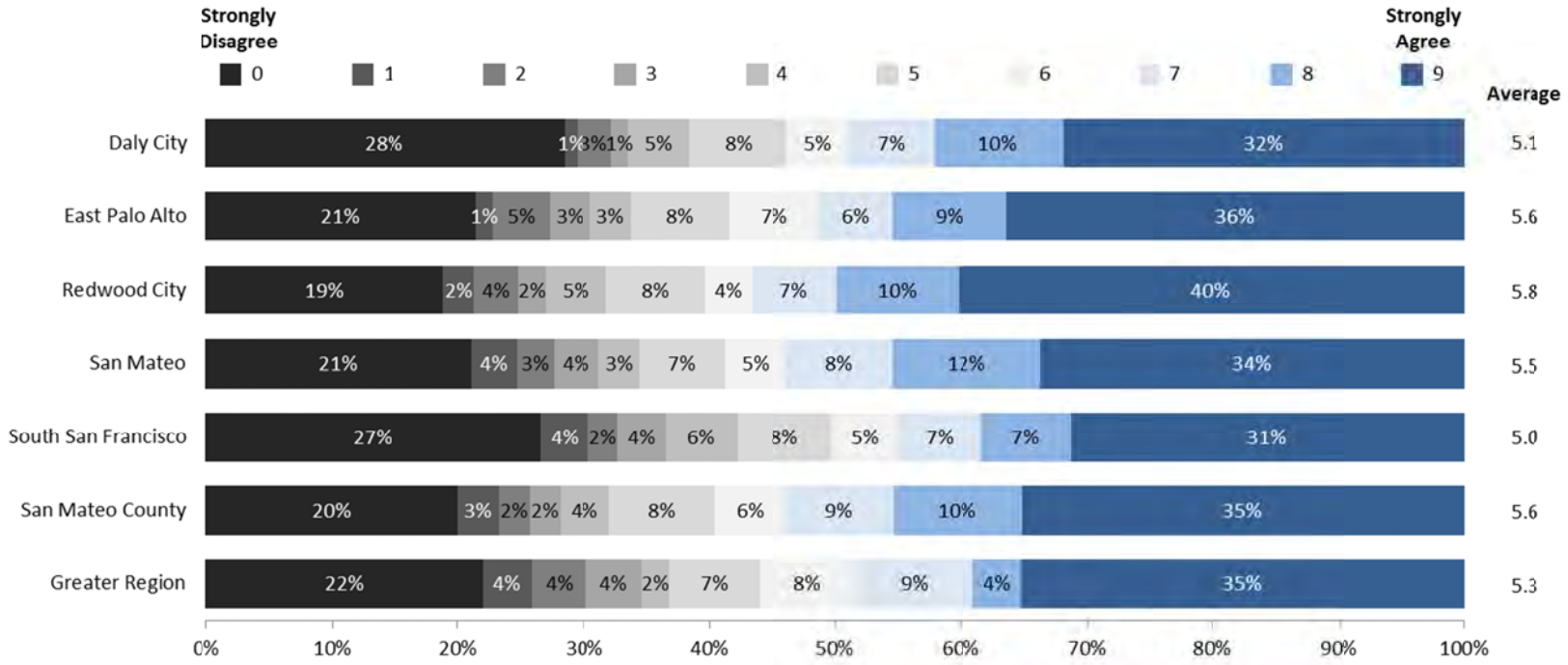
Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Resident perspectives on access to proficient schools. The figure below presents survey respondents' average rating of access to good quality schools for the participating jurisdictions, East Palo Alto and the greater region. On average, residents generally agree with the statement, but, as shown in the figure, resident perceptions are actually weighted heavily toward the ends of the rating scale, with about one in five respondents "strongly disagreeing" with the statement and about one in three "strongly agreeing." This pattern persisted regardless of the level of comparison (e.g., by jurisdiction, racial and ethnic groups, income levels, children in the household, size of household, housing tenure, disability, etc.).

As shown previously, HUD's school proficiency index suggests that most neighborhoods have access to proficient schools; the challenge reflected in the resident survey data is the lack of affordable housing across the board. The exception is access to proficient schools in East Palo Alto. Spanish language focus group participants shared that wealthier and White families send their children to private schools rather than public schools in East Palo Alto.

Figure V-44.
Resident Perspective on Access to Good Quality Schools

Please rate your level of agreement with the following statement about the city in which you live:
In this area it is difficult to find housing people can afford that is close to good quality schools.



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

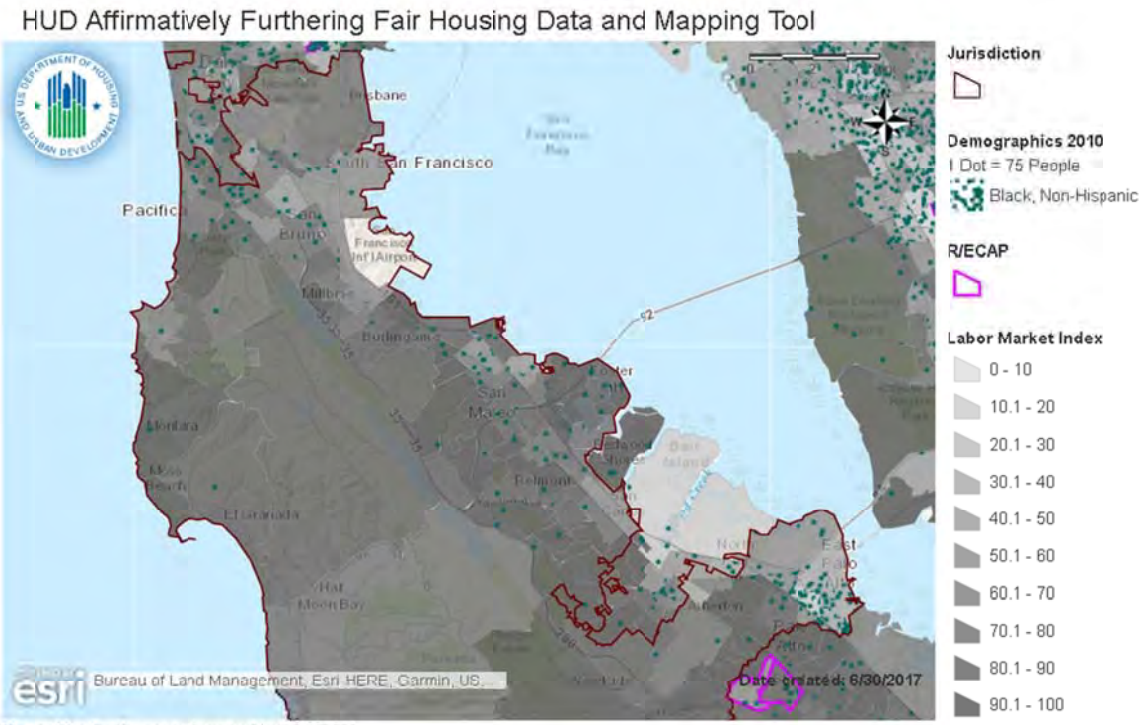
Employment. The jobs proximity index for the County overall is similar across races and ethnicities and for below- and above-poverty residents. It is also similar to the region's index. The index varies, however, by jurisdiction:

- Daly City has a relatively low index. The jobs proximity index is low across races and ethnicities.
- Redwood City's index is similar to the County's overall—and uniquely high for African Americans (62.66).
- The City of San Mateo is similar to Redwood City and also shows a high index for African American residents living in poverty.
- South San Francisco's job proximity index is curiously lower for residents living above the poverty level compared to residents overall, perhaps indicating a closer proximity to lower wage (v. higher wage) jobs.

The labor market index is a reflection of unemployment. Given the strong economy in the region, this index is relatively high. Variations exist for some jurisdictions:

- As shown in the HUD map below, East Palo Alto has the lowest labor market index—and is also home to residents who have historically faced discrimination in employment markets.
- African Americans and Hispanics in Redwood City have much lower employment indices than similar residents living in other jurisdictions.

Figure V-45.
Map 9 – Demographics and Labor Market : African Americans, 2010



Name: Map 9 - Demographics and Labor Market

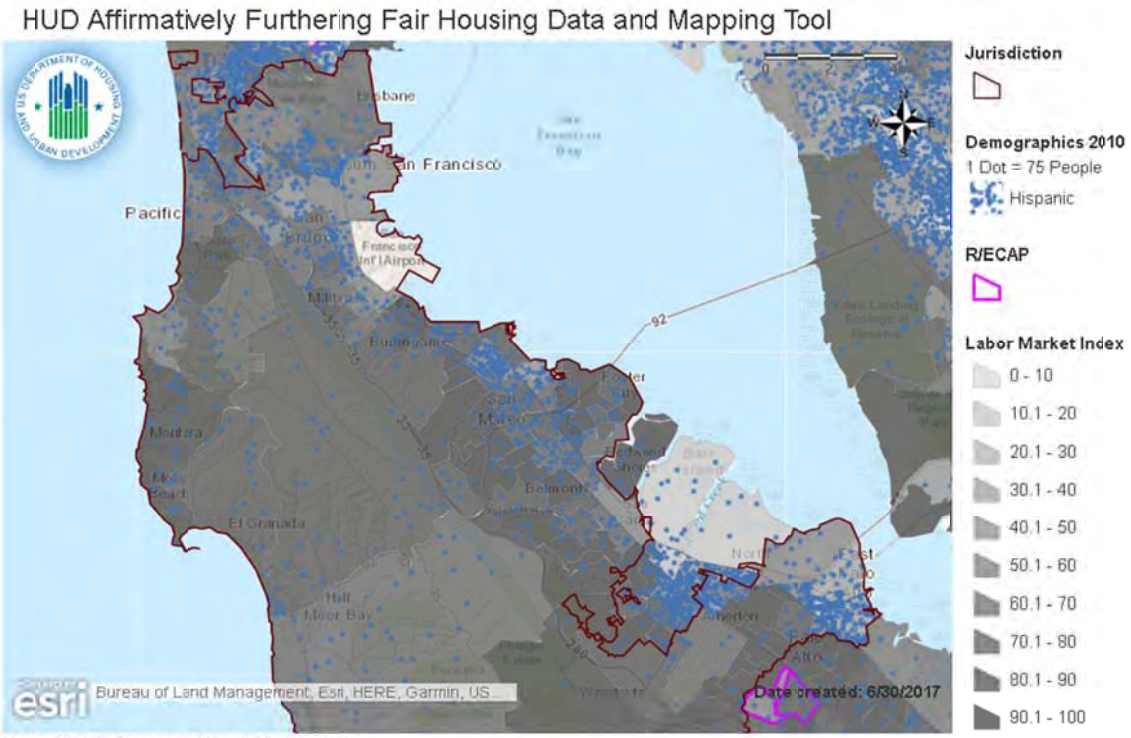
Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Figure V-46.
Map 9 – Demographics and Labor Market: Hispanics, 2010



Name: Map 9 - Demographics and Labor Market

Description: Labor Engagement Index with race/ethnicity, national origin, family status and R/ECAPs

Jurisdiction: San Mateo County (CONSORTIA)

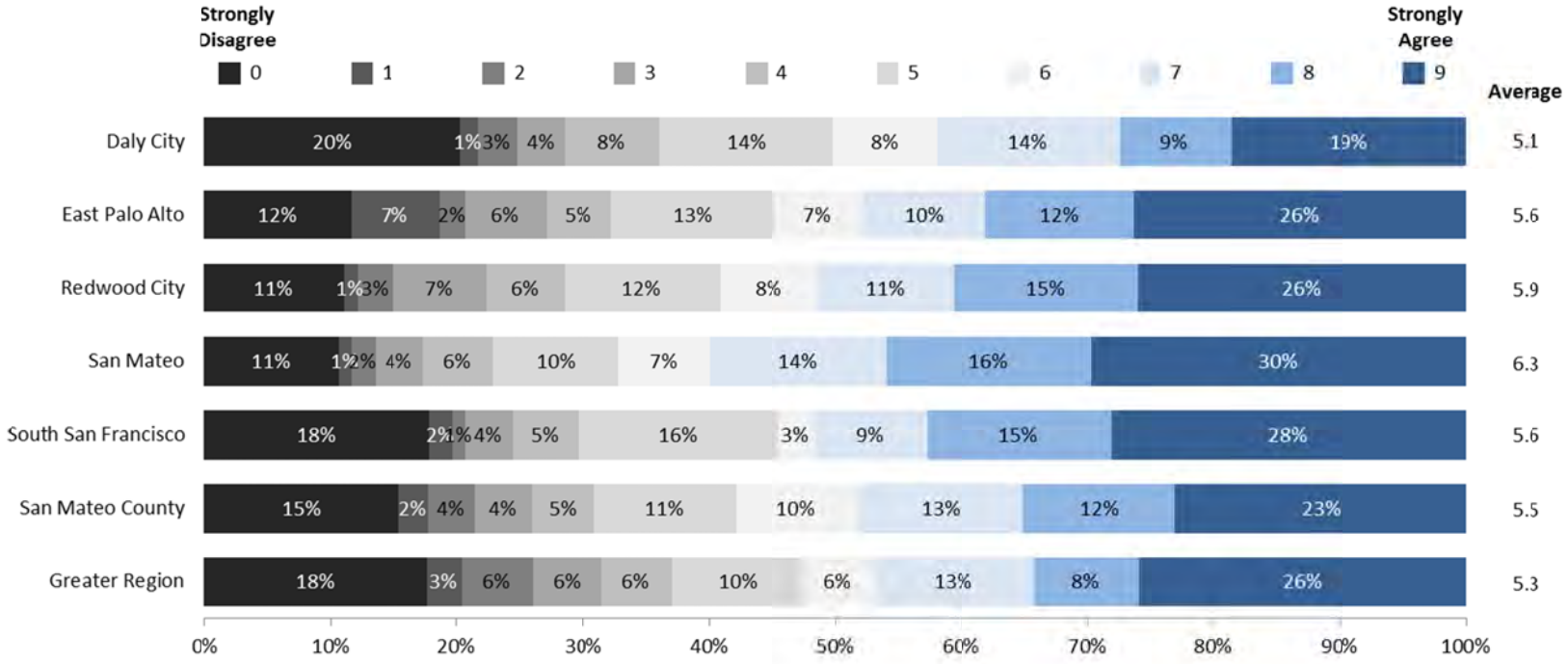
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Resident perspectives on access to employment opportunities. Figure V-47 confirms that most residents agree that the location of job opportunities is convenient to where they live, a similar finding to that from the examination of HUD's job proximity index. Among the participating jurisdictions, one in five Daly City residents strongly disagree that job locations are convenient, while one in five strongly agree. This suggests that for these Daly City residents, and their peers in South San Francisco, the types of jobs they consider are not conveniently located.

Figure V-47.
Resident Perspective on Access to Job Opportunities

Please rate your level of agreement with the following statement about the city in which you live:
The location of job opportunities is convenient to where I live.



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

In focus groups, participants generally reinforced the survey finding that employment opportunities are accessible from their neighborhoods. Convenience to employment opportunities is an important factor when making housing decisions; that less expensive housing may be available elsewhere is not appealing if those communities do not offer the opportunities, particularly schools and employment offered by areas with higher housing costs. Participants in the Spanish language focus group, many of whom work multiple jobs, highly value shorter commute times.

While access to jobs is high across the County, the wages paid by those opportunities are not always sufficient to support a family. Participants in the Spanish language focus group discussed the lengths to which their families must go to make ends meet—including household members working multiple jobs—and many, particularly those who do not speak English well, are caught in a Catch-22 of sorts. Higher wage jobs are perceived to go to those who speak English; those without proficient English skills work multiple lower wage jobs, leaving them little time or energy to spend with family, much less to pursue language skills that might lead to a higher hourly wage.

Participants in the Filipino focus group discussed employment in the context of housing costs. They characterized finding housing affordable to people working in minimum or other low wage jobs as impossible, resulting in room rentals and doubling up with family or friends as the only housing options available to this segment of the workforce. Some participants in this focus group have delayed retirement or come out of retirement in order to pay rising housing costs.

Transportation. A recent analysis conducted by the Metropolitan Transportation Commission (MTC), as part of the region's *Sustainable Communities Strategy Plan Bay Area,* found that, at a regional scale, planned transportation investments have equitably benefitted minority and low income households. This differs from other opportunity mapping that was completed for the study, which showed inequitable access to opportunity in education, employment, health, and housing.[8]

ABAG's Fair Housing Equity Assessment, which updated the MTC study, concluded that "opportunity is independent of job and transit access" based on data and mapping analysis that showed neighborhoods of concern also had the best access to public transit. ABAG noted that "Transportation/mobility access is an issue in very few areas."

That said, the ABAG study also found that continued displacement from communities of concern could create barriers to public transit if lower income residents must move to outlying communities—which are largely auto-dependent— to afford housing.

[8] It is important to note that that, historically, infrastructure development for transportation had a negative effect on some areas of San Mateo. Before environmental justice was considered in highway expansions, East Palo Alto, which was majority African American in the 1960s, was further separated from more prosperous areas in the County with the widening of Highway 101.

Figure V-48 illustrates the SamTrans public transit system map. The system includes bus routes that connect to BART stations (blue) and Caltrain stations (red). Lime green routes indicate School-day Only routes. Service is also provided on the coast (orange Coastside routes, inset).

Figure V-48.
SamTrans System Map

Source:

BBC Research & Consulting from http://www.samtrans.com/schedulesandmaps/maps.html .

The survey conducted for the AFH provides a closer look at transportation barriers. The majority of residents participating in the survey and focus groups affirmed ABAG's finding that transportation/mobility access is not a barrier for most residents.

Specifically, Figure V-49 demonstrates that most residents *disagreed* with the statement, "I have difficulty getting to the places I want to go because of transportation problems." Among the communities, a greater proportion of San Mateo and East Palo Alto residents (12% and 16% respectively) strongly agreed with the statement, indicating more pronounced transportation-related challenges. On average, responses to this indicator of access to transportation did not

vary significantly when examined by race, ethnicity, familial status, or housing tenure, and the distribution of ratings was very similar to those shown in Figure V-49, with the greatest proportion of respondents strongly disagreeing with the statement.

The one deviation from this pattern concerns Spanish language respondents. While the greatest proportion of Spanish speakers (20%) does not have difficulty getting to the places they want to go due to transportation problems, about two in five somewhat agree (ratings of 4, 5, 6) suggesting that transportation issues are more prevalent in this population.

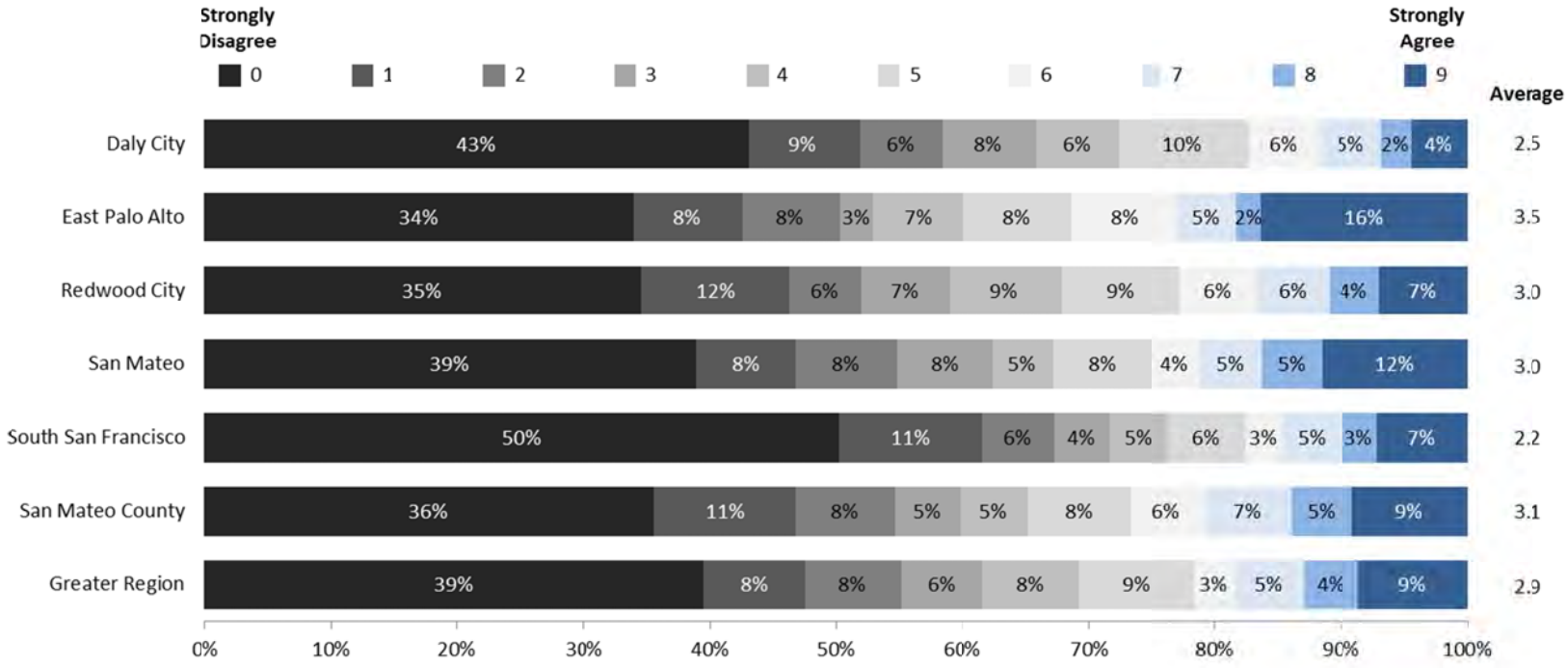
The median commute home from work for resident survey respondents living in San Mateo County is between 15 and 30 minutes. This is less than respondents from the greater region, whose median commute home is 30 minutes up to 45 minutes.

By jurisdiction, Daly City residents report the longest commute: Three in 10 Daly City residents who commute spend 30 to 45 minutes going home from work, a higher proportion than commuters living in other participating jurisdictions. This is supported by the HUD index on job proximity shown in Figure V-31.

Median commute time did not vary by race or ethnicity. However, a greater proportion of Spanish language respondents (40%) spend 15 to 30 minutes commuting home compared to approximately one in three of all Hispanics (34%), Black (33%), Asian (29%) and White (32%) survey respondents. Spanish language respondents are also less likely to have the shortest commute—less than 15 minutes—compared to other populations.

Figure V-49.
Resident Perspective on Access to Transportation

Please rate your level of agreement with the following statement about the city in which you live:
I have difficulty getting to the places I want to go because of transportation problems.



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Patterns in Disparities in Access to Opportunity. The San Mateo County region is, by and large, an area of opportunity with few measurable disparities in access to opportunity. As such, the affordable housing crisis, which impacts all residents, is the most significant barrier to accessing opportunity. As discussed previously, the data demonstrate that compared to other demographic groups, African American and Hispanic households have less access to proficient schools. Further, while there are few observed differences in access to jobs, findings from the community engagement process point to challenges, particularly among residents with limited English proficiency, to earning higher wages, necessitating many to work multiple low wage jobs.

Contributing Factors of Disparities in Access to Opportunity. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. The matrix below identifies those factors that significantly create, contribute to, perpetuate, or increase disparities in access to opportunity in San Mateo County and the participating partners.

Figure V-50.
Contributing Factors Matrix: Access to Opportunity

Contributing Factors to Access to Opportunity	Daly City	Redwood City	San Mateo City	South San Francisco City	San Mateo County	Note:
Access to financial services						
Availability, type, frequency, and reliability of public transportation					X	Countywide challenges with persons with disabilities accessing SamTrans
Impediments to mobility						
Lack of access to opportunity due to high housing costs	X	X	X	X	X	County is currently a high opportunity environment. Continued displacement of residents due to high housing costs will limit access to opportunity for lower and moderate income households.
Lack of private investments in specific neighborhoods						
Lack of public investments in specific neighborhoods, including services or amenities						
Lack of local or regional cooperation	X	X	X	X	X	Lack of private sector involvement to address housing needs
Land use and zoning laws						
Lending discrimination						
Location and type of affordable housing	X	X	X	X	X	Housing for large families is limited
Location of employers	X					
Location of environmental health hazards						
Location of proficient schools and school assignment policies					X	African American and Hispanic children are more likely to live in neighborhoods with lower proficiency schools
Loss of affordable housing	X	X	X	X	X	County is currently a high opportunity environment. Continued loss of affordable housing will limit access to opportunity for lower and moderate income households.
Occupancy codes and restrictions						
Private discrimination						
Source of income discrimination						

Note: Only those factors that were evident in the AFH research and summarized. Blank fields indicate no contributing factor.

Source: BBC Research & Consulting.

Disproportionate Housing Needs

This section examines which protected classes experience the highest rates of housing problems compared to other groups and for the region, examines how housing burden varies geographically, and examines the needs of families with children. It begins with a discussion of housing affordability trends and challenges in general.

Housing needs. There is no shortage of research documenting the growing affordability crisis in the region. Recent studies have examined these needs for the region, San Mateo County separately, and by household type. The main findings from these studies are discussed below.

Rapidly increasing housing costs. According to Home for All—the County's most current resource for housing policy—the median price for a home in San Mateo County is $1.25 million—the highest reported median between 2001 and 2015. The recent spike in prices is remarkable, even by the region's standards: in less than four years, the median price of a home rose by more than 50 percent. Condominiums, once an affordable alternative to single family homes, now carry a median of $702,000, almost as high as the "low" of $800,000 for all homes in 2011.

Figure V-51.
Median Home Price in San Mateo County, 2000-2015

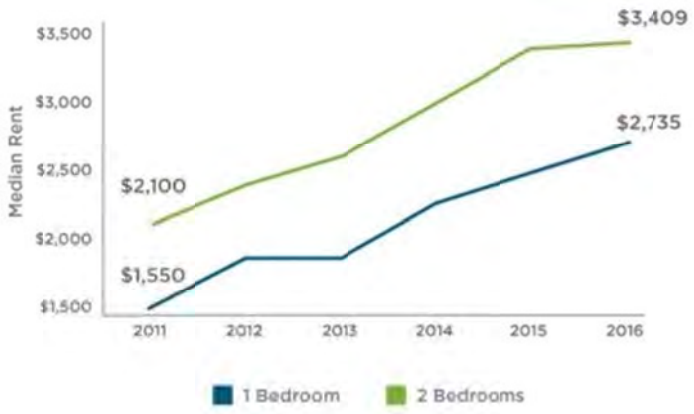
Source:
Sustainable San Mateo County, San Mateo County Association of Realtors, http://homeforallsmc.com/challenge/.

Rental costs demonstrate a different trend. Unlike home prices, whose peaks and valleys mirror economic strengths and weaknesses, rental costs have been rising consistently. The median rent for a 1 bedroom apartment is currently $2,735, requiring an income of more than $100,000. To afford the median for a 2 bedroom apartment (median of $3,409), a household must earn $136,000.[9]

[9] http://homeforallsmc.com/challenge/

Figure V-52.
Median Rent in San Mateo County, 2011-2016

Source:
Zillow Data, each year's data from June.
http://homeforallsmc.com/challenge/.



As the following figure demonstrates, housing constraints have existed in the County and in every participating jurisdiction for decades. Even during 2011—when the market was soft by San Francisco standards—vacancies were relatively low (a 5% vacancy rate is considered functional in housing markets). The slow pace of development combined with increased demands exacerbated the affordability challenge.

Figure V-53.
Housing Market Trends, County and Participating Partners

	Daly City	Redwood City	San Mateo City	South San Francisco	San Mateo County (unincorporated)
Vacancy Rate					
2000					
Rental vacancy	1.7%	2.3%	1.6%	1.3%	1.8%
Owner vacancy	0.3%	0.4%	0.5%	0.7%	0.5%
2011					
Rental vacancy	3.2%	4.5%	5.3%	2.4%	4.0%
Owner vacancy	1.8%	0.3%	1.3%	0.5%	1.2%
New Development					
Units built 2000 and more recently	4%	4%	5%	9%	5%
Overcrowding					
Renters overcrowded	1,785	1,658	1,500	769	590
Renters extremely overcrowded	807	1,239	756	291	395
Owners overcrowded	1,263	122	433	544	215
Owners extremely overcrowded	323	68	160	100	70

Source: www.21elements.com.

Hourly wage needed to afford rental housing in the region. The National Low Income Housing Coalition's (NLIHC) 2016 Out of Reach study listed both San Mateo County and San Francisco County as the top least affordable counties in the U.S. To afford a two-bedroom apartment at HUD's Fair Market Rent (FMR), a household in both counties would need to earn $44.02 per hour (the "housing wage")—or $91,500 per year. This compares to $28.59 for California overall. A minimum wage worker in San Mateo County would need to work more than 4 jobs to afford to rent in San Mateo County. Since this is not a possibility, minimum wage workers in the County

face severe cost burden, live in crowded conditions, and/or commute long distances from more affordable communities. And those more affordable communities have become harder to find, significantly lengthening the commute.

Housing unit and resource gaps. A May 2017 report by the California Housing Partnership uses NLIHC data to estimate the rental housing gap in San Mateo County. An estimated 25,000 affordable rentals are needed to address the County's current rental housing gap. Currently, fewer than 10,000 affordable rentals exist to serve the nearly 35,000 low income renter households who need affordable housing.

The median asking rent is $3,500 per month in San Mateo County—21 percent higher than in 2000. As rents have risen, household incomes have declined—and so have the resources available to fund affordable housing. The Partnership report estimates that housing resources have declined by 83 percent since 2008 due to elimination of State Redevelopment Agency funds, state housing bonds and programs, and federal housing programs.

Location of affordable housing. San Mateo County, the incorporated cities, and nonprofit and private sector organizations offer additional housing opportunities.

The latest inventory of affordable units in the County is about 6,875. Many of these are mixed income and are incorporated into market rate and affordable developments. In all, these units comprise about 50 percent of the approximately 14,000 developments with some level of affordable housing.

The location of affordable developments—all publicly-supported—is shown in the following maps. The developments are segmented by the resident type they primarily serve: residents with disabilities, seniors, families and large families, special needs housing, and mixed-income housing. The maps reveal some patterns in housing location and type: Housing for persons with disabilities and other special needs housing is most likely to be found in the area around North Fair Oaks, there are very few developments specifically serving large families, and senior and mixed-income housing are more likely to be dispersed throughout the County.

Figure V-54. Locations of Affordable Housing for Disability

Source:

San Mateo County, TIGER/Line, ESRI.

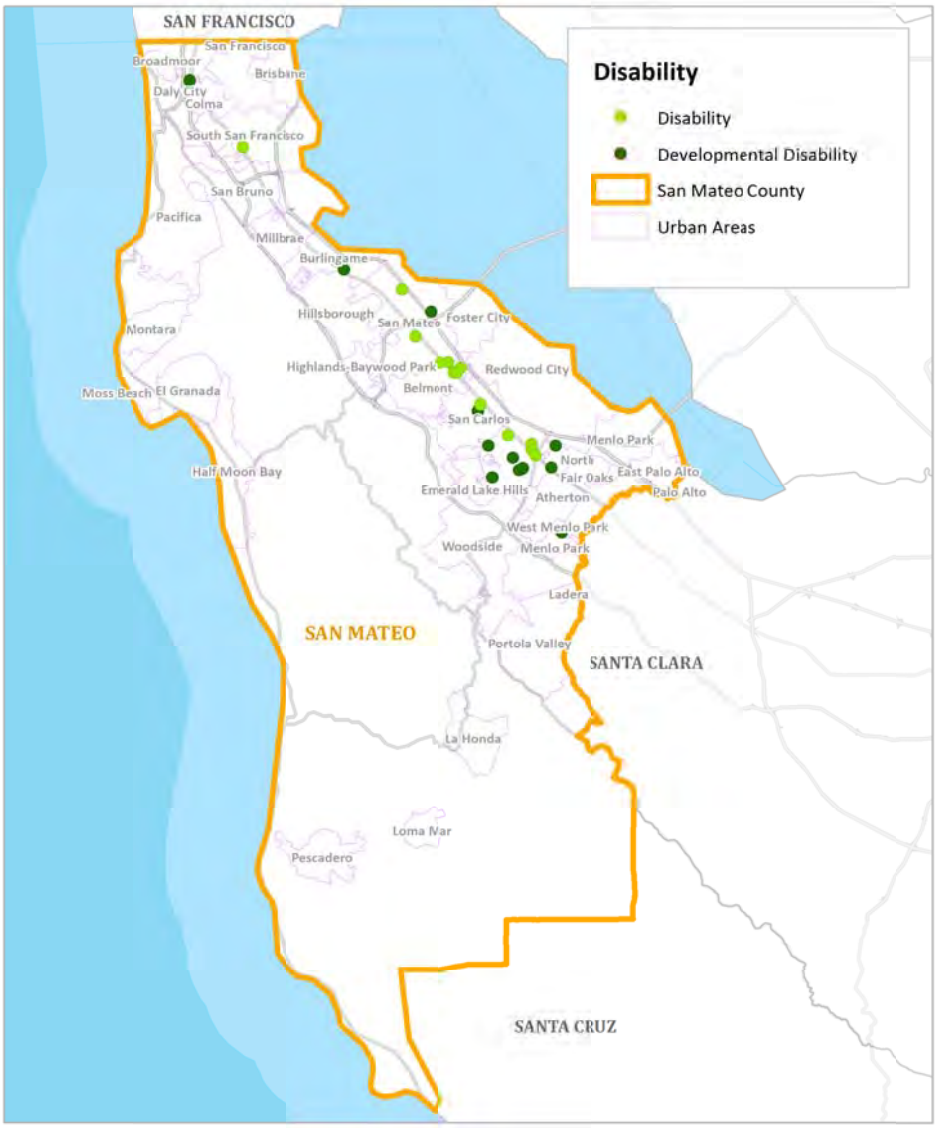


Figure V-55. Locations of Affordable Housing for Seniors

Source:

San Mateo County, TIGER/Line, ESRI.

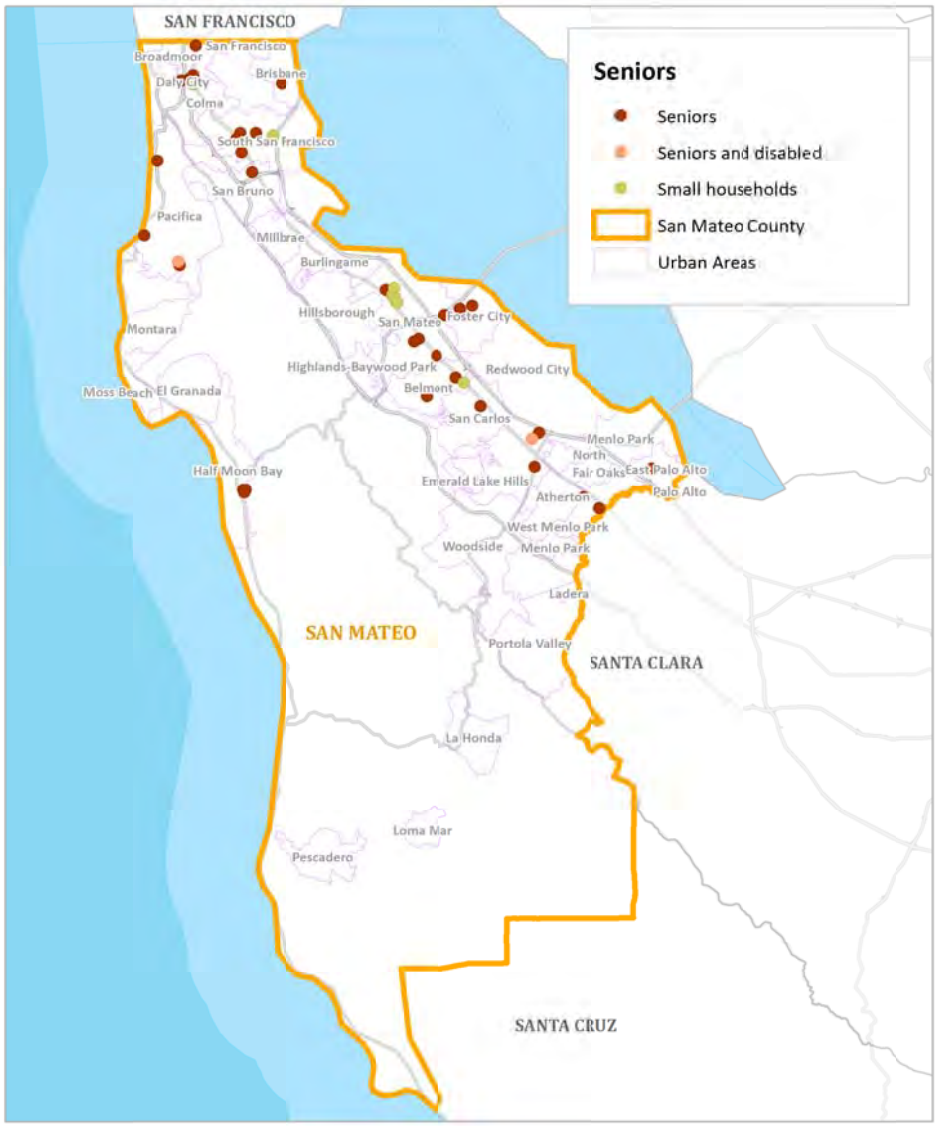


Figure V-56. Locations of Affordable Housing for Families

Source:

San Mateo County, TIGER/Line, ESRI.

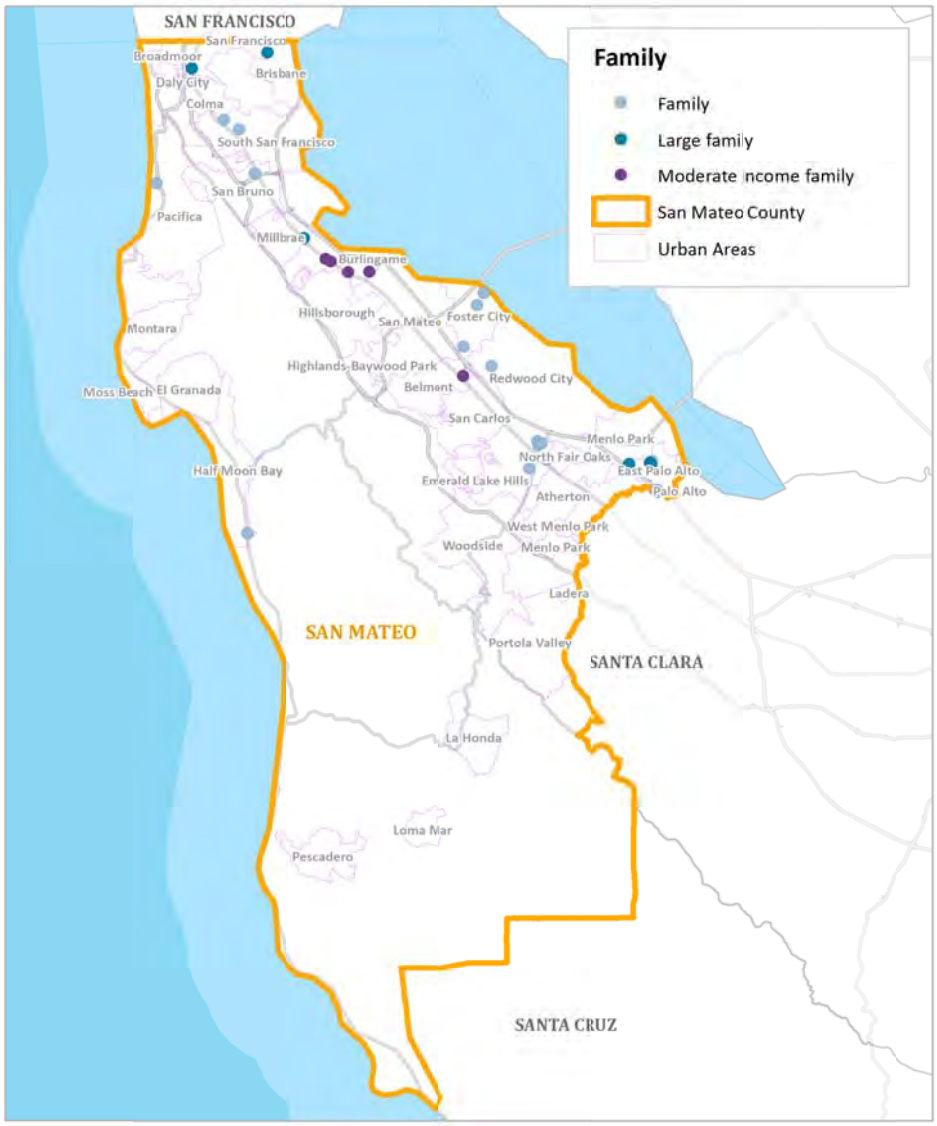


Figure V-57. Locations of Affordable Housing for Mixed Income

Source:

San Mateo County, TIGER/Line, ESRI.

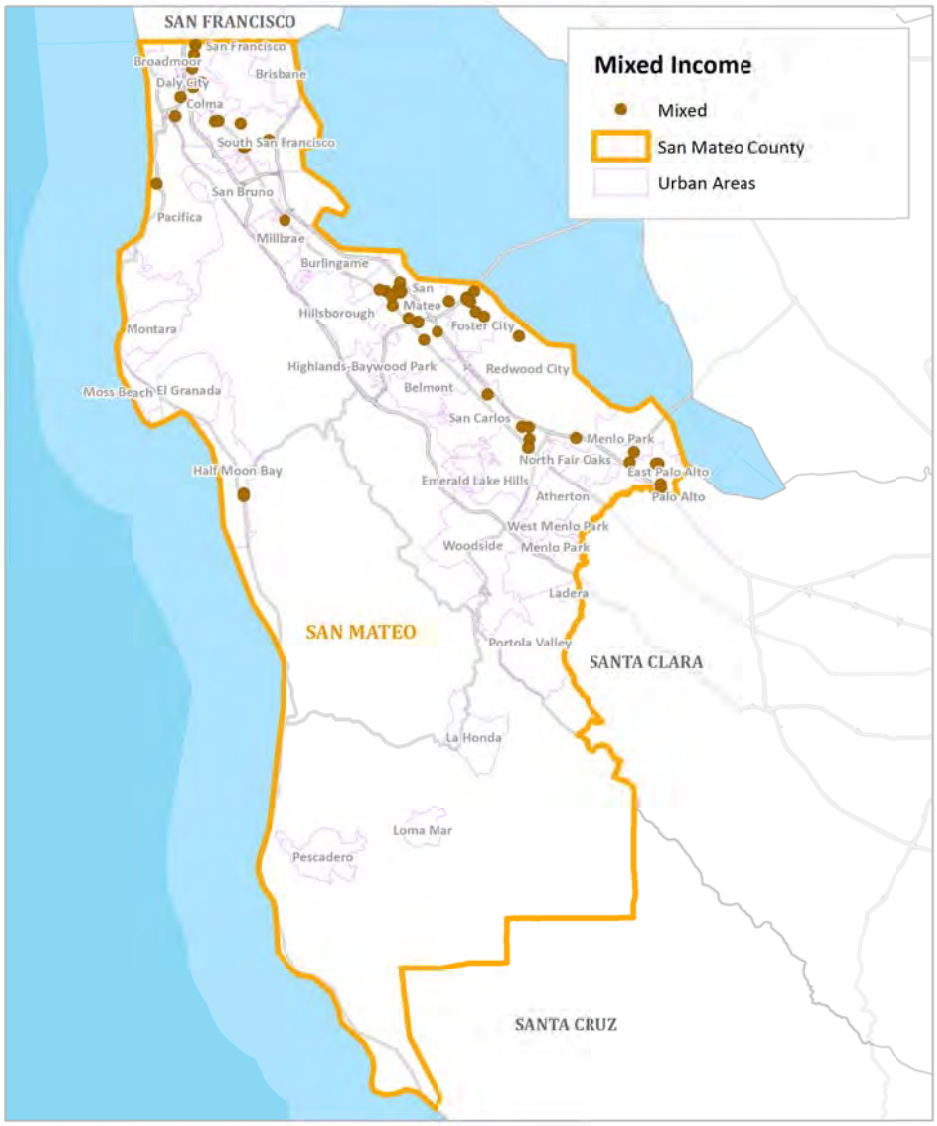


Figure V-58. Locations of Affordable Housing — Other Specialized Housing

Source:

San Mateo County, TIGER/Line, ESRI.

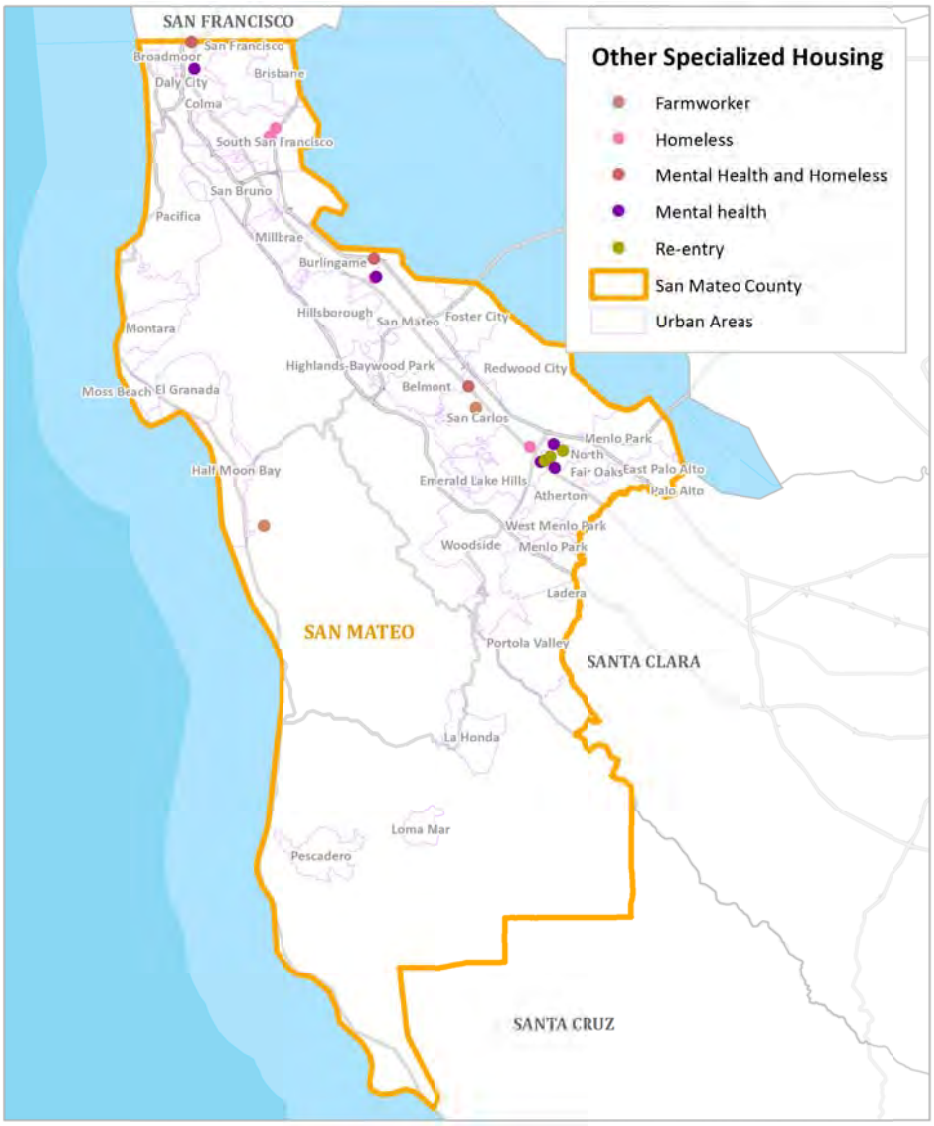
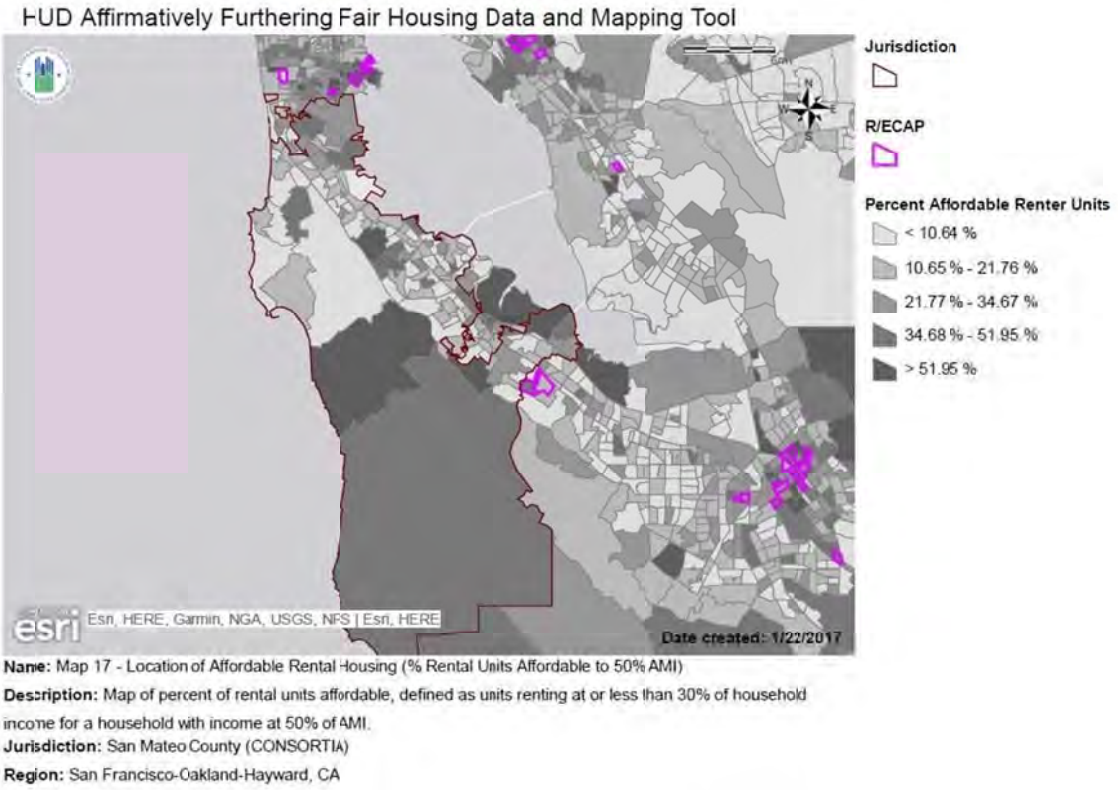


Figure V-59.
Map 17 – Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI), 2010



Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Homelessness. According to the 2015 Homeless Survey for San Mateo County, there were approximately 1,800 homeless people in the County on January 22, 2015. Of these, 775 were unsheltered—living on streets, in vehicles, in encampments. Nearly 1,000 were sheltered, living in shelters, emergency housing, transitional housing, motel voucher programs, residential treatment facilities, and jails or hospitals.

This count does not include persons who are at-risk of homelessness and is thought to undercount families and children, many of whom "float" among temporary residence and may be living in domestic violence situations.

According to the survey, the "typical" unsheltered homeless person in San Mateo County is a single man with at least one disability. The most common types of disabilities include substance abuse challenges and mental health challenges.

There is a greater representation of families among the unsheltered population. The level of disability among the unsheltered population is somewhat lower, although the primary disability types are consistent with unsheltered homeless.

African Americans are disproportionately represented among the homeless in San Mateo County (21%); Asians are significantly underrepresented; and Hispanics are slightly underrepresented.

More than 100 respondents (116) to the resident survey identified their housing situation as homeless/without shelter, living in hotel/motel/car or living in a shelter/transitional housing. The demographic characteristics of these respondents include:

- Two-thirds are male and single (household of one);
- Nearly half (48%) have a disability or a person with a disability is a member of their household;
- Two in five have a child under age 18 in their household;
- One in five is African American; two in five is Hispanic; 16 percent are Asian and one in four is white;
- Nearly 30 percent are working full-time and 15 percent are disability benefit recipients; and
- Nearly one in three are ages 25 to 34 and 28 percent are age 55 or older.

Housing policies. Stakeholders who participated in the development of the AFH represented a range of interests: private and public sector developers, real estate agents, housing and civil rights advocates. They described a number of housing policy barriers to provision of housing in San Mateo County:

- Not-in-My-Backyard-Syndrome (NIMBYism) by residents. Lack of support for affordable housing and multifamily housing.
- Development processes that provide many opportunities for public input. The County's and jurisdictions' efforts to be transparent and collect public opinions on proposed developments delay the development approval process. This can significantly increase the carrying costs of land, raising the overall cost of housing. Indeed, ABAG, in its 2015 Fair Housing Equity Assessment, found that San Mateo County failed to meet its regional housing permitting obligation for all but moderate income housing between 1999 and 2016.
- Slow response from public and private sector to address housing needs. As in many communities, there was a rapid onset to the housing crisis in San Mateo County. Strong employment growth in successful, dominant industries with headquarters in the region coupled with the large cohort of Millennials reaching housing independence and an already constrained housing supply has created a very challenging housing environment. San Mateo County has successfully increased resources to support housing development, yet the private sector has been slow to commit to addressing housing needs.

Federal housing policy. At the federal level, the proposed change to the Difficult Development Area (DDA) definition for the LIHTC program—reducing the number of DDAs in San Mateo County—would significantly limit future development of affordable rental housing. As shown in the maps in this section, San Mateo County has nearly 50 LIHTC developments that provided mixed-income housing throughout the County. According to the San Mateo County Department

of Housing, if the reduced DDA policy would have applied to these developments only 5 of the 49 would have been built. The Department of Housing advocates that the entire County should be considered a DDA given the high costs of housing and the County's promise of providing high opportunity environments to low income renters.

Ironically, discrimination provisions in the Federal Fair Housing Act also limit the County's and jurisdictions' ability to address housing needs. Other than the exceptions for seniors, persons with disabilities, and other special needs, housing developers cannot give preferences to certain protected classes. This can make it difficult to serve residents who need affordable housing the most—e.g., residents of specific races who have historically faced economic disadvantages and are being displaced in their communities due to rising rents.

Who is most affected by rising housing prices? It is rational to assume that landlords are "choosier" in high cost markets and may knowingly or unknowingly rely on biases in choosing potential tenants. They may also be encouraged by a market that commands high rents to evict current tenants and upgrade their developments to stay competitive, meet a perceived demand for luxury rentals, and secure investment in their properties.

This may also be the case for sellers. Prospective buyers often write letters to sellers hoping to influence them to choose a particular buyer over another. One respondent to the survey for this AFH reported that they had lost out on a home purchase because the seller "liked that the other buyer had kids."

A recent analysis of who is most affected by evictions, conducted by the Legal Aid Society of San Mateo County and based on a client sample, found that evictions are most likely to affect households with children, including single parents, African Americans, and Hispanic households—and disproportionately less likely to affect Whites and, to a much lesser extent, Asian families. It is important to note that these data are based on a sample of households who have been known to experience eviction. It is unknown how many households are affected by evictions overall.

Figure V-60. Evictions by Race/Ethnicity and Eviction Type, 2012-2015

Source:
Legal Aid Society of San Mateo County.

	No Cause Evictions		Evictions where Cause is Provided	
Race/Ethnicity	Number	Percent	Number	Percent
African American	23	9%	82	14%
Asian	15	6%	36	6%
Hispanic	122	48%	280	47%
Native Hawaiian/Pacific Islander	6	2%	43	7%
White	73	29%	116	19%
Some Other Race or Unknown	17	7%	39	7%
Total	**256**	**100%**	**596**	**100%**

Summary results from the Legal Aid's study of evictions occurring between 2012 and 2015 are shown below. The most striking finding: No cause evictions have risen significantly since 2012, from 37 to 113. For no cause evictions, Hispanic households made up the largest proportion of the increase at 39 percent. Where cause was provided, Whites made up the largest increase.

It is important to note that eviction activity can lead to a broader housing problem: the threat of eviction can have "silencing" effect on residents who fear being evicted (undocumented, LEP, foreign-born); they tolerate very poor housing conditions to remain housed.

Figure V-61. Trends in Evictions

Source:
Legal Aid Society of San Mateo County

	2012-2013	2013-2014	2014-2015	Change	Proportion of Change
No Cause					
African American	1	6	16	15	20%
Asian	3	5	7	4	5%
Hispanic	18	56	48	30	39%
Native Hawaiian/Pacific Islander	1	1	2	1	1%
White	14	30	29	15	20%
Some Other Race or Unknown	0	6	11	11	14%
Total	**37**	**104**	**113**	**76**	**100%**
Cause is Provided					
African American	17	6	26	9	18%
Asian	10	5	11	1	2%
Hispanic	84	56	76	-8	-16%
Native Hawaiian/Pacific Islander	12	2	17	5	10%
White	17	30	45	28	56%
Some Other Race or Unknown	4	6	19	15	30%
Total	**144**	**105**	**194**	**50**	**100%**

In 2016, the Legal Aid Society of San Mateo County partnered with Community Legal Services in East Palo Alto to understand the reasons for evictions: Are evictions occurring due to market forces? Related to tenant behavior? Like the recent analysis, the study also looked at who was affected by evictions. The study found:

- 1,100 evictions or unlawful detainers were reported between 2014 and 2015. Of these, 75 percent were due to no cause or because tenants could not afford rent increases: 39 percent were due to non-payment; 36 percent were no cause.
- The top five cities in the County for no cause eviction notices include Redwood City (258) and Daly City (130). As discussed elsewhere in this section, these two cities are some of the remaining most affordable communities in the County and have high proportions of Asian and Hispanic residents.
- The report concludes that African Americans and Hispanic renters are disproportionately likely to be affected by evictions relative to their share of the County's population: 49 percent of those evicted are of Hispanic descent and 21 percent are African American. One third list their primary language as Spanish.
- One-third of those evicted have a female head of household and 70 percent are families with children.

Differences in housing problems. HUD provides data tables as a starting point in assessing the differences in housing needs among household groups. These tables are supplemented by local data in this section: Recently, several researchers have examined housing affordability challenges in San Mateo County; their findings are discussed here.

Table 9 below shows the percentage of households with housing needs in San Mateo County and in the San Francisco region. "Housing problems" are defined as units having incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and households with cost burden greater than 30 percent. "Severe" housing problems include all of the above except that cost burden is greater than 50 percent.

Figure V-62.
Table 9 - Demographics of Households with Disproportionate Housing Needs

	(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction			(San Francisco-Oakland-Hayward, CA) Region		
Households experiencing any of 4 Housing Problems	**# with problems**	**# households**	**% with problems**	**# with problems**	**# households**	**% with problems**
Race/Ethnicity						
White, Non-Hispanic	41,053	113,451	36.19%	316,225	841,640	37.57%
Black, Non-Hispanic	3,141	5,662	55.48%	79,090	141,095	56.05%
Hispanic	20,168	32,902	61.30%	148,135	248,785	59.54%
Asian or Pacific Islander, Non-Hispanic	18,106	41,998	43.11%	155,414	347,022	44.79%
Native American, Non-Hispanic	86	243	35.39%	2,302	4,841	47.55%
Other, Non-Hispanic	1,989	4,582	43.41%	20,950	43,760	47.87%
Total	*84,654*	*198,919*	*42.56%*	*722,110*	*1,627,125*	*44.38%*
Household Type and Size						
Family households, <5 people	41,298	112,712	36.64%	331,070	856,140	38.67%
Family households, 5+ people	13,551	20,911	64.80%	99,495	159,025	62.57%
Non-family households	29,809	65,282	45.66%	291,550	611,960	47.64%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity						
White, Non-Hispanic	19,553	113,451	17.23%	156,775	841,640	18.63%
Black, Non-Hispanic	1,566	5,662	27.66%	46,125	141,095	32.69%
Hispanic	13,565	32,902	41.23%	94,990	248,785	38.18%
Asian or Pacific Islander, Non-Hispanic	9,805	41,998	23.35%	87,749	347,022	25.29%
Native American, Non-Hispanic	58	243	23.87%	1,448	4,841	29.91%
Other, Non-Hispanic	1,100	4,582	24.01%	12,134	43,760	27.73%
Total	*45,710*	*198,919*	*22.98%*	*399,195*	*1,627,125*	*24.53%*

Note: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: CHAS.

In San Mateo County, Hispanic households have the highest rate of housing problems: 61 percent of Hispanic households experience housing problems. This is followed by African Americans at 55 percent. Hispanic and African American households also have the highest rates of severe housing problems.

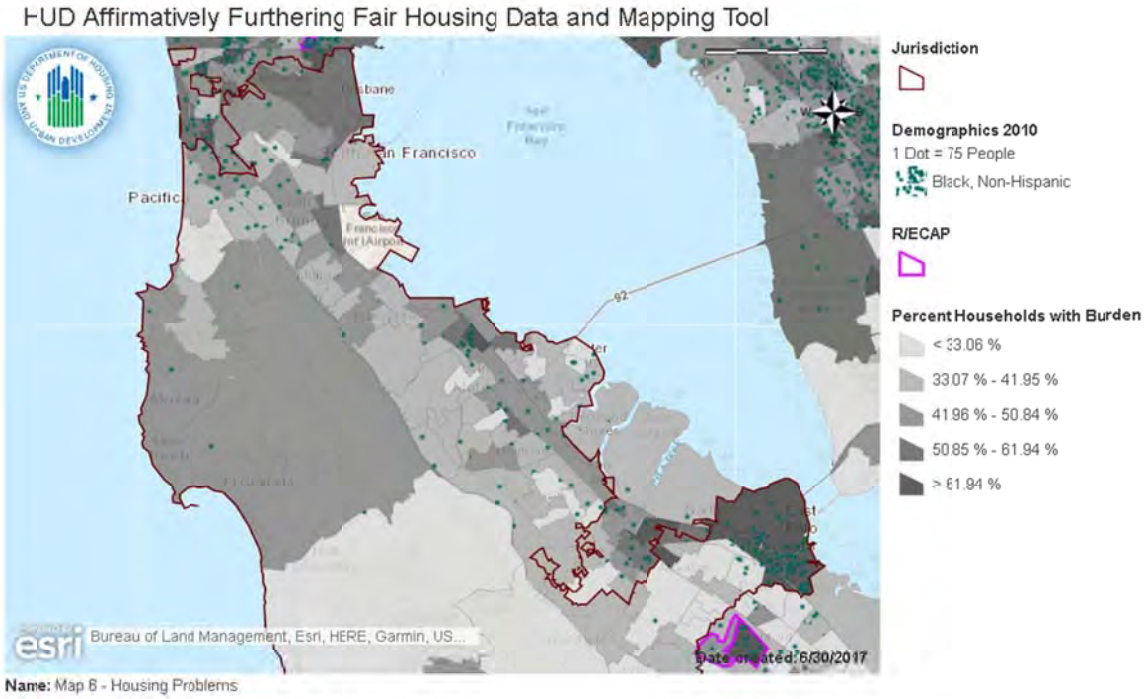
The highest rates of housing problems are experienced by large families (5+ people per household): 65 percent of these households experience some type of housing problems. White, Asian, and Native American households have the lowest rates of housing problems.

Housing burdens are similar for the County and the region (within a few percentage points difference) except for Native American households, who experience lower rates of housing burden in the County compared to the region overall.[10]

A difference (albeit small, 5 percentage points) also exists for African American households, who experience lower rates of housing problems in San Mateo County than in the region overall.

The map below shows where the neighborhoods with the highest housing burdens exist and how these relate to where Hispanic and African American households live. In general, housing burden is relatively low in San Mateo County. The highest rates of housing burden exist in and around East Palo Alto, where there are higher clusters of African American and Hispanic residents.

Figure V-63.
Map 6 – Housing Problems: African Americans, 2010

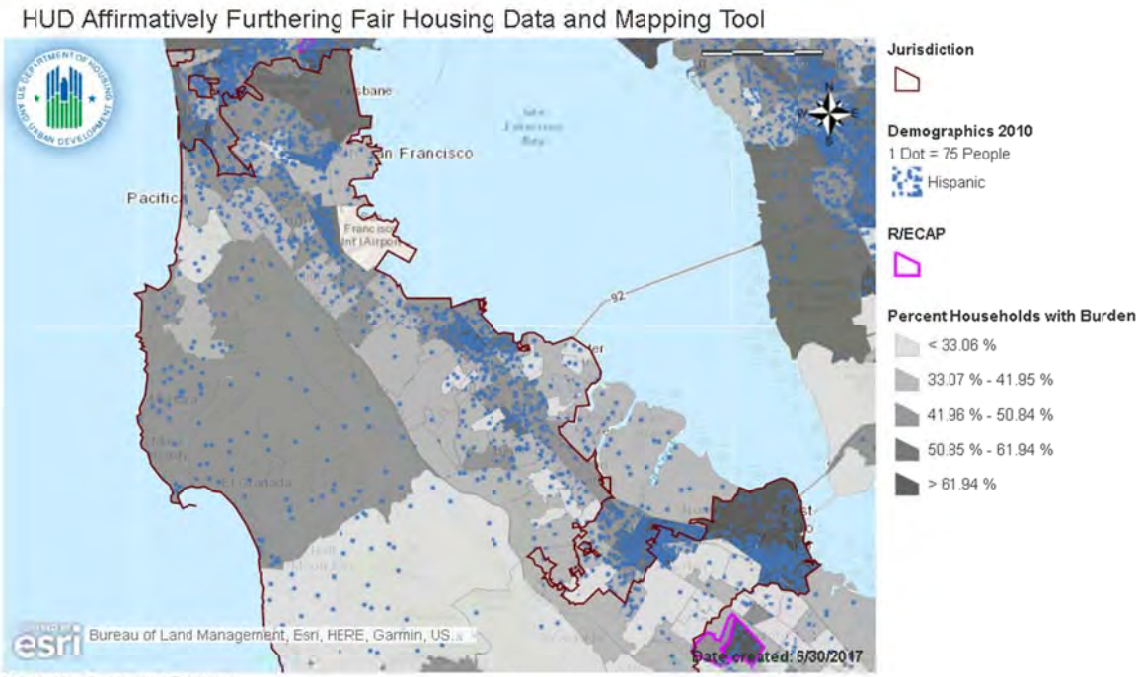


Name: Map 8 - Housing Problems
Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

[10] It is important to note that the numbers of Native American households in the County is very low, making the comparison less significant.

Figure V-64.
Map 6 – Housing Problems: Hispanics, 2010



Name: Map 6 - Housing Problems

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

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/.

Needs of housing for families with children. A recent HUD research study, *Findings of a Pilot Study of Discrimination Against Families with Children in Rental Housing Markets,* examined the existence of differential treatment between households with and without children during rental housing searches. [11] Los Angeles was one of the cities examined in the research.

The study found no differential treatment in making appointments with rental housing providers and that race and ethnicity did not influence the likelihood of discrimination based on family status—an interesting result, since denial of housing to children can be a pretext for racial and ethnic discrimination. Marital status of the families was also not a factor.

However, the study did find that families with children were shown fewer and larger and more expensive units than childless households. This was exacerbated by having additional children. The authors of the study suspect that misinterpretation of occupancy standards may play a role in the denial of housing for families with children—or the assumption that units of a certain size cannot accommodate families. This may result in steering families with children toward larger units.

[11] https://www.huduser.gov/portal/pdredge/pdr-edge-research-050117.html?WT.mc_id=edge_may022017&WT.tsrc=Email

Census data indicate that families with children—many of whom are Hispanic—have declined in many San Mateo County neighborhoods. As demonstrated by the displacement analysis in this section, families with children were no more or less likely than renters overall to have experienced displacement.

However, Hispanic renters, and especially those who responded to the resident survey in Spanish, were more likely than others to have experienced displacement; the primary cause of which was that the rent increased more than the renter could afford.

Discrimination against households with children may also contribute to the decline in family households in some neighborhoods. Among those respondents to the resident survey who believe they experienced discrimination when buying or renting housing in San Mateo County, 13 percent overall named having children as the reason for the discrimination.

Stakeholder perceptions. Stakeholders who participated in focus groups for this AFH described how market pressures were affecting their constituents:

- Veterans with criminal histories and/or past substance abuse challenges are disproportionately affected by housing market tightness. Market conditions are not allowing people to get reestablished after they have faced eviction or a personal challenge.
- "This cycle is worse than any we've ever seen." *Housing professional.*
- "The worst period in any history." *City Council member*
- Fear of gentrification is causing some communities to avoid investing in revitalization because they are scared that it will lead to people being pushed out of their community.

Differences in tenure. HUD's AFH Table 16 provides information on the race and ethnicity of renters and owners for the participating partners.[12] Shaded cells indicate significant variation from the County and region. These include:

- White, non-Hispanic residents have homeownership rates around 60 percent. There is little variation across communities except in South San Francisco, where the rate is 70 percent.
- Homeownership for African Americans differs significantly across jurisdictions. The rate is the highest in Daly City at 45 percent—but still well below the rate of White, non-Hispanic residents. The lowest rate is 13 percent in Redwood City—a large deviation from the region (33%).
- Homeownership is higher for Asians than for any other racial or ethnic category in all jurisdictions except for the City of San Mateo. Asian homeownership is higher in the County and jurisdictions than in the region overall.

[12] Table 16 has been modified to show tenure by race and ethnicity rather than the distribution of owners and renters by race and ethnicity. Due to different data sources, Table 16 differs slightly from Figure V-2, the source of which is the city and county Housing Elements.

- Hispanic homeownership is highest in Daly City at 42 percent and about the same as the region overall in most jurisdictions. It is lowest in Redwood and San Mateo Cities.
- There are very few Native Americans in the County and their homeownership rate varies considerably across jurisdictions.

Figure V-65.
Table 16 - Homeownership and Rental Rates by Race/Ethnicity, Jurisdictions and Region

	(Daly City, CA CDBG, HOME) Jurisdiction				(Redwood City, CA CDBG, HOME) Jurisdiction				(San Mateo, CA CDBG) Jurisdiction				(South San Francisco, CA CDBG) Jurisdiction				(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction				(San Francisco-Oakland-Hayward, CA) Region			
	Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters		Homeowners		Renters	
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
White	3,810	60%	2,490	40%	9,795	62%	5,880	38%	13,090	60%	8,615	40%	4,265	70%	1,835	30%	77,540	68%	35,959	32%	513,295	61%	328,315	39%
Black	510	45%	625	55%	75	13%	520	87%	215	24%	675	76%	165	27%	455	73%	1,943	34%	3,730	66%	47,205	33%	93,885	67%
Hispanic	2,830	42%	3,960	58%	2,355	30%	5,495	70%	2,075	32%	4,390	68%	2,320	38%	3,735	62%	12,675	39%	20,195	61%	101,040	41%	147,765	59%
Asian or Pacific Islander	10,295	63%	5,935	37%	2,040	67%	1,000	33%	4,550	57%	3,490	43%	5,555	72%	2,145	28%	26,424	63%	15,594	37%	200,525	58%	146,485	42%
Native American	4	10%	35	90%	50	50%	50	50%	25	71%	10	29%	4	21%	15	79%	89	36%	158	64%	1,904	39%	2,945	61%
Other	260	36%	470	64%	235	44%	305	56%	440	47%	500	53%	220	43%	295	57%	2,375	52%	2,214	48%	18,140	41%	25,620	59%
Total Household Units	17,715	57%	13,515	43%	14,540	52%	13,245	48%	20,395	54%	17,685	46%	12,535	60%	8,480	40%	121,060	61%	77,859	39%	882,115	54%	745,010	46%

Note: Data presented are numbers of households, not individuals.
Refer to the Data Documentation for details (www.hudexchange.info).
Source: CHAS.

Desire to move and interest in homeownership. To understand differences in tenure, renters were asked about their desire to move in general. Overall, three out of four renters (73%) responding to the resident survey would move from their current home or apartment if they had the opportunity. The desire to move varies somewhat by renters' demographic and socioeconomic characteristics:

- African American (79%) and Hispanic (81%) renters are somewhat more likely to want to move than renters overall (73%), and white renters are somewhat less likely (66%).
- As household income rises the desire to move decreases—82 percent of renters with household incomes less than $35,000 would move if they had the opportunity compared to 69 percent with incomes from $35,000 up to $50,000 and 62 percent of those with household incomes of $150,000 or more.
- As household size increases, so does the desire to move, from 62 percent of single person households to 72 percent of three person households; 78 percent of five person households to 90 percent of those in households of seven or more.
- Four in five renters with children under age 18 and four in five renters who responded to the Spanish language survey would move if they could.
- Renters whose household includes a member with a disability are as likely as the average renter to desire to move (76% compared to 73% of all renters).

The top reasons renters would move if they had the opportunity include:

- Want to buy a home (51%);
- Save money/get something less expensive (48%);
- Get own place/live with fewer people (32%);
- Closer to work (14%);
- Move to a different neighborhood (11%); and
- Move to a different city/county (10%).

Moving for better schools (9%); better job opportunities (9%); crime or safety reasons (9%); downsizing (6%); closer to transit (6%) and closer to family (6%) round out the reasons why current renters would move if they had the opportunity. The top reasons for wanting to move did not vary significantly by renter demographic or socioeconomic characteristics.

The primary barrier to moving identified by 87 percent of those who want to move is "can't afford to move/can't afford to live anywhere else" followed by "can't find a better place to live," (36%), "job is here" (35%), and "can't pay moving expenses—security deposit, first/last month's rent."

In a survey of San Mateo County landlords the California Apartment Association, Tri-County Division reports that the top reasons landlords are given by tenants who are moving are buying a home, moving to a different city/county, better or new job opportunities, change in financial status or are moving closer to work. The primary differences in motivations to move between renter and landlord responses is renters' desire to live in a less expensive unit or get their own place/live with fewer people.

Displacement. As this AFH was being developed, several studies were released examining the extent of displacement in San Mateo County.

Displacement in San Mateo County, California was produced in May 2017 by the Institute of Government Studies, University of California, Berkeley (UC Berkeley), authored by Justine Marcus and Miriam Zuk. This study compares the experience of two distinct types of renter households in San Mateo County: 1) households that were involuntarily moved from their current housing by a landlord action; and 2) households who had not been displaced by landlord action and either remained in their housing or moved by choice.

In addition to providing real life stories of the effects of the displacement, the study uses statistical analysis to assess the significance of the differences in outcomes between the two comparison groups. According to this research:

- Displacement can take many forms. Formal eviction is not the only way households become displaced. Landlords may refuse to make improvements and engage in negative behavior to discourage tenants from staying. About 14 percent of survey respondents reported this type of experience. Sometimes tenants are "code enforced" out of their units, a result of neighbors repeatedly complaining about conditions in the unit or complex.

- Displaced households commonly end up in substandard or overcrowded housing conditions;

- Displaced households are five times more likely to become homeless than non-displaced households;

- After being displaced, just 20 percent of households remained in their neighborhoods (defined by the study as within one mile of their former home). Thirty-three percent left the County, generally moving to the Central Valley or East Bay communities;

- Two out of three children in displaced households changed schools, a slightly higher proportion than among AFH resident survey respondents with children who had experienced displacement (53%) and;

- These moves resulted in displaced households residing in neighborhoods with fewer job opportunities on average, leading to lengthened commutes. These neighborhoods also had more environmental challenges and lower access to health care.

The study findings also suggest that the experience of displacement is likely to discourage future reporting of fair housing, code, or similar violations by landlords for fear of losing another home.

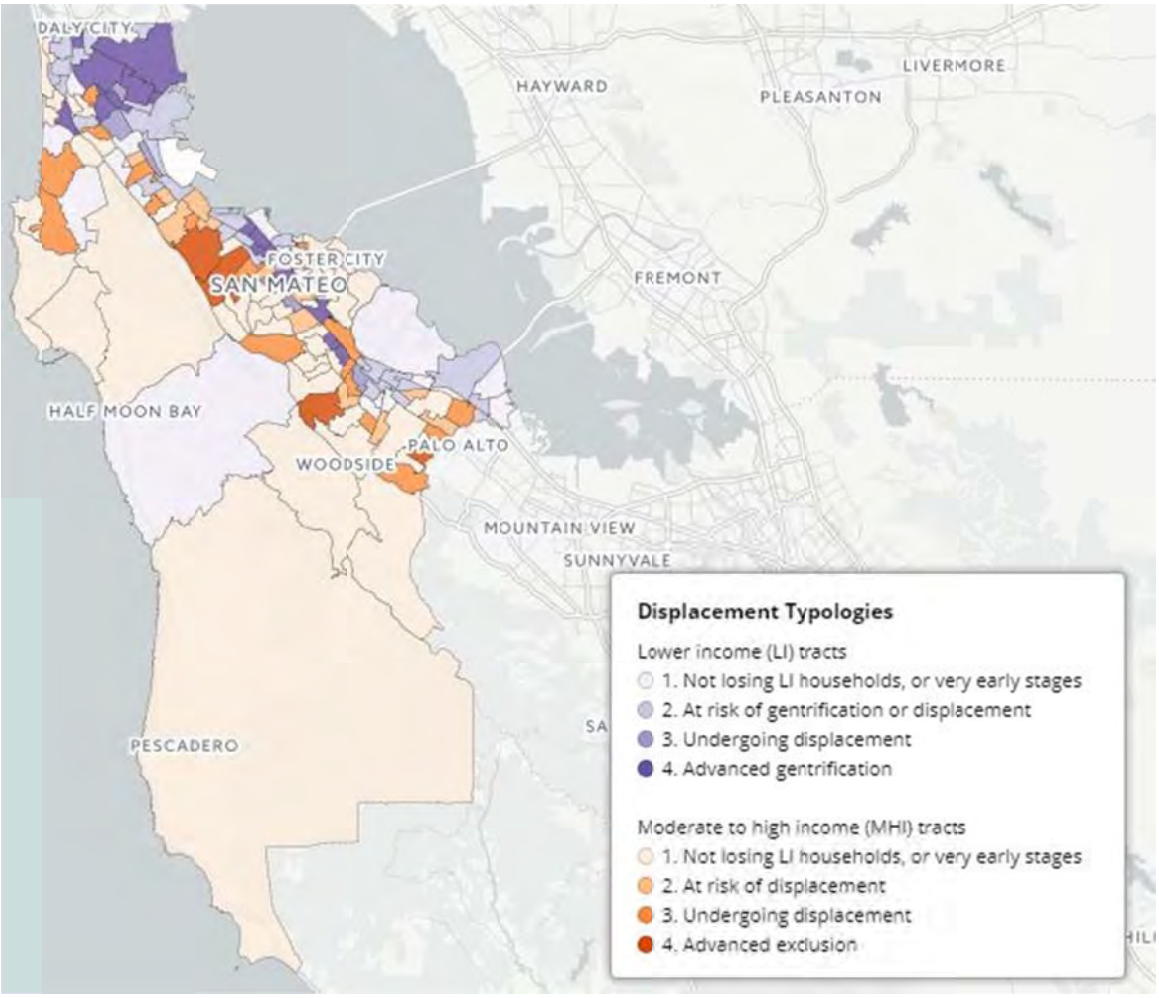
UC Berkeley's Urban Displacement Project, www.urbandisplacement.org, has recently examined patterns of gentrification in the region. In 2015, the project released a tool that provides an early warning side for displacement. The tool combines current signs of displacement with indicators that are part of past neighborhood transformations to "paint a comprehensive picture of the extent and nature of displacement" in the Bay Area.

The study found that, in the region, more than half of low income households live in neighborhoods at risk of or already experiencing displacement and gentrification. Displacement is occurring for moderate to high income neighborhoods, as well as traditionally lower income neighborhoods. The study concludes that displacement is very likely to continue, as the number of neighborhoods determined to be at-risk of displacement is 123 percent higher than the number of neighborhoods where displacement has occurred.

In San Mateo County, the neighborhoods that have experienced the most advanced gentrification or are experiencing displacement are located in the north and northeast part of the County (Daly City and South San Francisco), along the central highway corridor, and, for moderate to high income households, in some neighborhoods near the foothills. Neighborhoods surrounding Stanford University are also in moderate to advanced stages of gentrification.

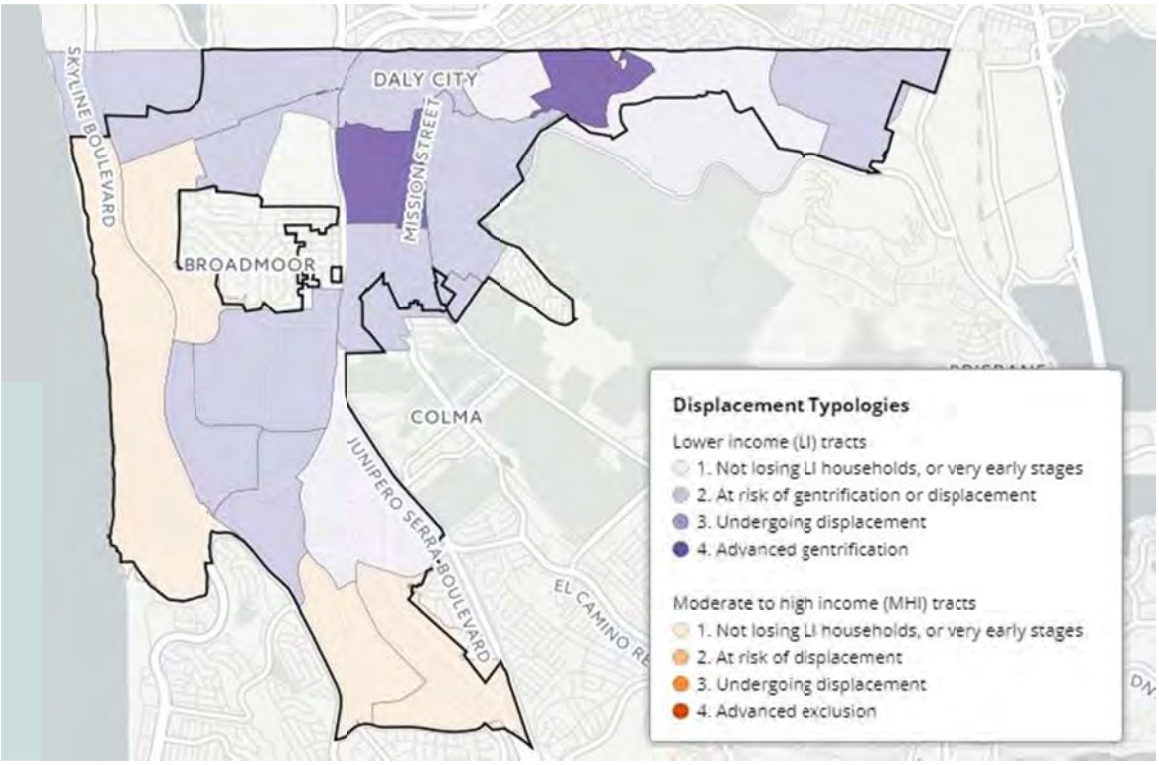
On the flip side, the neighborhoods without gentrification pressures include East Palo Alto and Redwood City.

Figure V-66.
Displacement and Gentrification, San Mateo County



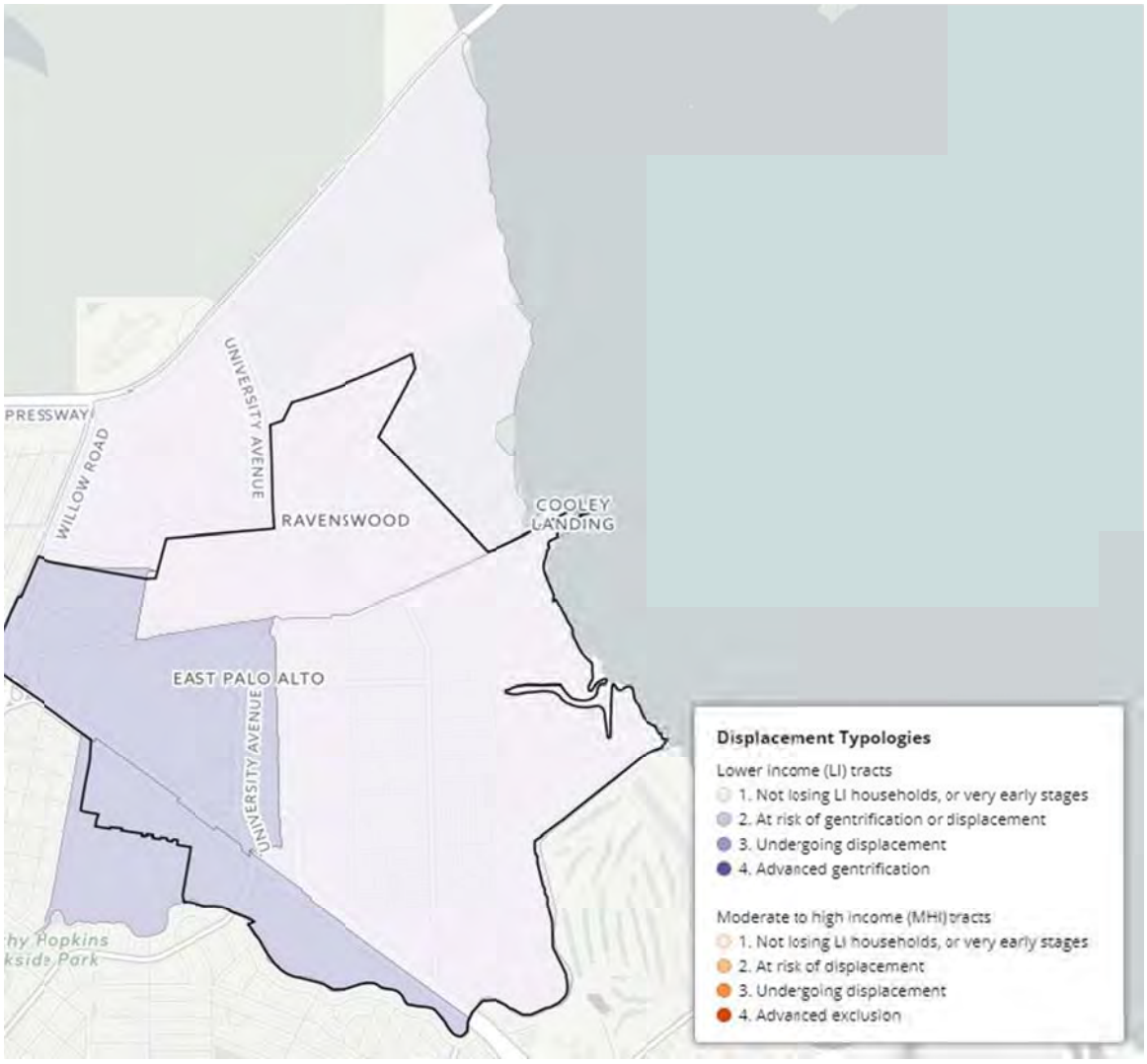
Source: www.urbandisplacement.org.

Figure V-67.
Displacement and Gentrification, Daly City



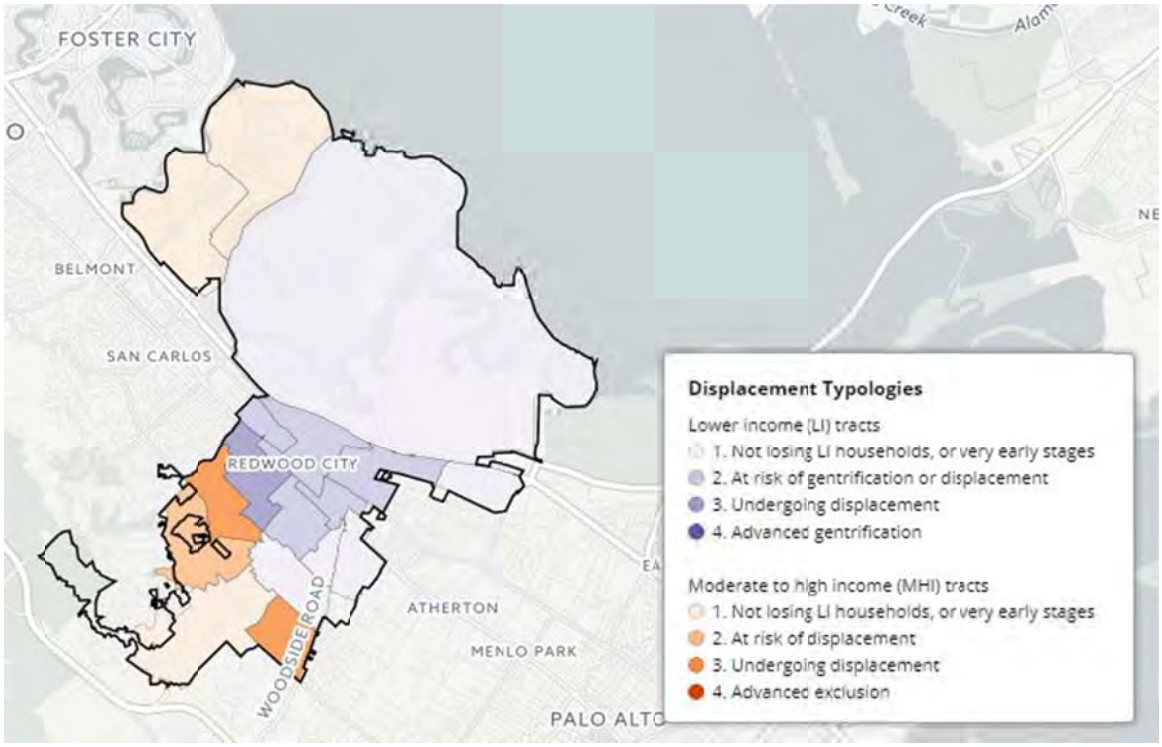
Source: www.urbandisplacement.org.

Figure V-68.
Displacement and Gentrification, East Palo Alto



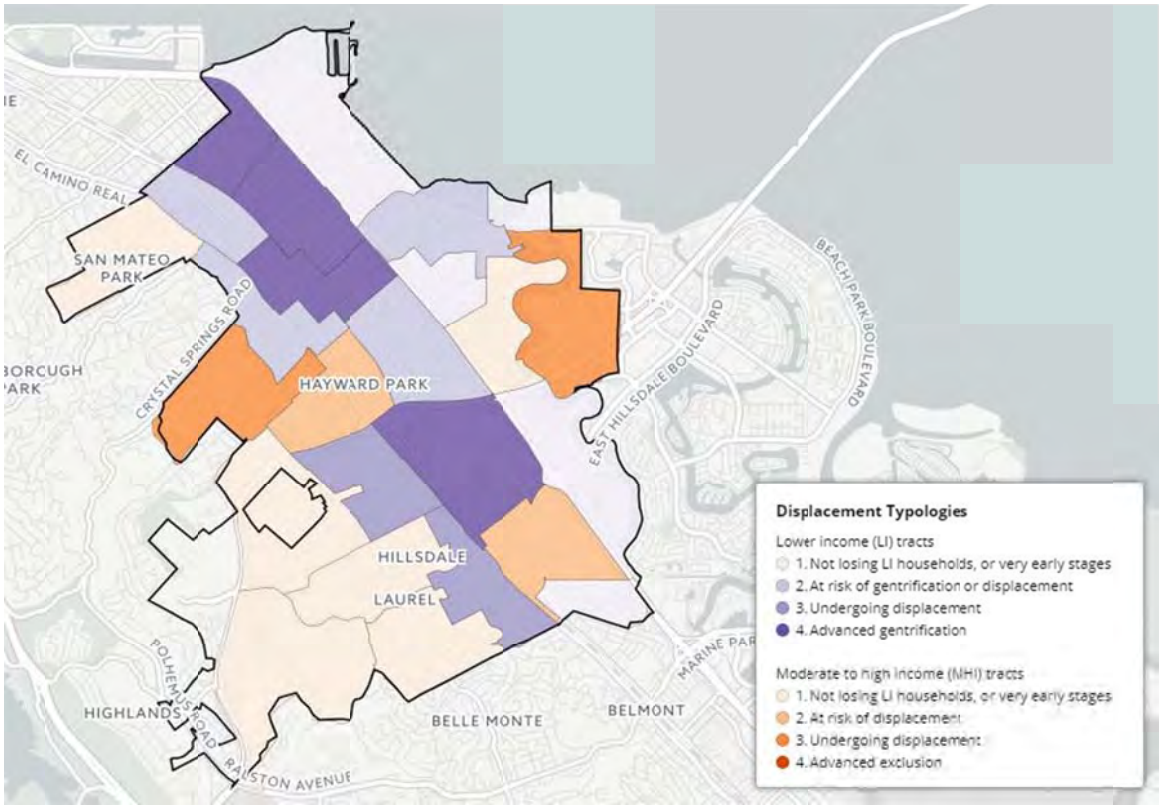
Source: www.urbandisplacement.org.

Figure V-69.
Displacement and Gentrification, Redwood City



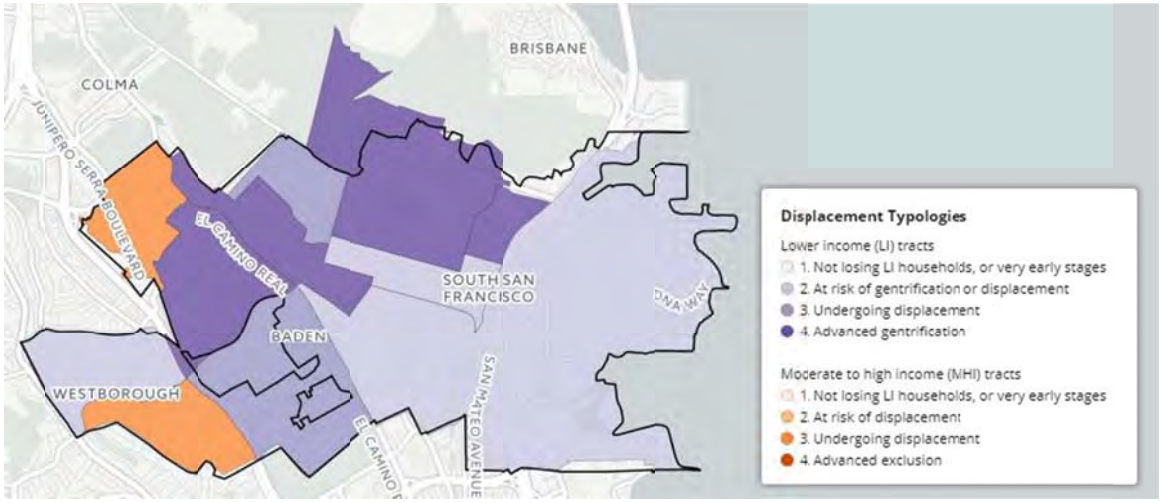
Source: www.urbandisplacement.org.

Figure V-70.
Displacement and Gentrification, San Mateo City



Source: www.urbandisplacement.org.

Figure V-71.
Displacement and Gentrification, South San Francisco



Source: www.urbandisplacement.org.

Who is most vulnerable to and affected by displacement? Given the changing diversity in the region, employment expansion, and rapidly increasing home prices, it can be difficult to determine which populations are most affected by displacement pressures. As discussed in the

first part of this section, the region has experienced a decline in African American residents, in addition to White, non-Hispanic residents—yet the number of Asian and Hispanic residents has grown.

The survey conducted for this study provides some information on how residents have been affected by displacement. To better understand the extent of displacement in San Mateo County, resident survey respondents answered a series of questions related to displacement, beginning with the question, "In the past five years, have you had to move out of a home or apartment in San Mateo County when you did not want to move?" Overall, one in three current renters (34%) who responded to the resident survey have experienced displacement—having to move when they did not want to move—in the past five years in San Mateo County. The greatest proportion of renters with displacement experience (41%) had to move because "rent increased more than I could pay." Eviction—for no reason (6%), behind on rent (3%) or apartment rules (1%)—was the primary reason for moving for one in 10 renters with displacement experience. Personal reasons or relationship reasons were the primary factor for 12 percent of renters with displacement experience.

As discussed above, one in three current renters who responded to the resident survey experienced displacement in San Mateo County in the past five years. The proportion of renters with displacement experience varies demographically and socioeconomically.

- Two in five Hispanic renters (43%) and nearly two in five African American renters (38%) report experiencing displacement in San Mateo County in the past five years, compared to 29 percent of white renters and 24 percent of Asian renters. Nearly half (49%) of the renters who responded to the Spanish language survey report experiencing displacement.

- Smaller proportions of higher income households have experienced displacement compared to lower income households—37 percent of households with income less than $25,000; 43 percent of those with incomes from $25,000 up to $50,000; 28 percent with income from $50,000 up to $100,000 and 22 percent of those with incomes from $100,000 or more.

- Households with children under age 18 had a similar rate of displacement experience (36%) as renters overall.

- Households with Section 8 are as likely as renters overall to have experienced displacement (32% of Section 8 versus 34% overall).

- Households that include a member with a disability are somewhat more likely to have experienced displacement (39%) than renters overall.

- More than two in five (43%) large households experienced displacement in the past five years, compared to 31 percent of households with four or fewer members.

Figure V-72 presents the proportion of respondents who identified rent increases, eviction or personal reasons as the primary reason for having to move when they did not want to move. (The top three factors for most respondents.) As shown, the greatest proportion of respondents

identified rent increases as the primary factor, regardless of their demographic or socioeconomic characteristics. Spanish language respondents were most likely to name rent increases as the primary factor (68%) and Asian respondents were the least likely (24%). Spanish language respondents (22%) and those with household incomes of $25,000 up to $50,000 (21%) were most likely to identify eviction as the displacement cause and white respondents were the least likely by far (3%).

Figure V-72.
Primary Reason for Displacement Experience

Source:
BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

	Rent increased more than I could pay	Evicted for any reason	Personal reasons
Race/ethnicity			
African American	31%	13%	16%
Asian	24%	18%	18%
Hispanic	53%	14%	10%
White	35%	3%	11%
Spanish language	68%	22%	1%
Children under 18	46%	9%	12%
Large family	48%	13%	11%
Disability	30%	12%	11%
Section 8	42%	17%	14%
Household Income			
Less than $25,000	38%	15%	18%
$25,000 up to $50,000	53%	21%	6%
$50,000 up to $100,000	39%	19%	12%
$100,000 or more	34%	12%	8%

The maps below were created for this AFH to assist in determining who is most affected by displacement by. They show increases or declines in residents between 2010 and 2015 by Census tract or neighborhood—and race and ethnicity.[13]

Comparing the racial and ethnic makeup of residents in 2010 and 2015 by neighborhood revealed that:

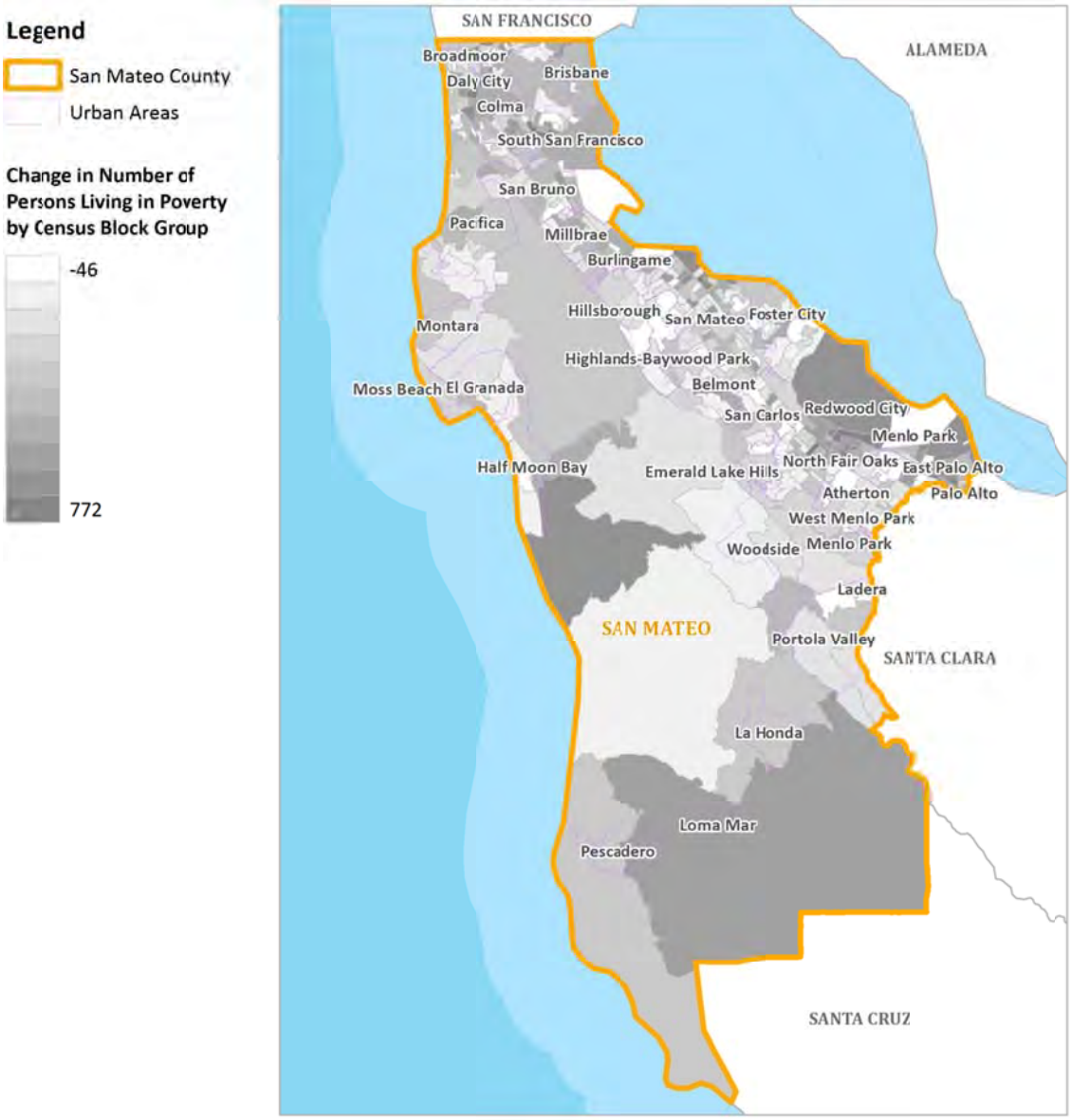
- The largest loss of African American residents by neighborhood occurred in the two Census tracts that make up East Palo Alto. This was offset by growth in White and Hispanic households.
- Patterns in the loss of Hispanic residents by neighborhood are far less distinct. Many neighborhoods show declines in Hispanic households—and many show increases.
- Neighborhoods that lost Asian residents sometimes gained White and Hispanic residents, although there is no clear pattern of displacement.

[13] 2015 data used the 5-year ACS, the only data available at the Census tract level. As such, this comparison likely underestimates changes because it does not capture shifts that occurred in the past 2 years, when the housing market has been the tightest in the past decade.

- Neighborhoods with losses in families were commonly those that experienced losses in Hispanic residents.

The first map shows changes in the number of residents living in poverty. The neighborhoods with declines in poverty are within and around North Fair Oaks, the City of San Mateo, and Menlo Park, while the areas with increases include Redwood City, East Palo Alto, and, to a lesser extent, South San Francisco.

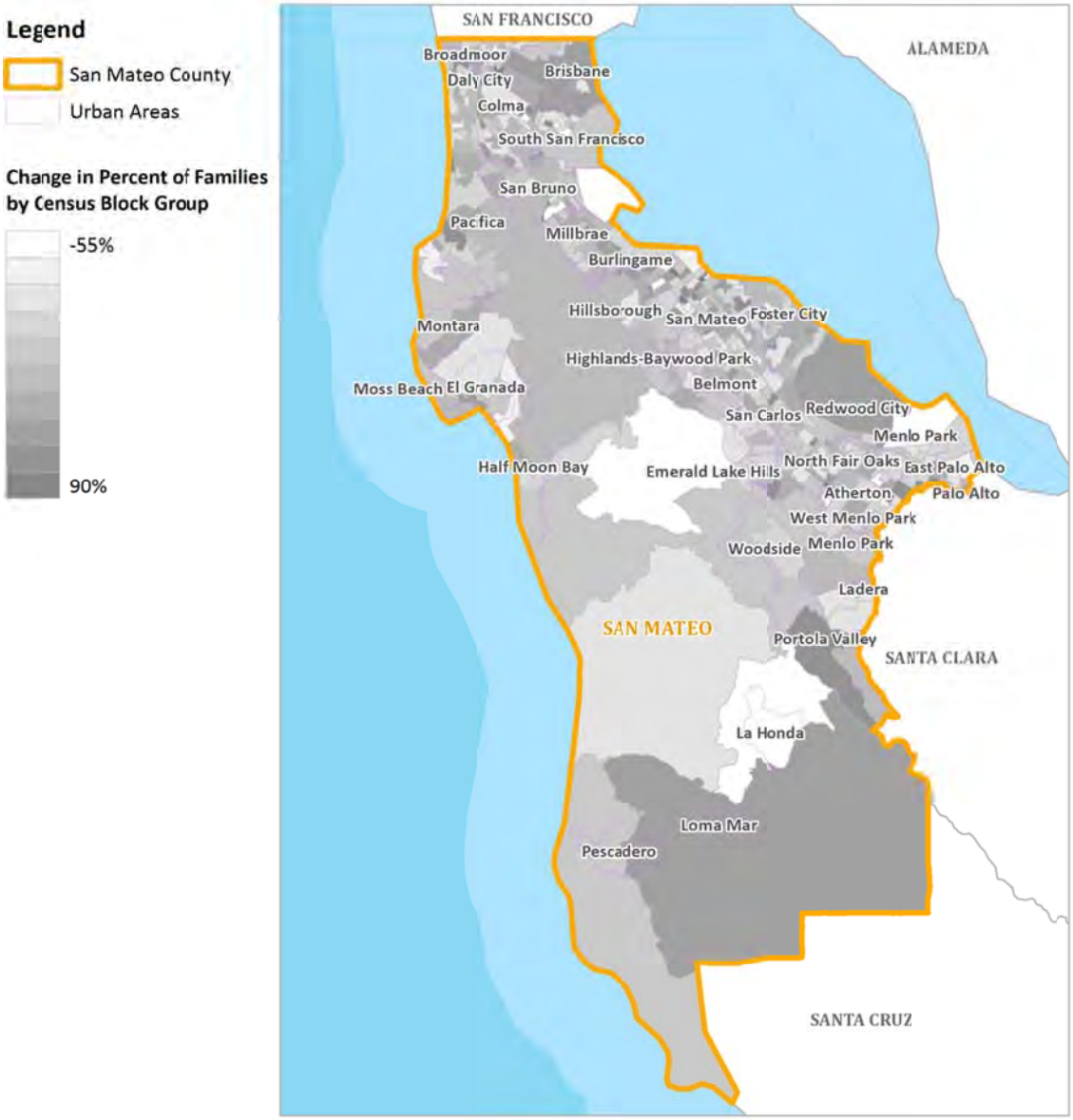
Figure V-73.
Change in Number of Residents Living in Poverty between 2010-2015, San Mateo County



Source: 2010 Census, 2015 5-Year ACS estimates, ESRI, TIGER/Line.

The second map shows changes in families with children. The patterns in this map are less significant, showing moderate changes in most areas of the County.

Figure V-74.
Change in Proportion of Families with Children between 2010-2015, San Mateo County

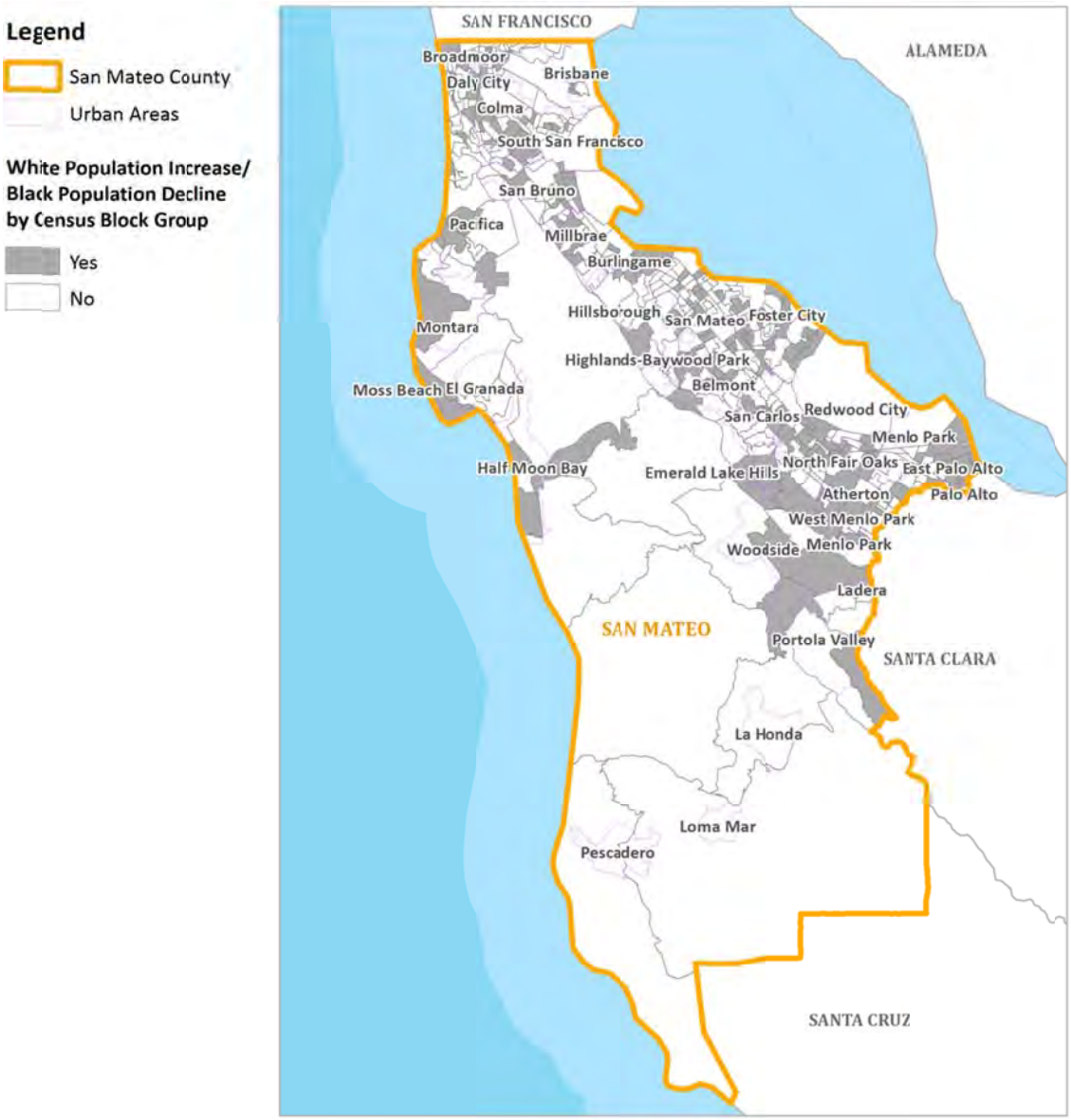


Source: 2010 Census, 2015 5-Year ACS estimates, ESRI, TIGER/Line.

The next three maps examine patterns of growth in the White, non-Hispanic population and declines in the African American, Asian, and Hispanic populations. These maps attempt to measure displacement of the County's primary racial "minority" residents by White, non-Hispanic residents.

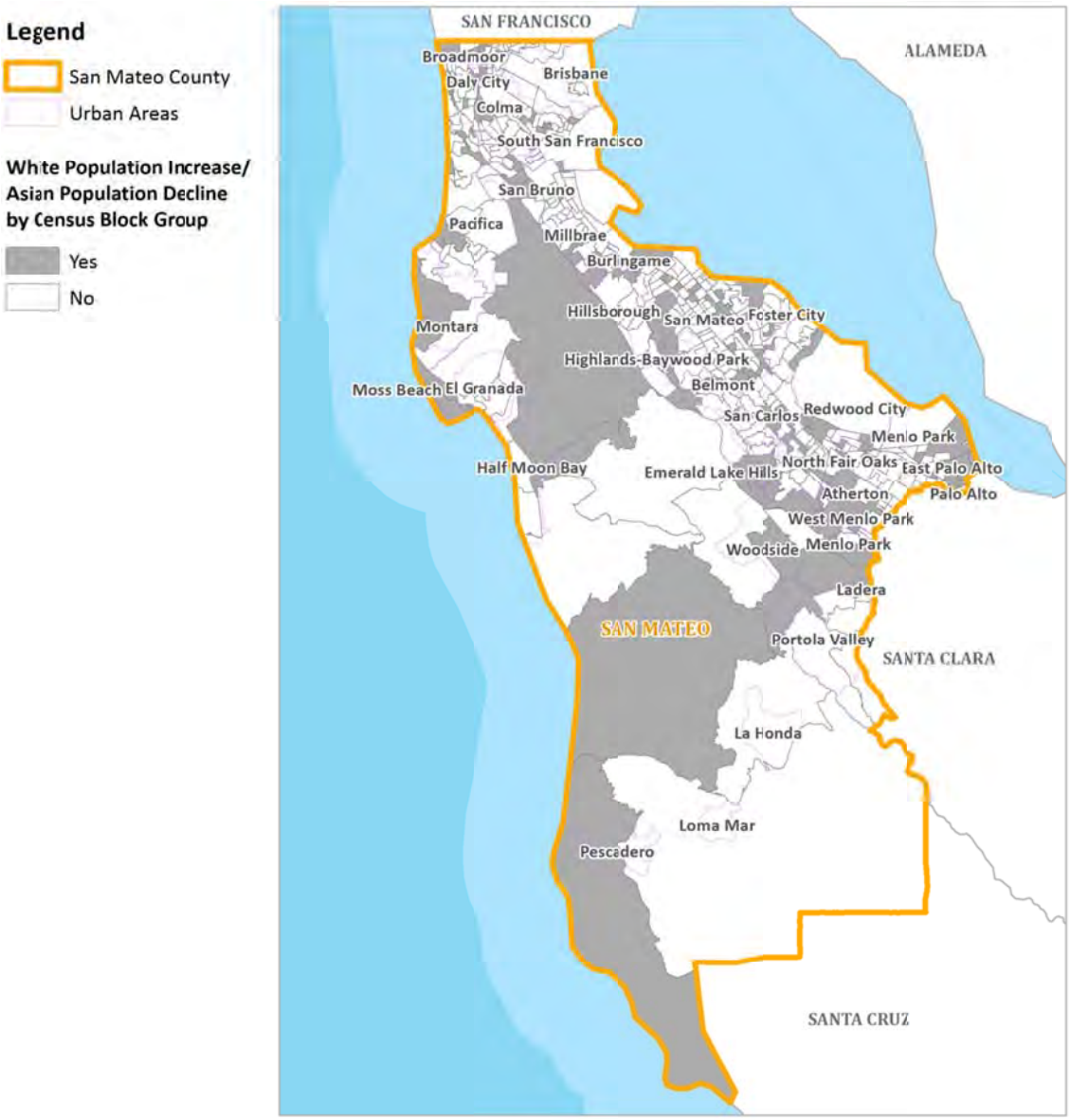
Displacement of African Americans by Whites appears most prevalent in the southeast central portion of the County—around Menlo Park and in and around East Palo Alto. This pattern is also shown in the Asian/White map, in addition to within rural parts of the County (large Census tracts). Hispanic displacement appears to cluster more around Foster City.

Figure V-75.
Areas of White Population Increase and Black Population Decline between 2010-2015, San Mateo County



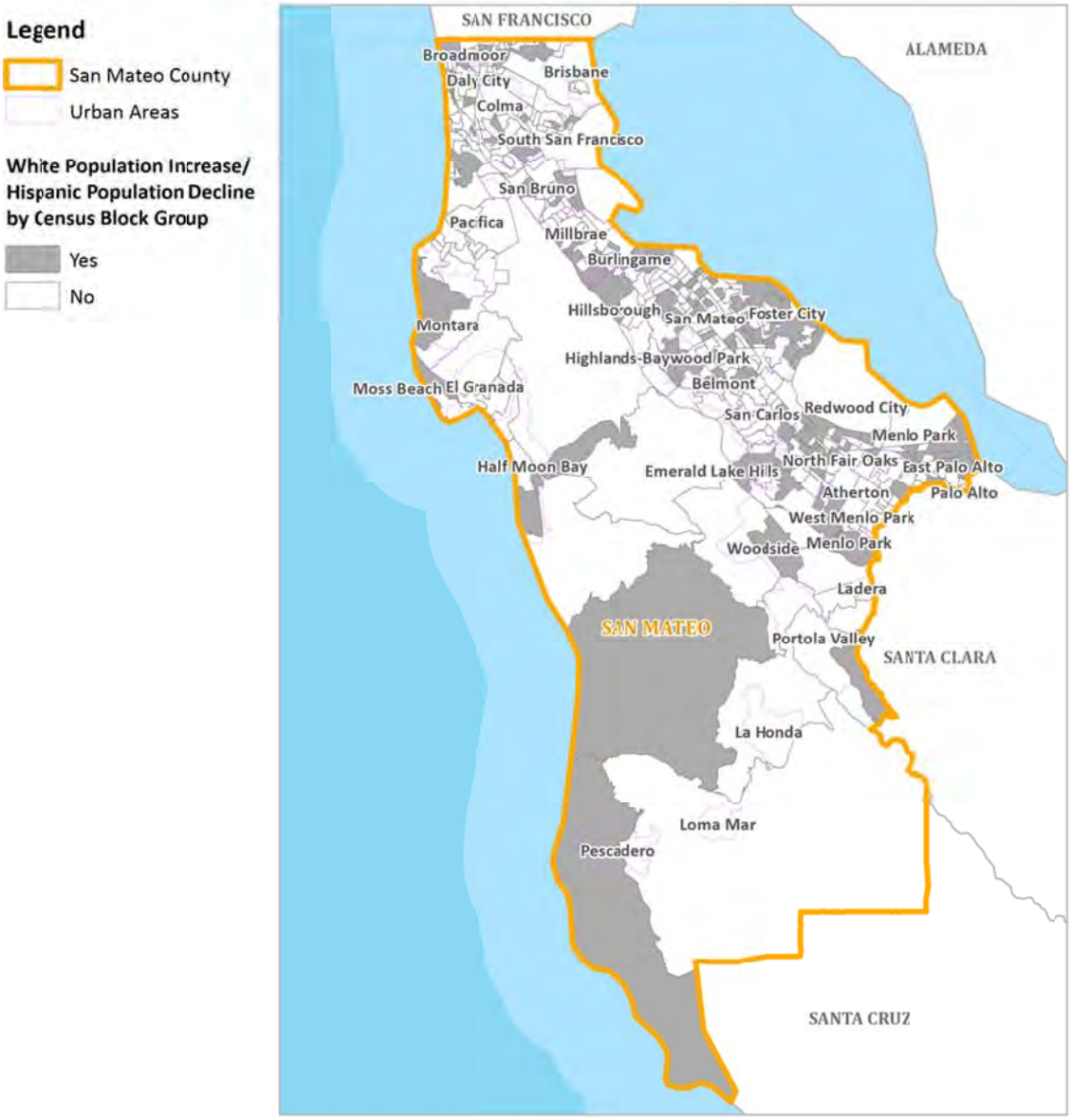
Source: 2010 Census, 2015 5-Year ACS estimates, ESRI, TIGER/Line.

Figure V-76.
Areas of White Population Increase and Asian Population Decline between 2010-2015, San Mateo County



Source: 2010 Census, 2015 5-Year ACS estimates, ESRI, TIGER/Line.

Figure V-77.
Areas of White Population Increase and Hispanic Population Decline between 2010-2015, San Mateo County



Source: 2010 Census, 2015 5-Year ACS estimates, ESRI, TIGER/Line.

Land use and zoning. The State of California has some of the strongest residential housing and fair housing regulations in the country. These regulations intend to mitigate the negative effects that land use, zoning, and siting of housing can have on affordability and access to opportunity. In general, because of these laws, California cities generally have more in their "affordability toolkit" than comparably sized communities in other western states. Yet citizen opposition, lack of political will, and the lag between identifying housing affordability challenges and implementing housing policy, can reduce the effectiveness of the best-intentioned regulations.

One frequently criticized policy is the limited enforcement (in lieu of advocacy pressure or legal action) of Housing Elements, which require that communities identify and plan for affordability gaps. In San Mateo County, the Housing Elements are now produced collaboratively and can be found in one central location, http://www.21elements.com/. This approach not only provides transparency, it facilitates coordinated planning and regional affordability goal-setting.

In July 2016, ABAG reviewed the 21elements and compiled a matrix of housing policies and programs, shown below.

Figure V-78.
San Mateo County Housing Policies and Programs Analysis

San Mateo County Housing Policies and Programs

Compiled by the Association of Bay Area Governments, February 2016 update; revised July 2016 by San Mateo County staff with updates from 21 Elements

Affordable Housing Policies and Programs	Atherton	Belmont	Brisbane	Burlingame	Colma	Daly City	East Palo Alto	Foster City	Half Moon Bay*	Hillsborough	Menlo Park	Millbrae*	Pacifica	Portola Valley*	Redwood City	San Bruno*	San Carlos	San Mateo	South San Francisco	Woodside	San Mateo County
Reduced Parking Requirements	N	UC	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	UC	Y	Y	Y	N	N
Streamlined Permitting Process	N	N	Y	N	Y	N	Y	Y	Y	Y	Y	Y	N	N	Y	UC	N	N	Y	N	N
Graduated Density Bonus (parcel assembly)	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	N	Y	N	Y	N	N	N
Form-based codes	N	N	Y	N	N	N	N	N	N	N	Y	N	N	N	Y	N	Y	Y	N	N	N
Mixed Use Zoning	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Housing Overlay Zone	N	N	N	Y	N	N	UC	N	N	N	Y	N	N	N	UC	N	N	Y	N	N	N
Density Bonus Ordinances	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	N	Y
Inclusionary/Below Market Rate Housing Policy	N	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y
Condominium Conversion Ordinance	N	Y	Y	Y	N	Y	Y	Y	Y	N	Y	Y	Y	N	N	N	N	N	Y	N	Y
Just Cause Evictions	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Rent Stabilization	N	N	N	N	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Acquisition/Rehabilitation/ Conversion Program	N	Y	Y	N	N	Y	N	Y	N	N	N	N	N	N	Y	Y	Y	Y	N	N	N
Preservation of Mobile Homes (Rent Stabilization ordinances)	N	N	Y	N	N	N	Y	N	N	N	N	N	Y	N	N	N	N	N	N	N	Y
SRO Preservation Ordinances	N	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N	Y	N	Y	N	N
Homeowner Rehabilitation program	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	N	Y	Y	Y	N	Y	Y	Y
Other Anti-Displacement Strategies	N	N	N	N	N	N	Y	Y	Y	N	Y	Y	N	N	N	N	N	Y	N	N	Y
Reduced Fees or Waivers	N	N	Y	N	N	Y	UC	Y	N	Y	N	N	N	Y	Y	Y	N	N	Y	N	Y
General Fund Allocation Incl. former RDA "Boomerang" Funds	N	N	Y	N	N	N	Y	N	N	N	Y	N	N	N	N	N	UC	N	N	N	N
In-Lieu Fees (Inclusionary Zoning)	N	N	N	UC	N	Y	Y	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y
Housing Development Impact Fee	N	UC	Y	UC	UC	Y	Y	N	N	N	Y	N	N	Y	Y	UC	Y	Y	N	N	Y
Commercial Development Impact Fee	N	UC	N	UC	N	N	Y	N	N	N	Y	N	N	N	Y	UC	UC	UC	UC	N	Y
Other taxes or fees dedicated to housing	N	N	N	N	N	Y	Y	N	N	N	N	N	N	N	N	N	Y	Y	N	N	N
Locally Funded Homebuyer Assistance Programs	N	Y	Y	N	N	N	UC	Y	N	N	Y	N	N	N	Y	N	N	N	N	N	N
Tenant-Based Assistance	N	N	N	N	N	Y	N	Y	N	N	N	N	N	N	N	N	N	N	N	N	N
Home sharing programs	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	N	Y	N	Y	Y
Has Public Housing? (Y/N)	N	N	N	N	N/A	Y	N	N	N/A	N	N	N/A	N	N/A	N	N/A	N	N	N/A	N	Y
Has Group Homes? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	N	N/A	Y	N/A	Y	Y	N/A	N	Y
Has a Second Unit Ordinance? (Y/N)	Y	N	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	Y	Y	Y	N/A	Y	Y	N/A	Y	Y
Has Emergency Shelters? (Y/N)	N	N	N	N	N/A	N	Y	Y	N/A	Y	Y	N/A	N	N/A	Y	N/A	N	Y	N/A	N	Y
Has Affordable Housing Complexes? (Y/N)	N	N	Y	N	N/A	Y	Y	N	N/A	N	Y	N/A	Y	N/A	Y	N/A	Y	Y	N/A	N	Y

ABAG tracked thirty housing policy and program types that represent the most prevalent and important strategies for fostering development of both market rate and affordable housing units. ABAG Staff compiled a summary ofpolicies adopted by each jurisdiction based on the jurisdiction's certified 2007-2014 housing element, and sent the summary to local staff for verification. We have indicated instances in which we were not able to verify or obtain information.

Legend:

Y: The policy or program is currently in effect in the jurisdiction

N: The policy or program is not in effect in the jurisdiction

UC: The policy or program is currently under consideration by the jurisdiction

N/A: Indicates information was unvailable for jurisdiction

Source: ABAG.

Areas where the policies and programs differ the most include:

- Reduced parking requirements—East Palo Alto, Redwood City, the City of San Mateo, and South San Francisco offer reduced requirements; Daly City and the County do not.
- Streamlined permitting—Offered by East Palo Alto, Redwood City, and South San Francisco, but not by Daly City or San Mateo City or County.
- Housing overlay ordinances—only offered by the City of San Mateo.
- Condominium conversion ordinance—offered by all but Redwood City and the City of San Mateo.

All participating partners have: Second unit ordinances, home sharing programs, reduced fees and waivers, density bonus ordinances, and inclusionary housing.

Developer perspectives. In a focus group with housing developers, the challenges to developing affordable housing included:

- Lack of urgency from jurisdictions to push needed projects through to completion. Developers shared that the entitlement process can take up to three years, and that there is a disconnect at the jurisdictional level between the approval process and the agreed upon housing crisis and need for housing. This is exacerbated by a lack of staff and capacity to move projects through the process;
- In some jurisdictions, parking requirements and height limitations;
- A lack of funding and developable land;
- Proposition 13 creates a financial disincentive for residential versus commercial development, particularly in Brisbane, Millbrae and Menlo Park; and
- The water moratorium in East Palo Alto.

Developers credited the jurisdictions for publicly talking about the need for housing and hope that these conversations lead to leadership around land decisions. Measure K funding, adopting impact fees to support housing and the adopted and approved Housing Elements are strengths. Developers also credited Menlo Park's interdepartmental cooperation related to housing development to be a strength and an example of effective leadership that could benefit other jurisdictions.

To decrease the challenges to affordable housing development, developers recommend that jurisdictions:

1) Prioritize creating affordable housing by streamlining processes, building staff capacity and being willing to try pilot programs; and
2) For mixed income sites streamline public input and develop a more streamlined process for CEQA, perhaps a special exemption.

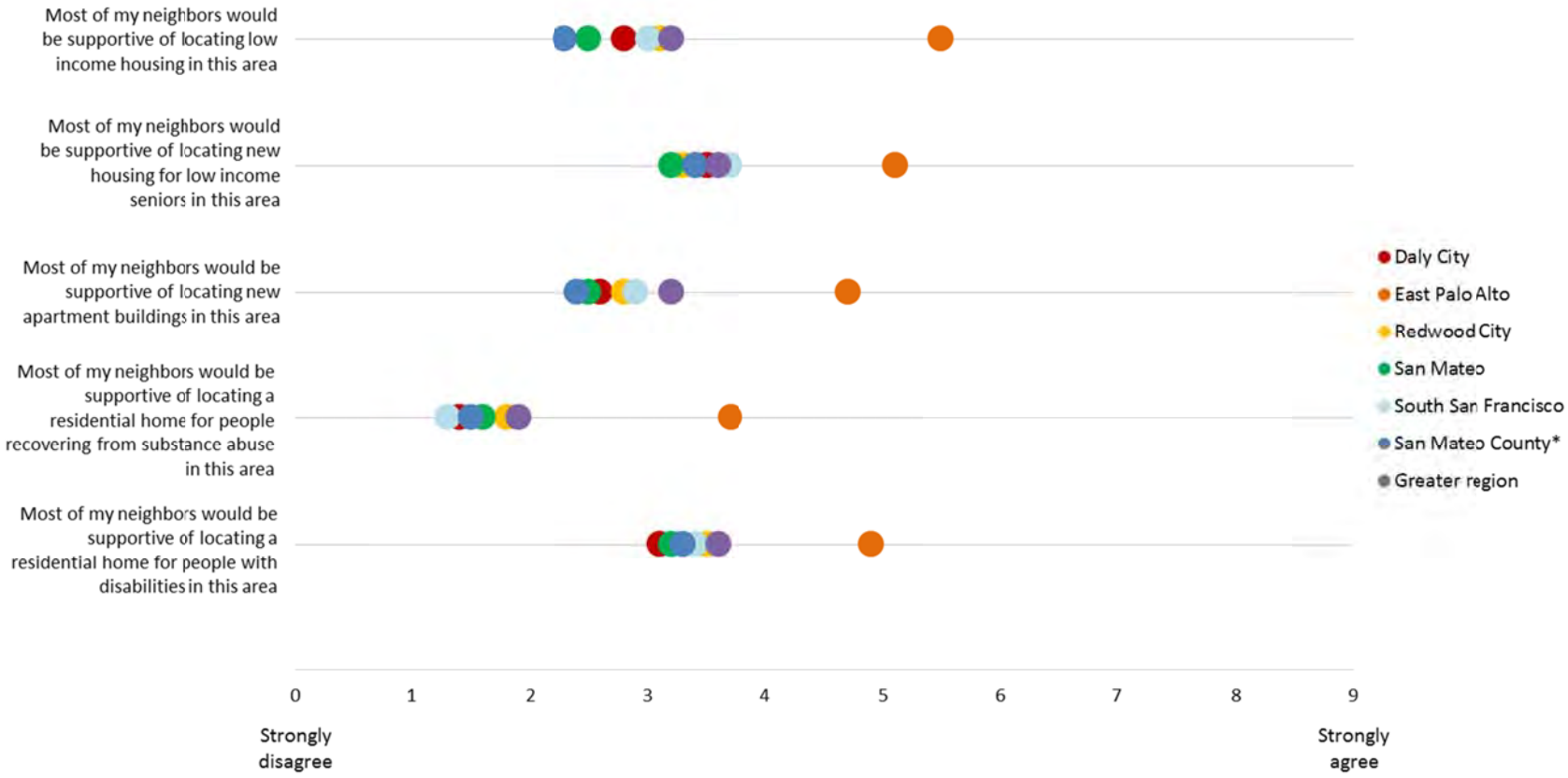
Resistance to development. The San Francisco region is unique for its immense beauty, rich history, and access to recreation. Citizen concerns about preserving this quality of life—by limiting growth—have existed for more than half a century. Many anti-growth efforts focused on limiting land use and zoning regulations.

In the 1960s, homeowners in the region fought multifamily development and encouraged land use restrictions on the number of rental units that could be built, as well as their location. Many cities passed regulations limiting development and some downzoned parcels to prevent certain types of development. Downzoning was challenged in a legal case that went to the California Supreme Court, which found in favor of downzoning. The Court also enacted required environmental reviews for larger developments.

These early cases set precedent for low-density housing, downzoning and/or preservation of land for environmental reasons, and, over time, contributed to home price increases that were unparalleled in most parts of the U.S.

Resistance to buildings of more than 3-4 stories, multifamily housing, and dense single family developments persists in San Mateo County and the region. Responses to the AFH resident survey underscore this perception. As shown, most resident survey respondents believe that their neighbors would not be supportive of a range of new housing types or uses in their neighborhood, and these perceptions are similar among the participating jurisdictions and residents of the balance of the County. (East Palo Alto residents are the outlier.) While support for new low income housing, or apartment buildings in general, is low across the jurisdictions, homeowners are much less likely than renters or those living with family or friends to support new housing types or uses in their neighborhood.

Figure V-79.
Perception of Neighbor Support for New Housing Types or Uses in the Neighborhood



Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Lending. In its Fair Housing Equity Assessment, ABAG attributed segregation in the region to historically discriminatory practices and policies, highlighting redlining and lower mortgage approval rates for persons of color—as well as segregation that resulted from structural inequities and, to some degree, self segregation.

An extensive HMDA analysis was completed for the 2012 regional Analysis of Impediments to Fair Housing Choice (2012 AI). The analysis covered home purchase data from 2004 through 2010. The average loan denial rate during this period was 20.5 percent, with considerable variation during the period: denial rates were 25 percent in 2006 and had dropped to 15 percent by 2010.

The analysis also found that African American, Native American and Hispanic mortgage loan applicants experienced much higher denial rates than Asian or White applicants, even after considering income. The 2012 AI also concluded that these applicants were also "disproportionately issued types of lower quality loan products," also known as subprime loans.

Specifically, during the time period examined (2004 through 2010), denial rates by race and ethnicity were:

- 33 percent for African American loan applicants,
- 21 percent for Asian applicants,
- 30 percent for Native American applicants,
- 29.8 percent for Hispanic applicants, and
- 18 percent for White applicants.

The largest gap, therefore, was between African American and White applicants (14.8%).

The 2012 study also examined denial rates by geographic areas. Maps demonstrating those findings found high denial rates for African Americans around Daly City and Brisbane and, lesser so, around North Fair Oaks. This was also true for Asian applicants and Whites (although the rates of denial were lower). Hispanic applicants had the highest denials for loans in the Daly City/Brisbane area and the City of San Mateo.

HMDA data on loans made between 2011 and 2015 show a lower denial rate overall. Of the approximately 166,500 applications for mortgage loans (where the home would be a primary place of resident for the applicant), 73 percent were originated, 14 percent were denied, 9 percent were withdrawn by the applicant and 4 percent were closed due to incompleteness. If closed and withdrawn applications are removed, the origination rate is 84 percent and, conversely, the denial rate is 16 percent.

By race and ethnicity, the denial rate was:

- 28 percent for African American loan applicants,

- 16 percent for Asian applicants,
- 28 percent for Native American applicants,
- 24 percent for Hispanic applicants, and
- 15 percent for White applicants.

The largest gap was for African American and Native American applicants and Whites—a difference of 13 percent.

Another important indicator is the proportion of loans that are withdrawn by applicants. For Asian and White applicants, between 8 and 9 percent of loans are withdrawn. Other races have slightly higher rates: 11 percent for African Americans and Hispanics and 13 percent for Native Americans.

It is important to note that a significant number of the applications—about 30,000—were done through the Internet or mail and the applicant's race was not provided.

Contributing Factors of Disproportionate Housing Needs. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. The matrix below identifies those factors that significantly create, contribute to, perpetuate, or increase disparities in housing needs in San Mateo County and the participating partners.

Figure V-80.
Contributing Factors Matrix: Disproportionate Housing Needs

Contributing Factors to Disproportionate Housing Needs	Daly City	Redwood City	San Mateo City	South San Francisco City	San Mateo County	Note:
Availability of affordable units in a range of sizes	X	X	X	X	X	Housing is limited for large families
Displacement of residents due to economic pressures	X	X	X	X	X	
Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking						
Lack of access to opportunity due to high housing costs					X	Specific to African American and Hispanic children, some of whom attend lower proficiency schools. Overall lack of access is increasing due to housing costs.
Lack of private investments in specific neighborhoods						
Lack of public investments in specific neighborhoods, including services or amenities						
Land use and zoning laws	X	X	X	X	X	Extensive public input process in development approvals and lack of support for affordable housing (NIMBYism) raises development costs.
Lending discrimination						
Loss of affordable housing					X	Investor-based market and conversion of existing rentals to high priced products
Source of income discrimination						
Occupancy codes and restrictions						
Deteriorated or abandoned properties						
Other factors:						
Development barriers: high cost of land and construction, low density development bias, slow process to receive building permits	X	X	X	X	X	
Decades of historical discrimination preventing some protected classes from wealth-building					X	
Spillover effect of severe housing constraints and employment growth in both San Francisco and Silicon Valley					X	
Federal and state contraints: LIHTC DDA restrictions, limits on targeting housing to specific protected classes					X	

Note: Only those factors that were evident in the AFH research and summarized. Blank fields indicate no contributing factor.

Source: BBC Research & Consulting.

Publicly Supported Housing Analysis

The AFH requires the following analysis of publicly-supported housing, which is covered in this section:

a. Publicly Supported Housing Demographics

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

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

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

b. Publicly Supported Housing Location and Occupancy

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

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

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

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

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

v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under

RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

c. Disparities in Access to Opportunity

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

Two housing authorities operate in San Mateo County. The largest, the Housing Authority of the County of San Mateo (HACSM) mainly provides assistance through 1) Housing Choice Vouchers, and 2) Project based Section 8 developments. This includes approximately 250 units of permanent supportive housing and 200 vouchers targeted to assist veterans.

Public housing is very limited: HACSM owns 30 units and the Housing Authority of South San Francisco owns and operates one development with 80 units. The table below shows the numbers of households assisted by type of assistance.

Figure V-81.
Section 8, Public Housing, and Other Rental Assistance Programs Administered by HACSM and the Housing Authority of South San Francisco

Program	Daly City	Redwood City	San Mateo City	Other Cities in San Mateo County	South San Francisco	Total
Public Housing units	0	0	0	30	80	110
Housing Choice Vouchers and other rental assistance programs	506	535	518	1,660	455	3,674
Project based Section 8	167	33	155	415	94	864
	673	**568**	**673**	**2,105**	**629**	**4,648**

Source: Housing Authority of the County of San Mateo and HUD.

Representation of racial and ethnic groups by housing program. HUD provides data on the racial and ethnic make up of households assisted by housing authorities; these are shown below. Relative to the County overall:

- Whites are underrepresented in public housing, Project based Section 8 developments and as voucher holders. Whites make up about 30-40 percent of households in these programs compared to 57 percent of households overall. When examined by income category, this difference narrows, as Whites represent 40-47 percent of low income households;
- African Americans are overrepresented, particularly in the Housing Choice Voucher program. Nearly 24 percent of voucher holders are African American compared with three

percent of households overall. African Americans make up 6 percent of households earning less than 30 percent of AMI (generally a target for voucher holders) yet 24 percent of voucher holders.

- Hispanic residents are significantly overrepresented as residents of public housing; they are more equally represented in other types of publicly supported housing;
- Asians and Pacific Islanders are somewhat overrepresented in Project based Section 8 and Other Multifamily developments.

A larger proportion of Whites and Hispanics make up low income households in San Mateo County than in the region overall. Conversely, a lower proportion of African Americans make up low income households in San Mateo County compared to the region.

Figure V-82.
Table 6 – Publicly Supported Households by Race/Ethnicity

	Race/Ethnicity							
(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	33	30.28%	7	6.42%	52	47.71%	17	15.60%
Project-Based Section 8	327	39.21%	82	9.83%	164	19.66%	260	31.18%
Other Multifamily	88	50.57%	2	1.15%	34	19.54%	50	28.74%
HCV Program	972	30.21%	766	23.81%	965	30.00%	499	15.51%
Total Households	113,451	57.03%	5,662	2.85%	32,902	16.54%	41,998	21.11%
0-30% of AMI	10,889	46.71%	1,374	5.89%	5,935	25.46%	4,535	19.46%
0-50% of AMI	18,504	40.21%	2,232	4.85%	12,836	27.90%	8,053	17.50%
0-80% of AMI	35,053	44.13%	3,345	4.21%	20,893	26.30%	14,821	18.66%
(San Francisco-Oakland-Hayward, CA) Region	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	1,536	17.10%	4,221	46.99%	1,442	16.05%	1,741	19.38%
Project-Based Section 8	5,869	26.28%	5,479	24.53%	2,735	12.25%	8,075	36.16%
Other Multifamily	1,314	27.15%	653	13.49%	632	13.06%	2,205	45.57%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	841,640	51.73%	141,095	8.67%	248,785	15.29%	347,022	21.33%
0-30% of AMI	94,495	36.82%	44,320	17.27%	49,170	19.16%	59,085	23.02%
0-50% of AMI	153,315	34.49%	65,385	14.71%	96,510	21.71%	93,534	21.04%
0-80% of AMI	256,205	38.15%	87,195	12.99%	146,695	21.85%	138,723	20.66%

Note: Numbers presented are numbers of households not individuals. Refer to the Data Documentation for details (www.hudexchange.info).

Source: Decennial Census; APSH; CHAS.

Persons with disabilities represent 8 percent of residents in San Mateo County and, as shown below, are overrepresented in Other Multifamily housing and, to a lesser extent, as voucher holders.

Figure V-83.
Table 15 – Disability by Publicly Supported Housing Program Category

Note:

The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

ACS.

(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction	People with a Disability	
	#	%
Public Housing	8	7.27%
Project-Based Section 8	75	8.53%
Other Multifamily	40	21.51%
HCV Program	568	16.85%
(San Francisco-Oakland-Hayward, CA) Region	**People with a Disability**	
	#	%
Public Housing	2,985	32.16%
Project-Based Section 8	2,399	10.46%
Other Multifamily	652	12.63%
HCV Program	N/a	N/a

Of all of the publicly supported housing programs, Housing Choice Vouchers and public housing do the best in accommodating families with children and/or households who need larger units. The table below shows unit size and occupancy of families with children by program type.

Figure V-84.
Table 11 – Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	25	22.73%	35	31.82%	47	42.73%	39	35.45%
Project-Based Section 8	794	90.33%	38	4.32%	21	2.39%	54	6.14%
Other Multifamily	180	96.77%	5	2.69%	0	0.00%	0	0.00%
HCV Program	1,547	45.91%	1,066	31.63%	668	19.82%	1,088	32.28%

Note: Refer to the Data Documentation for details (www.hudexchange.info).

Source: APSH.

HUD data were also examined to determine if occupancy patterns differ by protected class for individual housing developments. Those with significant divergences from the racial and ethnic distribution of low income household in the County overall include:

- Public housing developments owned and operated by the South San Francisco Housing Authority, where Hispanic households are overrepresented;
- Flores Garden Apartments, a senior complex, where residents are 67 percent Asian; Fairway Apartments, also a senior complex, where residents are 54 percent Asian, and Oceana Terrace, another senior complex, 54 percent Asian. These developments are located throughout the County.

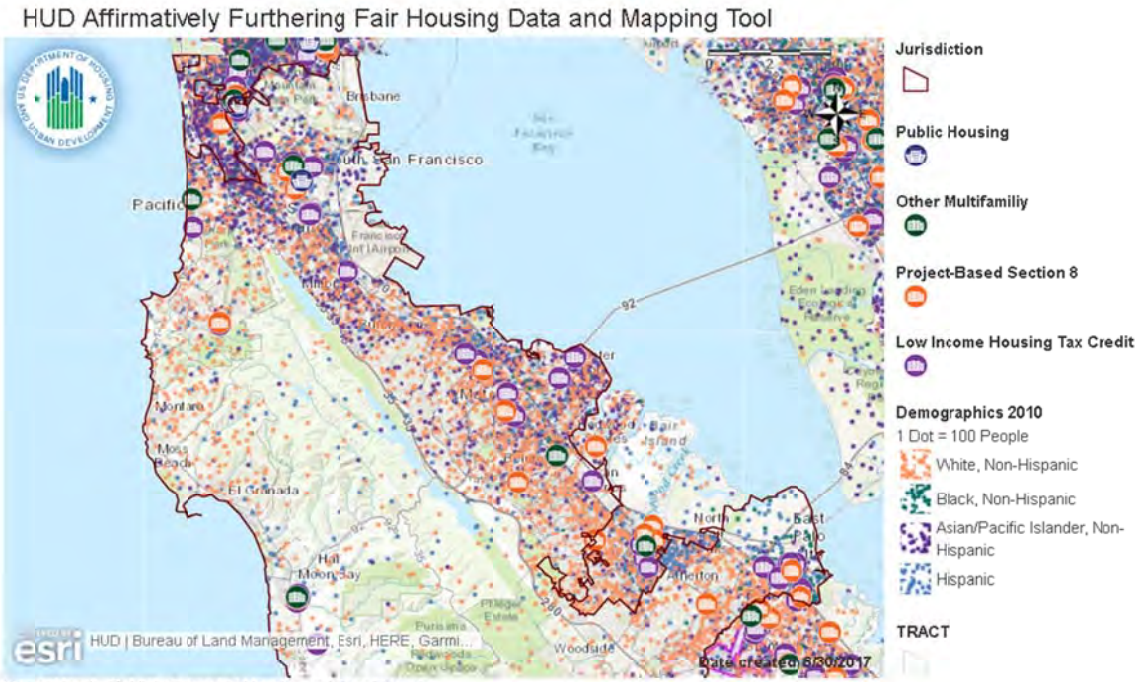
- Light Tree Apartments, in East Palo Alto, whose residents are 42 percent African American and 53 percent Hispanic. These are family units.
- Runnymede Gardens Apartments, a senior complex located in East Palo Alto, whose residents are 53 percent African American;
- Crane Place Apartments, a senior complex located in Menlo Park, whose residents are 72 percent White;
- Lesley Gardens, a senior complex located in Half Moon Bay, where residents are 70 percent White; and
- Horizons in Belmont, a living facility for adults who are developmentally disabled; residents are 91 percent White.

Based on the residents demographics and location of the publicly supported housing in HUD's database, it appears that 1) Senior complexes are most likely to be located in higher income communities and be occupied by White and Asian residents; 2) Housing with federal subsidies (other than the LIHTC) are predominantly senior complexes; 3) African Americans occupying this publicly supported housing are most likely to live in complexes located in East Palo Alto.

Patterns in location by program. The map below shows the distribution of publicly supported housing relative to where residents of different races and ethnicities live. The icons represent different types of publicly supported housing:

- Blue icons indicate housing that is owned and operated by a public housing authority.
- Orange icons represent affordable rental housing that offers Housing Choice Voucher/Section 8 subsidies.
- Purple icons represent Low Income Housing Tax Credit (LIHTC) developments.
- Green icons show other types of publicly supported rental housing.
- Grey shading shows the percentage of rental units that house Housing Choice Voucher holders. This shading is also shown separately in the second map.

Figure V-85.
Map 5 – Publicly Supported Housing and Race/Ethnicity, 2010



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

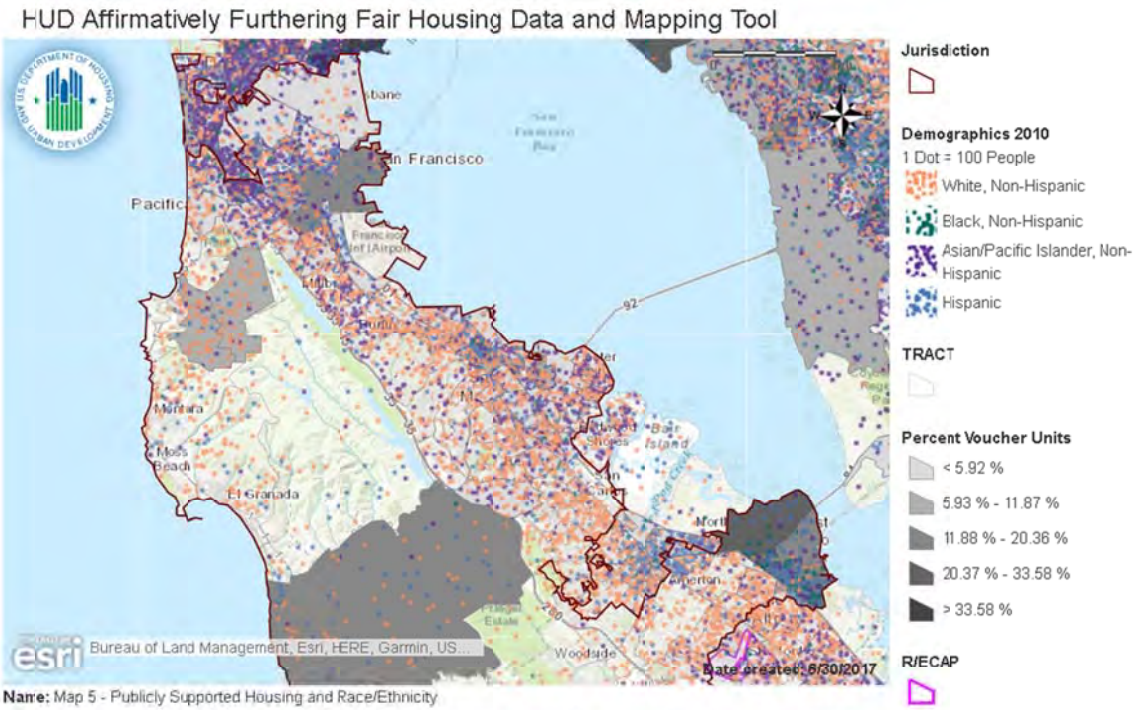
Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color

Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/

Figure V-86.
Map 5 – Publicly Supported Housing and Race/Ethnicity: Percent Voucher Units, 2010



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity
Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/

The publicly supported housing maps show some clustering of developments and vouchers in South San Francisco, parts of the City of San Mateo, and around the Belmont/San Carlos area.

The highest concentration of vouchers occurs in East Palo Alto, where between 20 and 30 percent of rental units are occupied by Housing Choice Voucher holders. East Palo Alto also has a number of LIHTC developments. East Palo Alto has a Source of Income ordinance, which prevents landlords from discriminating against Housing Choice Voucher holders. This may explain some of the voucher concentrations. Foster City also has Source of Income protections, but far fewer voucher-occupied rental units.

The housing authority provided the location of households receiving rental assistance by zip code. As of June 2017, 4,284 households received assistance. The cities with largest number of households included:

- Daly City, 687 households and 16% of total. This is slightly more than the city's share of the county's population overall;
- San Mateo, 600 households and 14%, the same as the city's share of county population;

- South San Francisco, 518 and 12%, larger than the city's share of the county population (8%);
- Redwood City, 489 and 11%, about the same as the city's share of the county's population; and
- East Palo Alto, 419 (10%, much larger than the city's share of the county's population, which is just 4%).

Challenges in utilizing publicly-supported housing. As demonstrated above, vouchers make up the largest part of housing provided by the housing authorities in San Mateo County, assisting more than 3,500 households. HACSM is the only housing authority in the County that issues vouchers. As the rental market has become tighter, voucher holders have had a harder time finding rental units. Specifically:

The HACSM tracks a voucher "success rate," which divides the number of vouchers leased by the number of vouchers issued. This shows the percentage of vouchers that resulted in rented units. These data were provided for 2015, 2016, and January through June for 2017:

- During 2015, 422 vouchers were issued. 128 were leased, for a success rate of 30.33 percent.
- During 2016 the success rate improved to 42.27 percent. Fewer vouchers were issued (362) and more voucher holders found rental units (153).
- From January through June 2017, 116 vouchers were issued. Just 32 resulted in leases, for a success rate of 27.59 percent. It is important to note that many of the 116 voucher holders are still actively seeking rentals; therefore, they could result in leases during the balance of 2017.

In sum, over the past three years, the lease rate has consistently been below 50 percent.

Nearly three in four resident survey respondents who have Section 8 vouchers found it "very difficult" to find a landlord that accepts Section 8 and 15 percent found it "somewhat difficult." These respondents identified the factors they believe made their experience difficult. These include:

- Landlords have policies of not renting to voucher holders (77%);
- Have a hard time finding information about landlords that accept Section 8 (61%);
- Not enough time to find a place to live before the voucher expires (45%); and
- Voucher is not enough to cover the rent for places I want to rent (43%).

With respect to measures of access to opportunity, Section 8 voucher holders who responded to the AFH resident survey are less likely to agree that the location of job opportunities is close to where they live. Voucher holders report similar access to other opportunity measures and less difficulty finding housing they can afford that is close to good schools than other respondents.

In low vacancy and high rent housing markets, landlords face fewer incentives to rent to Section 8 voucher holders: Landlords are less dependent on the voucher program to sustain tenants and rental income, their rents may far exceed Fair Market Rents (FMRs) which determine the amount voucher holders will pay out of pocket for a voucher, and they may not be willing to bear the costs of meeting HUD's requirements to participate in the program. Indeed, an examination of rent increases on voucher holders in 2016 and 2017 found that rent increased from $250 to $300 per month, on average, for households experiencing increases. The average rent now exceeds $2,000 per month, compared to $1,800 in 2016—an increase of around 14 percent.

The landlords in San Mateo County who choose to participate in the voucher program tend to be smaller, live in the area, and are committed to providing housing to lower income residents. Some landlords interviewed for the study said they saw benefits in HUD quality standard inspections and tenant screening.

HACSM has worked to address challenges with voucher acceptance by offering landlords a financial incentive to participate in the program ($1,000).

HACSM is also a participant in HUD's pilot Move to Work (MTW) program. The program began in 2000, when 300 vouchers were designated as MTW vouchers, which are time-limited and contain self-sufficiency requirements. This program was expanded in 2008, which offered the housing authority more independence from HUD requirements in budgeting, policy making, and programming. The three primary goals of the MTW program are to increase cost effectiveness, promote self-sufficiency, and expand housing opportunities for program participants.

Under the MTW program, voucher holders have five years of rental assistance. After this period, they are expected to be self-sufficient and able to access private market housing without a voucher. It is important to note that households where family members are unable to work (elderly, persons with disabilities) are granted an exception to this policy; they are allowed three year extensions of their vouchers as long as all members in the household are unable to work.

The HACSM allows voucher holders to request "hardship exemptions," which include an extension of the time period allowed to find a voucher (180 days) or transfer of the voucher subsidy to another community, also known as "portability." A review of the clients who had received such exemptions in 2016 and 2017 to date showed that:

- 45 households requested exemptions. Of these, four were denied, and one was denied and reversed upon appeal.
- The most common request was for an extension. Thirteen requests involved portability.
- "Tight rental market" was the reason for most extensions, followed by all household members being elderly or having a disability.

Several challenges to the HACSM's programs and policies were raised by advocacy organizations participating in the development of this AFH. These were all reviewed with the HACSM:

- Concern that hardship exemptions are not working to exempt persons with disabilities and seniors from the MTW work requirement:

- Confusion with the housing authority's subsidy table; clients do not understand how it works;

- Fatigue from not being able to find a rental unit and/or constant rent increases. Feeling that, although the client has a right to a hearing about the rent increase, it will not make a difference.

- Confusion about HACSM's migration to a "customer service" model. Some residents miss having a caseworker assigned to them even though this contributed to less efficient delivery of services.

Contributing Factors of Publicly Supported Housing Location and Occupancy. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. The matrix below identifies those factors that increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs.

Figure V-87.
Contributing Factors Matrix: Publicly Supported Housing Location and Occupancy

Contributing Factors to Disproportionate Housing Needs	Daly City	Redwood City	San Mateo City	South San Francisco City	San Mateo County	Note:
Admissions and occupancy policies and procedures, including preferences in publicly supported housing						
Community opposition	X	X	X	X	X	Low support for affordable rentals and increased density
Displacement of residents due to economic pressures	X	X	X	X	X	
Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking						
Impediments to mobility						
Lack of access to opportunity due to high housing costs					X	Specific to African American and Hispanic children, some of whom attend lower proficiency schools
Lack of meaningful language access						
Lack of local or regional cooperation	X	X	X	X	X	Lack of private sector involvement to address housing needs
Lack of private investment in specific neighborhoods						
Lack of public investment in specific neighborhoods, including services and amenities						
Land use and zoning laws	X		X			Offer expedited development review for affordable housing
Loss of affordable housing	X	X	X	X	X	Investor-based market and conversion of existing rentals to high priced products
Occupancy codes and restrictions						
Quality of affordable housing information programs						
Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs					X	Federal limitation on DDA
Source of income discrimination						

Note: Only those factors that were evident in the AFH research and summarized. Blank fields indicate no contributing factor.

Source: BBC Research & Consulting.

Disability and Access Analysis

Population Profile

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

2. *Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.*

Housing Accessibility

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

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

3. *To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?*

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

1. *To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

2. *Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.*

Disparities in Access to Opportunity

1. *To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:*

i. *Government services and facilities*

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

iii. *Transportation*

iv. *Proficient schools and educational programs*

v. *Jobs*

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

3. *Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.*

Disproportionate Housing Needs

1. *Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.*

Population profile. According to the San Mateo County Housing Element, there are 55,000 residents in the County with some type of disability. Of these, 29,000 are seniors. A significant number—23,000—are adults. 3,300 are children.

In all, 8 percent of residents have a disability. By city, Redwood City has the lowest proportion of residents with a disability at 3 percent. All other cities are between 7 and 9 percent and lower than the state's 10 percent.

The most common type of disability is an ambulatory disability followed by an independent living disability and cognitive disability. According to HUD data, the types of disabilities in the County are similar to that of the region overall with some modest differences. In the region overall, slightly more residents have cognitive and ambulatory disabilities.

Figure V-88.
Number, Characteristics, and Living Arrangements of Persons with Disabilities, 2009-2011

			Age Cohort			Disability Type						Living Arrangements (when known)					
	No. of Residents with a Disability	% of Residents with a Disability	Under 18	18-64 years	65+ years	With Hearing Disability	With Vision Disability	With Cognitive Disability	With Ambulatory Disability	With Self-Care Disability	With Independent Living Disability	Parents/ Legal Guardian	Community Care Facility (1-6 Beds)	Community Care Facility (7+ Beds)	Independent/ Supportive Living	Intermediate Care Facility	All Others
Daly City	9,286	9%	264	4,299	4,723	2,119	1,677	3,507	5,392	1,904	4,453	368	55	4	39	12	4
Redwood City	5,292	3%	538	1,984	2,770	1,149	668	1,987	2,754	1,381	2,254	344	71	44	77	7	7
San Mateo City	7,892	8%	327	3,213	4,352	2,635	1,225	2,767	4,251	1,748	3,115	389	195	8	64	83	7
South San Francisco City	5,671	9%	245	2,307	3,119	1,413	764	1,886	3,498	1,728	2,459	230	88	1	20	58	4
East Palo Alto	1,985	7%	162	1,143	680	291	374	814	1,068	309	837	155	0	0	15	0	2
San Mateo County	55,204	8%	3,270	23,231	28,703	15,651	8,199	19,549	29,757	12,819	22,735	2,289	532	73	349	191	60

Source: www.21elements.com.

Figure V-89.
Table 13 — Disability by Type, and Table 14 – Disability by Age Group

Note:

All % represent a share of the total population within the jurisdiction or region.

Refer to the Data Documentation for details (www.hudexchange.info).

Source:

ACS.

Disability Type	(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction		(San Francisco-Oakland-Hayward, CA) Region	
	#	%	#	%
Hearing difficulty	12,835	2.51%	108,299	2.64%
Vision difficulty	6,071	1.19%	68,538	1.67%
Cognitive difficulty	14,646	2.87%	154,925	3.77%
Ambulatory difficulty	21,689	4.24%	219,714	5.35%
Self-care difficulty	9,558	1.87%	97,192	2.37%
Independent living difficulty	16,694	3.27%	170,567	4.15%

Age of People with Disabilities	(Cnsrt-San Mateo County, CA CONSORTIA) Jurisdiction		(San Francisco-Oakland-Hayward, CA) Region	
	#	%	#	%
Age 5-17 with Disabilities	2,611	0.51%	22,606	0.55%
Age 18-64 with Disabilities	17,863	3.49%	196,756	4.79%
Age 65+ with Disabilities	21,444	4.19%	190,763	4.64%

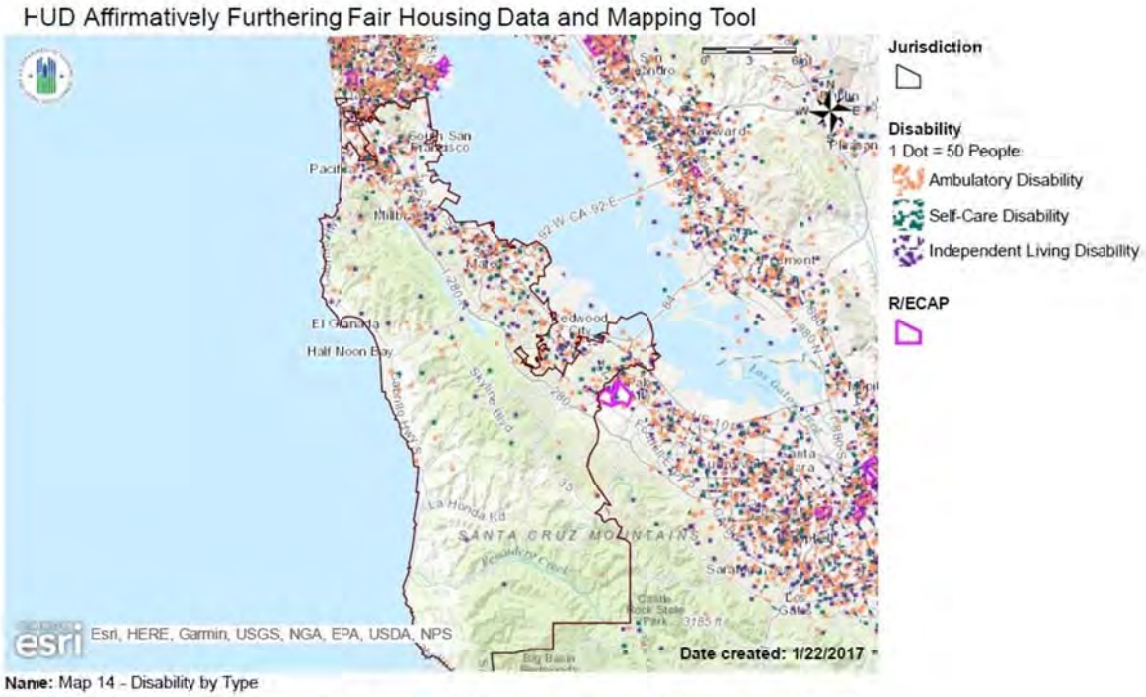
Housing Elements provide limited information on the living arrangements of persons with disabilities. According to the data available, most persons with disabilities live with their parents or in some type of care facility. It is unknown how many live alone.

Slightly less than one in five (17%) respondents to the resident survey with a disability live alone and the greatest proportion live in a two person household (29%). Nearly one in five are living in households with five or more members. One-third have children age 18 or younger living in the home.

It is important to note that, just like any household, not all persons with disabilities need or desire the same housing choices. Fair housing analyses often focus on how zoning and land use regulations govern the siting of group homes. Although group homes should be an option for some persons with disabilities, other housing choices—particularly scattered site units—must be available to truly accommodate the variety of needs of residents with disabilities.

The following maps show where persons with disabilities reside in the County. As the maps demonstrate, there is no distinct pattern to where people with disabilities live based on their disability type.

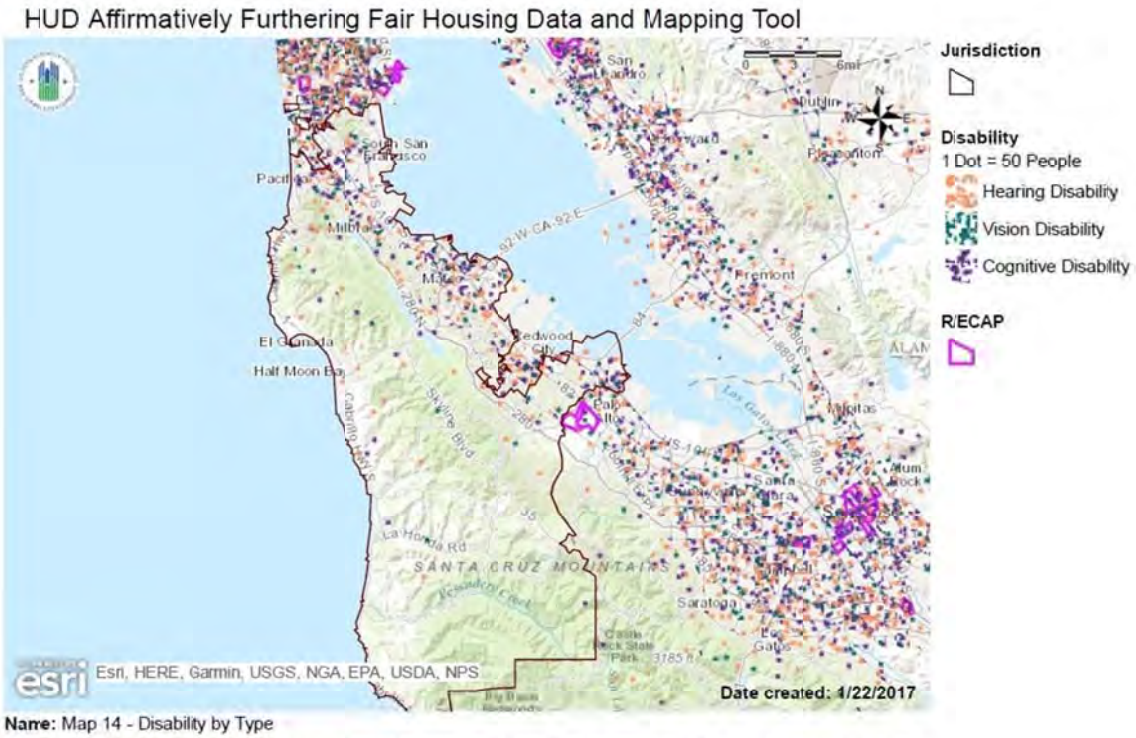
Figure V-90.
Map 14a – Disability by Type: Ambulatory, Self-Care, and Independent Living Disabilities



Name: Map 14 - Disability by Type
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region
Jurisdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/

Figure V-91.
Map 14b – Disability by Type: Hearing, Vision, and Cognitive Disabilities



Name: Map 14 - Disability by Type

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

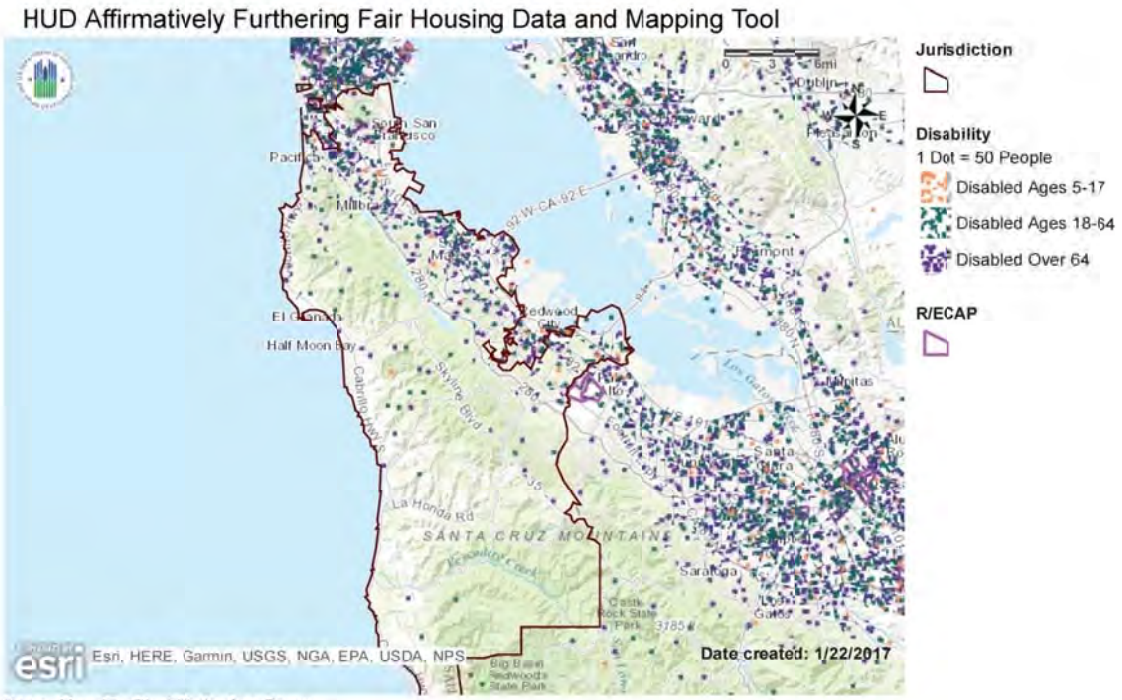
Jurisdiction: San Mateo County (CONSORTIA)

Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/

Similarly, as Map 15 (below) shows, there are no distinct patterns by age.

Figure V-92.
Map 15 – Disability by Type



Name: Map 15 - Disabilty by Age Group
Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs
Jursdiction: San Mateo County (CONSORTIA)
Region: San Francisco-Oakland-Hayward, CA

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool. https://egis.hud.gov/affht/

Availability of accessible housing. In the past five years, 56 percent of survey respondents whose household includes a member with a disability looked seriously for housing to rent or buy in San Mateo County. When asked to rate the relative ease of finding safe, quality housing that they could afford on a scale from 0 to 9, with 0 meaning "extremely difficult" and 9 meaning "extremely easy," 53 percent rated their experience "extremely difficult" (rating of 0) compared to 39 percent of all respondents who had looked seriously for housing. The cost of housing is by far the most common response (67%) when those who had difficulty (rating of 0 to 4) are asked why. In focus groups, residents with a disability explained that finding suitable housing that meets accessibility needs and is affordable is like finding a needle in a haystack. Nearly all residents in the region are impacted by high housing costs. For residents with disabilities, finding housing that is accessible and provides good access to transit stops in safe neighborhoods with accessible sidewalks is "nearly impossible."

In a stakeholder discussion facilitated for the AFH in March 2017, participants discussed factors that make finding affordable housing that meets the needs of a resident with disabilities more challenging, including:

- Ground level units are very limited. Even if on the first floor they are unlikely to be affordable. "Above carport" units, ADUs, not a solution for persons with disabilities.

- When existing mother-in-law units in single family homes are remodeled there are no requirements to include accessibility features;

- "People with disabilities do not enjoy the same income levels as others." A typical SSI payment of $900 per month is well below even the lowest priced rental unit.

Residents with disabilities living in housing that does not meet their needs. These issues—limited supply of accessible units, including ground floor units, compounded by housing costs, may explain why three in 10 households that include a member with a disability of any type are living in housing that *does not meet* that member's accessibility needs. The percentage of households living in housing that does not meet the accessibility needs of a member with a disability varies by jurisdiction:

- Half (53%) in East Palo Alto;

- Nearly half (45%) in South San Francisco;

- Three in 10 in Daly City (the same as the overall rate);

- One in four in the city of San Mateo and one in four in Redwood City; and

- Slightly more than one in four (27%) among residents living in San Mateo County but not in East Palo Alto or the participating jurisdictions.

Types of improvements or modifications needed by these households include:

- Service or emotional support animal allowed in apartment/room (30%);

- Grab bars in bathroom or other locations (29%);

- Reserved accessible parking space (25%);

- Wider doorways/hallways (10%);

- Fire alarm/doorbell made accessible for person with hearing disability (8%);

- Ground floor/single level unit or elevator/lift (8%); and

- Alarm to notify if a non-verbal child leaves the home (5%);.

Nearly half (45%) of survey respondents who need accessibility features of any type cannot afford them.

Reasonable modification or accommodation requests. Among those to whom the question applied, about three in 10 report that their landlord refused to make an accommodation for the household member with a disability. One in five had a landlord refuse a service animal and one in four had a landlord refuse to accept a therapy/companion/emotional support animal. In the focus group with residents with disabilities, participants described people with disabilities who

need accessibility modifications and are either afraid to ask their landlord or are afraid to lodge a complaint against a landlord who refuses a modification or accommodation request. Participants suggested a need for fair housing education for landlords, particularly small "mom and pop" landlords, related to requests for reasonable modifications or accommodations.

ABAG's Fair Housing Equity Analysis concluded that persons with disabilities have difficulty getting equal access to the housing market through a lack of reasonable accommodations.

In a focus group with landlords, landlords shared that making accessibility modifications to their buildings is expensive and lacks a funding stream. "I think everyone's heart is in the right place and don't want to discriminate against anyone. The real challenge is having funds available for landlords to bring buildings up to code, including reasonable modifications." Although payment for modification is the tenant's responsibility, landlords were discussing larger scale accessibility retrofits of lower density buildings, including adding elevators as well as accessibility modifications to individual units or common areas. "If someone with a disability is looking for a place, you just hope you have a unit that works. Because you don't want to put someone in a unit that doesn't work for them."

Integration. Like other residents of the San Mateo County region, the cost of housing, unit accessibility and access to public transit for transit-dependent residents are the primary issues that typically hinder an individual with a disability from living in the most independent, integrated setting desired, based on the community engagement process. Participants in the disability focus group described source of income discrimination—refusing to rent because the tenant's housing would be paid for by a voucher—is a "huge issue" in the region. As discussed above, about half of Section 8 voucher holders who experienced difficulty finding a place to rent identified landlords' unwillingness to accept Section 8 as a barrier. In the survey of landlords conducted by CAA Tri-County, 22 percent of the respondents have Section 8 tenants.

The Center for Independence of Individuals with Disabilities (CID) serves San Mateo County. CID's mission is to "provide support, services, community awareness, and systems change advocacy to promote full and equal community integration and participation for people with disabilities in San Mateo County."[14] CID's programs provide a broad spectrum of services ranging from counseling and peer support to independent living skills to helping individuals with disabilities transition out of segregated settings such as nursing homes. CID also provides housing accessibility modification for income-qualified County residents. In discussions with CID staff, the cost of housing was identified as the primary barrier to living in the most integrated setting possible.

Previously we discussed resident resistance to development in the context of new housing and development of low income housing. Participants in the resident survey believe that most of their neighbors would not be supportive of most new housing types. These residents believe that their neighbors would be relatively more supportive of new housing for low income seniors or a residential home for people with disabilities than new apartment buildings open to all tenants.

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[14] http://www.cidsanmateo.org/

Out of all the housing types considered, survey respondents believed their neighbors would be least supportive of housing for people recovering from substance abuse/sober living.

Access to publicly supported housing. As detailed in the publicly supported housing analysis, affordable housing developments for persons with disabilities and other special needs housing is most likely to be found in the area around North Fair Oaks. Persons with disabilities represent 8 percent of residents in San Mateo County and, as discussed in the publicly supported housing analysis, are overrepresented in Other Multifamily housing and, to a lesser extent, as voucher holders.

Disparities in Access to Opportunity. As discussed above, the San Mateo County region is largely one of high opportunity, and most residents are able to access its high proficiency schools, job opportunities, low cost transportation and public transit, low poverty environments and environmentally healthy neighborhoods. The AFH asks *"to what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning: Government services and facilities; Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals); Transportation; Proficient schools and educational programs; and Jobs."* Each area is discussed in turn.

Government services and facilities. Community engagement yielded examples of inaccessible government services and facilities based on resident experience. Other than specific comments about San Mateo County buildings and the City of San Bruno municipal building, comments related to government services and facilities (other than transportation) focused on access to parks. These include:

- Some aspects of the San Mateo County Aging and Adult Services building are not easily accessible as described by disability focus group participants. These include:
    - "Width of sidewalks";
    - "Turn around space between doors";
    - "When entering through the main door off of 37th Avenue, there are three to four stairs up to the main meeting room, so an individual using a wheelchair would need to go all the way around the building to get into this room."
- "More auto-doors [needed] at San Mateo County offices for wheelchair access, for example the Tax & Recorder Office double doors inside the rotunda." *(Resident survey respondent)*
- "There are still … some parks that still have no access to those with disabilities. This needs to be changed; every place that is public needs to have disabled access." *(Resident survey respondent)*
- "It is so hard to access some of our County parks. I wish I could get out into the woods more easily." *(Resident survey respondent)*
- "Wheelchair access to amenities. Can't get to beach." *(Resident survey respondent)*

- "Wheelchair accessible pathways in parks, baseball field with dugouts that are wheelchair accessible for players, and swings with seats and seatbelts." *(Resident survey respondent)*

- The perception that the San Bruno City building entrance is not fully accessible—"There is a blue wheelchair sign on the building, but no button to open the door." *(Resident survey respondent)*

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals). With respect to public infrastructure, incomplete sidewalk infrastructure, particularly connections to fixed route bus and other transit stops/stations, is a significant barrier to residents with mobility disabilities and limits access to all facets of community life, from employment opportunities to shopping and entertainment and services. The supply of accessible parking spaces and the need for enforcement of accessible parking ordinances is another need raised by residents with disabilities.

- "Sidewalks in the County are bad; they're not connected." *(Disability focus group participant)*

- "Fix the curb cuts for wheelchairs in Redwood City." *(Resident survey respondent)*

- "There are odd stretches of streets sometimes with no sidewalk or missing segments of sidewalk (e.g., Waterford Street or Farallon Avenue in Pacifica) but it's possible to re-route or walk more carefully over dirt or along the side of the street." *(Resident survey respondent)*

- "Transportation problems and cracked/buckled sidewalks are the big barriers to getting around." (*(Resident survey respondent)*

- "El Camino Real is not always accessible which is particularly inconvenient because this is where the main bus routes are located. People will get off the bus and not be able to get around." (*Disability focus group participant)*

- "More handicap parking on Laurel Street in San Carlos; sidewalks are in terrible shape." *(Resident survey respondent)*

- "Better policing of handicapped parking spaces; doorways into buildings/businesses need to mechanisms to open doors for wheelchairs." *(Resident survey respondent)*

- "Additional disabled parking, curb cutouts. Better enforcement of access to disabled placards (a sprained wrist doesn't mean you need to park at the front door). Better enforcement of usage—just because someone in the family has a placard/plate, huge abuses with able-bodied people taking scant handicap spaces then trotting into the store while grandma stays home or waits in the car." *(Resident survey respondent)*

Transportation. On average, households that include a member with a disability are only slightly more likely than all respondents to the resident survey to agree with the statement, *"I have difficulty getting to the places I want to go because of transportation problems."*

Paratransit. The experience of residents whose most frequent mode of transportation is paratransit/RediWheels/RediCoast (hereafter RediWheels) is different. These residents are much more likely report having difficulty getting to the places they want to go due to transportation problems—30 percent "strongly agree" with the statement (rating of 9), compared to 14 percent of all households that include a member with a disability and 9 percent of San Mateo County resident survey respondents overall. Interestingly, a slightly smaller percentage of frequent RediWheels riders (26%) "strongly disagree" (rating of 0) with the statement, suggesting inconsistent RediWheels service delivery or other factors influence how frequent riders experience the service. RediWheels riders who have difficulty reaching the places they want to go (rating of 7, 8, or 9):

- Are age 35 or older, and the greatest proportion (31%) are 75 or older; and
- 71 percent have household incomes of $25,000 or less.

Place of residence did not seem to be associated with RediWheels transportation difficulty. Residents with difficulty lived in cities across the County, and the greatest proportion of riders with difficulty live in the city of San Mateo (25%), followed by Foster City (15%), Redwood City (15%) and South San Francisco (15%).

Participants in the disability focus group identified several aspects of RediWheels operations that are challenging for residents with disabilities:

- Longer than expected pick-up wait times. "You have to wait 30 or more minutes to get picked up even though they said the wait is five minutes."
- Not receiving an arrival time window;
- Scheduling errors, including wrong address;
- Hours of operation issues associated with times of day that ride scheduling service is available;
- Upcoming fare increases; and
- Perception that SamTrans is only committed to meeting minimum ADA requirements. "Samtrans meets ADA requirements, but are not willing to provide anything extra or think outside the box. Other Bay Area transit companies are more innovative—provide ridesharing service to supplement paratransit—SamTrans doesn't want to risk anything."

Transportation improvements needed. Transportation was the most common response to questions in the resident survey about what improvements in San Mateo County are most needed to ensure that residents with disabilities are able to access employment opportunities (11% of responses), health care services (19% of responses) and community amenities, services and facilities (23% of responses). Types of improvements needed ranged from general comments like "better public transit" or "free transit" to specific areas where public

transportation services are needed, while others reinforced the disability focus group participant comments related to RediWheels services.

- "First and last mile connections. SamTrans pick up and wait times are limited and compromise ability to use public transit."
- "Better bus transportation between Foster City/San Mateo and Bart Millbrae." *(Resident survey respondent)*
- "Better transportation in Linda Mar, Pacifica." *(Resident survey respondent)*
- "Put funding into MORE EFFICIENT public transportation. SamTrans is a JOKE." *(Resident survey respondent)*
- "I don't understand why SamTrans does not have transfers. It takes two buses to get to my doctor. That's $8 round trip." *(Resident survey respondent)*
- "Better service when using RediWheels." *(Resident survey respondent)*
- "Carter & Geneva streets need better connections to BART & MUNI 3rd St line." *(Resident survey respondent)*
- "Ability to bring service animal on public transit without being bothered." *(Resident survey respondent)*
- "Help make RediWheels more user friendly for us disabled persons to use. RediWheels has the most unhelpful, rude, ready to leave you on the side of the road, pick you up 45 minutes late, unfriendly, unhelpful kind of people working for their company. It's a wonderful service, that can be super helpful if it was run correctly. I depend on it 100% of the time for work, school and all medical appointments because I'm unable to drive, but dread having to come in contact with any customer service reps. Please help!" *(Resident survey respondent)*

Proficient schools and educational programs. With respect to accessing proficient schools and educational programs, most comments focused on increasing resources and building capacity within the public school system to better serve students with disabilities.

- "Better bridges between school and employment for those with disabilities." *(Resident survey respondent)*
- "Better equip high school teachers and admin in dealing with children on the higher end of the autism spectrum. Children who have a high potential to be contributing and self-sufficient adults are falling through the cracks. Middle class are especially caught in a 'Catch 22.' Can't afford the specialized private education and don't meet low income requirements for subsidized assistance." *(Resident survey respondent)*
- "More coaching for students in mainstream education about how to self advocate and report their unseen disabilities." *(Resident survey respondent)*

- "One on one learning experiences in school starting at grammar level...focused one on one education is key to a developmentally challenged child's success, along with family and community support. There should always be a mission to ensure the funding is there in our public school system to support this." *(Resident survey respondent)*

Jobs. Other than the transportation issues discussed above, about 10 percent of comments related to ensuring that residents with disabilities are able to access employment opportunities concerned access to job training and coaching services, building connections to employers willing to hire residents with disabilities and increasing communications to the disability community about available employment-related services.

- "Case management from social services. County job resources for people looking for blue collar jobs. Help those who have no work experience or with experience build a resume." *(Resident survey respondent)*

- "Have real inclusive jobs not just retail, fast food. not all people with disabilities can stand long hours or do labor or heavy lifting." *(Resident survey respondent)*

- "More funding for job coaches and employment outreach workers." *(Resident survey respondent)*

- "More information on how to get help/employment for adults with autism [information about] specific employers that hire young adults with autism." *(Resident survey respondent)*

Processes to request and obtain reasonable accommodations and accessibility modifications to address access to opportunity barriers. As discussed above, transportation is a barrier to accessing opportunity for many residents with disabilities. As the primary provider of public transit and paratransit services in San Mateo County, SamTrans, has easy-to-find accessibility information on its website, with a prominent link on the homepage.[15] Residents seeking to make a reasonable modification request to a policy, practice or procedure can fill out an online form, specifying the transit mode, the requestor's contact information, and the details of the modification request.[16] The SamTrans Accessible Services Department staff handles these requests and the staff can be reached by phone at 650-508-6396 or TTY 650-508-6448 or email at accessible@samtrans.com or mail (P.O. Box 3006, San Carlos, CA 94070-1306). Requestors should receive a response within five business days.

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

Difficulties achieving homeownership. Overall, one-third of the resident survey respondents whose household includes a member with a disability are homeowners, compared to 67 percent of households in the region. Those who do not own homes consider the prospect of

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[15] http://www.samtrans.com/Accessibility.html

[16] http://www.samtrans.com/Accessibility/ReasonableModification/ReasonableModificationForm.html

homeownership to be out of reach when securing and maintaining affordable rental housing is a daunting task.

Disproportionate Housing Needs. The community engagement process also revealed that residents with disabilities have a very difficult time finding housing that meets their needs and is affordable. There is also a large presence of persons with disabilities on the five year voucher wait list (Moving to Work), another indicator of disproportionate housing needs of residents with disabilities. The five year voucher program, Moving to Work, has exceptions for persons with disabilities and the elderly, but those who do not receive an exception reportedly experience a "revolving door effect"—they can't find jobs, so they lose their vouchers and end up on wait list again.

Disability and Access Issues Contributing Factors. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. The matrix below identifies those factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs.

Figure V-93.
Contributing Factors Matrix: Disability and Access

Contributing Factors to Disability and Access	Daly City	Redwood City	San Mateo City	South San Francisco City	San Mateo County	Note:
Access for persons with disabilities to proficient schools						
Access to publicly supported housing for persons with disabilities						
Access to transportation for persons with disabilities	X	X	X	X	X	Countywide first and last mile connection barriers
Inaccessible government facilities or services	X	X	X	X	X	Address specific accessibility comments related to San Mateo County buildings. For all jurisdictions except San Mateo County, it is difficult to find information about ADA Public Access modification processes and contacts.
Inaccessible public or private infrastructure	X	X	X	X	X	Incomplete sidewalk networks, sidewalk disrepair described throughout the region
Lack of access to opportunity due to high housing costs						
Lack of affordable in-home or community-based supportive services						
Lack of affordable, accessible housing in range of unit sizes	X	X	X	X	X	Very limited affordable housing restricts choice
Lack of affordable, integrated housing for individuals who need supportive services						
Lack of assistance for housing accessibility modifications						
Lack of assistance for transitioning from institutional settings to integrated housing						
Lack of local or regional cooperation						
Land use and zoning laws						
Lending discrimination						
Location of accessible housing						
Loss of affordable housing	X	X	X	X	X	Investor-based market and conversion of existing rentals to high priced products
Occupancy codes and restrictions						
Regulatory barriers to providing housing and supportive services for persons with disabilities						
Source of income discrimination	X	X	X	X	X	Difficult to find landlords who accept Section 8
State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings						

Note: Only those factors that were evident in the AFH research and summarized. Blank fields indicate no contributing factor.

Source: BBC Research & Consulting.

Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

This section of the AFH discusses fair housing enforcement. It reviews legal cases and complaints, describes fair housing protections, and evaluates enforcement and outreach capacity.

As required by the AFH template, the County and participating jurisdictions must report unresolved fair housing:

a. *Charge or letter of finding from HUD concerning a violation of a civil rights-related law;*

b. *A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;*

c. *Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;*

d. *A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;*

e. *A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or*

f. *A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.*

County and participating jurisdictions' staff did not report any current unresolved claims, findings, or administrative complaints.

Fair housing protections. California fair housing law extends beyond the protections in the Federal Fair Housing Act (FHA). In addition to the FHA protected classes (race, color, ancestry/national origin, religion, disability, gender, and familial status), California law offers protections for age, sexual orientation, gender identity or expression, genetic information, marital status, and source of income. Unlike some states, a Housing Choice Voucher is not considered a source of income and, as such, voucher holders do not receive unique fair housing protections.

The State Department of Fair Employment and Housing investigates fair housing complaints. According to stakeholders consulted for this AFH, this state department is currently under-resourced. As a result, fair housing investigations at the state level can be delayed and/or may not be as effective as they would be if the department was adequately staffed.

Insufficient enforcement at the state level is most critical for residents who fall within protected classes covered by state, but not federal, law. These include residents who have a different sexual orientation, gender identification, gender disposition, and marital preference than the

majority. Source of income discrimination is also likely to be less effective without adequate resources to investigate such claims.

Fortunately, San Mateo County has a number of local enforcement organizations (shown below). These organizations receive funding from the County and participating jurisdictions.

Figure V-94.
Local Resources for Fair Housing Information and Complaints

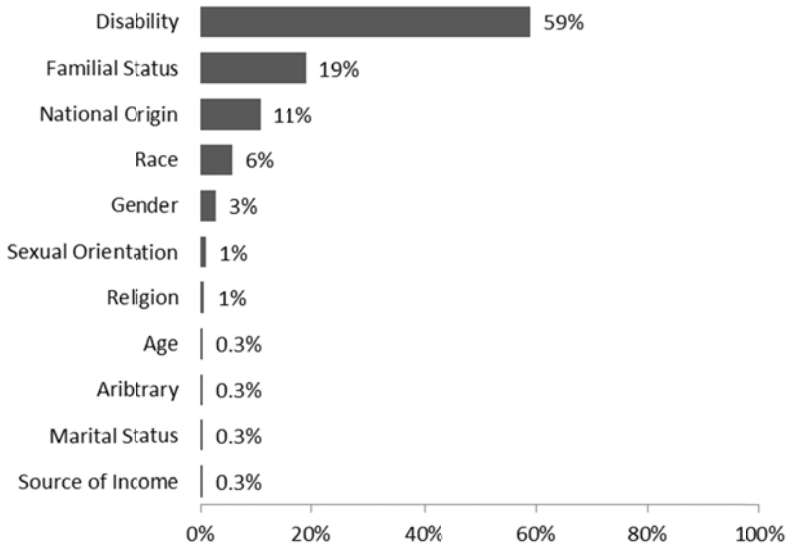
Name	URL	Phone Number
Project Sentinel	www.housing.org	888-FAIR-HOUSING (888-324-7468)
Legal Aid Society of San Mateo County	http://www.legalaidsmc.org/housing-resources.html	650-558-0915
Community Legal Services of East Palo Alto	http://clsepa.org/	650-326-6440

Trends in fair housing complaints and violations. Project Sentinel, the primary investigative agency in the County, was consulted about fair housing complaints and violations occurring since the last AI was completed in 2012.

Between 2012 and 2017, 300 cases were investigated by Project Sentinel. The chart below shows the basis for the discrimination claims.

Figure V-95.
Basis for Discrimination Claim, 2012-2017

Source:
Project Sentinel.

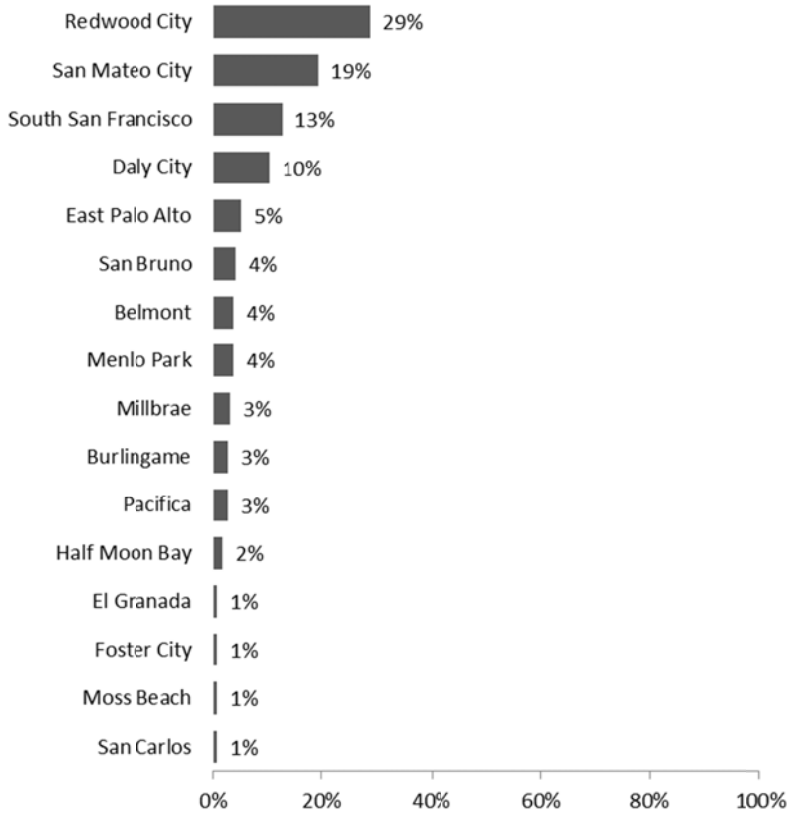


As shown by the chart above, disability is the most common reason for complaints, representing almost 60 percent of all cases. Familial status is second (19%), followed by national origin (11% of all cases).

The figure below shows the city where the alleged discriminatory action occurred. Redwood City was the most common city where complaints originated (29% of cases), followed by the City of San Mateo (19%), and South San Francisco (13%).

Figure V-96.
City Where Alleged Discrimination Occurred, 2012-2017

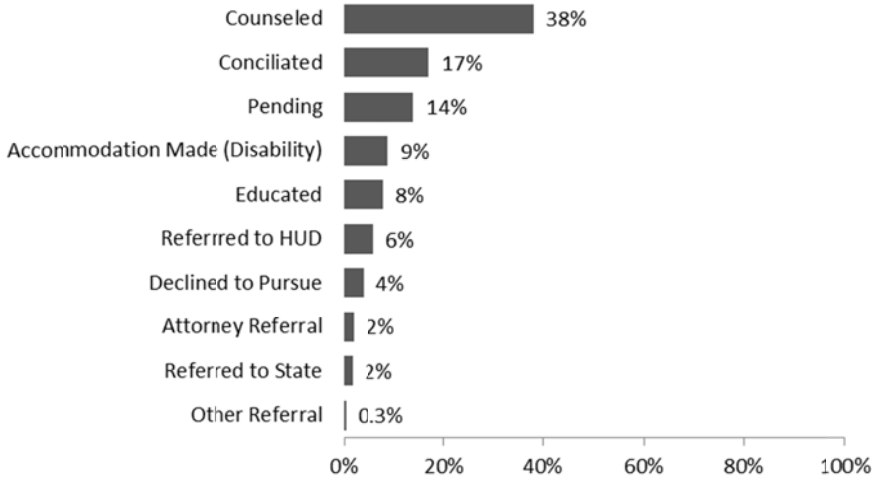
Source:
Project Sentinel.



The majority of the cases were resolved through counseling (114 of 300) or conciliation (52 of 300). About 15 percent are still outstanding. Only 12 cases were not pursued further. The disposition of cases overall is very successful, with 87 percent of the cases resulting in a positive resolution (including accommodation, conciliation, counseling, and education)

Figure V-97.
Resolution of Fair Housing Cases, 2012-2017

Source:
Project Sentinel.



The organizations receiving funding interviewed for this study raised a concern with the metrics required to track outcomes. Some CDBG required metrics—those that focus on case numbers rather than case complexities—not do not accurately reflect the level of effort needed to assist residents resolve their claims.

Project Sentinel also shared resolved cases and complaint scenarios, which represent residents' experiences with housing barriers and were gathered through outreach activities. These cases are summarized here to provide more context for the cases listed above. In general, the sample of cases suggests that residents with families and who are immigrants are most vulnerable to discriminatory behavior in the housing market.

Sample fair housing cases:

A landlord claimed his 71 year old tenant could not continue to live in her apartment after suffering a fall and requiring a physical therapist to enter the apartment to assist with her recovery. This case has been filed with HUD and is currently pending.

In a similar case, a 57 year old woman with a disability who requires a live-in caregiver is being told her rent will be raised by $300/month because of the "second occupant." This case is in conciliation.

A Menlo Park ad for an apartment complex (suggesting the occupants should be tech workers or students) led to an audit that found the landlord heavily discouraged families with children or pregnant women from living in the complex. This case has been filed with HUD and is currently pending.

In a very large settlement ($160,000), owners of apartment complexes in Redwood City and East Palo Alto will receive training and cease derogatory comments and threats to Latino/Hispanic family tenants.

An applicant for an apartment in Redwood City was refused the unit due to her emotional support dog. Testing supported the allegation. A complaint was filed with HUD and the landlord has agreed to allow companion animals with proper documentation.

Other local resources. As part of the enforcement and outreach analysis, the participating partners' webpages were reviewed for fair housing information. The search found fair housing information to be limited, difficult to find, and rarely in a language other than English. Jurisdictional and PHA webpages that provide links to fair housing resources for residents seeking more information about their housing rights are needed.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors. The AFH template requires an examination of potential contributing factors to each of the fair housing challenges analyzed in this section. The matrix below identifies those factors that negatively impact fair housing enforcement in San Mateo County and the participating partners.

Figure V-98.
Contributing Factors Matrix: Fair Housing Enforcement

Contributing Factors to Fair Housing Enforcement	Daly City	Redwood City	San Mateo City	South San Francisco City	San Mateo County	Note:
Lack of local private fair housing outreach and enforcement	X	X	X	X	X	Limited information on local government websites
Lack of local public fair housing enforcement						
Lack of resources for fair housing agencies and organizations	X	X	X	X	X	Local fair housing organizations would benefit from increased resources in current market
Lack of state or local fair housing laws	X	X	X	X	X	State fair housing investigation and enforcement resources limit the effectiveness of enforcement
Unresolved violations of fair housing or civil rights law						

Note: Only those factors that were evident in the AFH research and summarized. Blank fields indicate no contributing factor.

Source: BBC Research & Consulting.

SECTION VI.

Fair Housing Goals and Priorities

SECTION VI.
Fair Housing Goals and Priorities

This section describes how the participating cities and San Mateo County will address the fair housing issues described in prior sections.

As discussed in Section V, San Mateo County is sandwiched in between jurisdictions with some of the most active economies in the world. As the technology sector has ballooned, housing demand has increased considerably—yet development of housing has been severely inadequate to meet demand. According to data collected for the Home for All initiative, the County's mismatch between jobs and housing is 26:1, meaning there are 26 jobs for every 1 housing unit. From 2010 to 2014, the County added 54,600 jobs and just 2,100 housing units.

This mismatch is exacerbated by growing demand for residents to live in urban environments, residential real estate becoming an increasingly attractive market to investors, and, as such, few market incentives for landlords to serve low income households.

This section presents goals for how San Mateo County, the four jurisdictions participating in the AFH—Daly City, Redwood City, the City of San Mateo, and South San Francisco—and the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority, can address the fair housing challenges identified in this AFH.

To the extent possible, the goals and strategies address those challenges that disproportionately affect certain protected classes. However, given the extreme pressures in the existing housing market—and because the jurisdictions cannot apply housing preferences for certain protected classes without violating the Fair Housing Act (see below)—many of the goals and strategies will improve access to housing for all residents with housing challenges, and to the extent allowable, focus on the protected classes with the greatest housing needs.

In developing the goals, the County and participating partners recognized that the public sector faces some limitations in how it can influence housing prices. The public sector's primary "sphere of influence" lies in:

- The public sector can use its regulatory authority to encourage or mandate a range of housing prices and types;
- The public sector can fund or manage the development of housing that contains affordability restrictions; and
- The public sector can make resources available—monetary, staff, land, existing buildings—and work with partner organizations to address housing challenges.

The Federal Fair Housing Act (FHA) can make it challenging to specifically direct funding to address the housing needs of specific protected classes. Other than senior housing, housing for

persons with disabilities, and larger units that can accommodate families, housing cannot be specifically reserved for members of a protected class, even if they face disproportionate housing needs. Yet the public sector can be mindful of how its decisions and allocation of resources can negatively or positively affect certain protected classes.

Goals Development

The following matrices show the goals and action items the County, participating jurisdictions, and Housing Authorities will employ during the next five years to address priority fair housing challenges.

Following HUD's AFH guidelines, the goals were developed with the SMART acronym in mind:

- S—Specific
- M—Measurable
- A—Actionable
- R—Realistic
- T-Timebound.

Prioritization. Prioritization of the fair housing issues by the County and participating partners was steered by HUD's guidance in the AFH rule. In prioritizing the contributing factors to address, highest priority was given to those contributing factors that:

- Limit or deny fair housing choice;
- Limit or deny access to opportunity; and
- Negatively impact fair housing or civil rights compliance.

The housing crisis in San Mateo County and the San Francisco region is severe and unprecedented. It is the hope of the participating partners and the Housing Authorities that these goals will generate a stronger foundation for furthering housing choice and access to opportunity, especially for those residents most affected by housing and economic barriers.

FAIR HOUSING PLAN - San Mateo County

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Continue to dedicate Affordable Housing Fund (Measure K) dollars to the development of publicly-supported affordable housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Gap in homeownership rate for African American and Hispanic households; Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; High rates of denial of housing for African American and Hispanic households	San Mateo County Department of Housing and Board of Supervisors	Allocate $32.5M in County Measure K funds over two years to the Department of Housing for the creation or preservation of below market rent, deed restricted affordable housing units.	FY 18 and FY 19
Goal No. 2. Continue to support the addition of publicly supported housing units - housing with affordability restrictions - to the market.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing and Board of Supervisors	Begin construction on 600 units of County-subsidized, affordable housing throughout the county. Units will typically serve households earning up to 60% of AMI. Units will typically be income-restricted for a period of 55 years. Ensure that recipients of funds have strong affirmative marketing plans.	By end of FY 19
Goal No. 3. Continue to support the addition of publicly supported affordable housing units located near transit	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing	Include preference criteria within funding NOFAs that favor projects a) sited within easy walking distance of services, amenities, and transit; and/or b) submitting applications for Affordable Housing and Sustainable Communities (AHSC) funds	Through FY 22
Goal No. 4. Support the development of larger publicly-supported affordable housing units (2 - and 3- bedroom units, or larger)	Limited housing for families	Disproportionate housing needs	San Mateo County DOH and Housing Authority of San Mateo County	Include units for larger families (two- and three bedroom units, or larger) in the Preference Criteria for San Mateo County's Affordable Housing Fund allocations. Prioritize the development of family-sized units in the Request for Proposal for Midway/Bayshore Redevelopment Project.	FY 17-18
Goal No. 5. Continue to support the development of publicly-supported housing for County Clients - residents with special needs (experiencing homelessness, frail elderly, mental health issues, substance abuse issues)	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing, Health Plan, Behavioral Health and Recovery Services, and Probation, Human Service Agency	5% of units receiving County subsidy in FY 18 and FY 19 will be targeted towards County Clients	FY 18 and FY 19
Goal No. 6. Continue to support the development of publicly-supported housing for Extremely Low Income Households	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for low income housing	San Mateo County Department of Housing	10% of units receiving County subsidy in FY 18 and FY 19 will be targeted towards extremely low income households (earning up to 30% of AMI)	FY 18 and FY 19
Goal No. 7. Support the development of publicly-supported affordable housing for Transition-Aged Youth	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Human Services Agency	HSA to provide DOH with $1.3M in Measure A/K funds to finance the creation of up to 18 units of permanent affordable housing targeted towards transition-aged youth. Funds to be allocated to a developer via Notice of Funding Availability.	FY 18 and FY 19
Goal No. 8. Continue to support the development of publicly-supported affordable housing for Behavioral Health Recovery Services Clients	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Behavioral Health and Recovery Services	BHRS to provide DOH with ~$1M in Measure A/K funds to finance the creation of up to 6 units of permanent affordable housing targeted towards BHRS clients. Funds to be allocated to a developer via Notice of Funding Availability.	FY 18 and FY 19
Goal No. 9. Continue to support the development of publicly-supported affordable housing for CA Mental Health Services Act-eligible households	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	San Mateo County Department of Housing and Behavioral Health and Recovery Services and CA HCD	Develop plan for CA HCD No Place Like Home funds and release corresponding NOFA	FY 18 - develop plan. FY 19 - Release NOFA
Goal No. 10 Support the development of workforce housing	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	HEART, Home for All, San Mateo County DOH, County Manager's Office	Provide HEART with $5M in Measure K seed funds and technical assistance to 1) leverage County commitment with investment from additional jurisdictions and other investor partners 2) Support development of affordable and workforce housing through predevelopment, acquisition, preservation, bridge, and construction loans	FY 17-19

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 11. Explore a multifamily rehabilitation and accessibility improvement program using CDBG revolving loan or other public funds to provide an incentive for landlords to participate in the HCV program.	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities	HACSM and San Mateo DOH and Daly City	Complete analysis and determine program feasibility	FY 18
Goal No. 12. Research and implement best practices around supporting naturally occurring affordable rental housing.	Loss of affordable housing; Displacement of residents	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	San Mateo County DOH and 21 Elements	21 Elements to release final report on Displacement and Displacement prevention tactics which includes a discussion of "tenants' right of first refusal" in the No Net Loss Policy section. Jurisdictions to review, discuss, and implement as appropriate.	Release report FY 18. Discussion and Implementation to follow report release.
Goal No. 13. Research and implement best practices around subsidy loan terms for publicly-supported affordable rental housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Discrimination in market	Disproportionate housing needs; Displacement of residents	San Mateo County Department of Housing, Board of Supervisors	DOH staff to review current loan terms, research best practices, and make recommendations to revise terms as seen fit. Example: review of requirements around restrictive covenants on CDBG funding.	Through FY 22
Goal 14. Begin planning and determine site assembly process for publicly-owned land. Establish criteria for development (for inclusion of RFPs).	High housing costs due to land costs	Disproportionate housing needs: Lack of accessible housing for persons with disabilities; high rates of denial of housing for African American and Hispanic households	San Mateo County Department of Housing, City of Redwood City, and San Mateo County Manager's Office, South San Francisco, San Mateo County Planning and Building Dept, Real Property Services	Issue RFPs and select developers for two County-owned sites - Midway Village and Middlefield Junction - for development of affordable housing units. Issue RFQ/P for master planner to evaluate additional site(s) for appropriateness of housing development.	FY 18
Goal No 15. Support Affirmatively Further Fair Housing throughout the entire county regardless of HUD entitlement status.	Disparate efforts to address critical housing needs	Regional housing planning	San Mateo County DOH and urban county jurisdictions	Prepare and execute a new Cooperative Agreement between the County and the non-entitlement cities within the County to add additional language (per HUD) compelling jurisdictions to abide by the Fair Housing Act and affirmatively further fair housing	FY 17-18
Goal No. 16. Continue to fund and support outreach services for homeowners and renters at risk of losing their homes and/or experiencing fair housing impediments.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs: Gap in homeownership rate for African American and Hispanic households; Displacement due to rent increases for Spanish speaking and large households	San Mateo County DOH	Support five public service organizations that serve approximately 2,200 household per year. Provide funding up to $200,00 annually	Annual contingent on continued HUD funding allocation
Goal No. 17. Provide additional funding to support outreach services for renters at risk of losing their homes and/or having disputes with their landlords	Disproportionate housing needs; Displacement of residents	San Mateo County Board of Supervisors and DOH	San Mateo County Board of Supervisors and DOH	Support public service organizations that serve vulnerable low-income households by providing referrals, "rapid rehousing", fair housing counseling, and other services. Provide up to $977,000 over two years to supplement support services funded by HUD.	FY17-19
Goal No. 18. Continue and strengthen regional affordable housing planning.	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	Home For All, San Mateo County Housing and Planning Departments, 21 Elements, Housing Leadership Council	Home for All to update local housing policy status tracker on Home For All website. Home for All to launch RHNA sharing pilot legislation for San Mateo County. 21 Elements to support Decision Maker Events with coordination from Home for All and Housing Leadership Council to educate decision makers about housing issues.	Decision Maker Events: twice a year, during housing leadership day and affordable housing week. Housing policy tracker: June 2017 RHNA sharing pilot legislation: February 2018
Goal No. 19. Continue efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	County Manager's Office, Home For All, San Mateo County DOH, and County Library, 21 Elements	Launch Community Engagement Pilot Projects to test out new approaches to community engagement on housing. Launch County Library American Conversations Project which will include conversations regarding housing. 21 Elements to produce handout "How Housing Fits" on that presents a continuum of housing design, types, and density ranges that inform strategies to increase housing stock.	Community Engagement Pilot Projects: Fall 2017 American Conversations Project: October 2017 How Housing Fits handout: Spring 2018
Goal No. 20. Continue efforts to foster collaboration among jurisdictions regarding local challenges to housing, community engagement strategies, encouraging new housing development	Disparate efforts to address critical housing needs	Regional housing planning	County Manager's Office, Home For All, San Mateo County DOH, 21 Elements	Home for All launches bi-monthly Learning Network, bringing together elected officials and staff from all 21 County jurisdictions for information sharing, pilot project updates, research, best practices, and other learning opportunities. The group will discuss challenges and successes around group-identified pressing topics such as ADU's, reducing parking impacts of new housing, and partnering with school districts to evaluate the possibility of using surplus school district land for future housing development.	FY 17-18 meeting calendar set. Future meeting dates to be determined.

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 21. Continue regional efforts to develop program to encourage and assist with construction of new, permitted ADUs to increase supply of naturally occurring affordable housing (NOAH)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	San Mateo County Department of Planning and Buildings, Department of Housing, County Manager's Office, Home For All, 21 Elements	Present final ADU ordinance for adoption by the Board of Supervisors. Complete extensive marketing and outreach to public. Share ordinance and outreach best practices with other 20 County jurisdictions via 21 Elements and Home for All. Work with lenders to develop ADU loan product for construction of new ADUs.	Board adoption of ordinance in FY 18
Goal No. 22. Continue regional efforts to develop ADU certification program targeted toward owners of non-permitted accessory dwelling units (ADUs) to improve the quality of naturally occurring affordable housing (NOAH)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	San Mateo County Department of Planning and Buildings, Department of Housing, County Manager's Office, Home For All, 21 Elements	Develop and roll out ADU Certificate program. Select loan program administrator via RFP, develop and roll out loan program. Complete extensive marketing and outreach to public. Share Certificate and Loan Program Best practices with other 20 County jurisdictions via 21 Elements and Home for All.	FY 18 and FY 19
Goal No. 23. Explore strategic partnerships with CDFI's, large regional employers, and investors to add to the financial resources available for the creation and preservation of deed-restricted affordable housing units.	Rapidly rising housing costs due to strong economy; Strong demand for housing from workers in San Francisco and San Jose	Regional cooperation related to addressing Disproportionate Housing Needs	San Mateo County DOH and HEART	Creation of leverage, acquisition, or other appropriate fund	Through FY 22
Goal No. 24. Improve access to high quality education opportunities for vulnerable students, particularly Latino and black children	Disparities in education for Latino and African American children	Access to high proficiency schools	Peninsula Partnership Leadership Council (includes San Mateo County Superintendent of Schools and Board of Supervisors, Silicon Valley Community Foundation, other partners) and ~300 funders	A) Pilot "Big Lift" initiative focused on improving educational attainment for pre-K through 3rd graders by focusing on: (1) sending kids to kindergarten who are ready to learn, (2) making sure they attend school regularly, (3) supporting learning at home, and (4) providing enriching summer experiences so they don't fall behind. Fulfill fundraising campaign of $50M (currently at $28M raised), complete proof of concept phase, evaluate continuation and expansion. B) Administer the Summer Learning Challenge program through the library system in order to a halt the "summer slide," or the loss in some of the achievement gains students made during the school year. The summer slide disproportionately affects students from families with low incomes.	FY 17-22
Goal No. 25. Caltrain as an independent agency will assume jurisdictional leadership in partnership with other agencies in the furtherance of the implementation of goals and objectives of Caltrain Strategic Plan FY 15-24	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain	Improve multimodal station access: 1) Develop a station access plan based on the Caltrain Access Policy Statement; 2) Reduce the incidence of "bike bumps" by complementing the bikes onboard program with improved capacity information and wayside improvements (e.g. secure parking and expanded bikeshare); 3) Pursue strategies that enhance first- and last-mile connections to stations. Improve connectivity to local and regional transportation systems: 1) Explore mutually beneficial ways to plan and coordinate services with local transit providers; 2) Prioritize partnerships and efforts related to key intermodal stations including the Transbay Transit Center, Millbrae and San Jose Diridon; 3) Improve physical, electronic and web-based intermodal way finding and transfer information; 4) Participate in and influence regional initiatives related to the integration of fares and payment, information systems and marketing	FY 24
Goal No. 26. Continue to convene meetings between SamTrans and disability advocates to discuss how to address barriers to transit access. Explore partnerships with private providers of transportation services to better address the transportation needs of persons with disabilities.	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Party: SamTrans, SamTrans Board, Citizens Advisory Committee, Paratransit Coordinating Council	The Citizens Advisory Committee and the Paratransit Coordinating Council will continue monthly reporting to the SamTrans Board regarding concerns raised during formal and informal meetings with the disability community. Needs of the disabled community will continue to be incorporated into all service and development planning.	Ongoing
Goal No. 27. Encourage transit-supportive development at and around transit and explore preferring or requiring development within Priority Development Areas (PDAs). Any transit agencies listed as a responsible party will assume jurisdictional leadership in partnership with other agencies in the furtherance of the goal(s).	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain, San Mateo County DOH, SamTrans, SMTA	Caltrain to: 1) Adopt a transit-oriented development policy; 2) Participate in and influence local station area planning efforts along the corridor; 3) Develop JPB real estate assets in a way that supports the system financially and operationally with local land use goals; 4) Develop land use policy. DOH to: 1) require that all developments eligible for County funding be located near transit and 2) Research including a requirement or preference for DOH-funded development projects to be located within a PDA, incorporating into future funding NOFAs if appropriate. SamTrans to develop land near the San Carlos Caltrain station as a mixed-used TOD with 202 dwelling units and commercial space.	Caltrain metrics: FY 15-24. DOH metrics: FY 17-18. SamTrans metrics FY 22.

FAIR HOUSING PLAN - San Mateo County (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 28 Strengthen ties between Housing and Transportation Agencies	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	San Mateo County DOH, C/CAG, MTC, County Manager's Office, Home for All, SamTrans, 21 Elements	County to convene Quarterly funding and pipeline meetings to discuss strategic partnerships	FY 18
Goal No. 29 Caltrain as an independent agency will assume jurisdictional leadership in partnership with other agencies to complete the Caltrain Business Plan	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	Caltrain, VTA, MUNI, SAMTRANS, MTC, Bay Area Council, Samceda, SVLG, and key local business leaders	The Caltrain Business Plan will form the framework for a 2020 ballot measure that seeks to resolve funding deficiencies at the railroad and will answer the following questions: * What infrastructure is needed to support that service ? * How much funding will be needed? * How should Caltrain be governed to successfully meet the region's need for expanded rail service? address the following issues: * How much service should Caltrain provide to accommodate our regional needs?	kickoff Workshop 9/20/2017. Complete by end of FY 19
Goal No. 30. SamTrans as an independent agency will assume jurisdictional leadership in partnership with other agencies to complete the SamTrans Business Plan	Challenges in accessing transit, especially for persons with disabilities	Access to transportation	SamTrans	The SamTrans Business Plan will form the framework for a ballot measure in 2018 to address funding deficiencies the agency is facing, particularly with respect to the need for new and more effective paratransit models. The plan will: 1) Build upon the SamTrans Strategic Plan and the SamTrans Short Range Transit Plan (SRTP) to enhance and complement them. 2. Incorporate the fundamentals of being a mobility manager, including everyday matters such as service planning and organizational management. 3. Encourage the agency to embrace an attitude of innovation as a mobility manager as it responds to a changing marketplace. This includes being open to: o Experimenting to find the right mix and type of services. o Exploring organizational improvements to position the District as a mobility manager.	Draft Plan to be submitted to Board in January 2018
Goal No. 31 Explore relevance of past and feasibility of future air quality studies	Poor air quality in many areas of the County	Access to environmentally healthy neighborhoods	County Office of Sustainability, Bay Area Air Quality Management District	County to meet with the Bay Area Air Quality Management District regarding past and future studies of air quality at Highway 101 and other congested roadways. Explore the feasibility and soundness of completing a study on this issue.	By end of FY 2018

FAIR HOUSING PLAN - Housing Authority of the County of San Mateo

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Maintain high voucher utilization rate	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	•Collaborate with affordable housing developers to secure additional project-based units, up to 35% of HACSM's voucher allocation. •Outreach to landlord community on an ongoing basis and host landlord event at least annually. •Allocate $250,000 for the Leasing Success Program to support housing locator services and landlord incentives. •Continue to host Renting Success workshops for voucher holders to prepare them in their housing search. •Continue to analyze subsidy calculation methodology	35% of HACSM's voucher allocation to be achieved by 2022.
Goal No. 2. Maintain high level of customer service	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	•Continue to work with program partners to provide resource assistance and guidance for customers. •Analyze survey data from the AFH to evaluate internal processes in order to provide more efficient services to voucher holders experiencing difficulty.	9/30/2018
Goal No. 3. Increase the subsidy calculation for Section 8 vouchers	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the County of San Mateo (HACSM)	HACSM implemented a new subsidy table effective 8/1/17. The new table increased subsidy amounts in all unit and income categories, averaging $309 per household, or 13.25% higher than the previous amounts.	8/1/2017

FAIR HOUSING PLAN - Daly City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more ownership housing with affordability restrictions to the supply of housing.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs; Gap in homeownership rate for African American and Hispanic households; Risk of losing ownership advantage for African American and Hispanic households as city gentrifies. Although Daly City has the smallest gap, there is a risk that the gap will increase if affordable ownership opportunities are not sustained	DCHCD (Daly City Housing & Community Development Division)	1. Enter into affordable housing agreements, per the City's Affordable Housing Ordinance, to require market rate developments of ownership housing to set aside and deed restrict up to 20% of the units for households at 120% AMI. 2. Develop up to 8 units with Habitat for Humanity affordable to households at 80% AMI.	1. 1-5 years; 2. 1-3 years
Goal No. 2. Add more rental housing with affordability restrictions to the supply of housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; High rates of denial of housing for African American and Hispanic households	DCHCD	Provide at least $2 million in City affordable housing funds to develop 50 rental units affordable to lower income households.	5 years
Goal No. 3. Preserve homeownership access. Daly City offers more equity in ownership across races than any other city.	Historic lack of credit; high housing prices; lack of ability to influence seller	Disproportionate housing needs: Risk of losing ownership advantage for African American and Hispanic households as city gentrifies	DCHCD	Downpayment assistance, silent second loans.	1-3 years
Goal No. 4. Fund rehabilitation and accessibility improvements for low income homeowners (< 80% AMI).	Lack of accessible housing; Housing built in period where split level, stairs, and small hallways were common	Disproportionate housing needs: 41% of residents with a household member with a disability need acessibility improvements	DCHCD	Rehab and provide accessibility improvements annually to 15 low income homeowners.	Annually during the next Consolidated Plan period; 75 households total
Goal No.5. Adopt zoning policies that incentivize lot mergers to facilitate residential developments.	Lack of flexibility in zoning code	Disproportionate housing needs	DC Planning	Lot merger incentive allowance incorporated into Zoning Ordinance	Completed by 2021
Goal No. 6 . Develop rental acquisition program.	Loss of affordable rentals; Lack of affordable housing supply; Displacement of low income residents due to rent increases; Conversion of existing naturally occurring affordable rentals to investment properties	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	DCHCD	Working with public and private sector partners, explore creation of a loan fund for rental property acquisition. Time the fund to take advantage of the properties owned by small, "mom and pop" landlords, who are aging.	Determination of feasibility completed in 2019
Goal No. 7 (regional). Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program and those willing to offer naturally occurring affordable rental housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	HACSM and San Mateo DOH and Daly City	Complete analysis and determine program feasibility	2018
Goal No.8 (regional). Continue efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	DCHCD, San Mateo County, Home for All	Participation in regional workshops and conferences to address barriers to affordable housing.	Annually
Goal No. 9. Maintain funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	DCHCD	Provide legal assistance annually to low income homeowners facing eviction. Provide fair housing counseling to 10 persons annually.	1-5 years

FAIR HOUSING PLAN - Daly City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal. No. 10 (regional). Strengthen utilization of Section 8 program. Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of Daly City staff	Collaborate with County Housing Authority and other local jurisdiction staff to review current practices and potential options. Complete analysis and determine program feasibility .	Ongoing
Goal No. 11. Consider implementation of fair housing audit program	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: displacement of residents	City of Daly City staff	Collaborate with other jurisdictions and evaluate costs and benefits of a fair housing audit program	Submit fiindings to City Council by September 2018.

FAIR HOUSING PLAN - Redwood City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. (also regional) Add affordable housing to the market. Prioritize housing that accommodates families (larger units).	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City, San Mateo County	Implement polices that produce estimated 50 affordable housing units from sources such as Affordable Housing Fund, CDBG and HOME Funds on an annual basis.	Estimated completion by December 2020
Goal No. 2. Support the development of affordable senior housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City	Produce 100 units of affordable housing for very-low income seniors.	Estimated completion by December 2021
Goal No. 3. Prioritize acquisition and new construction of special needs housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs	City of Redwood City	Produce 50 units of affordable housing for low income disabled adults.	Estimated completion by September 2018
Goal 4. Continue to fund rehabilitation and accessibility improvements for low income homeowners to preserve existing affordable housing.	Lack of accessible housing	Disproportionate housing needs: 30% of residents with a household member with a disability need accessibility improvements.	City of Redwood City, nonprofit organizations	Continue to fund the City's Home Improvement Loan Program that assists low-income homeowners and property owners. Assist no less than 10 units annually with rehabilitation and improvements through the City program and/or minor home repair programs.	Annual contingent on continued HUD funding allocations
Goal 5 (regional) .Continue supporting organization(s) that provide outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of Redwood City, San Mateo County	City to provide referrals and continue to support organizations that provide legal assistance, landlord tenant mediation and outreach, education and fair housing audits. Collaborate to collect data on displacements.	1-5 years
Goal 6. Ensure affirmative marketing of City assisted affordable housing is targeted to all segments of the community.	Lack of awareness of effective affirmative marketing strategies	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of Redwood City	Continue to collaborate with developers of affordable housing projects during final phase of construction to develop effective affirmative marketing plans. Encourage marketing in Spanish.	Varies with project.
Goal 7. (regional) Support and engage in efforts to educate community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of Redwood City, San Mateo County, Home for All, Housing Leadership Council	Apply to County Community Engagement Pilot Program and participate in Countywide Home For All "Learning Network" to share best practices. Participation in regional workshops and conferences to address barriers to affordable housing.	Submit application to County program by Summer 2017 and ongoing with Learning Network.
Goal 8. (regional) Encourage development of Accessory Dwelling Units (ADU) to increase lower cost housing in the community.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	City of Redwood City	Review Accessory Dwelling Units production annually and continue collaboration with 21 Elements to develop programs to encourage production of units.	Ongoing
Goal 9. (regional) Minimize displacement of low income renters, and increase units available to them. Regional: Analyze lessons learned from pilot programs regarding successes and challenges of preserving rental housing at risk of redevelopment and rent increases.	Loss of affordable housing; Displacement of residents	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households	City of Redwood City, County of San Mateo	Continue efforts to develop polices for displacement, such as minimum lease terms, first right to refusal and relocation assistance. Explore programs to incentivize Section 8 landlords.	Ongoing

FAIR HOUSING PLAN - San Mateo City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more City supported housing with affordability restrictions to the market.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	1) Bay Meadows Project-68 units 30-50% AMI 2)Select developer to provide a range of affordable housing units as part of mixed use/income project on City owned Downtown former RDA sites.	1) Bay Meadows completion by December 2019. (17 large family units, 12 disabled veterans units) 2) Downtown site completion by December 2021.
Goal No.2. Attempt to distribute affordable housing units throughout the City and encourage mixed income developments.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Community Development	Require all new housing projects in excess of 11 units provide affordable inclusionary units scattered within project.	Affordability agreement executed as condition of building permit.
Goal 3. Ensure affirmative marketing of City assisted affordable housing is targeted to all segments of the community.	Lack of awareness of effective affirmative marketing strategies	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	Develop Marketing Plan with developers of affordable housing projects during final phase of construction. Focus outreach to those least likely to apply based on racial make-up of neighborhood. Include Spanish marketing materials and ensure bilingual interpration services are available.	Varies with project.
Goal No. 4. Prioritize acquisition and new construction of housing that accommodates families (larger units) when possible.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	City of San Mateo Housing Division	1) Bay Meadows Project-requires 25% 3 BR units (17 units) 2)Review City Council Resolution to establish Community Priority for large bedroom units, which allows developer to provide fewer BMR units in exchange for units with more bedrooms.	1) Bay meadows completion by December 2018. 2) Annual Council BMR resolution adopted upon publication of California median income
Goal 5. Fund minor home repairs and accessibility improvements for low and moderate income homeowners. Allow accessiblity improvements on rental properties with owner permission.	Lack of accessible housing	Disproportionate housing needs: Percent of residents with a household member with a disability needing accessibility improvements is lowest in San Mateo City; this hopes to preserve that.	Sub contractors to City of San Mateo (CIID, Rebuilding Together, El Conciio)	Annual Goal: 10 Accessible units and 32 Minor Home Repair units.	Annual Goal completed each year by June 30.
Goal 6. Adopt additional development review practices that facilitate housing creation including streamlining reviews.	Challenges with development approval process; Lack of support for affordable housing creating barriers to approval	Disproportionate housing needs	City of San Mateo Building Division	Draft guidelines for concurrent Planning Plan Check and Buidling Permit Check process to speed up approval process to begin construction.	Complete Guidelines by December 2017.
Goal 7. (regional) Support and engage in efforts to education community stakeholders and residents about housing gaps and the effects of programs and policies on addressing those gaps.	Lack of support for housing; suburban scale communities resistant to added density; frustration with recent growth implications	Lack of support for affordable housing	City of San Mateo Community Development Department	1)Continue Community engagement process for Downtown Specific Plan Update. 2) Develop Coummunity Engagement process for General Plan update. 3) Participate in Countywide Home For All "Learning Network" to share best practices	1) Continue Downtown outreach efforts throuugh December 2017. 2) Discuss project scope and timeline at Council Study Session by December 2017. 3) TBD as
Goal 8 (regional).Strengthen utilization of Section 8 program. Explore a multifamily rehabilitation and accessibility improvement program to provide an incentive for landlords to remain in the HCV program.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing	1) Collaborate with County Housing Authority staff to review current practices and potential options. Complete analysis and determine program feasibility . 2) Explore Section 8 nondiscrimination policy.	1) Ongoing 2) Submit findings to City Council by June 2018.
Goal 9. Assist with the retention of special needs housing that is at risk of expiring affordability requirements.	Loss of affordable housing; Displacement of residents; Lack of accessible housing	Disproportionate housing needs; lack of support for special needs housing	City of San Mateo Housing	Outreach and negotiate with Mateo Lodge for affordability extenisons for Humboldt House (9 units)	Execute extension by January 2020.
Goal 10. (regional) Continue funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	Sub Contractors to City of San Mateo (Project Sentinel, Legal Aid)	Annual Fair Housing Activity Goals: Investigate 23 cases, Provide R & I 45 individuals, Public Education/ Outreach 100 individuals. Annual legal assistance to renters: 125 individuals	Annual Goal completed each year by June 30.

FAIR HOUSING PLAN - San Mateo City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal 11. Continue implementation of City Reasonable Accommodation Policy to allow for relaxation of City zoning codes on residential properties used by persons with disabilities.	Lack of flexibility in zoning code	Disproportionate housing needs: Lack of accessible housing for persons with disabilities	City of San Mateo Planning	Review requests for Reasonable Accommodations as they are submitted.	Ongoing
Goal 12. (regional) Encourage development of Accessory Dwelling Units (ADU) and Junior Accessory Dwelling Units (JADU) to increase lower cost housing in the community.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	City of San Mateo Planning	1)Review pilot ADU/JADU fee reduction after one year. 2)Continue collaboration with 21 Elements to develop programs to encourage production of ADU's.	1) Review June 2018 2) Ongoing
Goal 13. Minimize tenant displacement. Explore programs to preserve properties with under market rents at risk of redevelopment and rent increases.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Lack of accessible housing for persons with disabilities; Limited housing for families	City of San Mateo Housing Division	Collaborate with other countywide jurisdictions. Complete analysis and determine feasiblity.	Submit findings to City Council by December 2018.
Goal 14. Gather data regarding local rents and rent increases.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: displacement of residents	City of San Mateo Housing Division	Evaluate gaps in current rental data and determine approach to collect that data.	Submit fiindings to City Council by September 2018.

FAIR HOUSING PLAN - South San Francisco City

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. Add more publicly supported housing--housing with affordability restrictions--to the market. Prioritize housing that accommodates families (larger units)	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	The City shall implement zoning to ensure there is an adequate supply of land to meet its 2014 to 2022 ABAG Regional Housing Needs Allocation (RHNA) of 565 very low income units, 281 low income units, 313 moderate income units, and 705 above moderate income units.	Zoning implemented with in the 2014 Housing Element. Upcoming project in the City includes the Rotary Project for Senior Housing with 80 units. City will continue to look for opportunities to support additional units, including units suitable for families.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies		Vacant and Underutilized Land Inventory: The City shall periodically update its inventory of vacant and underutilized parcels identified in this Housing Element. The City shall also conduct a periodic review of the composition of the housing stock, the types of dwelling units under construction or expected to be constructed during the following year, and the anticipated mix, based on development proposals approved or under review by the City, of the housing to be developed during the remainder of the period covered by the Housing Element. This analysis will be compared to the City's remaining 2014-2022 Regional Housing Needs Allocation (RHNA) to determine if any changes in land use policy are warranted.	The land inventory was completed with adoption of the 2014 Housing Element, and will be revisited and updates prior to 2023. The City will continue to annually evaluate and report to the State on the number of new units built and how many units meet the criteria for lower income RHNA.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development/Planning	The City shall continue to implement the Inclusionary Housing Ordinance. Inclusionary Housing Ordinance: The City shall continue to implement the Inclusionary Housing Ordinance, in accordance with State law, requiring new for sale residential development over four units to provide a minimum of twenty (20) percent low- and moderate-income housing. Inclusionary Housing Ordinance Review: The City shall periodically review the success of the Inclusionary Housing Ordinance, SSFMC 20.380, to determine if the objectives of the ordinance are being met. Consideration shall be made to revising provisions of the ordinance to ensure that a range of housing opportunities for all identifiable economic segments of the population, including households of low-and moderate incomes, are provided.	Ongoing. The City requires all new development to include a minimum of 20 percent low and moderate housing. The City will assess the Inclusionary Ordinance performance as part of the annual Housing Element report, and will evaluate if revisions are needed at that time.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	As feasible, the City will investigate new sources of funding for the City's affordable housing programs. Investigate Commercial and Housing Linkage Fee: Through participation in the 21 Elements group, the City will investigate the feasibility of commercial and housing linkage fees to support affordable housing.	Ongoing: The City will continue exploring opportunities to support affordable housing. By 2022 City expects to investiage the feasibility of including commercial and housing linkage fees and will evauate any necessary updates.
	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division and Planning Division; Planning Commission; City Council	The City shall work with for-profit and non-profit developers to promote the development of housing for extremely low-, very low-, and lower-income households. Site Acquisition: The City shall work with for-profit and nonprofit housing developers to acquire sites that are either vacant or developed with underutilized, blighted, and/or nonconforming uses for the development of affordable housing. As needed, the City will meet with developers to discuss and identify development opportunities and potential funding sources. Support and Pursue Funding Applications for Affordable Housing: Consistent with existing practice, the City shall continue to support funding applications	Ongoing: The City actively explores opportunities to cooperate with for-profit and non-profit developers and will continue to support funding applications.

FAIR HOUSING PLAN - South San Francisco City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal 2. Fund minor home repairs and accessibility improvements for low and moderate income homeowners. Allow accessiblity improvements on rental properties with owner permission.	Lack of accessible housing; Loss of naturally occurring affordable housing	Disproportionate housing needs; Displacement; Percent of households in SSF that need accessibility improvements is 45%	Department of Economic and Community Development	Encourage reinvestment in older residential neighborhoods and rehabilitation of housing, especially housing for very low-, low- and moderate-income households. As appropriate, the City shall use local, State, and Federal funding assistance to the fullest extent these subsidies exist to facilitate housing rehabilitation. Minor Home Repair: The City will provide funds to non-profit organizations providing free minor home repairs to assist extremely low- to low-income homeowners to bring houses into a good state of repair and maintain them as viable units in the local housing stock. Funding Prioritization: The City shall continue to give housing rehabilitation efforts high priority in the use of Community Development Block Grant (CDBG) funds. Funds shall be targeted towards older housing stock and to families earning less than 80 percent of AMI. Low Interest Loans for Housing Rehabilitation: The City shall provide low-interest loans for rehabilitation of single-family and multi-family housing by supporting the City's Housing Rehabilitation Program with continued CDBG funding.	Ongoing: Take goals out of Action Plan - Take carry this on through action plan.. Got providers
Goal 3. Preserve opportunity to meet transitional and emergency housing needs through SRO housing.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development	Financial Assistance for SROs: The City shall provide financial assistance, when feasible, for physical improvements to existing boarding rooms and Single Room Occupancies in the Downtown area.	Ongoing: The City continues to coordinate with the Continuum of Care (COC) to engage with the community and look for opprotunities for financial assistance opportunities to help SRO development. The City shall coordinate with the County on such opportunities throughout the year.
Goal 4 (regional). Prevent displacement of households.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Displacement	Department of Economic and Community Development	The City shall support the preservation of public affordable housing stock. Support SSF Public Housing Authority (PHA): The City shall support the South San Francisco PHA in its continued operation and rental of 80 units of public housing. Examine Displacement of Affordable Housing and Lower-Income Households: The City shall coordinate with other jurisdictions in San Mateo County, under the umbrella of work to be undertaken by 21 Elements, to quantify, develop and evaluate potential strategies to address displacement of lower income residents. The City will use this analysis, in addition to other analysis, to develop potential measures and programs and the City will implement those programs, as it considers and deems appropriate, to address the risk of displacement of existing lower income residents. Displacement might be direct, caused by the redevelopment of sites with existing residential properties, or indirect, caused by increased market rents as an area becomes more desirable. The City shall monitor any such implemented programs annually for effectiveness and make adjustments as necessary.	The City will continue to support the SSF PHA to reserve public affordable housing stock. The City will participate, as feasible, with the San Mateo County regional housing displacement analysis and strategies, throught the 21 Elements.
Goal No. 5. Facilitate development of secondary units.	Loss of affordable housing; Lack of affordable housing supply; High housing costs; Lack of flexibility in zoning code	Disproportionate housing needs; Displacement		The City shall support and facilitate the development of second units on single-family designated and zoned parcels. Continue to support the development of secondary dwelling units and educate the community about this program: Actively promote community education on second units, as permitted in SSFMC 20.350.035, by posting information regarding second units on the City's website and providing brochures at the public counter in the Centralized Permit Center.	Ongoing. The City will review current planning and zoning ordinances to make sure they comply with current state ADU regulations. The City w ill track and explore opportunities to encourage additional development. Information will be available at the Public Counter and online.

FAIR HOUSING PLAN - South San Francisco City (Continued)

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 6. (regional). Participate in and support regional efforts to address housing needs.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Segregation increases; Decline in Access to Opportunity (depending on ADU locations)	Department of Economic and Community Development - Economic Development and Housing Division	THE CITY OF SOUTH SAN FRANCISCO WILL TAKE NECESSARY STEPS TO REMOVE GOVERNMENT AND PUBLIC INFRASTRUCTURE CONSTRAINTS TO HOUSING DEVELOPMENT THROUGH ADMINISTRATIVE SUPPORT, INTERGOVERNMENTAL COOPERATION, PUBLIC-PRIVATE PARTNERSHIPS, AND PERMIT STREAMLINING. The City shall continue to cooperate with other governmental agencies and take an active interest in seeking solutions to area-wide housing problems. The City supports efforts such as the San Mateo County Sub RHNA effort, which seeks to bring the 21 jurisdictions of San Mateo County together to address common housing and planning needs. Support regional funding programs: The City shall continue to participate with other government agencies to support regional funding programs, such as participating with San Mateo County in its Housing Revenue Bond and Mortgage Credit Certificate programs.	Ongoing: The City will continue to participate with the San Mateo 21 Elements to address common housing and planning needs. Will continue to participate and cooperate and explore opportunities with the MCCP.
Goal No. 7. Promote equity in housing choice.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; discrimination in the housing market	Department of Economic and Community Development - Economic Development and Housing Division	SOUTH SAN FRANCISCO VALUES DIVERSITY AND STRIVES TO ENSURE THAT ALL HOUSEHOLDS HAVE EQUAL ACCESS TO THE CITY'S HOUSING RESOURCES. The City will work to eliminate on a citywide basis all unlawful discrimination in housing with respect to age, race, sex, sexual orientation, marital or familial status, ethnic background, medical condition, or other arbitrary factors, so that all persons can obtain decent housing. Support Equal Housing Opportunity Laws: The City shall require that all recipients of locally-administered housing assistance funds and other means of support from the City acknowledge their understanding of fair housing law and affirm their commitment to the law. The City shall provide materials to help with the understanding of and compliance with fair housing law.	Ongoing. The City continues to support fair housing entities such as Project Sentinel, Legal Aid and other groups to help ensure fair housing practices on a city wide basis. The CIty will work with fair housing entities to educate tenants, landlords, and the community on fair housing practicies through workshops and classes.
Goal No. 8. Continue funding and support for outreach services for homeowners and renters at risk of being displaced and/or facing fair housing challenges.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs: Displacement due to rent increases for Spanish speaking and large households; Limited housing for families	Department of Economic and Community Development - Economic Development and Housing Division	The City shall provide fair housing information and referrals regarding fair housing complaints, tenant-landlord conflicts, habitability, and other general housing assistance. Legal Counsel and Advocacy Assistance: The City shall support non-profits providing legal counseling and advocacy assistance concerning fair housing laws, rights, and remedies to those who believe they have been discriminated against. Persons requesting information or assistance related to housing discrimination are referred to one or more fair housing groups for legal services. Consistent with existing practice, brochures providing information on fair housing and tenants' rights are available at City Hall, public libraries and on the City's website. The brochures are also available at nonprofit organizations serving low-income residents. The brochures are available in English and Spanish. As funding allows, the City shall provide funding assistance to organizations that provide fair housing, tenant/landlord, and habitability counseling and other general housing assistance.	Ongoing. The City continues to support fair housing entities such as Project Sentinel, Legal Aid and other groups to help ensure fair housing practices on a city wide basis. The CIty will work with fair housing entities to educate tenants, landlords, and the community on fair housing practicies through workshops and classes.
Goal No. 9. Collaborate with other jurisdictions to explore the development of a database for rentals, track displacement and evaluate the benefits of implementing fair housing audits.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; discrimination in the housing market	Department of Economic and Community Development - Economic Development and Housing Division	The City understands the importance of collecting data on displacement and the need for tracking rental data . However it currently does not have the resources to implement this effort and will work with other jurisidctions on exploring and partnering on such a database and evaluating the benefits implementing fair housing audits. .	Ongoing
Goal No. 10. Explore ways to retain under below-market rental units.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division	The City shall monitor its supply of subsidized affordable housing to know of possible conversions to market rate, including taking the following actions: a. Publicize existing State and federal notice requirements to nonprofit developers and property owners of at-risk housing. b. Respond to any federal and/or State notices including Notice of Intent to Pre-Pay, owner Plans of Action, or Opt-Out Notices filed on local projects.	Ongoing
Goal No. 11. The City will explore and evaluate the merits and effectiveness of rent stabilization and just cause policy in South San Francisco.	Loss of affordable housing; Lack of affordable housing supply; High housing costs	Disproportionate housing needs; Risk of losing affordable housing as the city gentrifies	Department of Economic and Community Development - Economic Development and Housing Division	The City will identify and complete a process to evaluate the merits and effectiveness of a rent stabilization and just cause policy in South San Francisco.	Ongoing

FAIR HOUSING PLAN - South San Francisco City Housing Authority

FAIR HOUSING GOAL	CONTRIBUTING FACTORS TO BE ADDRESSED BY GOAL	FAIR HOUSING ISSUES/IMPEDIMENTS	RESPONSIBLE PARTY	METRICS AND MILESTONES	TIMEFRAME FOR ACHIEVEMENT
Goal No. 1. To Promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination and violence.	Lack of affordable housing; Displacement of residents; Growing importance of publicly-supported housing as the only affordable option for some residents	Disproportionate housing needs: African American and Hispanic renters are disproportionately housed in publicly-supported housing due to historic and current discrimination, low wages	Housing Authority of the City of South San Francisco (HASSF)	•Replaced failed windows in 18 units, replaced 8 damaged sprinklers, 2 timeclocks, 3 valves, annually prune and fertilize property trees since 2015. •Inspect all units annually.	•30% of the Goals and Objectives have been achieved for our 5-Year Plan.

RESOLUTION NO. 075455

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA

* * * * * *

RESOLUTION APPROVING THE DEPARTMENT OF HOUSING FAIR HOUSING GOALS AND PUBLIC COMMENT RESPONSES TO BE INCLUDED IN THE FINAL SAN MATEO COUNTY REGIONAL ASSESSMENT OF FAIR HOUSING PURSUANT TO THE AFFIRMATIVELY FURTHERING FAIR HOUSING FINAL RULE, PUBLISHED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT IN JULY 2015

RESOLVED, by the Board of Supervisors of the County of San Mateo, State of California, that

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") published a final rule on Affirmatively Furthering Fair Housing (24 C.F.R. § 5.154) ("AFFH") in July 2015 to establish a process for recipients of HUD funding to help them meet their long-standing obligations to affirmatively further fair housing by performing an Assessment of Fair Housing ("AFH"); and

WHEREAS, the AFH refers to the analysis undertaken pursuant to the AFFH Rule that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and that must be conducted and submitted to HUD using the AFFH Assessment Tool; and

WHEREAS, the County of San Mateo, the Housing Authority of the County of San Mateo, the Housing Authority of the City of South San Francisco, and the Cities of Daly City, Redwood City, San Mateo and South San Francisco are subject to the AFFH Final

Rule and entered into an agreement to prepare an AFH for the entire San Mateo County region in compliance with the AFFH Final Rule; and

WHEREAS, the County contracted with BBC Research and Consulting to prepare the Regional AFH, including completing the analysis of HUD-provided data and local data, engaging in extensive community outreach, and presenting the draft AFH at a public hearing before the Board of Supervisors on July 25, 2017; and

WHEREAS, some of the primary fair housing issues identified in the draft AFH included: a severe lack of affordable housing, a dearth of housing for families – both privately provided and publicly supported, African American Hispanic households with almost half the home ownership rate of White and Asian households, higher rates of denial and housing discrimination for African American and Hispanic residents, highest rate of segregation for African Americans, and less access for African American and Hispanic children to quality schools; and

WHEREAS, DOH has since revised the draft AFH to incorporate feedback and comments received from the public since the hearing on July 25, 2017;

WHEREAS, DOH intends to use the goals identified for the Final AFH as guidelines for defining policy priorities and allocating future agency funding;

WHEREAS, DOH presents these Fair Housing Goals and Public Comment Responses to the Board of Supervisors for its approval because the Final AFH will be incorporated into the County's Consolidated Plan, which will then be adopted by the Board, and DOH must submit its endorsement of the Final Regional AFH to HUD by October 4, 2017; and

NOW THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Supervisors, County of San Mateo, State of California, hereby adopts this resolution: approving the Department of Housing Fair Housing Goals and Public Comment Responses to be included in the San Mateo County Regional Assessment of Fair Housing pursuant of the Affirmatively Furthering Fair Housing Final Rule, published by the U.S. Department of Housing and Urban Development in July 2015.

* * * * * *

RESOLUTION NUMBER: 075455

Regularly passed and adopted this 26th day of September, 2017

AYES and in favor of said resolution:

Supervisors: *DAVE PINE*

CAROLE GROOM

DON HORSLEY

WARREN SLOCUM

DAVID J. CANEPA

NOES and against said resolution:

Supervisors: *NONE*

President, Board of Supervisors
County of San Mateo
State of California

Certificate of Delivery

I certify that a copy of the original resolution filed in the Office of the Clerk of the Board of Supervisors of San Mateo County has been delivered to the President of the Board of Supervisors.

Deputy Clerk of the Board of Supervisors

RESOLUTION NO. 075456

BOARD OF SUPERVISORS, COUNTY OF SAN MATEO, STATE OF CALIFORNIA, ACTING AS THE GOVERNING BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO

* * * * * *

RESOLUTION APPROVING THE HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO FAIR HOUSING GOALS AND PUBLIC COMMENT RESPONSES TO BE INCLUDED IN THE SAN MATEO COUNTY REGIONAL ASSESSMENT OF FAIR HOUSING PURSUANT TO THE AFFIRMATIVELY FURTHERING FAIR HOUSING FINAL RULE, PUBLISHED BY THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT IN JULY 2015

RESOLVED, by the Board of Commissioners for the Housing Authority of the County of San Mateo, State of California, that

WHEREAS, the U.S. Department of Housing and Urban Development ("HUD") published a final rule on Affirmatively Furthering Fair Housing (24 C.F.R. § 5.154) ("AFFH") in July 2015 to establish a process for recipients of HUD funding to help them meet their long-standing obligations to affirmatively further fair housing by performing an Assessment of Fair Housing ("AFH"); and

WHEREAS, the AFH refers to the analysis undertaken pursuant to the AFFH Rule that includes an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals, and that must be conducted and submitted to HUD using the AFFH Assessment Tool; and

WHEREAS, the County of San Mateo, the Housing Authority of the County of San Mateo (HACSM), the Housing Authority of the City of South San Francisco, and the Cities of Daly City, Redwood City, San Mateo and South San Francisco are subject to the AFFH

Final Rule and entered into an agreement to prepare an AFH for the entire San Mateo County region in compliance with the AFFH Final Rule; and

WHEREAS, the County of San Mateo contracted with BBC Research and Consulting to prepare the Regional AFH, including completing the analysis of HUD-provided data and local data, engaging in extensive community outreach, and presenting the draft AFH at a public hearing before the County of San Mateo Board of Supervisors on July 25, 2017; and

WHEREAS, some of the primary fair housing issues identified in the draft AFH included: a severe lack of affordable housing, a dearth of housing for families – both privately provided and publicly supported, African American Hispanic households with almost half the home ownership rate of White and Asian households, higher rates of denial and housing discrimination for African American and Hispanic residents, highest rate of segregation for African Americans, and less access for African American and Hispanic children to quality schools; and

WHEREAS, HACSM has since revised the draft AFH to incorporate feedback and comments received from the public since the hearing on July 25, 2017; and

WHEREAS, HACSM intends to use these goals identified for the Final AFH as guidelines for defining policy priorities and allocating future agency funding; and

WHEREAS, HACSM presents these Fair Housing Goals and Public Comment Responses to the Board of Commissioners for the Housing Authority of the County of San Mateo for its approval because these goals and public comment responses will be

incorporated into the Final AFH and County must submit its endorsement of the Final Regional AFH to HUD by October 4, 2017; and

NOW THEREFORE, IT IS HEREBY DETERMINED AND ORDERED that the Board of Commissioners for the Housing Authority of the County of San Mateo, State of California, hereby adopts this resolution: approving The Housing Authority of the County of San Mateo Fair Housing Goals and Public Comment Responses to be included in the San Mateo County Regional Assessment of Fair Housing pursuant of the Affirmatively Furthering Fair Housing Final Rule, published by the U.S. Department of Housing and Urban Development in July 2015.

* * * * * *

RESOLUTION NUMBER: 075456

Regularly passed and adopted this 26th day of September, 2017

AYES and in favor of said resolution:

Supervisors: *DAVE PINE*

CAROLE GROOM

DON HORSLEY

WARREN SLOCUM

DAVID J. CANEPA

NOES and against said resolution:

Supervisors: *NONE*

President, Board of Supervisors
County of San Mateo
State of California

Certificate of Delivery

I certify that a copy of the original resolution filed in the Office of the Clerk of the Board of Supervisors of San Mateo County has been delivered to the President of the Board of Supervisors.

Deputy Clerk of the Board of Supervisors

APPENDIX A.

Community Engagement

APPENDIX A.
Community Engagement

This Appendix summarizes the findings from community engagement that informed the AFH development. A detailed description of outreach methods and stakeholder consultation is found in Section III. This Appendix is meant to serve as a standalone summary of the AFH community engagement, as such it includes content also found in Section V.

Outreach Activities

The San Mateo County Regional AFH's community participation process resulted in meaningful engagement of more than 4,000 residents and stakeholders representing local organizations and coalitions.

Methods of engagement. The regional AFH engagement methods included opportunities for residents and opportunities for stakeholders to participate in the development of the AFH. Resident opportunities included:

- **Resident survey.** The resident survey was available in online and postage-paid printed formats. Residents could take the survey in English, Spanish, Chinese and Tagalog[1].

- **Resident focus groups.** BBC facilitated four resident focus groups—one in Spanish; one with Filipino residents; a group with Section 8 voucher holders, including Moving to Work participants; and a focus group with residents with disabilities. Project Sentinel staff facilitated a focus group with African American residents. Refreshments and interpreters were provided and children were welcome to attend. (A search for a child care provider to attend the Spanish language focus group was not successful.) Focus groups were held at locations on days of the week and times of day recommended by local stakeholders who recruited and hosted the groups. Community Legal Services of East Palo Alto (CLESPA) provided $20 grocery gift cards to participants in the Spanish language, Filipino and Section 8 focus groups.

  The study team would like to sincerely thank the Center for Independence of Individuals with Disabilities in San Mateo County, Legal Aid of San Mateo County, Community Legal Services in East Palo Alto, Pilipino Bayanihan Resource Center, Faith in Action Bay Area and El Comité de Vecinos for recruiting and hosting the resident focus groups, identifying locations and referring the team to child care providers and interpreters.

[1] The resident survey was open to anyone interested in participating and distribution and promotion focused on members of protected classes and residents most likely to be vulnerable to housing discrimination. This means that the results are based on non-probability sampling methods. Unlike a statistically valid, random probability sample, the results from the online survey are not necessarily representative of San Mateo County residents. However, the large number of responses yields a robustness to the results that minimizes error around the estimates is representative of the types of residents who responded.

- **Open house community meetings.** Two open house community meetings—one in Daly City and one in North Fair Oaks—were held on Saturday, June 17, 2017. The events were a drop-in open house format featuring a scrolling presentation of information about the AFH and the HUD AFFH-T maps; activities for telling residents' housing stories and an exercise to prioritize desired outcomes of increased fair housing choice and access to opportunity in the region. Interpreters for Spanish, Mandarin and Tagalog speakers were available. Child care and food were provided. Project Sentinel and Legal Aid Society of San Mateo County staffed information tables and provided information about their services. Project Sentinel supplied a door prize given away to a randomly selected attendee in a drawing.

- **Public hearing.** On July 25, 2017, prior to the release of the draft AFH on August 1, 2017, San Mateo County, as the lead jurisdiction, held a public hearing before the Board of County Supervisors that included a detailed presentation of the AFH process, results, fair housing issues identified, and contributing factors.

- **Town hall.** On September 12, 2017 Supervisors Warren Slocum and David Canepa of the San Mateo County Board of Supervisors organized and hosted an event in North Fair Oaks in order to hear directly from residents about their fair housing issues. Approximately 60 residents attended the evening meeting and shared their experiences and concerns with the Supervisors and their staff. Interpretation services were provided in Spanish as many of the residents were native Spanish-speakers. Snacks and childcare were also provided.

Stakeholders had the opportunity to consult and participate in the community engagement process. Activities included advising the AFH team on resident engagement; participating in a stakeholder kickoff meeting that included discussion of fair housing issues; and participating in focus groups for housing developers and landlords. The California Apartment Association's Tri-County Division (CAA Tri-County) developed and deployed a survey for rental property owners and managers in San Mateo County to support development of the AFH; 150 participated in the survey and CAA Tri-County shared the results with the AFH team.

Community Engagement in a Box. BBC developed a Community Engagement in a Box tool for use by stakeholders to build capacity to engage their clients, consumers and coalition members in the AFH process through promoting and distributing the resident survey, facilitating AFH conversations and focus groups, sharing the AFFH-T maps and using all of the community engagement tools available to AFH participating jurisdictions. Interested stakeholders could request a Box which included printed surveys in each of the four languages; flyers promoting the online survey, a booklet of AFFH-T maps and instructions for interpreting the maps; and a community conversations discussion guide. BBC facilitated a webinar for participating stakeholders and mailed CE Boxes to 10 organizations.

Partner outreach. Local stakeholders, including organizations, agencies and coalitions, promoted the AFH survey directly to their members, residents, consumers and clients. Using the Community Engagement in a Box tools, stakeholder outreach to traditionally underrepresented populations, particularly residents with limited English proficiency, was extremely effective. As described above, local partners hosted and recruited focus groups ensuring that the most difficult to reach populations had a voice in the AFH development.

Stakeholder Consultation Summary

Figure A-1 recognizes the organizations, agencies and coalitions that participated in making the regional AFH community participation process a success. In addition to lending their subject-matter expertise to the AFH development, participating organizations promoted resident engagement opportunities to their clients, consumers and coalition members, tirelessly distributing surveys, recruiting focus group participants, and encouraging residents to attend the community open house events. Not all organizations that contributed to resident outreach are recognized in Figure A-1; participating organizations were identified through sign-in sheets, webinar participants, and other communications.

Figure A-1.
Participating Stakeholder Organizations

Stakeholder Consultation Participating Organizations	
AFT Local 1481	Migrante-Northern San Mateo County
AFT Local 3267	National Hispanic Organization of Real Estate Associates
Bay Area Legal Aide	National Housing Law Project
Brilliant Corners	North Fair Oaks
California Apartment Association Tri-County Division	Peninsula Conflict Resolution Center
Center for Independence of Individuals with Disabilities	Project Sentinel
Community Legal Services of East Palo Alto	Public Advocates
Community Overcoming Relationship Abuse	Rebuilding Together Penninsula
El Comité de Vecinos	Samiritan House
Faith in Action	San Mateo County Union Community Alliance
Habitat for Humanity Greater San Francisco	San Mateo County Health System
HELP	Urban Habitat
HIP Housing	VA Palo Alto
Home and Hope	Woodland Park Communities
Housing Leadership Council	Youth United for Community Action
Legal Aid of San Mateo County	

Note: Participating organizations were identified through stakeholder kickoff meeting sign-in sheets, receipt of Community Engagement in a Box materials or webinar participation, participation in conference calls, focus group hosts or recruiting support and as signatories to communications providing guidance for the community engagement process. As such, some organizations that participated in the AFH development may not be recognized in Figure III-1.

Source: BBC Research & Consulting.

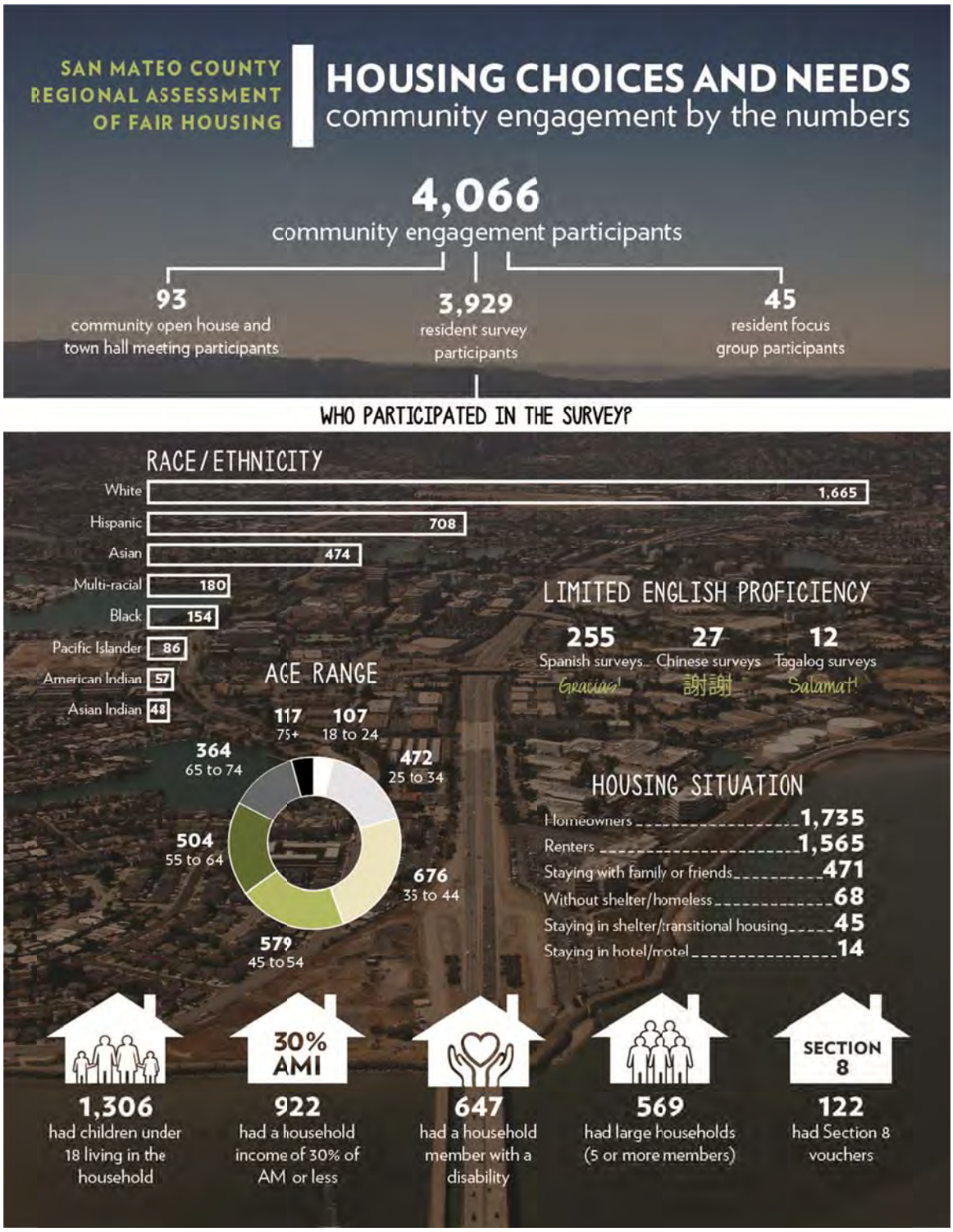
Resident Public Participation Summary

More than 4,000 residents participated in the AFH community engagement process. Figure A-2 summarizes the successful AFH community participation process which engaged traditionally underserved residents in the development of the AFH. Some highlights of community engagement include participation by:

- More than 1,700 people of color;
- More than 300 people with limited English proficiency who participated in Spanish, Chinese or Tagalog;
- More than 900 households with incomes less than 30 percent of AMI;

- Nearly 570 large families;
- More than 647 households that include a member with a disability;
- More than 1,300 families with children under the age of 18; and
- More than 100 Section 8 voucher holders.

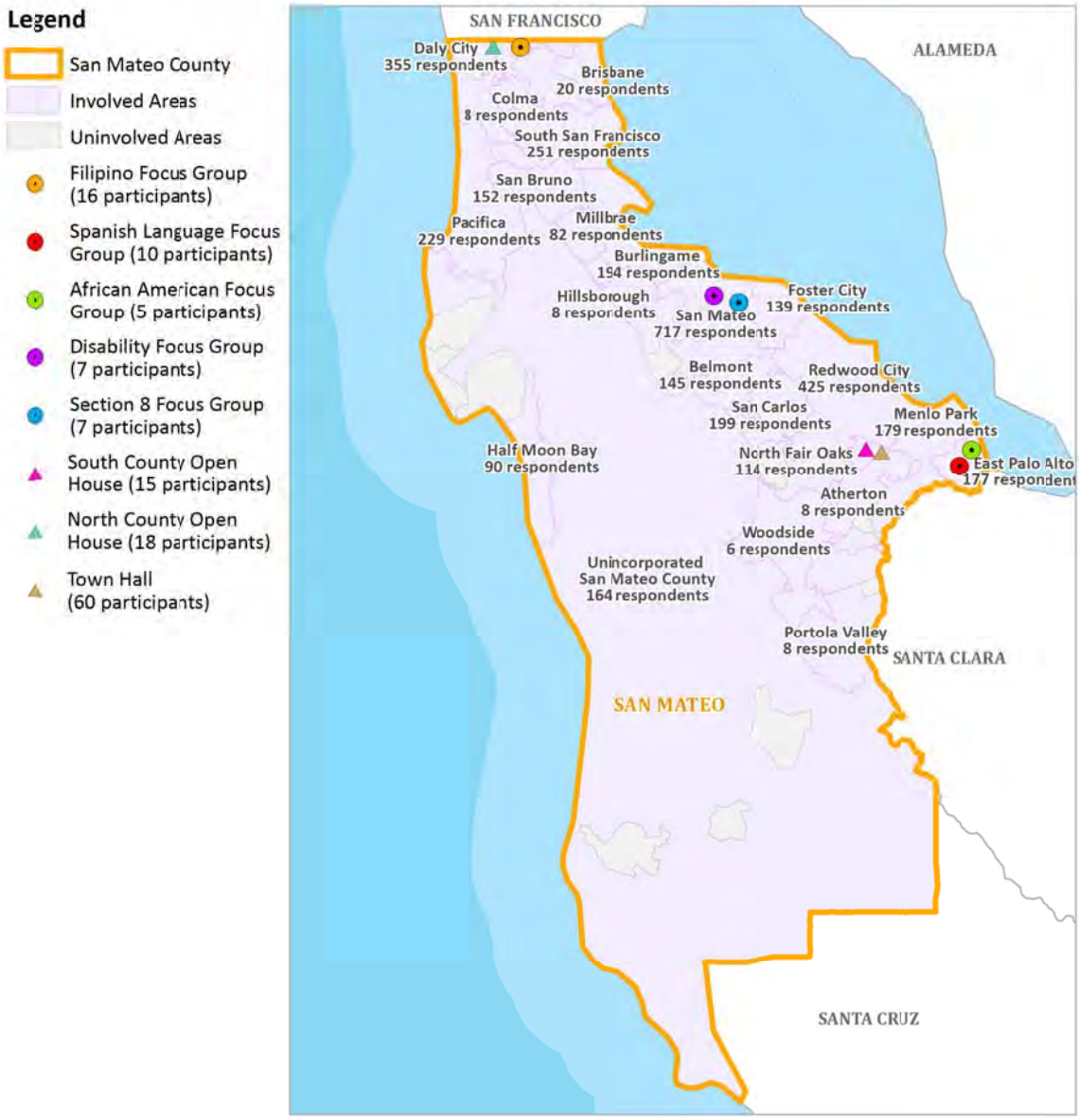
Figure A-2.



Source: BBC Research & Consulting from the Regional AFH Resident Survey, resident focus groups and Community Open House meetings.

Figure A-3 shows the number and place of residence of survey respondents and focus group and community open house locations.

Figure A-3.
Summary of San Mateo County Resident Participation



Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey and focus group and open house sign-in sheets.

Figures A-4 and A-5 present the demographic characteristics of resident survey respondents by place of residence within San Mateo County. Note that the data presented for San Mateo County excludes residents of participating jurisdictions and East Palo Alto. Respondents living outside of San Mateo County are included in the "Greater Region" category.

Figure A-4.
Demographic Characteristics of Resident Survey Respondents by Place of Residence

Survey Respondent Characteristics	Daly City	East Palo Alto	Redwood City	San Mateo	South San Francisco	San Mateo County (excluding PJs and East Palo Alto)	Greater Region
Race/ethnicity							
White, Non-Hispanic	33%	11%	50%	55%	40%	62%	37%
Black, Non-Hispanic	8%	13%	5%	3%	7%	3%	11%
Hispanic	15%	49%	36%	19%	22%	17%	29%
Asian	35%	3%	8%	16%	23%	12%	15%
Asian Indian	3%	1%	1%	2%	2%	1%	2%
Native Hawaiian/Pacific Islander	4%	7%	2%	3%	5%	2%	3%
Native American, Non-Hispanic	3%	1%	2%	1%	4%	2%	2%
Multi-racial	5%	3%	6%	6%	8%	5%	8%
Number of respondents (n=)	276	176	357	587	204	1,461	171
Disability							
Household includes member with a disability	22%	24%	22%	19%	24%	17%	23%
(n=)	288	156	368	606	213	1,518	184
Older adults							
% of respondents age 65 or older	21%	8%	15%	14%	14%	20%	15%
(n=)	238	132	323	510	184	1,287	145
Children							
Household includes child under age 18	41%	60%	45%	36%	43%	41%	43%
(n=)	269	137	355	579	201	1,441	171
Large families							
Households with five or more members	19%	46%	24%	13%	20%	15%	19%
(n=)	276	144	357	584	204	1,460	167

Note: Data for San Mateo County include all resident respondents who do not live in one of the five participating jurisdictions (PJs).
Numbers for race/ethnicity add to greater than 100 percent due to multiple response.
n=number of respondents.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Figure A-5.
Income, Resident Survey Respondents

Survey Respondent Characteristics	Daly City	East Palo Alto	Redwood City	San Mateo	South San Francisco	San Mateo County (excluding PJs and East Palo Alto)	Greater Region
Extremely low income household							
Income is 0-30% AMI based on household size	25%	54%	34%	17%	28%	19%	25%
(n=)	355	54	425	717	251	1,745	259
Household income							
Less than $5,000	12%	22%	7%	5%	6%	3%	10%
$5,000 up to $9,999	2%	6%	4%	2%	4%	1%	3%
$10,000 up to $14,999	4%	9%	6%	2%	6%	2%	2%
$15,000 up to $19,999	2%	6%	5%	3%	3%	3%	4%
$20,000 up to $24,999	6%	10%	9%	3%	6%	5%	4%
$25,000 up to $34,999	5%	12%	8%	5%	9%	7%	13%
$35,000 up to $49,999	11%	12%	9%	5%	13%	9%	13%
$50,000 up to $74,999	16%	12%	10%	13%	14%	11%	10%
$75,000 up to $99,999	11%	4%	9%	13%	12%	12%	13%
$100,000 up to $149,999	15%	5%	11%	18%	12%	16%	13%
$150,000 or more	16%	4%	23%	30%	15%	30%	16%
(n=)	263	139	342	548	194	1,376	165

Note: Data for San Mateo County include all resident respondents who do not live in one of the five participating jurisdictions (PJs). n=number of respondents.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Housing Choice

Through the survey and focus groups San Mateo County residents described their current housing situation, including: satisfaction, factors that were most important to their housing decision, desire to move, and experience with displacement.

Current housing situation. Figure A-6 presents the current housing situation of survey respondents by place of residence. As shown, the resident survey represented the spectrum of housing situations, from homeowners and renters to those who are couch-surfing or doubled-up to those who are in transitional housing programs or currently experiencing homelessness.

Figure A-6.
Current Housing Situation, Resident Survey Respondents

Current Housing Situation	Daly City	East Palo Alto	Redwood City	San Mateo	South San Francisco	San Mateo County (excluding PJs and East Palo Alto)	Greater Region
Homeowner	46%	15%	35%	45%	42%	51%	32%
Renter	37%	53%	44%	44%	34%	36%	45%
Staying with friends or family (not on lease or property title)	13%	21%	15%	6%	17%	11%	19%
I am without shelter, experiencing homelessness	2%	5%	2%	2%	4%	1%	2%
Staying in a shelter or transitional housing	1%	3%	3%	1%	1%	1%	1%
Staying in a motel/hotel	0%	1%	0%	0%	1%	0%	1%
Other	1%	3%	1%	1%	1%	1%	1%
Total	**100%**	**101%**	**100%**	**99%**	**100%**	**101%**	**101%**
Number of respondents (n=)	355	177	425	717	251	1,745	259

Note: Data for San Mateo County include all resident respondents who do not live in one of the five participating jurisdictions (PJs). Numbers may not add to 100% due to rounding.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

More than 100 respondents (116) to the resident survey identified their housing situation as homeless/without shelter, living in hotel/motel/car or living in a shelter/transitional housing. The demographic characteristics of these respondents include:

- Two-thirds are male and single (household of one);
- Nearly half (48%) have a disability or a person with a disability is a member of their household;
- Two in five have a child under age 18 in their household;
- One in five is African American; two in five is Hispanic; 16 percent are Asian and one in four is white;
- Nearly 30 percent are working full-time and 15 percent are disability benefit recipients; and
- Nearly one in three are ages 25 to 34 and 28 percent are age 55 or older.

Satisfaction with current housing. On average, San Mateo County residents who responded to the survey are somewhat satisfied with their current housing situation (average rating of 5.4 on a scale from 0 "extremely unsatisfied" to 9 "extremely satisfied). One in five are "extremely satisfied and one in 10 are "extremely unsatisfied." Satisfaction varies by place of residence and demographic and socioeconomic characteristics:

- On average, residents who live in San Mateo County but not in a participating jurisdiction or East Palo Alto are more satisfied with their current housing situation (average of 5.8) than

residents of East Palo Alto (average of 4.1), Daly City (4.8), Redwood City (4.9) and more similar to South San Francisco (5.2) and the city of San Mateo (5.5).

- White and Asian residents are more likely to be satisfied with their current housing situation. Nearly half of Black respondents are very unsatisfied with their current housing situation (rating of 0 to 2), as are one in three Hispanic respondents—compared to 15 percent of Asian and 13 percent of White respondents.

- One in three respondents whose household includes a member with a disability is very unsatisfied with their current housing situation.

- Renters are nine times more likely than homeowners to be very unsatisfied with their current housing situation (28% of renters versus 3% of homeowners). On average Section 8 voucher holders are more satisfied with their current housing situation than renters overall (average rating of 5.0 compared to 4.3 for all renters).

With two exceptions—homeowners and persons experiencing homelessness—the greatest proportion of respondents are unsatisfied with their housing because the "rent was too high." "Too much traffic" was the reason named by the greatest proportion of unsatisfied homeowners (22%) and 71 percent who are homeless and unsatisfied with their situation are unsatisfied because they are "homeless/can't find a place to rent."

Most important factors to current housing choice. Not surprisingly, "cost/I could afford it" was one of the three most important factors to residents when they made their current housing choice; two-thirds of respondents selected cost as one of their top three factors. Cost/affordability was the top selection of the greatest proportion of respondents regardless of demographic or socioeconomic characteristics. Other "most important" factors to at least one in five respondents are:

- Close to work/job opportunities (38%);

- Like the neighborhood (34%);

- Low crime rate/safe (31%);

- Close to family/friends (26%); and

- It was available (21%).

Landlords responding to the CAA Tri-County's survey reported similar factors are important to their tenants.

Desire to move. To put displacement into context, renters were asked about their desire to move in general. Overall, three out of four renters (73%) responding to the resident survey would move from their current home or apartment if they had the opportunity. The desire to move varies somewhat by renters' demographic and socioeconomic characteristics:

- African American (79%) and Hispanic (81%) renters are somewhat more likely to want to move than renters overall (73%), and white renters are somewhat less likely (66%).
- As household income rises the desire to move decreases—82 percent of renters with household incomes less than $35,000 would move if they had the opportunity compared to 69 percent with incomes from $35,000 up to $50,000 and 62 percent of those with household incomes of $150,000 or more.
- As household size increases, so does the desire to move, from 62 percent of single-person households to 72 percent of three-person households; 78 percent of five-person households to 90 percent of those in households of seven or more.
- Four in five renters with children under age 18 and four in five renters who responded to the Spanish language survey would move if they could.
- Renters whose household includes a member with a disability are as likely as the average renter to desire to move (76% compared to 73% of all renters).

The top reasons renters would move if they had the opportunity include:

- Want to buy a home (51%);
- Save money/get something less expensive (48%);
- Get own place/live with fewer people (32%);
- Closer to work (14%);
- Move to a different neighborhood (11%); and
- Move to a different city/county (10%).

Moving for better schools (9%); better job opportunities (9%); crime or safety reasons (9%); downsizing (6%); closer to transit (6%) and closer to family (6%) round out the reasons why current renters would move if they had the opportunity. The top reasons for wanting to move did not vary significantly by renter demographic or socioeconomic characteristics.

In a survey of San Mateo County landlords, the California Apartment Association, Tri-County Division reports that the top three reasons landlords are given by tenants who are moving are: buying a home, moving to a different city/county, better or new job opportunities, change in financial status, or moving closer to work. The primary differences in motivations to move between renter and landlord responses is renters' desire to live in a less expensive unit or get their own place/live with fewer people.

Displacement. The survey conducted for this study provides some information on how residents have been affected by displacement. To better understand the extent of displacement in San Mateo County, resident survey respondents answered a series of questions related to displacement, beginning with the question, "In the past five years, have you had to move out of a

home or apartment in San Mateo County when you did not want to move?" Overall, one in three current renters (34%) who responded to the resident survey have experienced displacement—having to move when they did not want to move—in the past five years in San Mateo County. The greatest proportion of renters with displacement experience (41%) had to move because "rent increased more than I could pay." Eviction—for no reason (6%), behind on rent (3%) or apartment rules (1%)—was the primary reason for moving for one in 10 renters with displacement experience. Personal reasons or relationship reasons were the primary factor for 12 percent of renters with displacement experience.

As discussed above, one in three current renters who responded to the resident survey experienced displacement in San Mateo County in the past five years. The proportion of renters with displacement experience varies demographically and socioeconomically.

- Two in five Hispanic renters (43%) and nearly two in five African American renters (38%) report experiencing displacement in San Mateo County in the past five years, compared to 29 percent of white renters and 24 percent of Asian renters. Nearly half (49%) of the renters who responded to the Spanish language survey report experiencing displacement.

- Smaller proportions of higher income households have experienced displacement compared to lower income households—37 percent of households with income less than $25,000; 43 percent of those with incomes from $25,000 up to $50,000; 28 percent with income from $50,000 up to $100,000 and 22 percent of those with incomes from $100,000 or more.

- Households with children under age 18 had a similar rate of displacement experience (36%) as renters overall.

- Households with Section 8 are as likely as renters overall to have experienced displacement (32% of Section 8 versus 34% overall).

- Households that include a member with a disability are somewhat more likely to have experienced displacement (39%) than renters overall.

- More than two in five (43%) large households experienced displacement in the past five years, compared to 31 percent of households with four or fewer members.

Figure A-7 presents the proportion of respondents who identified rent increases, eviction or personal reasons as the primary reason for having to move when they did not want to move (the top three factors for most respondents). As shown, the greatest proportion of respondents identified rent increases as the primary factor, regardless of their demographic or socioeconomic characteristics. Spanish language respondents were most likely to name rent increases as the primary factor (68%) and Asian respondents were the least likely (24%). Spanish language respondents (22%) and those with household incomes of $25,000 up to $50,000 (21%) were most likely to identify eviction as the displacement cause and white respondents were the least likely by far (3%).

Figure A-7.
Primary Reason for Displacement Experience

Source:
BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

	Rent increased more than I could pay	Evicted for any reason	Personal reasons
Race/ethnicity			
African American	31%	13%	16%
Asian	24%	18%	18%
Hispanic	53%	14%	10%
White	35%	3%	11%
Spanish language	68%	22%	1%
Children under 18	46%	9%	12%
Large family	48%	13%	11%
Disability	30%	12%	11%
Section 8	42%	17%	14%
Household Income			
Less than $25,000	38%	15%	18%
$25,000 up to $50,000	53%	21%	6%
$50,000 up to $100,000	39%	19%	12%
$100,000 or more	34%	12%	8%

Recent experience seeking housing in San Mateo County. Slightly more than half (53%) of survey respondents looked seriously for housing to rent or buy in San Mateo County in the past five years. When asked to rate the relative ease or difficulty of finding safe, quality housing that they could afford on a scale from "extremely difficult (0)" to "extremely easy (9)", nearly two in five (39%) rated this task "extremely difficult" (0) and four in five rated it difficult (rating from 0 to 4). During their housing search in the past five years, slightly more than one in four respondents (28%) reported being denied housing to rent or buy. The share of prospective homebuyers or tenants experiencing denial varied by demographic and socioeconomic characteristics:

- Asian and White searchers experienced denial in about the same rate as searchers overall (25% and 24% respectively).
- More than two in five Black residents (44%) who sought housing in San Mateo County in the past five years experienced denial, as did one in three Hispanics (35%). Residents who responded to the survey in Spanish fared slightly better than all Hispanics, with 31 percent experiencing a denial.
- Households with incomes of 30 percent of less than AMI and households that include a member with a disability experienced similar rates of denial, about two in five.
- Large families were slightly more likely than households with children to experience denial (35% compared to 32%).
- Nearly 60 percent of Section 8 Voucher holders (57%) who looked for housing in the past five years in San Mateo County experienced a denial.

Landlords who participated in the CAA Tri-County survey described a slightly softer market than would be expected from the resident survey and recent housing studies. Among the landlords responding to the CAA Tri-County survey, nearly two in five report their typical vacancy as one month or more, 36 percent have vacancies of two to four weeks and 25 percent lease units in less than a week. With respect to the typical number of applications for an available unit, 44 percent of landlords typically receive one application, 34 percent receive up to three applications and 22 percent receive more than three applications.

Experience of Section 8/Housing Choice Voucher holders. Nearly three in four resident survey respondents who have Section 8 vouchers found it "very difficult" to find a landlord that accepts Section 8 and 15 percent found it "somewhat difficult." These respondents identified the factors they believe made their experience difficult. These include:

- Landlords have policies of not renting to voucher holders (77%);
- Have a hard time finding information about landlords that accept Section 8 (61%);
- Not enough time to find a place to live before the voucher expires (45%); and
- Voucher is not enough to cover the rent for places I want to rent (43%).

With respect to measures of access to opportunity, Section 8 voucher holders who responded to the AFH resident survey are less likely to agree that the location of job opportunities is close to where they live. Voucher holders report similar access to other opportunity measures and less difficulty finding housing they can afford that is close to good schools than other respondents.

The experience of participants in the focus group with Section 8 voucher holders and residents of project-based Section 8 units were similar to those who responded to the survey—difficulty finding a landlord willing to participate in the program and challenges associated with finding units that meet inspection standards. Since many landlords who are willing to accept Section 8 do not necessarily advertise their participation in the program, voucher holders must contact many potential landlords in order to find the few willing to accept a voucher.

In addition to difficulty with securing a unit to rent, participants discussed challenges they experience with program administration and recent changes in how the HASMC operates resident customer service. In the past, residents had a single point of contact with HASMC staff; currently resident calls are routed to a member of a resident customer service team, the "officer of the day." This new approach feels more formulaic and less responsive to changes in resident circumstances such as a job loss or having to take in a family member. Participants described peers who are "homeless with a voucher," unable to find a place to rent. HASMC is seen as inflexible and bureaucratic.

Slightly more than one in five (22%) of the landlords who participated in the CAA Tri-County currently have tenants using housing subsidies. When asked about their experience as a landlord with the Section 8 program, nearly one in five (17%) reported that their experience was "good, haven't had significant issue to opt-out" and about half (46%) said, "OK, it could be better with the right program improvements." Slightly less than two in five (37%) responded, "Bad, I've

had/experienced problems with the program and/or tenants." Landlords identified recommendations that could help increase landlord participation in the program. The top five responses include:

- "Clear and straightforward exit procedure if tenant or the program is not a good fit" (13%);
- "Liability protection against damaged units" (11%);
- "Less paperwork" (10%); and
- "Faster inspection process" (9%).

Access to Opportunity

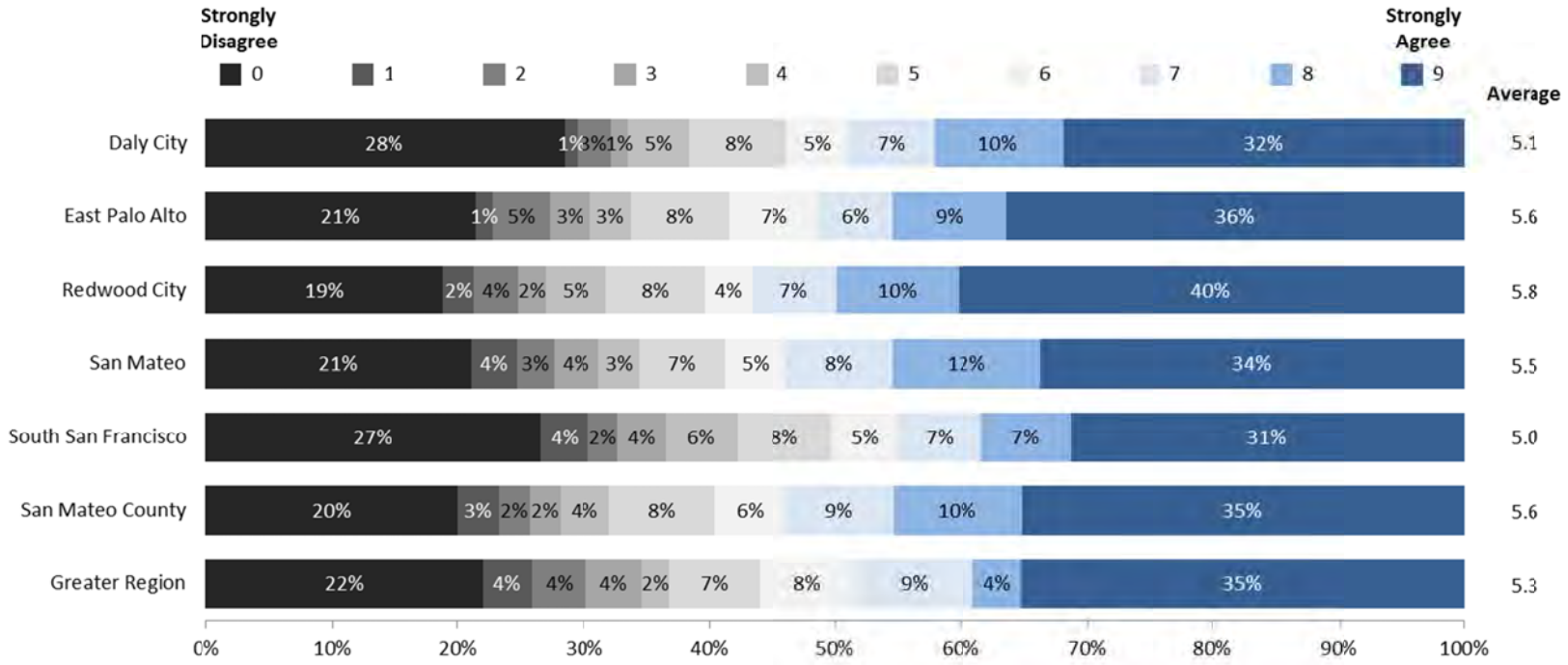
The community engagement process solicited resident opinions about and experience with access to opportunity in San Mateo County.

Educational opportunities. The figure below presents survey respondents' average rating of access to good quality schools for the participating jurisdictions, East Palo Alto and the greater region. On average, residents generally agree with the statement, but, as shown in Figure A-8, resident perceptions are actually weighted heavily toward the ends of the rating scale, with about one in five respondents "strongly disagreeing" with the statement and about one in three "strongly agreeing." This pattern persisted regardless of the level of comparison (e.g., by jurisdiction, racial and ethnic groups, income levels, children in the household, size of household, housing tenure, disability, etc.).

HUD's school proficiency index suggests that most neighborhoods have access to proficient schools; the challenge reflected in the resident survey data is the lack of affordable housing across the board. The exception is access to proficient schools in East Palo Alto. Spanish language focus group participants shared that wealthier and White families send their children to private schools rather than public schools in East Palo Alto.

Figure A-8.
Resident Perspective on Access to Good Quality Schools

Please rate your level of agreement with the following statement about the city in which you live:
In this area it is difficult to find housing people can afford that is close to good quality schools.



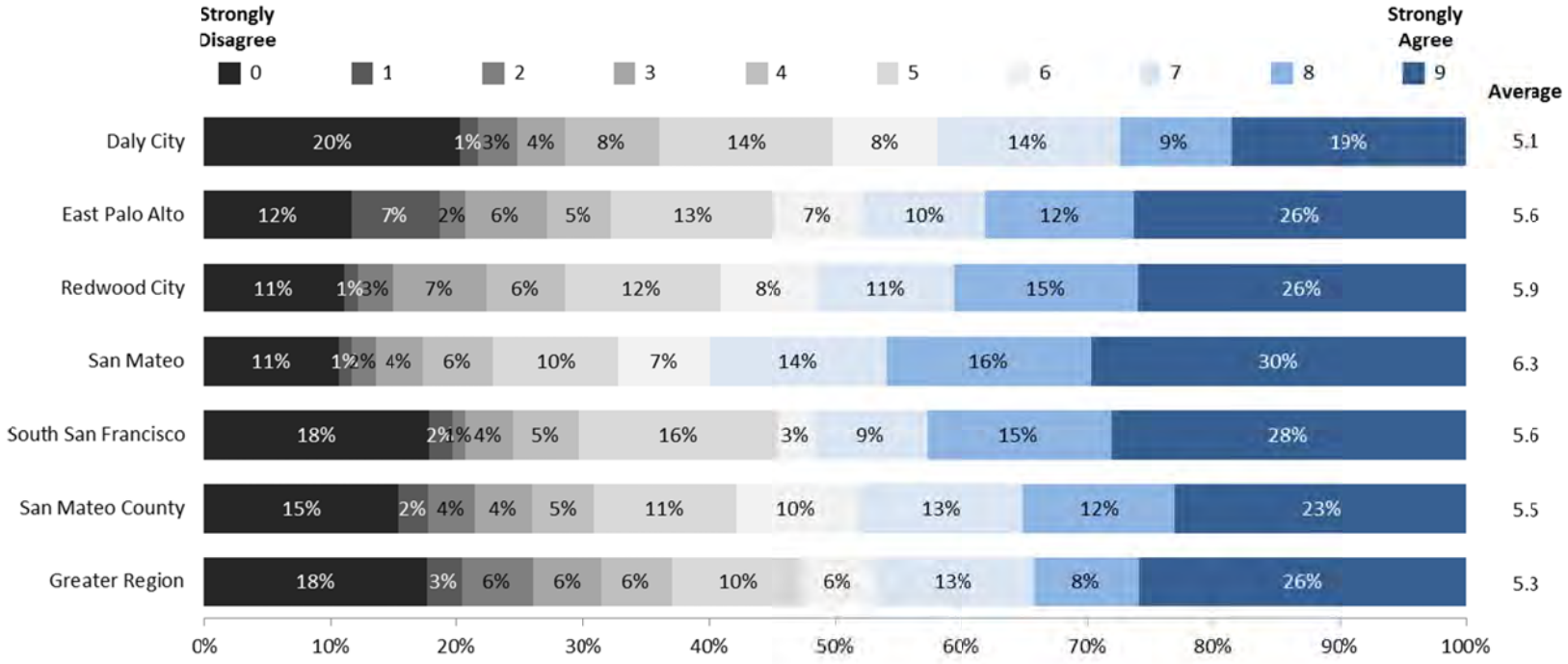
Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Employment opportunities. Figure A-9 confirms that most residents agree that the location of job opportunities is convenient to where they live, a similar finding to that from the examination of HUD's job proximity index. Among the participating jurisdictions, one in five Daly City residents strongly disagrees that job locations are convenient, while one in five strongly agrees. This suggests that for these Daly City residents, and their peers in South San Francisco, the types of jobs they consider are not conveniently located.

Figure A-9.
Resident Perspective on Access to Job Opportunities

Please rate your level of agreement with the following statement about the city in which you live:
The location of job opportunities is convenient to where I live.



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

In focus groups, participants generally reinforced the survey finding that employment opportunities are accessible from their neighborhoods. Convenience to employment opportunities is an important factor when making housing decisions; that less expensive housing may be available elsewhere is not appealing if those communities do not offer the opportunities—particularly schools and employment—offered by areas with higher housing costs. Participants in the Spanish language focus group, many of whom work multiple jobs, highly value shorter commute times.

While access to jobs is high across the County, the wages paid by those opportunities are not always sufficient to support a family. Participants in the Spanish language focus group discussed the lengths to which their families must go to make ends meet—including household members working multiple jobs—and many, particularly those who do not speak English well, are caught in a Catch-22 of sorts. Higher wage jobs are perceived to go to those who speak English; those without proficient English skills work multiple lower wage jobs, leaving them little time or energy to spend with family, much less to pursue language skills that might lead to a higher hourly wage.

Participants in the Filipino focus group discussed employment in the context of housing costs. They characterized finding housing affordable to people working in minimum or other low wage jobs as impossible, resulting in room rentals and doubling up with family or friends as the only housing options available to this segment of the workforce. Some participants in this focus group have delayed retirement or come out of retirement in order to pay rising housing costs.

Transportation. The survey conducted for the AFH provides a closer look at transportation barriers. The majority of residents participating in the survey and focus groups affirmed ABAG's finding that transportation/mobility access is not a barrier for most residents.

Specifically, Figure A-10 demonstrates that most residents *disagreed* with the statement, "I have difficulty getting to the places I want to go because of transportation problems." Among the communities, a greater proportion of San Mateo and East Palo Alto residents (12% and 16% respectively) strongly agreed with the statement, indicating more pronounced transportation-related challenges. On average, responses to this indicator of access to transportation did not vary significantly when examined by race, ethnicity, familial status, or housing tenure, and the distribution of ratings was very similar to those shown in Figure A-10, with the greatest proportion of respondents strongly disagreeing with the statement.

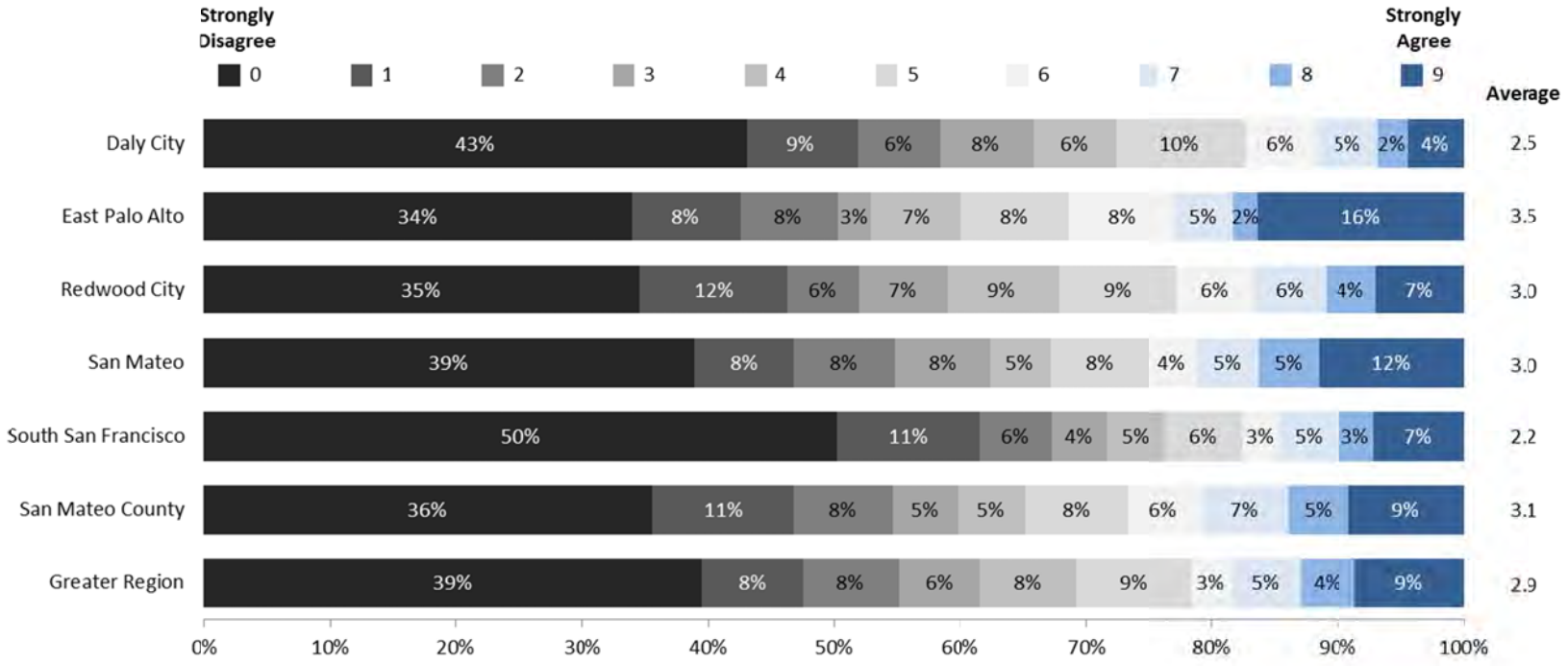
The one deviation from this pattern concerns Spanish language respondents. While the greatest proportion of Spanish speakers (20%) does not have difficulty getting to the places they want to go due to transportation problems, about two in five somewhat agree (ratings of 4, 5, 6) suggesting that transportation issues are more prevalent in this population.

The median commute home from work for resident survey respondents is 15 up to 30 minutes, with the exception of respondents from the greater region—median commute home is 30 minutes up to 45 minutes. Three in 10 Daly City residents who commute spend 30 to 45 minutes going home from work, a higher proportion than commuters living in other participating jurisdictions. Median commute time did not vary by race or ethnicity. However, a greater

proportion of Spanish language respondents (40%) spend 15 to 30 minutes commuting home compared to approximately one in three of all Hispanics (34%), Black (33%), Asian (29%), and White (32%) survey respondents. Spanish language respondents are also less likely to have the shortest commute—less than 15 minutes—compared to other populations.

Figure A-10.
Resident Perspective on Access to Transportation

Please rate your level of agreement with the following statement about the city in which you live:
I have difficulty getting to the places I want to go because of transportation problems.

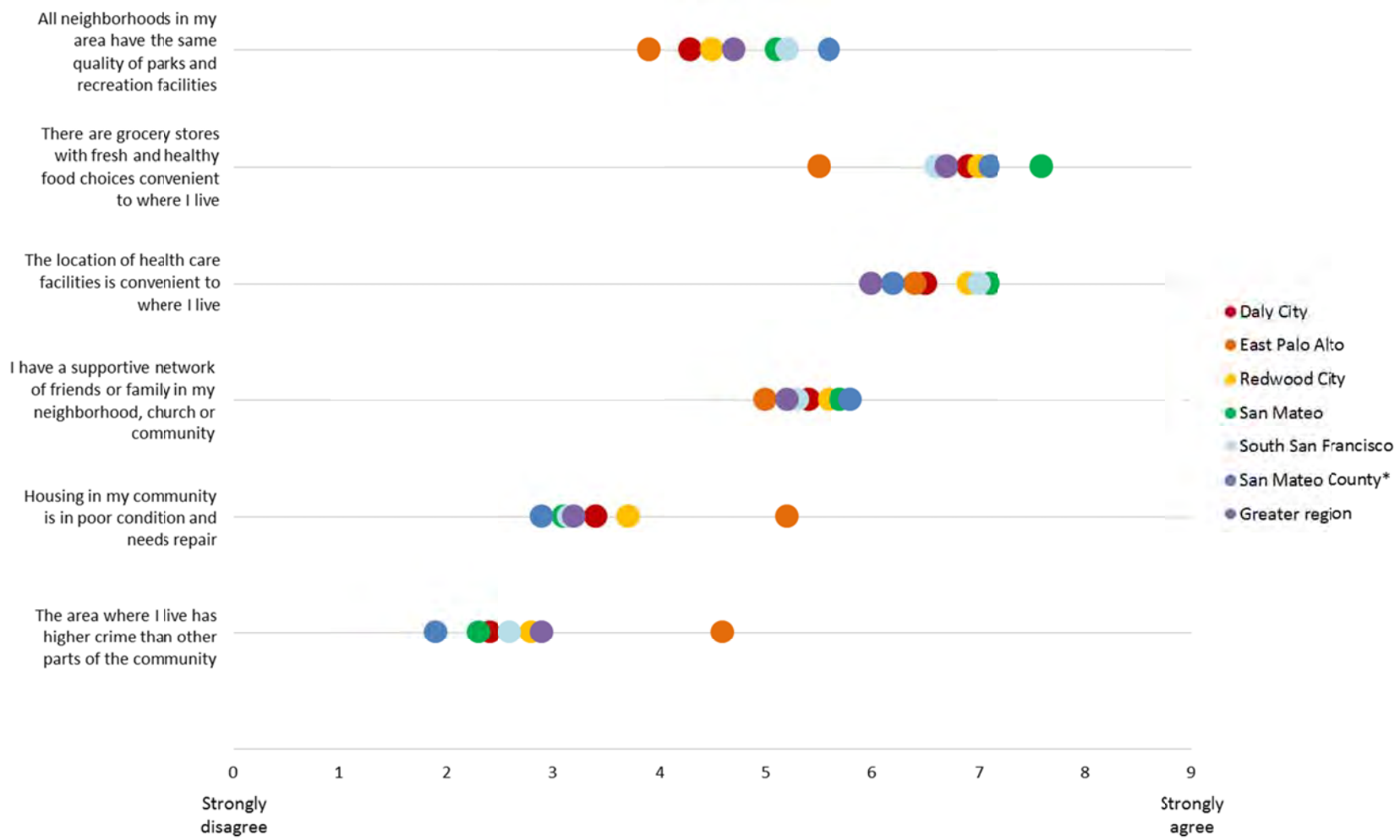


Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Low poverty environments. The community engagement process solicited resident perspectives on key indicators of low poverty neighborhoods—access to grocery stores with fresh and healthy food, access to health care services, quality of neighborhood public parks and recreation facilities, housing condition and crime, as well as a measure of social isolation. As shown in Figure A-11 below, residents' survey responses demonstrate that in general, their neighborhoods in the participating jurisdictions and San Mateo County provide access to fresh and healthy food, health care services, similar quality parks and recreation facilities as other neighborhoods, housing stock in good condition and levels of crime similar to other neighborhoods.

Figure A-11.
Resident Perspectives on Access to Low Poverty Neighborhood Indicators



Note: * Data for San Mateo County exclude residents of the participating jurisdictions and East Palo Alto.

Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

In focus groups, residents generally confirmed the findings of survey respondents; San Mateo County is a place of opportunity, with access to quality public amenities (e.g., parks, libraries), fresh food, health care services and safe neighborhoods.

- **Daly City parks, libraries, and beautification efforts.** Compared to the other jurisdictions, Daly City residents who responded to the survey were less likely to agree that the parks in their neighborhood have the same quality as other neighborhoods. In the Filipino focus group, Daly City residents made similar observations about differences in park conditions by neighborhood, particularly related to playground equipment. Several participants shared their experience that some libraries are of a higher quality than others (e.g., better selection of books) and noted that they believe city beautification efforts are targeted to areas where "new residents" are moving in.

- **Housing condition.** East Palo Alto survey respondents were more likely than residents of other jurisdictions to agree that housing in their community is in poor condition and needs repair. Spanish language focus group participants—most live in East Palo Alto—reinforced this perception. These participants shared that housing in their neighborhood is of poor quality or in bad condition with cockroaches, dilapidated kitchens, nonworking appliances, and that residents do not request repairs out of fear of rent increases or other retaliation. Some make or pay for repairs themselves rather than contacting the landlord or management company. Participants also discussed their perception that rent controlled units are less well maintained than units not covered by rent control.

  Some Section 8 focus group participants also shared a reluctance to report condition issues out of fear of being displaced. They are willing to make do with broken ovens or furnaces rather than move. Others discussed needing to contact inspectors to motivate landlords to make necessary repairs. From the discussion, it seemed that these condition issues generally manifest after the tenant has occupied the unit.

Experience with Discrimination and Community Attitudes

Community engagement participants described their experience with housing discrimination and estimated the degree to which most of their neighbors would support locating different housing types and uses in their neighborhood.

Experience with housing discrimination. Slightly more than one in 10 resident survey respondents (14%) felt they were discriminated against when they looked for housing in San Mateo County. The share of residents who believe they experienced housing discrimination varies by demographic and socioeconomic characteristics:

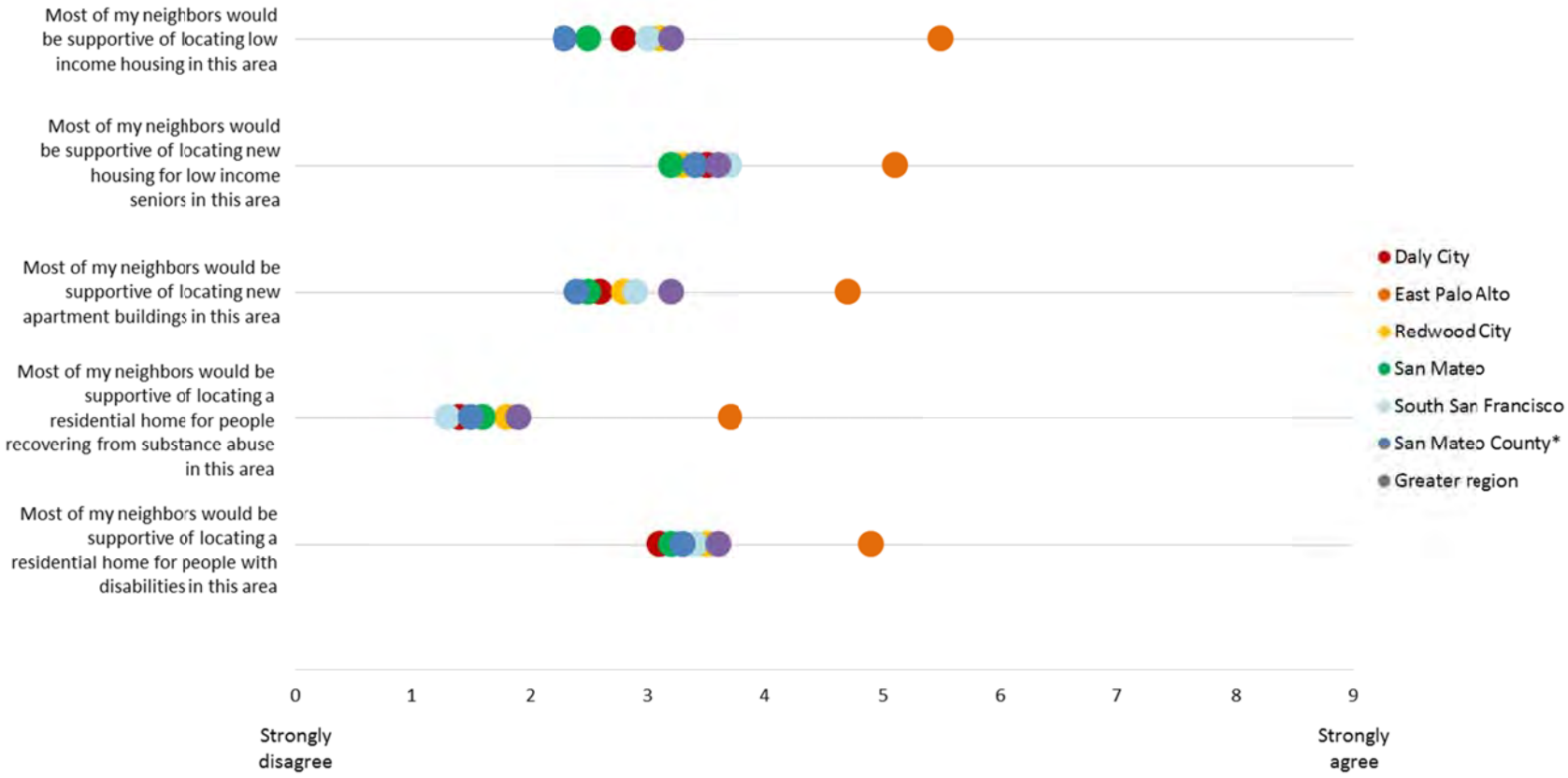
- Nearly 40 percent of Black respondents (38%);
- Three in 10 respondents whose household includes a member with a disability;
- Nearly one in four Hispanic respondents (23%);
- One in five Spanish language respondents;

- Nearly one in five large families (18%);
- Nearly one in five households with children (17%);
- Slightly more than one in 10 White respondents (11%); and
- Fewer than 9 percent of Asian respondents;

When asked to describe the reason for the discrimination, the greatest proportion of responses (20%) involved race or ethnicity; 15 percent due to income (not the source of income); 13 percent due to having children; one in 20 due to disability; and one in 20 due to Section 8.

Community attitudes toward different housing types and uses. Resistance to buildings of more than 3-4 stories, multifamily housing, and dense single family developments persists in San Mateo County and the region. Responses to the AFH resident survey underscore this perception. As shown in Figure A-12, most resident survey respondents believe that their neighbors would not be supportive of a range of new housing types or uses in their neighborhood, and these perceptions are similar among the participating jurisdictions and residents of the balance of the County. (East Palo Alto residents are the outlier.) While support for new low income housing, or apartment buildings in general, is low across the jurisdictions, homeowners are much less likely than renters or those living with family or friends to support new housing types or uses in their neighborhood.

Figure A-12.
Perception of Neighbor Support for New Housing Types or Uses in the Neighborhood



Source: BBC Research & Consulting from the 2017 San Mateo County Regional AFH Resident Survey.

Disability and Access

Slightly less than one in five (17%) respondents to the resident survey with a disability live alone, and the greatest proportion live in a two-person household (29%). Nearly one in five are living in households with five or more members. One-third have children age 18 or younger living in the home.

Availability of accessible housing. In the past five years, 56 percent of survey respondents whose household includes a member with a disability looked seriously for housing to rent or buy in San Mateo County. When asked to rate the relative ease of finding safe, quality housing that they could afford on a scale from 0 to 9, with 0 meaning "extremely difficult" and 9 meaning "extremely easy," 53 percent rated their experience "extremely difficult" (rating of 0) compared to 39 percent of all respondents who had looked seriously for housing. The cost of housing is by far the most common response (67%) when those who had difficulty (rating of 0 to 4) are asked why. In focus groups, residents with a disability explained that finding suitable housing that meets accessibility needs and is affordable is like finding a needle in a haystack. Nearly all residents in the region are impacted by high housing costs; for residents with disabilities, finding housing that is accessible and provides good access to transit stops in safe neighborhoods with accessible sidewalks is "nearly impossible."

In a stakeholder discussion facilitated for the AFH in March 2017, participants discussed factors that make finding affordable housing that meets the needs of a resident with disabilities more challenging, including:

- Ground level units are very limited. Even if on the first floor they are unlikely to be affordable. "Above carport" units and ADUs are not a solution for persons with disabilities.
- When existing mother-in-law units in single family homes are remodeled there are no requirements to include accessibility features;
- "People with disabilities do not enjoy the same income levels as others." A typical SSI payment of $900 per month is well below even the lowest priced rental unit.

Residents with disabilities living in housing that does not meet their needs. These issues—limited supply of accessible units, including ground floor units, compounded by housing costs may explain why three in 10 households that include a member with a disability of any type are living in housing that *does not meet* that member's accessibility needs. The percentage of households living in housing that does not meet the accessibility needs of a member with a disability varies by jurisdiction:

- Half (53%) in East Palo Alto;
- Nearly half (45%) in South San Francisco;
- Three in 10 in Daly City (the same as the overall rate);
- One in four in the city of San Mateo and one in four in Redwood City; and

- Slightly more than one in four (27%) among residents living in San Mateo County but not in East Palo Alto or the participating jurisdictions.

Types of improvements or modifications needed by these households include:

- Service or emotional support animal allowed in apartment/room (30%);
- Grab bars in bathroom or other locations (29%);
- Reserved accessible parking space (25%);
- Wider doorways/hallways (10%);
- Fire alarm/doorbell made accessible for person with hearing disability (8%);
- Ground floor/single level unit or elevator/lift (8%); and
- Alarm to notify if a non-verbal child leaves the home (5%).

Nearly half (45%) of survey respondents who need accessibility features of any type cannot afford them.

Reasonable modification or accommodation requests. Among those to whom the question applied, about three in 10 report that their landlord refused to make an accommodation for the household member with a disability. One in five had a landlord refuse a service animal and one in four had a landlord refuse to accept a therapy/companion/emotional support animal. In the focus group with residents with disabilities, participants described people with disabilities who need accessibility modifications and are either afraid to ask their landlord or are afraid to lodge a complaint against a landlord who refuses a modification or accommodation request. Participants suggested a need for fair housing education for landlords, particularly small "mom and pop" landlords, related to requests for reasonable modifications or accommodations.

ABAG's Fair Housing Equity Analysis concluded that persons with disabilities have difficulty getting equal access to the housing market through a lack of reasonable accommodations.

In a focus group with landlords, landlords shared that making accessibility modifications to their buildings is expensive and lacks a funding stream. "I think everyone's heart is in the right place and don't want to discriminate against anyone. The real challenge is having funds available for landlords to bring buildings up to code, including reasonable modifications." Although payment for modification is the tenant's responsibility, landlords were discussing larger scale accessibility retrofits of lower density buildings, including adding elevators as well as accessibility modifications to individual units or common areas. "If someone with a disability is looking for a place, you just hope you have a unit that works. Because you don't want to put someone in a unit that doesn't work for them."

Integration. Based on the community engagement process, like other residents of the San Mateo County region, the cost of housing, unit accessibility, and access to public transit for transit-dependent residents are the primary issues that typically hinder an individual with a

disability from living in the most independent, integrated setting desired. Participants in the disability focus group described source of income discrimination—refusing to rent because the tenant's housing would be paid for by a voucher—is a "huge issue" in the region. As discussed above, about half of Section 8 voucher holders who experienced difficulty finding a place to rent identified landlords' unwillingness to accept Section 8 as a barrier. In the survey of landlords conducted by CAA Tri-County, 22 percent of the respondents have Section 8 tenants.

The Center for Independence of Individuals with Disabilities (CID) serves San Mateo County. CID's mission is to "provide support, services, community awareness, and systems change advocacy to promote full and equal community integration and participation for people with disabilities in San Mateo County."[2] CID's programs provide a broad spectrum of services ranging from counseling and peer support to independent living skills to helping individuals with disabilities transition out of segregated settings such as nursing homes. CID also provides housing accessibility modification for income-qualified County residents. In discussions with CID staff, the cost of housing was identified as the primary barrier to living in the most integrated setting possible.

Previously we discussed resident resistance to development in the context of new housing and development of low income housing. Participants in the resident survey believe that most of their neighbors would not be supportive of most new housing types. These residents believe that their neighbors would be relatively more supportive of new housing for low income seniors or a residential home for people with disabilities than new apartment buildings open to all tenants. Out of all the housing types considered, survey respondents believed their neighbors would be least supportive of housing for people recovering from substance abuse/sober living.

Access to publicly supported housing. As detailed in the publicly supported housing analysis, affordable housing developments for persons with disabilities and other special needs housing is most likely to be found in the area around North Fair Oaks. Persons with disabilities represent 8 percent of residents in San Mateo County and, as discussed in the publicly supported housing analysis, are overrepresented in Other Multifamily housing and, to a lesser extent, as voucher holders.

Disparities in Access to Opportunity. As discussed above, the San Mateo County region is largely one of high opportunity, and most residents are able to access its high proficiency schools, job opportunities, low cost transportation and public transit, low poverty environments, and environmentally healthy neighborhoods. The AFH asks *"to what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning: Government services and facilities; Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals); Transportation; Proficient schools and educational programs; and Jobs."* Each area is discussed in turn.

Government services and facilities. Community engagement yielded examples of inaccessible government services and facilities based on resident experience. Other than specific comments about San Mateo County buildings and the City of San Bruno municipal building, comments

[2] http://www.cidsanmateo.org/

related to government services and facilities (other than transportation) focused on access to parks. These include:

- Some aspects of the San Mateo County Aging and Adult Services building are not easily accessible as described by disability focus group participants. These include:
    - "Width of sidewalks";
    - "Turn around space between doors";
    - "When entering through the main door off of 37th Avenue, there are three to four stairs up to the main meeting room, so an individual using a wheelchair would need to go all the way around the building to get into this room."
- "More auto-doors [needed] at San Mateo County offices for wheelchair access, for example the Tax & Recorder Office double doors inside the rotunda." *(Resident survey respondent)*
- "There are still … some parks that still have no access to those with disabilities. This needs to be changed; every place that is public needs to have disabled access." *(Resident survey respondent)*
- "It is so hard to access some of our County parks. I wish I could get out into the woods more easily." *(Resident survey respondent)*
- "Wheelchair access to amenities. Can't get to beach." *(Resident survey respondent)*
- "Wheelchair accessible pathways in parks, baseball field with dugouts that are wheelchair accessible for players, and swings with seats and seatbelts." *(Resident survey respondent)*
- The perception that the San Bruno City building entrance is not fully accessible—"There is a blue wheelchair sign on the building, but no button to open the door." *(Resident survey respondent)*

Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals). With respect to public infrastructure, incomplete sidewalk infrastructure, particularly connections to fixed route bus and other transit stops/stations, is a significant barrier to residents with mobility disabilities and limits access to all facets of community life, from employment opportunities to shopping and entertainment and services. The supply of accessible parking spaces and the need for enforcement of accessible parking ordinances is another need raised by residents with disabilities.

- "Sidewalks in the County are bad; they're not connected." *(Disability focus group participant)*
- "Fix the curb cuts for wheelchairs in Redwood City." *(Resident survey respondent)*
- "There are odd stretches of streets sometimes with no sidewalk or missing segments of sidewalk (e.g., Waterford Street or Farallon Avenue in Pacifica) but it's possible to re-route

or walk more carefully over dirt or along the side of the street." *(Resident survey respondent)*

- "Transportation problems and cracked/buckled sidewalks are the big barriers to getting around." (*(Resident survey respondent)*

- "El Camino Real is not always accessible which is particularly inconvenient because this is where the main bus routes are located. People will get off the bus and not be able to get around." (*Disability focus group participant)*

- "More handicap parking on Laurel Street in San Carlos; sidewalks are in terrible shape." *(Resident survey respondent)*

- "Better policing of handicapped parking spaces; doorways into buildings/businesses need to mechanisms to open doors for wheelchairs." *(Resident survey respondent)*

- "Additional disabled parking, curb cutouts. Better enforcement of access to disabled placards (a sprained wrist doesn't mean you need to park at the front door). Better enforcement of usage—just because someone in the family has a placard/plate, huge abuses with able-bodied people taking scant handicap spaces then trotting into the store while grandma stays home or waits in the car." *(Resident survey respondent)*

Transportation. On average, households that include a member with a disability are only slightly more likely than all respondents to the resident survey to agree with the statement, *"I have difficulty getting to the places I want to go because of transportation problems."*

Paratransit. The experience of residents whose most frequent mode of transportation is paratransit/RediWheels/RediCoast (hereafter RediWheels) is different. These residents are much more likely report having difficulty getting to the places they want to go due to transportation problems—30 percent "strongly agree" with the statement (rating of 9), compared to 14 percent of all households that include a member with a disability and 9 percent of San Mateo County resident survey respondents overall. Interestingly, a slightly smaller percentage of frequent RediWheels riders (26%) "strongly disagree" (rating of 0) with the statement, suggesting inconsistent RediWheels service delivery or other factors influence how frequent riders experience the service. RediWheels riders who have difficulty reaching the places they want to go (rating of 7, 8, or 9):

- Are age 35 or older, and the greatest proportion (31%) are 75 or older; and

- 71 percent have household incomes of $25,000 or less.

Place of residence did not seem to be associated with RediWheels transportation difficulty. Residents with difficulty lived in cities across the County, and the greatest proportion of riders with difficulty live in the city of San Mateo (25%), followed by Foster City (15%), Redwood City (15%) and South San Francisco (15%).

Participants in the disability focus group identified several aspects of RediWheels operations that are challenging for residents with disabilities:

- Longer than expected pick-up wait times. "You have to wait 30 or more minutes to get picked up even though they said the wait is five minutes."
- Not receiving an arrival time window;
- Scheduling errors, including wrong address;
- Hours of operation issues associated with times of day that ride scheduling service is available;
- Upcoming fare increases; and
- Perception that SamTrans is only committed to meeting minimum ADA requirements. "SamTrans meets ADA requirements, but are not willing to provide anything extra or think outside the box. Other bay area transit companies are more innovative—provide ridesharing service to supplement paratransit—SamTrans doesn't want to risk anything."

Transportation improvements needed. Transportation was the most common response to questions in the resident survey about what improvements in San Mateo County are most needed to ensure that residents with disabilities are able to access employment opportunities (11% of responses), health care services (19% of responses) and community amenities, services and facilities (23% of responses). Types of improvements needed ranged from general comments like "better public transit" or "free transit" to specific areas where public transportation services are needed, while others reinforced the disability focus group participant comments related to RediWheels services.

- "First and last mile connections. SamTrans pick up and wait times are limited and compromise ability to use public transit."
- "Better bus transportation between Foster City/San Mateo and Bart Millbrae." *(Resident survey respondent)*
- "Better transportation in Linda Mar, Pacifica." *(Resident survey respondent)*
- "Put funding into MORE EFFICIENT public transportation. SamTrans is a JOKE." *(Resident survey respondent)*
- "I don't understand why SamTrans does not have transfers. It takes two buses to get to my doctor. That's $8 round trip." *(Resident survey respondent)*
- "Better service when using RediWheels." *(Resident survey respondent)*
- "Carter & Geneva streets need better connections to BART & MUNI 3rd St line." *(Resident survey respondent)*

- "Ability to bring service animal on public transit without being bothered." *(Resident survey respondent)*

- "Help make RediWheels more user friendly for us disabled persons to use. RediWheels has the most unhelpful, rude, ready to leave you on the side of the road, pick you up 45 minutes late, unfriendly, unhelpful kind of people working for their company. It's a wonderful service, that can be super helpful if it was run correctly. I depend on it 100% of the time for work, school and all medical appointments because I'm unable to drive, but dread having to come in contact with any customer service reps. Please help!" *(Resident survey respondent)*

Proficient schools and educational programs. With respect to accessing proficient schools and educational programs, most comments focused on increasing resources and building capacity within the public school system to better serve students with disabilities.

- "Better bridges between school and employment for those with disabilities." *(Resident survey respondent)*

- "Better equip high school teachers and admin in dealing with children on the higher end of the autism spectrum. Children who have a high potential to be contributing and self-sufficient adults are falling through the cracks. Middle class are especially caught in a 'Catch 22.' Can't afford the specialized private education and don't meet low income requirements for subsidized assistance." *(Resident survey respondent)*

- "More coaching for students in mainstream education about how to self advocate and report their unseen disabilities." *(Resident survey respondent)*

- "One on one learning experiences in school starting at grammar level...focused one on one education is key to a developmentally challenged child's success, along with family and community support. There should always be a mission to ensure the funding is there in our public school system to support this." *(Resident survey respondent)*

Jobs. Other than the transportation issues discussed above, about 10 percent of comments were related to ensuring that residents with disabilities are able to access employment opportunities. These comments referred to access to job training and coaching services, building connections to employers willing to hire residents with disabilities, and increasing communications to the disability community about available employment-related services.

- "Case management from social services. County job resources for people looking for blue collar jobs. Help those who have no work experience or with experience build a resume." *(Resident survey respondent)*

- "Have real inclusive jobs not just retail, fast food. not all people with disabilities can stand long hours or do labor or heavy lifting." *(Resident survey respondent)*

- "More funding for job coaches and employment outreach workers." *(Resident survey respondent)*

- "More information on how to get help/employment for adults with autism [information about] specific employers that hire young adults with autism." *(Resident survey respondent)*

Difficulties achieving homeownership. Overall, one-third of the resident survey respondents whose household includes a member with a disability are homeowners, compared to 67 percent of households in the region. Those who do not own homes consider the prospect of homeownership to be out of reach when securing and maintaining affordable rental housing is a daunting task.

APPENDIX B.

Comments and Communications

October 14, 2016

Rose Cade
Department of Housing
San Mateo County
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Community Participation in the 2017 Assessment of Fair Housing

Dear Ms. Cade:

We write to offer recommendations for a robust, accessible, and impactful community participation process as San Mateo County, Daly City, South San Francisco, San Mateo, Redwood City, and the Housing Authority of the County of San Mateo (HACSM) conduct the region's first Assessment of Fair Housing over the next year.

The undersigned community-based organizations, legal services providers, and housing policy advocates work with and represent those most impacted by housing inequality and barriers to opportunity in San Mateo County. The voices of these community members will be of critical importance in identifying fair housing issues, analyzing their underlying causes, and developing strategies and policy priorities that local governments and HACSM should pursue to affirmatively further fair housing.

We applaud your commitment to conducting a thorough and inclusive Assessment of Fair Housing. The following recommendations will further our shared goal of ensuring that the views of those most affected by the region's housing challenges are heard and incorporated at every stage of the process.

1) **The community participation process should be designed to engage those who are most likely to experience barriers to fair housing choice and access to opportunity.**

U.S. Department of Housing and Urban Development ("HUD") regulations make clear that public meetings and outreach should be designed to emphasize the involvement of those affected by housing inequality, displacement, and barriers to opportunity: communities of color and low-income communities, including those with limited English proficiency, persons with disabilities, and residents of subsidized housing.[1]

[1] 24 C.F.R. § 91.105(a)(2)(i), (iii).

To achieve this goal, we recommend that all participating jurisdictions and HACSM implement a robust outreach strategy that prioritizes people of color, low-income individuals, persons with disabilities, persons with limited English proficiency, immigrants, families with children, and other groups who have historically been denied equal access to housing opportunities, including—but not limited to—those groups protected by the Fair Housing Act. A strong outreach strategy should include direct communication with organizations that work with or represent those populations, use of media outlets such as radio stations that serve minority and non-English speaking communities, as well as outreach materials that are made available in appropriate languages, such as Spanish, Tagalog, and Chinese, according to the needs of the community.[2]

Additionally, community meetings should be planned to emphasize and encourage participation by those most affected by housing problems in the region.

- Community meetings should be held in low-income neighborhoods, as well as at locations frequently attended by members of protected classes that provide a welcoming environment.[3] The locations should be easily accessible by public transportation. We would be happy to assist with identifying potential meeting locations.
- Meetings should be scheduled for evenings or weekends.[4]
- Childcare should be provided free of charge at public meetings to allow participation of families with children and lower-income parents.[5]
- Meals or snacks should be available at the meetings.[6]
- Appropriate oral interpretation services, as well as translation of written materials, should be provided at community meetings, in light of the significant numbers of persons with limited English proficiency in San Mateo County.[7]
- Meeting locations must be accessible to persons who experience disabilities.[8]

2) The Assessment of Fair Housing process should be fully transparent.

A transparent process will both strengthen public trust in the Assessment of Fair Housing and enhance the ability of community members and other stakeholders to participate in the analysis.

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[2] HUD, Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 72 Fed. Reg. 2732 (Jan. 27, 2007); *see also* 24 C.F.R. § 5.158(a) ("To ensure that the AFH, the consolidated plan, and the PHA Plan and any plan incorporated therein are informed by meaningful community participation, program participants should employ communications means *designed to reach the broadest audience*.") (emphasis added).

[3] 24 C.F.R. § 91.105(e)(3) (requiring that meetings be held "at locations and times convenient to potential and actual beneficiaries").

[4] HUD, *Affirmatively Furthering Fair Housing Rule Guidebook* (Dec. 1, 2015) at 33, available online at https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf.

[5] *Id.*

[6] *Id.*

[7] 24 C.F.R. § 91.105(e)(4).

[8] HUD, *Affirmatively Furthering Fair Housing Rule Guidebook*, at 30.

We recommend that you publish a timeline, accessible to the public online, that describes the different components of the process, when each will take place, and how members of the public and organizations can get involved in each one. Those components should include, at a minimum, consultation with stakeholders, collection of local data and local knowledge, community hearings, publication of the draft Assessment of Fair Housing for comment, incorporation of feedback to develop the final Assessment, submission of the final Assessment to HUD, and implementation of the goals and strategies from the Assessment. We also recommend that those responsible for conducting the Assessment provide regular communications about the status of each of these components as the Assessment progresses. We also recommend that you create a timeline that affords sufficient time for public input at various stages of the process.

We recommend that the timeline provide for initiating consultation with community groups at the outset of the process.[9] Conversations with housing advocacy groups, fair housing organizations, legal services providers, tenant organizations, and community-based organizations that work with or represent low-income people, communities of color, and immigrants will be an important aid in surfacing key topics of concern and identifying research needs.

We also recommend that collection and publication of relevant local data should begin as early as possible, with a goal of publishing as much relevant local data as possible before the community meetings begin.[10] These community hearings may also bring to light additional data collection and analysis that is needed. The data should be published online in a format that is easily accessible and understandable to non-experts.

In addition to HUD-provided data, we recommend as a starting point that you identify and make available data on (1) eviction actions in San Mateo Superior Court, by city, reason for eviction, and outcome of eviction proceeding; (2) demographic characteristics (including race, national origin, disability status, familial status, and income) for renter households and owner-occupied households, by city; (3) turnover rates for both rental and owner-occupied housing units, by city; (4) number of public school students who have left or joined a school due to a move during the school year, by school district; (5) percentage of children who are homeless, by city; (6) transit lines and ridership demographics for SamTrans and CalTrain, including an identification of low-income neighborhoods with poor access to transit; and (7) jobs-housing fit, by city. Making this and other data easily accessible will strengthen the ability of residents and community organizations to engage with the Assessment process, and to connect their experiences to broader patterns in the region. Ideally, this data would be made available at least a full month before the community meetings.

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[9] 24 C.F.R. § 91.100(e)(1).

[10] *See* 24 C.F.R. § 91.105(b)(1)(i) (requiring jurisdictions to make available supplemental data early in the public participation process); 24 C.F.R. § 5.152 (defining "local data").

3) **The community participation process should enable focused conversations about local issues throughout the county, cross-cutting topics related to access to opportunity, and concerns specific to San Mateo Housing Authority programs.**

In order to facilitate meaningful and focused community input, we recommend that each entitlement city hold at minimum two community meetings or "listening sessions" at different stages of the Assessment process—one as the draft is being developed, and another after the draft Assessment of Fair Housing is released.[11] City officials, including housing and community development staff, planning officials and staff, elected officials, and representatives of local transportation agencies and school districts should be strongly encouraged to attend to hear their constituents' concerns. Similarly, we recommend that the County hold two listening sessions in North Fair Oaks.

Not only does each jurisdiction and HACSM have an independent obligation to satisfy the community participation requirements set out in the regulations regarding the duty to affirmatively further fair housing, these local and targeted meetings will ensure that residents have the opportunity to address the distinct policies, regulations, and housing needs affecting their communities.

We also recommend that you collaborate with local officials in non-entitlement cities to facilitate additional listening sessions in their cities. We applaud your plans to conduct a comprehensive assessment that includes non-entitlement cities in the county. As you know, HUD regulations require the Assessment of Fair Housing to address conditions that impede fair housing choice and access to opportunity within the relevant geographic area.[12] In light of the reality that fair housing issues "are often not constrained by political-geographic boundaries,"[13] we fully agree with your determination that the Assessment of Fair Housing, in order to be complete, must address conditions and policies in the non-entitlement cities of the county.

Moreover, cities that accept HUD funds subgranted through the urban county consortium have an independent obligation to affirmatively further fair housing.[14] The joint Assessment of Fair Housing provides an excellent opportunity for those cities to benefit from community insight on the barriers to equal housing choice and access to opportunity in their community. For example, East Palo Alto was the subject of particular attention in the last Analysis of Impediments—we recommend that this attention be sustained by holding listening sessions in that city during this round. And, many fair housing challenges in the county can be found in other non-entitlement cities that would benefit

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[11] *See* 24 C.F.R. § 95.105(e)(iii) (requiring entitlement jurisdictions to hold at least one public hearing before the draft Assessment of Fair Housing is published for comment).
[12] *See* 24 C.F.R. § 5.152 (defining fair housing issues and local data and local knowledge by reference to the relevant geographic area).
[13] U.S. Department of Housing and Urban Development, Fair Housing Assessment Tool, Appendix C at 7.
[14] *See, e.g.*, Federal High Administration, Letter of Determination, DOT# 2012-0020 (June 26, 2013), available online at http://www.ablelaw.org/images/stories/FHWA-Response-BeavercreekOH_June2013.pdf (last accessed Oct. 5, 2016) (finding that a subrecipient of federal transportation funding violated Title VI civil rights obligations connected with that funding).

from a fair housing analysis that includes the voices of residents affected by those challenges.

In addition to the local meetings, we also recommend that the county and participating cities hold at least one county-wide public meeting or listening session addressing cross-cutting issues related to access to opportunity. That meeting should focus on access to economic, educational, and transportation opportunity, as well as access to environmental health.

We also recommend that HACSM hold multiple meetings in different parts of the County so that residents served by HACSM, and those eligible to be served by HACSM, have the opportunity to attend meetings that specifically address issues related to HACSM programs, including the challenges faced by Section 8 Housing Choice Voucher participants in obtaining and maintaining housing.

* * *

Thank you for the opportunity to share these recommendations. We look forward to participating in a productive and inclusive Assessment of Fair Housing over the course of the coming year.

Sincerely,

Anne Bellows
Public Advocates

Salimah Hankins
Community Legal Services of East Palo Alto

Sergio Robledo-Maderazo
AFT Local 1481

Melinda Dart
AFT Local 3267

Naomi Young
Bay Area Legal Aid

Doroteo García
El Comité de Vecinos

Dr. Jennifer Martinez
Faith in Action

Leora Tanjuatco
Housing Leadership Council

Shirley Gibson
Legal Aid Society of San Mateo County

Nikki Santiago-Victoria
Migrante-Northern San Mateo County

Susan Stern & Renee Williams
National Housing Law Project

Ann Marquart
Project Sentinel

Rev. Kirsten Spalding
San Mateo County Union Community Alliance

Tony Samara
Urban Habitat

Tameeka Bennett
Youth United for Community Action

Call with Anne / public advocates

- Thank you for your feedback the County and the PJs are committed to conducting a thorough and inclusive AFH

- We welcome your participation and encourage your assistance helping us spread the word about this process – specifically, stakeholder focus groups, resident focus groups and community meetings

- We welcome your recommendations for community meeting locations

If asked here is our CPP plan so far:

- Focus group with **stakeholders**
- **3 resident focus groups** (with protected classes most vulnerable to discriminatory treatment)
- **Community survey** on housing needs/barriers to housing choice (A paper and online community survey would be offered in English and up to three additional languages)
- **2 community meetings** - recommend that these meetings be conducted in areas with protected class concentrations and/or high poverty
- One presentation at **a public hearing**
- ***We will ask each jurisdiction (including non-entitlement jurisdictions) to hold listening sessions in order to obtain hyper local feedback - **we cannot force them to do so**
- ***We will develop a website for the AFH process and each of the PJs will link to it from their websites

In December we will have a more complete timeline here is the Rough CPP Timeline:

- *Early January: Focus group with stakeholders. Community survey distribution begins.*
- *Month of March:*

  Resident focus groups (three).

  In person meetings with Participating Agency staff (San Mateo Housing Authority, planning departments, parks and recreation, building inspection, public works)

  Two community meetings (workshop format)

  Survey closes and analysis begins.

February 24, 2017

Dear Alessandra and Rose,

We appreciate the conversation with you and BBC Research and Consulting about the interest of a deep and broad coalition of community based organizations committed to participating in the development of the San Mateo County Assessment of Fair Housing (AFH). A robust partnership with community organizations is essential to both the public participation process and to the ultimate success of any AFH.

We understand the Assessment of Fair Housing process has deep ties to the communities most impacted by fair housing challenges in the county, and we are prepared to provide the community input and expertise needed to create a useful community survey, inclusive community engagement plan, solid data analysis, and, ultimately, a successful AFH.

We are concerned with the participation process thus far. As a group that is representative of agencies, organizations, and community organizers with knowledge of county residents' housing issues, we reached out to you early and communicated that there was widespread interest in collaborating with you on this AFH (see our October 14, 2016 letter, attached). To date, we have not had meaningful opportunities to do so, however.

Unfortunately, even the first step in the community engagement plan proceeded without essential input from community groups. The Stakeholder Focus Group scheduled for March 6 was a surprise to many and inaccessible to most due to existing commitments to daily operations of our individual community service programs. It is also scheduled at a time and location that makes attendance by community members impossible. We have deep concerns that this first meeting will have a significant impact on the community engagement process moving forward, which would be inappropriate given that it is unlikely to include the voices of those who most need to be engaged in that process. To date, we have not been informed of, nor had the opportunity to give input for, the format and agenda of the meeting. We also have concerns about the survey and updated community engagement plan that we want to address before the process has moved past the point of no return.

Regarding the draft survey that you shared with us on February 9, please consider the following general observations from some of the individuals among our group:

- The substance, length, and format of the survey is not appropriate for this context.
- The survey is not a model that would produce useful data in San Mateo County.
- It is not clear that many community members will actually fill out this survey. There needs to be more accessible ways to collect this information.
- We would be happy to work closely with you on a survey that better reflects the unique challenges faced by protected classes in San Mateo County.
- The survey fails to adequately capture issues of housing insecurity and homelessness. The perspective of the survey is one that reflects the experiences of someone who has a place to live.

We would still like to provide more detailed input regarding the survey and the community engagement plan; however, before doing so, we respectfully request:

- The budget, timetable and additional stakeholder information for the AFH process, as discussed in our call of February 1st. If we have more information regarding the budget limitations and the deadlines for the project, perhaps we could help you prioritize and engage the community more effectively.
- That the March 6th meeting be rescheduled for a time and place that would allow attendance by key community stakeholders. Alternative dates should include evenings and weekends. If rescheduling the meeting is not possible, an agenda for the March 6th Stakeholder Focus Group, and alternative means to provide input for stakeholders unable to attend a mid-day meeting.
- That all future meeting times, locations, and agendas be decided in partnership with us.
- Your proposed process for our group to provide input regarding the substance of future community meetings.
- Clarification on your coordination (if any) regarding the community participation processes (including meetings, public hearings, and public comment periods) of the participating entitlement jurisdictions and public housing authorities.

If the community is approached as a true partner, we feel confident that ours can be a robustly collaborative process similar to the community participation process in New Orleans. The New Orleans AFH, while not perfect, is considered to be the strongest of the AFHs in the first round despite budgetary and time constraints faced by the City of New Orleans and the collaborating housing authority.[1] Their success came from a strong community partnership with weekly conversations with a core group of stakeholders regarding substance of the AFH as well as logistics. This supplemented other steps the City of New Orleans and the collaborating housing authority took to solicit substantive feedback from interested stakeholders.

We reaffirm our interest in being involved with all substantive and logistical aspects of the process; we can help our County create an AFH that works. San Mateo County faces severe fair housing challenges. We all must work together in order to analyze these challenges and to devise goals that will make meaningful progress toward ensuring housing security and access to opportunities for all County residents.

Please respond to us as soon as possible to let us know how you plan to address our concerns, and our specific above requests.

Sincerely yours,

Salimah K. Hankins
Community Legal Services in East Palo Alto

[1] We encourage you to review the New Orleans Assessment of Fair Housing, available at: http://www.nola.gov/community-development/documents/2016-updated-afh-plan-090516/afh-plan-090516-final/

Sam Tepperman-Gelfant
Public Advocates

AFT Local 1481
AFT Local 3267
Bay Area Legal Aid
El Comité de Vecinos
Faith in Action
Housing Leadership Council
Legal Aid Society of San Mateo County
Migrante-Northern San Mateo County
National Housing Law Project
Project Sentinel
San Mateo County Union Community Alliance
Urban Habitat
Youth United for Community Action

Attachment: Letter to Rose Cade, Re: Community Participation in the 2017 Assessment of Fair Housing (October 14, 2016)

From: Patricia Wishart
To: rcade@smchousing.org; Barbara Deffenderfer
Cc: Anne Bellows; Jen Garner
Subject: Fwd: Concerns re: 4/29/17 Spanish-language focus group
Date: Tuesday, June 27, 2017 9:23:45 AM

Dear Ms. Cade and Ms. Deffenderfer:

I am forwarding you a copy of the May 2 email that was sent to BBC Consultants. This should be included in the appendix of the draft AFH report. In addition to this email, there will be three more forwarded to you for inclusion.

Thank you.

Patricia Garcia

---------- Forwarded message ----------
From: **Patricia Wishart** <patricia.wishart@gmail.com>
Date: Tue, May 2, 2017 at 8:07 AM
Subject: Concerns re: 4/29/17 Spanish-language focus group
To: Jen Garner <jgarner@bbcresearch.com>, Mehgie Tabar <MTabar@bbcresearch.com>, Salimah Hankins <shankins@clsepa.org>
Cc: Shirley Gibson <sgibson@legalaidsmc.org>, Naomi Young <nyoung@baylegal.org>, Scott Hochberg <shochberg@clsepa.org>, Tameeka Bennett <tbennett@youthunited.net>, Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>, Tony Roshan Samara <tony@urbanhabitat.org>, Kirsten Spalding <kss@well.com>, Leora Tanjuatco <leora@hlcsmc.org>, Diana Reddy <diana.94062@yahoo.com>, Adriana Guzman <adriana@faithinactionba.org>, Doroteo <doroteogarcia@yahoo.es>, Jaqueline Ramirez <JRamirez@housing.org>, Evelyn Stivers <estivers@hlcsmc.org>, Daniel Saver <dsaver@clsepa.org>, "sstern@nhlp.org" <sstern@nhlp.org>, Adriana Guzman <adriana@sfop.org>, Melinda Dart <aft3267@gmail.com>, "Eldridge, Karyl" <keldridge@cbnorcal.com>, Molly Current <mcurrent@housing.org>, Nikki Santiago-Victoria <nikki.r.santiago@gmail.com>, Mark Leach <markjleach4@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Renee Williams <rwilliams@nhlp.org>, Sergio Robledo-Maderazo <Robledo-Maderazo@aft1481.org>, Patricia Wishart <patricia.wishart@gmail.com>, Belén Seara <searamb@gmail.com>, Jeremias David <jeremias.h.david@gmail.com>, David Zisser <dzisser@publicadvocates.org>, Javanni Munguia-Brown <javannibrown@gmail.com>, "kbrodfuehrer@nhlp.org" <kbrodfuehrer@nhlp.org>

Dear BBC Consultants:

My name is Patricia (Patty) Garcia and I am a member of El Comité de Vecinos del Lado Oeste in East Palo Alto, CA. I am writing, along with Noelia Corzo of Faith in Action Bay Area, to express concerns about the 4/29/17 Spanish-language focus group conducted by BBC Consultants.

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The setting for this focus group was in a government building. A licensed agency with individuals who are trained in first aid and have been background-checked should have been engaged, with a safe adult to child ratio. As government-paid consultants, what was your rationale for not providing childcare to this group as promised?

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Regards,

Patty Garcia, El Comite de Vecinos
Noelia Corzo, Faith in Action - Bay Area

From: Patricia Wishart
To: rcade@smchousing.org; Barbara Deffenderfer
Cc: Anne Bellows; Jen Garner
Subject: Fwd: Concerns re: 4/29/17 Spanish-language focus group
Date: Tuesday, June 27, 2017 9:25:58 AM

For inclusion in draft AFH.

---------- Forwarded message ----------
From: **Jen Garner** <jgarner@bbcresearch.com>
Date: Wed, May 3, 2017 at 10:32 AM
Subject: RE: Concerns re: 4/29/17 Spanish-language focus group
To: Patricia Wishart <patricia.wishart@gmail.com>, Mehgie Tabar <MTabar@bbcresearch.com>, Salimah Hankins <shankins@clsepa.org>
Cc: Shirley Gibson <sgibson@legalaidsmc.org>, Naomi Young <nyoung@baylegal.org>, Scott Hochberg <shochberg@clsepa.org>, Tameeka Bennett <tbennett@youthunited.net>, Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>, Tony Roshan Samara <tony@urbanhabitat.org>, Kirsten Spalding <kss@well.com>, Leora Tanjuatco <leora@hlcsmc.org>, Diana Reddy <diana.94062@yahoo.com>, Adriana Guzman <adriana@faithinactionba.org>, Doroteo <doroteogarcia@yahoo.es>, Jaqueline Ramirez <JRamirez@housing.org>, Evelyn Stivers <estivers@hlcsmc.org>, Daniel Saver <dsaver@clsepa.org>, "sstern@nhlp.org" <sstern@nhlp.org>, Adriana Guzman <adriana@sfop.org>, Melinda Dart <aft3267@gmail.com>, "Eldridge, Karyl" <keldridge@cbnorcal.com>, Molly Current <mcurrent@housing.org>, Nikki Santiago-Victoria <nikki.r.santiago@gmail.com>, Mark Leach <markjleach4@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Renee Williams <rwilliams@nhlp.org>, Sergio Robledo-Maderazo <Robledo-Maderazo@aft1481.org>, Belén Seara <searamb@gmail.com>, Jeremias David <jeremias.h.david@gmail.com>, David Zisser <dzisser@publicadvocates.org>, Javanni Munguia-Brown <javannibrown@gmail.com>, "kbrodfuehrer@nhlp.org" <kbrodfuehrer@nhlp.org>, Heidi Aggeler <haggeler@bbcresearch.com>

Good afternoon Patty,

Thank you for your email. Mehgie and I enjoyed meeting you and your husband and Noelia, and appreciate your support on Saturday at the focus group. The discussion was very informative and we are grateful to each of the women and men who took time from their Saturday to share their experiences.

I'd like to respond to the concerns you raise in your email and share how my experiences as a moderator inform our approach.

Child care. Whenever we have a focus group with low income Spanish speakers, we create a space in the room for children to quietly play while the adults converse. Years ago, we set up a separate room with a child care provider and learned that separating the adults from the children caused unnecessary anxiety and worry. From that experience, we learned the importance of not separating children and their parents when they agree to come to a focus group led by unknown people. The tradeoff is that sometimes children's noises cause momentary interruptions.

Until the moment one child's video became too loud, I did not think the children were a distraction and did not observe any disturbance among the participants. All were engaged in the conversation and did not seem distracted.

As to your question about professionally trained child care providers, I do not think it was needed for this format---a small group discussion where the adults would be in the same room as the children. The purpose of welcoming children as we did is so that adults will not be prevented from attending the focus group due to child care needs and to ensure that their children are safe during the 90 minute discussion.

Style. The proper format for a focus group is the popcorn style you described. Were the desire to simply go around the table having each person respond to every question, we would have set up individual interviews. The purpose of the focus group format is to lead to discussion amongst the participants and to allow participants to build off others' responses. This allows for coverage of a broader range of topics and to make room in the discussion for participants to raise issues that we had not considered when developing the discussion guide. It is also my practice to ask at the end of each session if there were questions that I should have asked or other topics I should have raised. The purpose of this technique is to create a space for participants to raise issues that have been on their mind.

My role as the independent, objective moderator is to pose questions so that the participants can tell their story in their own words. When a participant raised the issue that people who speak English receive better pay, it is incumbent on me to ask about the barriers to learning English so that in our reporting, the barriers raised are those actually experienced by these women. Similarly, if the initial barrier is a lack of time to attend classroom lessons, because of work and family schedules, I must ask about alternatives so that if such methods (e.g., online, YouTube) are suggested for programming we can provide appropriate advice. I.e., that participants shared that they could not muster the energy or concentration necessary to make such alternatives practical.

Sign in sheet and timing. The session was scheduled from 2:00-3:30. We began at about 2:10 and finished right on time. As people arrive we offer them food and ask them to sign in. Once we settle

in to begin, we wait until the end of the group to ask latecomers to sign in. We agree that it is important to have a record of the number of participants.

Again, I'd like to thank you for your role in recruiting focus group participants and for sharing your concerns. The focus group discussion yielded rich insights into the fair housing issues experienced by the participants and the people they know in the community. We are grateful for their time and contributions.

Kind regards,

Jen

Jen Garner | Senior Consultant

BBC Research & Consulting

t: 303-321-2547 x236 | www.bbcresearch.com

1999 Broadway, Suite 2200, Denver, CO 80202

From: Patricia Wishart [mailto:patricia.wishart@gmail.com]
Sent: Tuesday, May 02, 2017 9:07 AM
To: Jen Garner; Mehgie Tabar; Salimah Hankins
Cc: Shirley Gibson; Naomi Young; Scott Hochberg; Tameeka Bennett; Sam Tepperman-Gelfant; Tony Roshan Samara; Kirsten Spalding; Leora Tanjuatco; Diana Reddy; Adriana Guzman; Doroteo; Jaqueline Ramirez; Evelyn Stivers; Daniel Saver; sstern@nhlp.org; Adriana Guzman; Melinda Dart; Eldridge, Karyl; Molly Current; Nikki Santiago-Victoria; Mark Leach; Noelia Corzo; Renee Williams; Sergio Robledo-Maderazo; Patricia Wishart; Belén Seara; Jeremias David; David Zisser; Javanni Munguia-Brown; kbrodfuehrer@nhlp.org
Subject: Concerns re: 4/29/17 Spanish-language focus group

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Noelia Corzo, Faith in Action - Bay Area

From:	Patricia Wishart
To:	rcade@smchousing.org; Barbara Deffenderfer
Cc:	Anne Bellows; Jen Garner
Subject:	Fwd: Concerns re: 4/29/17 Spanish-language focus group
Date:	Tuesday, June 27, 2017 9:28:23 AM

For inclusion in draft AFH.

---------- Forwarded message ----------
From: **Patricia Wishart** <patricia.wishart@gmail.com>
Date: Wed, May 3, 2017 at 12:32 PM
Subject: Re: Concerns re: 4/29/17 Spanish-language focus group
To: Jen Garner <jgarner@bbcresearch.com>
Cc: Mehgie Tabar <MTabar@bbcresearch.com>, Salimah Hankins <shankins@clsepa.org>, Shirley Gibson <sgibson@legalaidsmc.org>, Naomi Young <nyoung@baylegal.org>, Scott Hochberg <shochberg@clsepa.org>, Tameeka Bennett <tbennett@youthunited.net>, Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>, Tony Roshan Samara <tony@urbanhabitat.org>, Kirsten Spalding <kss@well.com>, Leora Tanjuatco <leora@hlcsmc.org>, Diana Reddy <diana.94062@yahoo.com>, Adriana Guzman <adriana@faithinactionba.org>, Doroteo <doroteogarcia@yahoo.es>, Jaqueline Ramirez <JRamirez@housing.org>, Evelyn Stivers <estivers@hlcsmc.org>, Daniel Saver <dsaver@clsepa.org>, "sstern@nhlp.org" <sstern@nhlp.org>, Adriana Guzman <adriana@sfop.org>, Melinda Dart <aft3267@gmail.com>, "Eldridge, Karyl" <keldridge@cbnorcal.com>, Molly Current <mcurrent@housing.org>, Nikki Santiago-Victoria <nikki.r.santiago@gmail.com>, Mark Leach <markjleach4@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Renee Williams <rwilliams@nhlp.org>, Sergio Robledo-Maderazo <Robledo-Maderazo@aft1481.org>, Belén Seara <searamb@gmail.com>, Jeremias David <jeremias.h.david@gmail.com>, David Zisser <dzisser@publicadvocates.org>, Javanni Munguia-Brown <javannibrown@gmail.com>, "kbrodfuehrer@nhlp.org" <kbrodfuehrer@nhlp.org>, Heidi Aggeler <haggeler@bbcresearch.com>

Dear Ms. Garner:

Thank you for responding to me. (Please note, however, that the original email addressing these concerns was from two individuals, not one, representing two different organizations.)

Childcare

Childcare was promised by you to the attendees. If you are indeed attempting to argue that you never intended to provide this service and that this service was not needed, your argument is specious.

BBC was attempting to find childcare as promised and failed in its responsibilty to secure it. I have an email dated 04/25/17 from your associate, Meghie Tobar, asking me what my rates and preferred method of payment were for providing

childcare. (She sent a similar email to Lanelle, who was connected to the Tagalog focus group.) My response, dated 04/25/17, stated that providing childcare was not my role within this process. Ms. Tobar's response, dated 04/25/17, apologized and said that she would look into other options (i.e., local agencies). Please also refer to your own email, dated 04/25/17:

Good morning everyone,

Earlier today my colleague, Mehgie Tabar, reached out to Salimah, Shirley Gibson and Victor with a few questions about an interpreter and child care. FYI, Mehgie is taking the lead on nailing down final details in preparation for this weekend's focus groups.

We've budgeted to pay for an interpreter, child care and food (thank you for the La Cazuela recommendation). Have arrangements already been made for an interpreter and/or someone to watch any children that might attend? If not, is there an interpreter and child care worker you recommend? I know Victor previously mentioned putting us into contact with interpreters used by East Palo Alto if this group did not have a preference.

Other than pinning down the details for interpretation and child care, we should be all set.

Thanks!

Jen

Please also refer to my 04/25/17 email stating that BBC seemed to need help locating responsible, bilingual childcare and asked for recommendations. I told Meghie that if no recommendations were given, she could call a local agency.

So, it seems BBC was not able to find the easy answer and so decided not to follow through.

Perhaps I should have cited other distractions besides volume: children running to the food table, two boys playing tug-of-war with a toy, and so on. Perhaps these were not distractions to you, but, then again, you were not there to watch them.

Style

As a moderator, perhaps you noticed that individuals that were the quickest to put their hand up or were more assertive were the ones giving the most responses. You say that you wanted "to allow participants to build off of others' responses." Ms. Corzo noted that it seemed that the translator did not have time to finish before you started asking the next question.

Questions

You gave the following rationale in your response (bolded emphasis is mine):

> Similarly, if the initial barrier is a lack of time to attend classroom lessons, because of work and family schedules, I must ask about alternatives so that if such methods (e.g., online, YouTube) are suggested for programming **we can provide appropriate advice**. I.e., that participants shared that they could not muster the energy or concentration necessary to make such alternatives practical.

Methods available online were suggested by you after people told you about people working crazy hours, sometimes two or three jobs. Your response to people's large number of working hours was a suggestion on how they could perhaps use their time when they are doing something else, i.e., walking to church, etc. Did you ever stop to think that that walk to church is time spent with their families or time on the bus ride is time needed to just recharge? It seems you were hired as an independent, objective moderator to collect information, not to provide what you might consider "appropriate advice" to non-native English speakers.

Carelessness with sign-in sheet

You state what you did at the beginning. Perhaps the distraction of getting children settled and getting food diverted the attention of participants since the sheet was not completed at the end. The follow-through circulation to ensure completion was done by me when I noticed its state at the end.

In closing, Ms. Corzo and I still stand by our original assertions. Again, we hope that these voiced concerns, along with this additional response, help to inform future AFH sessions.

Sincerely,

Patty Garcia

El Comité de Vecinos

On Wed, May 3, 2017 at 10:32 AM, Jen Garner <jgarner@bbcresearch.com> wrote:

> Good afternoon Patty,
>
> Thank you for your email. Mehgie and I enjoyed meeting you and your husband and Noelia, and appreciate your support on Saturday at the focus group. The discussion was very informative and we are grateful to each of the women and men who took time from their Saturday to share their experiences.
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> I'd like to respond to the concerns you raise in your email and share how my experiences as a moderator inform our approach.
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Jen Garner | Senior Consultant

BBC Research & Consulting

t: 303-321-2547 x236 | www.bbcresearch.com

1999 Broadway, Suite 2200, Denver, CO 80202

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Sent: Tuesday, May 02, 2017 9:07 AM
To: Jen Garner; Mehgie Tabar; Salimah Hankins
Cc: Shirley Gibson; Naomi Young; Scott Hochberg; Tameeka Bennett; Sam Tepperman-Gelfant; Tony Roshan Samara; Kirsten Spalding; Leora Tanjuatco; Diana Reddy; Adriana Guzman; Doroteo; Jaqueline Ramirez; Evelyn Stivers; Daniel Saver; sstern@nhlp.org; Adriana Guzman; Melinda Dart; Eldridge, Karyl; Molly Current; Nikki Santiago-Victoria; Mark Leach; Noelia Corzo; Renee Williams; Sergio Robledo-Maderazo; Patricia Wishart; Belén Seara; Jeremias David; David Zisser; Javanni Munguia-Brown; kbrodfuehrer@nhlp.org
Subject: Concerns re: 4/29/17 Spanish-language focus group

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Cc:	Anne Bellows; Jen Garner
Subject:	Fwd: Concerns re: 4/29/17 Spanish-language focus group
Date:	Tuesday, June 27, 2017 9:29:15 AM

For inclusion in draft AFH.

---------- Forwarded message ----------
From: **Jen Garner** <jgarner@bbcresearch.com>
Date: Wed, May 3, 2017 at 1:40 PM
Subject: Re: Concerns re: 4/29/17 Spanish-language focus group
To: Patricia Wishart <patricia.wishart@gmail.com>
Cc: Mehgie Tabar <MTabar@bbcresearch.com>, Salimah Hankins <shankins@clsepa.org>, Shirley Gibson <sgibson@legalaidsmc.org>, Naomi Young <nyoung@baylegal.org>, Scott Hochberg <shochberg@clsepa.org>, Tameeka Bennett <tbennett@youthunited.net>, Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>, Tony Roshan Samara <tony@urbanhabitat.org>, Kirsten Spalding <kss@well.com>, Leora Tanjuatco <leora@hlcsmc.org>, Diana Reddy <diana.94062@yahoo.com>, Adriana Guzman <adriana@faithinactionba.org>, Doroteo <doroteogarcia@yahoo.es>, Jaqueline Ramirez <JRamirez@housing.org>, Evelyn Stivers <estivers@hlcsmc.org>, Daniel Saver <dsaver@clsepa.org>, "sstern@nhlp.org" <sstern@nhlp.org>, Adriana Guzman <adriana@sfop.org>, Melinda Dart <aft3267@gmail.com>, "Eldridge, Karyl" <keldridge@cbnorcal.com>, Molly Current <mcurrent@housing.org>, Nikki Santiago-Victoria <nikki.r.santiago@gmail.com>, Mark Leach <markjleach4@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Renee Williams <rwilliams@nhlp.org>, Sergio Robledo-Maderazo <Robledo-Maderazo@aft1481.org>, Belén Seara <searamb@gmail.com>, Jeremias David <jeremias.h.david@gmail.com>, David Zisser <dzisser@publicadvocates.org>, Javanni Munguia-Brown <javannibrown@gmail.com>, "kbrodfuehrer@nhlp.org" <kbrodfuehrer@nhlp.org>, Heidi Aggeler <haggeler@bbcresearch.com>

Hi Patty and Noelia,

Thank you for the clarification of your concerns. We will share your comments with the county and cities tomorrow as part of a project update.

You are absolutely correct that we made a good faith effort to find someone trusted by coalition members and not connected with the focus group to watch over the children during the session. We were not successful; sometimes that happens, so we improvise. In the case of Saturday's meeting, Mehgie was prepared to step in to serve the role of an adult to watch the children. Even if we had secured someone else's services, the room setup would have been the same, based on our past experiences with this participant population.

Theresa and I decided to use simultaneous translation. Using this method, the next piece of the conversation tends to begin as translation to me of the prior sentence is being concluded. It is a style decision to use this approach as it keeps the discussion flowing. It is a delicate balance to draw out quieter participants by directly calling on them while not discouraging those who raise their hands from participating; I simply do my best.

To your final point, my intention was to convey that while moderating I ask follow up questions so that when our clients and local organizations like yours are thinking through policies and programs we can advise our clients on the potential effectiveness of different approaches based on the research. Asking the next level of question, such as would non-classroom based approaches be effective, is my role.

I appreciate your noticing that not all participants had completed our sign in sheet and taking action to make sure all attendees took the time to sign.

Again, we are grateful to all who participated and the efforts you and your colleagues made to recruit. As I noted in my prior email, the substance of the focus group discussion was incredibly valuable to our efforts to understand the fair housing landscape in San Mateo and the factors which may contribute to fair housing issues and disparities in access to opportunity. We will certainly be mindful of your concerns as we plan the community meetings.

Kind regards,
Jen

Jennifer Garner
BBC Research & Consulting
303-321-2547 ext. 236

On May 3, 2017, at 1:32 PM, Patricia Wishart <patricia.wishart@gmail.com> wrote:

> Dear Ms. Garner:
>
> Thank you for responding to me. (Please note, however, that the original email addressing these concerns was from two individuals, not one, representing two different organizations.)
>
> **Childcare**
>
> Childcare was promised by you to the attendees. If you are indeed attempting to argue that you never intended to provide this service and that this service was not needed, your argument is specious.
>
> BBC was attempting to find childcare as promised and failed in its responsibilty to secure it. I have an email dated 04/25/17 from your associate, Meghie Tobar, asking me what my rates and preferred method of payment were for providing childcare. (She sent a similar email to Lanelle, who was connected to the Tagalog focus group.) My response, dated 04/25/17, stated that providing childcare was not my role within this process. Ms. Tobar's response, dated 04/25/17, apologized and said that she would look into other options (i.e., local agencies). Please also refer to your own email, dated 04/25/17:

Good morning everyone,

Earlier today my colleague, Mehgie Tabar, reached out to Salimah, Shirley Gibson and Victor with a few questions about an interpreter and child care. FYI, Mehgie is taking the lead on nailing down final details in preparation for this weekend's focus groups.

We've budgeted to pay for an interpreter, child care and food (thank you for the La Cazuela recommendation). Have arrangements already been made for an interpreter and/or someone to watch any children that might attend? If not, is there an interpreter and child care worker you recommend? I know Victor previously mentioned putting us into contact with interpreters used by East Palo Alto if this group did not have a preference.

Other than pinning down the details for interpretation and child care, we should be all set.

Thanks!

Jen

Please also refer to my 04/25/17 email stating that BBC seemed to need help locating responsible, bilingual childcare and asked for recommendations. I told Meghie that if no recommendations were given, she could call a local agency.

So, it seems BBC was not able to find the easy answer and so decided not to follow through.

Perhaps I should have cited other distractions besides volume: children running to the food table, two boys playing tug-of-war with a toy, and so on. Perhaps these were not distractions to you, but, then again, you were not there to watch them.

Style

As a moderator, perhaps you noticed that individuals that were the quickest to put their hand up or were more assertive were the ones giving the most responses. You say that you wanted "to allow participants to build off of others' responses." Ms. Corzo noted that it seemed that the translator did not have time to finish before you started asking the next question.

Questions

You gave the following rationale in your response (bolded emphasis is mine):

> Similarly, if the initial barrier is a lack of time to attend classroom lessons, because of work and family schedules, I must ask about alternatives so that if such methods (e.g., online, YouTube) are suggested for programming **we can provide appropriate advice**. I.e., that participants shared that they could not muster the energy or concentration necessary to make such alternatives practical.

Methods available online were suggested by you after people told you about people working crazy hours, sometimes two or three jobs. Your response to people's large number of working hours was a suggestion on how they could perhaps use their time when they are doing something else, i.e., walking to church, etc. Did you ever stop to think that that walk to church is time spent with their families or time on the bus ride is time needed to just recharge? It seems you were hired as an independent, objective moderator to collect information, not to provide what you might consider "appropriate advice" to non-native English speakers.

Carelessness with sign-in sheet

You state what you did at the beginning. Perhaps the distraction of getting children settled and getting food diverted the attention of

participants since the sheet was not completed at the end. The follow-through circulation to ensure completion was done by me when I noticed its state at the end.

In closing, Ms. Corzo and I still stand by our original assertions. Again, we hope that these voiced concerns, along with this additional response, help to inform future AFH sessions.

Sincerely,

Patty Garcia

El Comité de Vecinos

On Wed, May 3, 2017 at 10:32 AM, Jen Garner <jgarner@bbcresearch.com> wrote:

> Good afternoon Patty,
>
> Thank you for your email. Mehgie and I enjoyed meeting you and your husband and Noelia, and appreciate your support on Saturday at the focus group. The discussion was very informative and we are grateful to each of the women and men who took time from their Saturday to share their experiences.
>
> I'd like to respond to the concerns you raise in your email and share how my experiences as a moderator inform our approach.
>
> **Child care.** Whenever we have a focus group with low income Spanish speakers, we create a space in the room for children to quietly play while the adults converse. Years ago, we set up a separate room with a child care provider and learned that separating the adults from the children caused unnecessary anxiety and worry. From that experience, we learned the importance of not separating children and their parents when they agree to come to a focus group led by unknown people. The tradeoff is that sometimes children's noises cause momentary interruptions.

Until the moment one child's video became too loud, I did not think the children were a distraction and did not observe any disturbance among the participants. All were engaged in the conversation and did not seem distracted.

As to your question about professionally trained child care providers, I do not think it was needed for this format---a small group discussion where the adults would be in the same room as the children. The purpose of welcoming children as we did is so that adults will not be prevented from attending the focus group due to child care needs and to ensure that their children are safe during the 90 minute discussion.

Style. The proper format for a focus group is the popcorn style you described. Were the desire to simply go around the table having each person respond to every question, we would have set up individual interviews. The purpose of the focus group format is to lead to discussion amongst the participants and to allow participants to build off others' responses. This allows for coverage of a broader range of topics and to make room in the discussion for participants to raise issues that we had not considered when developing the discussion guide. It is also my practice to ask at the end of each session if there were questions that I should have asked or other topics I should have raised. The purpose of this technique is to create a space for participants to raise issues that have been on their mind.

My role as the independent, objective moderator is to pose questions so that the participants can tell their story in their own words. When a participant raised the issue that people who speak English receive better pay, it is incumbent on me to ask about the barriers to learning English so that in our reporting, the barriers raised are those actually experienced by these women. Similarly, if the initial barrier is a lack of time to attend classroom lessons, because of work and family schedules, I must ask about alternatives so that if such methods (e.g., online, YouTube) are suggested for programming we can provide appropriate advice. I.e., that participants shared that they could not muster the energy or concentration necessary to make such alternatives practical.

Sign in sheet and timing. The session was scheduled from 2:00-3:30. We began at about 2:10 and finished right on time. As people arrive we offer them food and ask them to sign in. Once we settle in to begin, we wait until the end of the group to ask latecomers to sign in. We agree that it is important to have a record of the number of participants.

Again, I'd like to thank you for your role in recruiting focus group participants and for sharing your concerns. The focus group discussion yielded rich insights into the fair housing issues experienced by the participants and the people they know in the community. We are grateful for their time and contributions.

Kind regards,

Jen

Jen Garner | Senior Consultant

BBC Research & Consulting

t: 303-321-2547 x236 | www.bbcresearch.com

1999 Broadway, Suite 2200, Denver, CO 80202

From: Patricia Wishart [mailto:patricia.wishart@gmail.com]
Sent: Tuesday, May 02, 2017 9:07 AM
To: Jen Garner; Mehgie Tabar; Salimah Hankins
Cc: Shirley Gibson; Naomi Young; Scott Hochberg; Tameeka Bennett; Sam Tepperman-Gelfant; Tony Roshan Samara; Kirsten Spalding; Leora Tanjuatco; Diana Reddy; Adriana Guzman; Doroteo; Jaqueline Ramirez; Evelyn Stivers; Daniel Saver; sstern@nhlp.org; Adriana Guzman; Melinda Dart; Eldridge, Karyl; Molly Current; Nikki Santiago-Victoria; Mark Leach; Noelia Corzo; Renee Williams; Sergio Robledo-Maderazo; Patricia Wishart; Belén Seara; Jeremias David; David Zisser; Javanni Munguia-Brown; kbrodfuehrer@nhlp.org
Subject: Concerns re: 4/29/17 Spanish-language focus group

Dear BBC Consultants:

My name is Patricia (Patty) Garcia and I am a member of El Comité de Vecinos del Lado Oeste in East Palo Alto, CA. I am writing, along with Noelia Corzo of Faith in Action Bay Area, to express concerns about the 4/29/17 Spanish-language focus group conducted by BBC Consultants.

1. <u>No childcare was provided</u>

The focus group participants brought eight (8) children with the understanding that childcare would be provided. There was none.

The lack of childcare impacted the participants' ability to listen, focus, and respond, as well as the translator's and moderator's ability to conduct the session. At one point, the translator, Ms. Teresa Mendivil, stopped translating so she could dig earbuds out of her purse and give them to a child whose phone was too loud. Participants had to divide their attention between listening and participating and peripherally watching their kids. Ms. Garner had to pause at another point because of the children's noise.

The setting for this focus group was in a government building. A licensed agency with individuals who are trained in first aid and have been background-

checked should have been engaged, with a safe adult to child ratio. As government-paid consultants, what was your rationale for not providing childcare to this group as promised?

2. Style of focus group

The style of the focus group was popcorn style and random. Participants who wanted to share a story were skipped because Ms. Garner would ask the next question before letting everyone share. This created confusion and it was pretty much a free for all.

3. Questions

Noelia and I were very frustrated when Ms. Garner continued to insinuate that learning English was the solution to not being able to afford the cost of living. Ms. Garner was asking, if one knew that better English skills were a pathway to a better job, why someone did not get resources to listen to on the walk to church or riding the bus, etc., after participants had explained that a lot of people were already working crazy hours, sometimes two or three jobs. Laura Rubio, one of the participants, explained at one point that it was hard to concentrate and learn when you are working so many hours. This question from Ms. Garner was met with confusion and folks found it hard to know what to say. It really came off as why weren't these people working harder. When Ms. Corzo responded and stated something along the lines of "the question

shouldn't be how can people who are already working extremely hard work harder but how can our laws and policies be more just", Ms. Garner then asked the group, "What are the right questions to ask then?". Noelia and I were surprised and frustrated by that question. Other folks responded a bit and then Ms. Garner ended the focus group early at that point. Noelia and I hope that Ms. Tabar captured this exchange in her notes.

4. Carelessness with sign-in sheet for participants

CLSEPA was generous enough to provide $20 gift cards as a thank you for participants' time at the end of the focus group. While I (Patty) was circulating with the cards and the sign-off sheet for CLSEPA, I noticed the consultants' sign-in sheet had not been signed by everyone, so I started circulating that as well. That sign-in sheet is the proof that the number of participants, etc., is not fabricated. Those individuals can also corroborate what was said. Noelia said she did not even know there was a sign-in sheet until I handed it to her. This struck both Noelia and I as concerning.

We are hoping these comments will inform how things are run at BBC's future AFH community meetings.

Regards,

Patty Garcia, El Comite de Vecinos

Noelia Corzo, Faith in Action - Bay Area

May 24, 2017

Rose Cade
San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Special Interests and Civil Rights in Housing: Ensuring the Assessment of Fair Housing Process Provides an Accurate and Complete Analysis of Resident Experiences in San Mateo County

Dear Ms. Cade:

The ongoing Assessment of Fair Housing ("AFH") in San Mateo County represents a long-delayed step towards fulfilling of one of the promises that this country made when it adopted the Fair Housing Act in the wake of Dr. Martin Luther King's assassination in 1968. That promise was that public authority would be used to affirmatively further fair housing, *i.e.*, to promote equal housing opportunity regardless of race, national origin, and other protected characteristics.[1] The San Mateo AFH process comes at a crucial moment for the region as the racial and ethnic diversity of our cities and communities is being threatened by a housing crisis that is placing relentless pressure on Latino, Asian immigrant, and African American households.

The community participation process for the AFH, as dictated by federal regulation, is intended to encourage the participation of those who are directly and personally affected by housing inequality, in particular low- and moderate-income persons and members of protected classes under the Fair Housing Act.[2] As you know, the San Mateo AFH has several instruments of community participation designed to meet this standard, among them a survey regarding community residents' experiences in housing, several focus groups, larger community meetings, and a public comment period.

It has come to our attention that special interest groups—namely, politically organized landlords and realtors—have been circulating the AFH survey amongst their members in order to bias the survey results away from the experiences and needs of tenants. (Attachments 1 & 2.) In light of this development, we write to provide you with some context regarding civil rights and the current housing crisis affecting renters, and we ask you to take steps to preserve the integrity

[1] 42 U.S.C. § 3608(d) & (e)(5).

[2] 24 C.F.R §§ 91.105(a)(2), 91.105(e)(3) & (4); 91.105(i). As HUD explained in introducing the regulation, the purpose of the AFH community participation process is to "[p]rovide an opportunity for the public, *including individuals historically excluded because of characteristics protected by the Fair Housing Act,* to provide input about fair housing issues, goals, priorities, and the most appropriate use of HUD funds and other investments." 80 Fed. Reg. 42273 (emphasis added).

of the AFH process, facilitate the collection of relevant information, and adhere to the civil rights goals embodied in the duty to affirmatively further fair housing. Specifically, we ask that you:

(1) Evaluate the input that you receive from landlords and realtors with a critical eye, in light of the civil rights goals of the AFH and the information detailed in this letter;
(2) Analyze the survey results to limit the undue impact of any interference;
(3) Create dedicated and tailored focus groups or other forums for gathering information from these two special interest groups;
(4) Ensure that public participation forums are a safe space for vulnerable tenants, where they will not be subject to harassment or intimidation by landlords and realtors; and
(5) Include a robust analysis of pressures in the rental market in the AFH, including a discussion of displacement pressures, disproportionate housing needs affecting tenants who are members of protected classes, and the lack of regulations protecting tenants from large rent increases and no-cause evictions—along with clear, measurable goals in the AFH to alleviate and eventually overcome these market pressures.

While we understand the need to solicit input from all segments of the community, it is crucial that those conducting the Assessment of Fair Housing differentiate between the views of those with a primarily financial stake in the housing market, such as landlords and realtors, and the needs and experiences of members of protected classes under the Fair Housing Act, who the process is intended to engage. Members of protected classes are best situated to describe the challenges they encounter in securing safe, stable housing and equal access to the rich opportunity afforded by San Mateo County's strong economy and good schools. Indeed, bringing landlords and realtors into the same community participation process along with tenants is certain to diminish tenant participation unless this distinction in stakeholder postures is openly acknowledged and appropriate protective measures are taken.

Of course, politically organized landlords and realtors are important players and a proper focus of attention in the AFH. Indeed, their actions are a powerful force in shaping the fair housing issues affecting people of color, immigrants, families with children, and people with disabilities in San Mateo County. In recent years, these special interest groups have perpetuated barriers to fair housing for tenants of color in San Mateo County through their fierce and well-financed opposition to policies that would stabilize housing opportunity and help to stem the displacement crisis. This opposition has been characterized by fear mongering, misinformation and even direct harassment against tenants of color participating in the political process—as described below. We fear that their participation in the AFH may be similar.

The remainder of this letter (1) contextualizes issues related to tenants' rights within the framework of HUD's regulation governing the AFH; (2) summarizes what we know about current participation in the AFH by realtors and landlords; (3) provides some background information about our experiences with these interest groups in the past; and (4) explains why we believe that these interest groups have created significant obstacles to achieving fair housing opportunity.

//

1. *HUD Regulations: Civil Rights Issues Relating to Tenants, Housing Needs, and Displacement*

In San Mateo County, where a majority of tenant households are people of color, and more than 60 percent of African American and Latino households are renters, analyzing the state of civil rights in housing by necessity entails an examination of conditions affecting renters in the region.[3]

For example, the "disproportionate housing needs" analysis required by HUD's regulation examines whether members of protected classes under the Fair Housing Act—*i.e.*, people of color, people with disabilities, and families with children—experience problems like "cost burden, severe cost burden, overcrowding, and substandard living conditions" at disproportionate rates.[4] Unquestionably, the high rents and uncontrolled rent increases resulting in high cost burden for the racially diverse tenant population in San Mateo County must be a part of this analysis. Similarly, identifying the contributing causes of overcrowding and substandard conditions affecting tenants of color will also require an analysis of rents, eviction rates, and the presence or absence of laws protecting tenants.

Moreover, in light of the widely acknowledged displacement pressures in San Mateo County's rental market, an adequate Assessment of Fair Housing will analyze the degree to which tenants who are forced to leave the area are at risk of losing access to the many opportunities to be found in San Mateo County's thriving economy and strong public schools in the document's required "access to opportunity" section.[5] Additionally, the loss of Latino, African American, and Asian immigrant renter households from San Mateo County due to displacement pressures should be examined as a significant threat to County's diversity in the portion of the AFH examining dynamics of integration and segregation.[6]

HUD's own guidance regarding the duty to affirmatively further fair housing identifies the "displacement of residents due to economic pressures," including displacement resulting from rising rents, as a potential contributing factor to fair housing issues such as residential segregation.[7] To fairly and adequately analyze these fair housing issues, the AFH must consider the presence or absence of protections available to renters, including rent stabilization and just cause limitations on evictions. Indeed, other jurisdictions in the region that are experiencing similar pressures in the rental market have addressed displacement and inadequate tenant protections in recent Analyses of Impediments or AIs (the predecessor to the AFH).[8]

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[3] HUD AFFH Data and Mapping Tool, Table 16, San Mateo County

[4] 24 C.F.R. §§ 5.152, 5.154(d)(2)(iv) & (d)(4)(ii).

[5] 24 C.F.R. § 5.152, 51.154(d)(2)(iii) & (d)(4)(ii).

[6] 24 C.F.R. § 5.152, 51.154(d)(2)(i) & (d)(4)(ii).

[7] U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf . As the guidance explains: "[s]uch pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic[s], the displacement of residents due to economic pressures may exacerbate patterns of residential segregation."

[8] *See* Oakland Analysis of Impediments, 83-84 (2015) (discussing displacement due to the loss of naturally occurring affordable units and analyzing gaps in rent regulations); San Jose Analysis of Impediments, 104 (2017)

These neighboring jurisdictions have it right, as do tenant leaders in San Mateo County. Deeply cognizant of the threat to their ability to remain in their homes and communities posed by the unregulated rental market, tenants in cities around the county have been advocating for ordinances that would establish rent stabilization, just cause, and anti-harassment protections for tenants. These policies would prevent or mitigate disproportionate housing needs resulting from uncontrolled rent increases and evictions; they would also stabilize realistic housing choice for tenants of color—helping to maintain the region's diversity and to preserve access to opportunity for residents of color within San Mateo County.

Any suggestion by real estate interest groups that tenant protections or other topics related to the rental market are somehow inappropriate to address in the AFH reveals an effort to suppress important data on fair housing and civil rights. We ask that you ensure that the ongoing federally-required effort to collect information about the occurrence of key challenges related to housing, and their impact on tenants and homeowners who belong to protected classes, are not diluted or distorted by interference from these special interest groups.

2. *Current AFH Participation by Realtors and Landlords*

We understand that at least two emails have sent to members of the San Mateo County Association of Realtors ("SAMCAR") urging their member realtors to fill out the AFH survey, complaining that the survey was not balanced because it was being circulated to renters. (Attachments 1 & 2.) These emails reveal that SAMCAR has identified the AFH as a politically significant terrain for their ongoing battle against tenant protections, and we anticipate that SAMCAR and politically active landlords will continue to search for opportunities to influence the process.

For the reasons mentioned above, we do not oppose gathering the views of realtors and landlords, and in fact we know that their views can be an important data point for the AFH. For example, we understand that the Housing Department of San Mateo County conducted a focus group with landlords in East Palo Alto as part of the Assessment of Fair Housing. According to a representative of Project Sentinel who was present at the focus group, this conversation has already yielded some important data that should be considered in the AFH. Landlords expressed a reluctance to rent units to people with disabilities, particularly people with physical disabilities, because they did not want to shoulder the financial responsibility to make accessibility modifications as required by law. *See* 42 U.S.C. § 3604(f) (prohibiting discrimination against housing applicants with disabilities and requiring housing providers to make reasonable modifications).

Indeed, we believe that more targeted data gathering from those with a financial stake in the housing market could yield important information about the housing-related challenges confronting people of color and other protected classes in San Mateo County. We would encourage you to host additional focus groups with landlords and realtors using questions

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(identifying "displacement of residents due to economic pressures" and the "lack of tenant eviction protection and tenant education" as impediments to fair housing).

tailored to their role.[9] To that extent that SAMCAR realtors may have participated in the AFH survey responsive to the April 21, 2017 "Call To Action" email message, we encourage you to analyze the survey results with this in mind. If there are notable differences in data trends before and after April 21, 2017, the findings should be weighted accordingly.

3. Real Estate Interest Groups and Recent Housing Debates in San Mateo County

The AFH process must be conducted with an open acknowledgement that the power dynamic between tenants as consumers and landlords as housing providers is an extremely lopsided one. Particularly in the current political and economic climate of San Mateo County, landlords and realtors are able to wield tremendous control in individual rental relationships, and their presence in public discourse about the rental market has a chilling effect on renter participation, sometimes to the point of being abusive.

In recent months, landlords and realtors in San Mateo a County have been increasingly explicit in their bias against tenants from protected classes. The rate at which minority tenants are being jettisoned from the local rental market is unprecedented.[10] Trion Properties, upon acquiring a 48-unit building in unincorporated Redwood City in July 2016, served eviction notices to tenants who were primarily Latino families with children after issuing a press release stating that the renovated apartments would "cater[] to young working professionals" from companies like Facebook and Oracle.[11] In April 2017, CityLab reported an increase in immigration related threats against tenants by landlords, citing the example of a property manager for a multi-unit complex in Pacifica threatening a single Latina mother with deportation if she refused to agree to a new lease.[12] These are but a few examples of the increasingly visible prejudice with which protected class tenants are met.

In public forums, the hostility directed toward tenants by opponents of rent control has been ferocious. In September 2015, when the City Council of San Mateo was considering renter protection measures and hearing public comment, the Board of Directors for San Francisco Organizing Project/Peninsula Interfaith Action wrote to the City Council describing the intimidation and harassment experienced by tenants in attendance at an open meeting.

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[9] For example, it may be appropriate to ask landlords about, among other things, (1) number and type of evictions; (2) rent increases; (3) position on tenant protections, such as rent stabilization and just cause limitations on eviction; (4) policies regarding language access and renting to non-English speakers; (5) reasonable accommodation policies; (6) experience providing reasonable accommodations; (7) age of the rental unit; (8) yearly expenditure on repairs and upgrades; (9) outstanding maintenance needs; (10) understanding of fair housing laws and protections; and (11) policies on acceptance of Section 8 vouchers (and, if applicable, reasons for not accepting Section 8 vouchers). Similarly, it may be appropriate to ask realtors about (1) the marketing and sale of occupied rental housing; (2) the probable impact of rent stabilization and just cause protections on sales of rental properties; and (3) whether they have experience with or knowledge of clients evicting tenants in protected classes in order to flip properties.

[10] *See* San Mateo County Eviction Report 2016 (http://www.legalaidsmc.org/eviction_report_2016.html)

[11] *See* "Low-income families face eviction as building 'rebrands' for Facebook workers," by Sam Levin, September 21, 2016 *The Guardian* (https://www.theguardian.com/technology/2016/sep/21/silicon-valley-eviction-facebook-trion-properties)

[12] *See* "In California, Landlords Threaten Immigrant Tenants with Deportations," by Kriston Capps, April 5, 2017 *CityLab* (https://www.citylab.com/housing/2017/04/landlords-are-threatening-immigrant-tenants-with-ice-deportations/521370/)

(Attachment 3). Behavior by landlords and realtors directed to tenants included ridiculing tenants for not speaking English, booing and hissing while tenants were speaking, and physically blocking a tenant from entering the meeting.

Similarly, in recent City Council meetings in Pacifica regarding a proposed ballot measure that would enact tenant protections, the rhetoric by speakers in opposition to the proposed Pacifica ballot measure has mirrored that of the April 21, 2017 "Call To Action" message from SAMCAR (Attachment 1), invoking the prospect of gang members and drug dealers entrenched in neighborhoods because they are impossible to evict.[13] Speakers bemoaned the "problem tenants" who, in the language of the "Call to Action," will "harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity." A passage from a recent op-ed in the Pacifica Tribune is illustrative:

> Why would Pacifica pass rent control? That's not a rhetorical question. Why would we? Rent control takes away property owners [sic] rights to manager their property and removes their financial incentive to keep their places up. *Owners can't remove gangs, drug dealers, loud or dangerous neighbors and deal with overcrowding. Care to live down the street from a rent-controlled property?*
>
> *No thanks! We don't want the same messes rent control created in San Francisco and East Palo Alto, do we?*[14]

Such coded language plays to racial fears and prejudices, directly calling on stereotypes linked to crime, overcrowding, and two majority-minority cities. Such fearmongering tactics are designed to stoke resistance to policies that would promote economic and racial diversity.

Intimidation tactics against tenants extend beyond racially charged comments in print and at public meetings. Shortly after a tenant named Barbara O'Neil spoke out publicly about a rent increase of $1,100 that she received for her longtime home in San Mateo City, her landlords threatened to evict her, using her pets as pretext—even though she had kept cats there for many years with the knowledge and permission of the owners.[15] We understand that many tenants fear similar consequences if they speak out in public about the challenges they face in connection with their housing.

These examples of recent conduct by landlords and realtors give context for the environment into which you invite feedback for the AFH. To bring landlords into the same community participation process with tenants, as if they merely represent an alternate

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[13] This conduct was observed by Shirley Gibson, a directing attorney at San Mateo Legal Aid, one of the signatories to this letter.

[14] Tom Thompson, *Rent control: Pacifica's big danger*, Pacifica Tribune (April 13, 2017), available online at http://www.pacificatribune.com/opinion/editorials/rent-control-pacifica-s-big-danger/article_21a22500-209a-11e7-83fc-cf3eef08d2ab.html (emphasis added).

[15] Bill Silverfarb, "Lawsuit alleges landlord retaliation: school teacher says she was threatened with eviction after speaking to media," *The Daily Journal* (Feb. 22, 2016), available online at http://www.smdailyjournal.com/articles/lnews/2016-02-22/lawsuit-alleges-landlord-retaliation-school-teacher-says-she-was-threatened-with-eviction-after-speaking-to-media/1776425158856.html .

perspective on tenant issues, would invite this uneven and toxic dynamic into the process. Their participation may give rise to a chilling effect that could corrupt the result. Landlord and realtor perspectives should instead be solicited through the separate, more tailored approach discussed above.

4. *Landlords and Realtors' Actions Are A Contributing Factor to the Displacement of Residents of Color, Loss of Access to Opportunity, and the Perpetuation of Disproportionate Housing Needs*

As the history described above demonstrates, interest groups representing landlords and realtors have used some unsavory tactics and the exercise of significant political muscle to help block policies that would have protected tenants, who are disproportionately members of protected classes, from displacement due to unregulated evictions and large rent increases. Their actions are a contributing cause of the continued loss of equal housing opportunity for members of protected classes resulting from the crisis in the rental market in San Mateo County.

In this way, politically active landlords and realtors are similar to another familiar fair housing obstacle: NIMBYs who oppose the construction of affordable housing in affluent communities. The Guidebook published by HUD on the duty to affirmatively further fair housing, for example, identifies "community opposition"-- i.e., "NIMBY-ism," or "[t]he opposition of community members to proposed or existing [housing] developments," as a potential "contributing factor" to fair housing issues like segregation—whether the opposition is based on factual concerns or on biases.[16]

Moreover, federal courts recognize that NIMBYs' opposition to affordable housing, particularly when expressed via racially charged stereotypes and coded language, can furnish compelling evidence of intentional discrimination on the part of local governments that accede to their demands. *See also Avenue 6E Investments v. City of Yuma*, 818 F.3d 493, 504-06 (9th Cir. 2016) (discussing how community opposition to an affordable housing development based on racially charged stereotypes can support a discrimination claim under the Fair Housing Act); *Smith v. Clarkton*, 682 F.2d 1055, 1066 (4th Cir. 1982) (citing stated community concerns about an "influx of 'undesirables'" resulting from a housing project as evidence supporting a Fourteenth Amendment racial discrimination claim).

Similar to NIMBYs who oppose affordable housing in wealthy suburbs, the landlords and realtors' interest groups in San Mateo County have incited opposition to tenant protections based on untruths and fearmongering, as outlined above, including appeals to racially-charged stereotypes of low-income tenants as gang members and criminals. The actions of these interest groups have contributed to the loss of housing opportunity. Tenants of color have faced unjustified evictions and untenable rent increases without any legal protection, putting the racial diversity of the county at risk. Additionally, by successfully opposing tenant protection policies, landlords and realtors' interest groups have contributed to the increasing incidence of severe housing cost burden and overcrowding affecting members of protected classes who are renters. The discriminatory effects of the political activities of these real estate interest groups compound

[16] U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf

the impact of individual instances of discrimination against tenants with disabilities, tenants of color, and immigrants, as described above.

* * *

We hope and expect that the AFH will provide a thorough and factually grounded analysis of the civil rights challenges facing renters of color, tenant families with children, and other members of protected classes caught up in the brutal housing market in San Mateo County. We urge the County to consider this letter and the circumstances described herein when completing the AFH – specifically in identifying contributing factors, prioritizing and justifying the prioritization of these factors to be addressed by fair housing goals, and engaging in goal-setting.[17] Furthermore, we note the AFFH Rule's requirement that "[i]n prioritizing contributing factors, [HUD] program participants shall give highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance."[18]

An honest analysis must identify the fair housing impacts of unregulated rents and evictions, as well as acknowledge the role that real estate interest groups have played in perpetuating displacement pressures and other harms. Local governments who receive funding from HUD, and the consultants they hire to complete the AFH, have the obligation to investigate the causes or contributing factors of fair housing problems, and they cannot shrink from just criticism of interest groups whose actions or views are contrary to fair housing goals.

Sincerely,

Public Advocates

Legal Aid Society of San Mateo County

American Civil Liberties Union of Northern California

American Civil Liberties Union of Northern California - North Peninsula Chapter

Project Sentinel

National Housing Law Project

Enc.

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[17] *See generally* 24 C.F.R. § 5.154.
[18] 24 C.F.R. § 5.154(d)(4)(ii).

CC: Jen Garner, BBC Research & Consulting
John Maltbie, San Mateo County Manager
Kenneth Cole, Director, San Mateo County Department of Housing
Supervisor David Pine, San Mateo County Board of Supervisors
Supervisor Carole Groom, San Mateo County Board of Supervisors
Supervisor Don Horsley, San Mateo County Board of Supervisors
Supervisor Warren Slocum, San Mateo County Board of Supervisors
Supervisor David Canepa, San Mateo County Board of Supervisors
Jeff Jackson, U.S. Department of Housing and Urban Development

Attachment 1

From: Gina Zari [mailto:gina@samcar.org]
Sent: Friday, April 21, 2017 11:53 AM
To: Gina Zari
Subject: MONDAY -- Rent Control Moratorium: Council Vote

CALL FOR ACTION

OPPOSE RENT CONTROL IN PACIFICA

Monday, April 24th, the Pacifica City Council will vote a SECOND & FINAL time on a Rent Control Moratorium, including "just cause" eviction.

How can you help?

1. **PLEASE JOIN US** at a **Reception at Nick's Rockaway, 4:30 PM - 6:30 PM** at 100 Rockaway Beach Ave, Pacifica on Monday, prior to the City Council Meeting; RSVP to me (gina@samcar.org)
2. **THEN, JOIN US** at the Pacifica City Council Meeting at 6:45 PM
3. **COMPLETE THIS SURVEY** being conducted by **San Mateo County** regarding housing, affordable housing, **rent control**, just cause eviction, relocation payments and other housing topics. Unfortunately, this survey has only been seen being circulated among one specific group: renters. *(To ensure balance, if you know renters who believe in property rights, please pass this survey on to them, as well.)* **https://www.research.net/r/LiveSMC2017**

MONDAY, APRIL 24th

4:30 – 6:30 PM

Nick's Rockaway Reception
100 Rockaway Beach Avenue, Pacifica, CA 94044

6:45 PM

Pacifica City Council Meeting
2212 Beach Blvd, Pacifica, CA 94044

PACIFICA RENT CONTROL FACTS

Rent control will create a stagnant housing market in Pacifica. As household incomes naturally increase, instead of buying a home, renters in a rent-controlled environment are incentivized to stay in the subsidized unit – even when they are making well over $150,000 annually, preventing scarce affordable housing from being available to those who really need it.

Rent control will reduce the number and quality of rental housing units available in Pacifica. Rent control exacerbates a housing shortage by incentivizing tenants to stay far longer in more affordable units. When government places an artificial control on rent, property owners are not able to adjust rents to accommodate increased costs or unexpected circumstances and properties deteriorate.

Rent control will lead to higher rents in Pacifica. Although people think rent control will lead to lower rents, the exact opposite is true. The rents of available apartments in rent controlled cities are dramatically higher than rents in cities without rent control. In cities without rent control, available units exist all along the spectrum from low-priced to high-priced. In rent controlled cities, the only units available are the highest priced, far above the median rent.

Rent control will take the investment, life savings, and retirement from people in Pacifica who have invested their money in real estate. Many Pacificans have unconventional retirement plans. Rent control ordinances that prohibit property owners from asking for market rate rents unfairly steal from people's retirements.

Rent control will bankrupt Pacifica. Rent control ordinances create substantial administrative costs. Rent controls require the creation of convoluted bureaucratic systems. Rental property must be registered, detailed information on the rental property must be collected, complex systems for determining rents must be created, and processes for hearing complaints and appeals must be established. In Santa Monica in 1996, the Rent Control Board had a budget of more than $4 million a year to control rents for only 28,000 units.

Rent control will disproportionately harm Pacificans in affordable housing. Poorer families suffer a marked decline in existing housing as the quality of existing housing falls in response to reduced maintenance expenditures. The middle class have greater ability to move out, but poorer families lack this option. In addition, poor families are at a substantial disadvantage when it comes to finding new housing. In a tight market – as we currently have – there are

more people looking for housing than available rental units, giving housing providers far more discretion in choosing among competing potential customers. In rent-controlled markets, housing providers turn to factors such as income and credit history to choose among competing renters.

Rent control means expensive consumer entry costs. In many rent-controlled communities, prospective consumers must pay substantial finder's fees to obtain a rental unit, due to the scarcity of available housing. And, in some rent-controlled areas, a "gray-market" in rental housing has developed in which units are passed among friends or family members, or new consumers may be required to pay "key money" or to make other payments to current consumers to obtain housing. Sub-leasing is common in rent-controlled cities.

Rent control will artificially destroy home values in Pacifica. Plummeting values will adversely impact our schools and city services. As home and apartment values decline, revenue from the county also declines. This will jeopardize the long term health of our schools and city infrastructure such as police, fire, and other services.

PACIFICA "JUST CAUSE" EVICTION FACTS

"Just Cause" Eviction will punish good renters in Pacifica. "Just Cause" Eviction ordinances have the detrimental effect of making " good tenants" endure years of harassment, verbal abuse, inconvenience, or dangerous living circumstances where they live in close proximity to drug dealers, petty thieves, and lewd or offensive individuals. Rarely will the "good tenants" testify in court for fear of

their safety. Instead, they will expect the property owner to handle the problem. When it is not handled, the "good tenants" are forced to leave their homes.

"Just Cause" Eviction provisions dramatically increase the cost to evict problem tenants. With "just cause" eviction, the property owner has to prove that "good cause" exists, which requires witnesses and additional trial time. Under these circumstances, the problem tenant's attorney often requests a jury trial, hoping they can persuade jurors, who are less accustomed to dealing with problem tenants. In one San Francisco case, attorney's fees exceeded $75,000. These costs were passed on to the "good tenants" who suffer because "Just Cause" Eviction ordinances protect the "problem tenant" over the " good tenant."

Month-to-Month leases will be made virtually obsolete in Pacifica. While the tenant can serve the property owner with a 30 day notice, the property owner can only terminate the tenancy if the property owner can prove "just cause" in court. And, while the "just cause" might very well exist, it is extremely difficult to prove this in court, particularly when the good tenants or neighbors are scared or intimidated by going to court and testifying against the problem tenant.

There is no need for "just cause" eviction legislation in Pacifica -

evictions are already costly and time consuming processes for property owners. Evictions can take several months and cost many thousands of dollars. Tenants being evicted often do physical damage to the property. For property owners, eviction is the final alternative to which they turn, not the first.

Gangs and criminal behavior thrive where "just cause" eviction ordinances are in place. In areas where "Just Cause" Eviction ordinances are enacted, it is virtually impossible for property owners to evict gang members due to the burden of proof placed on the property owner. In these situations, it is very unusual that a "good tenant," who is witness to the activities of a gang member, will actually testify in court on what he or she has seen for fear of retribution.

Good renters in Pacifica will experience harassment under the "just cause" eviction ordinance. The worst unintended consequence of all that will be created by this "Just Cause" eviction ordinances is when a property owner – facing several thousands of dollars in attorney's fees and several months in uncollected rent – decides NOT to evict because of this ordinance and leaves the "problem tenant" alone to harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity.

John Keener, Mayor Pro Tem
(650) 557-9738
keenerj@ci.pacifica.ca.us

Sue Digre, Councilmember
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Deirdre Martin, Councilmember
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Mike O'Neill, Mayor
(650) 302-2470
o'neillm@ci.pacifica.ca.us

Sue Vaterlaus, Councilmember
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Phone (650) 696-8200 | Fax (650) 342-7509 | samcar@samcar.org | www.samcar.org

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Attachment 2

From: Gina Zari, SAMCAR Government Affairs Director [mailto:gina@samcar.org]
Sent: Thursday, May 11, 2017 10:03 AM
To:
Subject: DEADLINE: FRIDAY -- County Rent Control Survey

SAN MATEO COUNTY ASSOCIATION *of* REALTORS®

DEADLINE: FRIDAY AFTERNOON

Please complete the survey being conducted by San Mateo County regarding housing, affordable housing, rent control, "just cause" eviction, mandatory relocation payments, and other housing topics. *The results of this questionnaire are likely to help formulate the County's Affordable Housing and Renter Protection/Property Control priorities.*
Unfortunately, this survey has only been seen being circulated among one specific group: renters. So, to ensure balanced results, please complete the survey and forward it to anyone you know who believes in property rights, particularly renters.

Click HERE to complete the County Affordable Housing Survey.

The County will take down the survey on Friday afternoon.

850 WOODSIDE WAY, SAN MATEO, CA 94401
Phone (650) 696-8200 | Fax (650) 342-7509 | [samcar@samcar.org]samcar@samcar.org | www.samcar.org
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Attachment 3

RECEIVED

2015 SEP 29 P 1:04

OFFICE OF CITY CLERK
CITY HALL
SAN MATEO, CA

September 25, 2015

San Mateo City Council Members
330 W. 20th Ave
San Mateo, CA 94403

Esteemed Council Members,

We are writing on behalf of Peninsula Interfaith Action (now SFOP/PIA) to thank you for the effort you have put into hosting important conversations about the housing and displacement crisis facing our families and seniors in San Mateo and beyond. We appreciate your courage for taking on this issue and standing with the most vulnerable in our community.

We also want to respectfully share some concerns that tenants have raised as they've attempted to be part of these community-wide meetings. We want to submit recommendations for how to make this process even more inclusive going forward:

- Professional translation provided by the City
- Functioning audio systems that allow everyone to hear council proceedings
- If a police presence is necessary, a more relaxed presence (residents, especially those with vulnerable status, found the police presence to be intimidating and felt that renters were singled out when people were asked to disperse from the corridor)

Beyond that which the City has the ability to control, and because your vantage point might not allow you to see all that is going on, we also want to make you aware of the behavior of some landlords and realtors who were disparaging and used intimidation tactics towards renters, particularly immigrant renters.

- ~~Anti-tenant-protection advocates booed and hissed when they heard things they didn't~~ agree with
- Anti-tenant-protection advocates loudly whispered – with the evident intention of being heard by others – "learn English", [with sarcasm] "they're gonna start crying now, get out the tissues…", when immigrant residents gave public testimony
- Anti-tenant-protection advocates refused to give up seats to renters, even when it was evident that no one else was yet using the chairs
- Anti-tenant-protection advocates harassed SFOP/PIA staff for attempting to provide translation, asking her to stop talking and to leave
- Two anti-tenant-protection advocates followed around a group of renters who were trying to have a private conversation and refused to leave them alone
- An anti-tenant-protection advocate grabbed a renter's advocacy sticker, tore it up in front of her and said, "You probably don't even understand what this says."
- One landlord verbally attacked a tenant in the corridor and used physical intimidation, precipitating police intervention

SFOP/PIA is a non-profit 501(c)(3) organization Tax ID #94-2716470 and an affiliate of the PICO National Network
1200 Florida Street, San Francisco, CA 94110-4113 • (415) 821-5000 / 1336 Arroyo Avenue, San Carlos, CA 94070-3913 • (650) 592-9181
www.sfop.org / pia@piapico.org

Many of these behaviors are meant to signal that some voices are less valuable than others. The result of this behavior is that renters, who are already vulnerable and in a lower position of power than the anti-tenant-protection advocates, felt intimidated and excluded and many left early, as a result.

We raise these issues because the City has expressed an interest in bringing all stakeholders to the table. However, this cannot be accomplished if vulnerable stakeholders – renters – don't have equal access and are harassed for participating.

We also raise these issues because the mission of our organization is to create economic and racial equity in the region. While on the face of it, the housing crisis is an economic equity issue, the problem and the political process around it are also being defined by racial inequities. To be clear, all of the experiences mentioned above happened to people of color. White renters and advocates did not report being personally attacked or harassed. SFOP/PIA cannot stay silent in the face of this kind of racism during a public process that should be safe and inclusive for all.

Finally, it should be said that the afore-mentioned pressures to keep renters out of Council Chambers and relegating renters to auxiliary rooms, supported by a police presence, is symbolic of the way renters – particularly renters of color – are excluded from the opportunities that our region has to offer. What does this behavior suggest about the treatment of renters in the intimate power dynamics between renters and landlords?

We hope that the Council will take seriously these concerns and ensure the safe and inclusive participation of all. We are interested in working with the City to find ways that to do this and would be happy to discuss this further. If you would like to do so, our Executive Director Jennifer Martinez will make herself available at 650-796-4160.

Thank you for your consideration,

Members of the Board of Directors
San Francisco Organizing Project/Peninsula Interfaith Action

Liz Jackson-Simpson
Success Center

Aïdah Rasheed
Muslim Community Center

Gloria Stofan
St. Peter Catholic Church

Michael Paul Pulizzano
Star of the Sea Catholic Church

Almudena Bernabeu
St. Dominic's Catholic Church

Cc:
Larry Patterson, City Manager
Shawn Mason, City Attorney
Patrice Olds, City Clerk

DOH
DEPARTMENT OF HOUSING
COUNTY OF SAN MATEO

Main Office - Department of Housing
264 Harbor Blvd., Building A, Belmont, CA 94002-4017

Housing & Community Development (HCD)
Tel: (650) 802-5050

Housing Authority of the County of San Mateo (HACSM)
Tel: (650) 802-3300

Board of Supervisors:
Dave Pine
Carole Groom
Don Horsley
Warren Slocum
David Canepa

Director: Ken Cole

May 31, 2017

Shirley E. Gibson
Directing Attorney
Legal Aid Society of San Mateo County
330 Twin Dolphin Drive, Suite 123
Redwood City, CA 94065

Re: Special Interests and Civil Rights in Housing: Ensuring the Assessment of Fair Housing Process Provides an Accurate and Complete Analysis of Resident Experiences in San Mateo County

Dear Ms. Gibson:

Thank you for your letter dated May 24, 2017 regarding *"Special Interests and Civil Rights in Housing: Ensuring the Assessment of Fair Housing Process Provides Accurate and Complete Analysis of Resident Experiences in San Mateo County."*

On behalf of San Mateo County, I would like to thank the coalition of advocates including Public Advocates, Legal Aid Society of San Mateo County, American Civil Liberties Union of Northern California, American Civil Liberties Union of Northern California – North Peninsula Chapter, Project Sentinel, and the National Housing Law Project for your active participation in the Assessment of Fair Housing (AFH) for the San Mateo County Region. With your help and support, the AFH for the San Mateo Region will reflect significant input from residents of the county most likely to be impacted by fair housing issues and whose input in the AFH is most critical. The input of the coalition in drafting the survey instrument and assistance distributing the survey to low income residents, and resident members of protected classes based on race, ethnicity, nationality, and/or persons with disabilities, will help to ensure that their stories are reflected in the AFH.

Thank you as well for informing us that special interest groups – namely, "politically organized landlords and Realtors" – are interested in the County's regional AFH. We are aware of their interest and concerns regarding the AFH. We reached out to BBC Research, the consultants managing the AFH process, about the notice that was sent out by SamCAR regarding participation in the AFH Survey. BBC informed us that there was no appreciable uptick in the number of surveys submitted between May 11th, and the survey deadline of May 12th. In fact, with the help of housing advocate organizations to get the word out about the survey, we received more than 3,200 survey responses and are confident that the analysis of the survey results will reflect a broad cross section of residents of San Mateo County. Furthermore, because outreach was targeted to individuals and groups connected with various local housing advocacy organizations, we anticipate that survey results will in fact tell the story of San Mateo County residents most affected by lack of affordable housing and fair housing issues.

In your letter, you note several steps that the County, entitlement cities and the public housing authorities should take in conducting the AFH process. We have discussed these recommendations with our consultant team at BBC and are confident that we are taking steps to include these recommendations in our process. We will keep the issues outlined in the letter in mind throughout the process of collecting and analyzing the data that will inform the AFH.

As you are undoubtedly aware, there are still several opportunities for your organizations to participate in the AFH process. On Saturday, June 17, 2017, the County, entitlement cities and the public housing authorities will host two Community Meetings providing another opportunity for residents of San Mateo County to tell their housing story and for us to hear about their housing decisions and experiences living, working or going to school in the county. At this meeting, residents will have the opportunity to help prioritize issues and identify solutions that will be included in the AFH. Flyers for these meetings in English, Spanish, Mandarin and Tagalog are available on the Department of Housing website. I encourage you to download and distribute these flyers to make sure that we have robust participation of county residents who are members of protected classes and who disproportionately feel the effects of the pressures in the rental market here in San Mateo County.

In addition to the upcoming Community Meetings on June 17th, there will be a public hearing to solicit input on the Assessment of Fair Housing at the meeting of the Board of Supervisors on July 25, 2017. This public hearing will be in advance of a 30-day public comment period. Working with BBC, we plan to integrate all the relevant public comments into the fair housing analysis, goals, and priorities that will comprise the Assessment of Fair Housing for the San Mateo County region.

We encourage you to continue to share your expertise about the housing issues faced by the most vulnerable residents of San Mateo County; to provide the County and our consultants with relevant information to inform the Assessment of Fair Housing; to help publicize ways in which residents can contribute information, data, and feedback to the process; and to help us to prepare an AFH that provides a "*thorough and factually grounded analysis of the civil rights challenges facing renters of color, tenant families with children, and other members of protected classes caught up in the brutal housing market of San Mateo County.*" [1]

Thank You,

Rose Cade
Housing and Community Development Specialist III

Department of Housing, San Mateo County
264 Harbor Blvd., Bldg. A
Belmont, CA 94002
Phone 650-802-3386/Fax 650-802-3373
RCade@smchousing.org

[1] See May 24, 2017 Letter to San Mateo County Department of Housing from Public Advocates, Legal Aid Society of San Mateo County, American Civil Liberties Union of Northern California, American Civil Liberties Union of Northern California – North Peninsula Chapter, Project Sentinel and National Housing Law Project.

CC: Ken Cole, Director, San Mateo County Department of Housing
Douglas W. Frederick, HCD Program Manager, San Mateo County Department of Housing
Lindsay Haddix, Management Analyst, San Mateo County Department of Housing
Heidi Aggler, BBC Research & Consulting
Jen Garner, BBC Research & Consulting

LEGAL AID SOCIETY
OF SAN MATEO COUNTY

May 31, 2017

Jen Garner
BBC Research and Consulting
Via email to jgarner@bbcresearch.com

Re: Local Data in San Mateo County for Assessment of Fair Housing

Dear Jen:
As you work toward assembling the necessary information for the draft Assessment of Fair Housing, please consider these assembled suggestions for local data from members of our housing advocate cohort.

1. Demographic characteristics (including race, national origin, disability status, familial status, and income) for renter households and owner-occupied households for each of the 21 jurisdictions in the county;
2. Data from school districts on enrollment rates by race and income, teacher attrition and hiring issues, and number of public school students who have left or joined a school due to a move during the school year, by school district;
    a. Source: each school district should have this data
3. Transit lines and ridership demographics for SamTrans and CalTrain, including an identification of low-income neighborhoods with poor access to transit;
    a. Source: SamTrans and CalTrain
4. Jobs-housing fit for each of the 21 jurisdictions;
    a. Source: researchers may have updated numbers and data for cities that are not listed in this short report: http://nonprofithousing.org/wp-content/uploads/JH-Fit-Fact-Sheet-FINAL-9.15.pdf
5. Data on the types of rental housing - how many single family homes, how many apartment units, age of apartment buildings;
    a. Source: 21 Elements draft report
6. How many rental units are owned by corporations;
    a. Source: County Recorder
7. The average length of the entitlement process for affordable housing, market rate housing, and commercial development;
8. Differing requirements for affordable housing, market rate housing, and commercial development (e.g. height requirements etc);
9. Raw numbers of affordable housing projects approved each year for the last ten years by city or jurisdiction;
10. Of the Housing Element identified sites, how many were developed into affordable housing? Into something else? If something else, were replacement affordable housing sites identified?
11. How many homeless people that go through homeless programs get placed in other counties?
    a. LifeMoves should have data on shelter-to-housing placements.

The Natalie Lanam Justice Center @ the Sobrato Center for Nonprofits – Redwood Shores
330 Twin Dolphin Drive, # 123 • Redwood City, CA 94065 • 650.558.0915 • 800.381.8898 • Fax 650.517-8973

12. Number and location by city and/or zip code of market units currently leased with a Housing Choice Voucher (Section 8);
    a. Source: Housing Authority of San Mateo County
13. Number and location by city and/or zip code of below-market units currently leased with a Housing Choice Voucher (Section 8);
14. Section 8 voucher success rate (number of new vouchers issued compared to number leased up), comparable over past five years;
15. Number and degree of rent increases approved by the Housing Authority for units leased with Section 8 vouchers, over the past five years.

We also recommend the following sources as general resources for useful data.

- UC Berkeley Urban Displacement maps http://www.urbandisplacement.org/map/sf
    - San Jose's most recent AI referenced these maps. For example, they mapped "urban villages" (which are sort of transit-oriented-development planning areas) against the urbandisplacement map
- CalEnviroScreen: https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30
- UC Davis Regional Opportunity Index maps: http://interact.regionalchange.ucdavis.edu/roi/about.html
- Compare sites identified in the most recent housing elements for each of the 21 jurisdictions to opportunity indicators from AFFH data & mapping tool, racial concentration, and CalEnviroScreen.
- Data on education qualify can be found at the following sites. To properly link education data to housing, you will need to get attendance boundaries for the local school districts.
    - http://dq.cde.ca.gov/dataquest/
    - http://caaspp.cde.ca.gov/

To assisting in exploration of solutions to housing pressures, please ensure that the AFH contains a review of which San Mateo jurisdictions have what policies from the list below, and a rating of each as a strong version or a weak version of the policies:

A. Tenant protections--rent stabilization, just cause, anti-harassment ordinance, relocation requirements
B. Impact fees (residential, commercial)
C. Affordable housing overlay zone
D. Ordinance implementing the surplus land act (Housing Leadership Council is a useful source)
E. Zoning provisions allowing accessory dwelling units

We hope these suggestions are helpful to your process, and look forward to seeing the draft AFH next month.

Sincerely,

Shirley E. Gibson
Legal Aid Society of San Mateo County

June 16, 2017

Rose Cade
San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Initial Input for Draft Assessment of Fair Housing

Dear Ms. Cade:

The ongoing Assessment of Fair Housing ("AFH") finds San Mateo County at an important crossroads in terms of civil rights and equal opportunity. While the local powerhouse economy has generated stunning job growth in recent years, including a large proportion of working class jobs, the pressures of a long-running housing crisis pose a serious threat to the ability of families with children, seniors, persons with disabilities, and Latino, Asian immigrant, and African American residents to remain in the community and benefit from the rising prosperity. In addition to pressures pushing residents out of the area, disparities in access to opportunity and housing needs persist across neighborhoods and communities within the county, carving an uneven playing field that fails to live up to our shared ideals.

As you know, the duty to affirmatively further fair housing, imposed by federal law as a condition of receiving funding from HUD, requires San Mateo County and other local governments and agencies to take meaningful actions to address these serious fair housing problems.[1] We have already lost much of the African American population. The AFH is an essential step towards compliance with that duty.

In order to ensure that the AFH adequately addresses the pressing fair housing issues affecting residents of color, immigrants, families with children, seniors, and persons with

[1] 24 C.F.R. § 5.166 (requiring recipients of HUD funding to certify compliance with the duty to affirmatively further fair housing). San Mateo County, South San Francisco, Daly City, Redwood City, San Mateo City, the Housing Authority of San Mateo County, and the Housing Authority of South San Francisco are all subject to the duty to affirmatively further fair housing.

disabilities in San Mateo County, we write to offer initial recommendations regarding topics which should receive robust attention in the AFH, including:

- Displacement pressures in the rental market affecting members of protected classes, including those resulting from the absence of protections against rent increases and no-cause evictions;
- Local and regional patterns of segregation and disparities in access to opportunity, including a consideration of the location of affordable housing;
- Barriers or limitations experienced by protected classes with regard to access to jobs, high quality education, adequate transit services, a healthy environment, and high quality health care;
- The particular housing challenges facing Section 8 voucher holders and residents of mobilehome parks in San Mateo County.

We also offer some key principles that should guide the assessment's analytical approach to discussing fair housing issues, prioritizing contributing factors, and setting fair housing goals and corresponding metrics and milestones.

Our organizations welcome the important discussions regarding equal housing opportunity that the AFH process has helped to promote in San Mateo County, and we are confident that our continued dialogue will facilitate a meaningful assessment. We hope that the AFH, as intended by federal law, will lay a strong foundation for expanding fair housing choice and access for San Mateo County workers and residents—including communities of color, immigrant populations, families with children, and persons with disabilities—in the years to come.

1. Essential Topics to Include in the AFH

The undersigned organizations are actively involved in representing, organizing, and/or supporting members of protected classes in San Mateo County as they navigate challenges related to housing and access to opportunity. Based on this experience, we believe that each of the following fair housing issues[2] must receive careful and prominent attention in the AFH.

First, the AFH must analyze displacement pressures and other challenges facing renters in San Mateo County's brutal rental housing market as urgent and high priority fair housing issues. It is well documented that working class tenants, including many tenants of color and families with children, have been pushed out of their homes through mass evictions, harassment, and staggering rent increases in recent years.[3] This displacement represents a direct loss of

[2] The AFFH rule defines a "fair housing issue" as "a condition in a program participant's geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as ongoing local or regional segregation or lack of integration, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing." 24 C.F.R. § 5.152 (definition of "fair housing issue").

[3] Institute of Governmental Studies, University of California, Berkeley, *Displacement in San Mateo County, California: Consequences for Housing, Neighborhoods, Quality of Life, and Health*, Research Brief (May 2017), available online at http://www.urbandisplacement.org/sites/default/files/images/impacts_of_displacement_in_san_mateo_county.pdf

housing choice, and contributes to deepening segregation and unequal access to opportunity as diverse families are forced to move to lower resourced and frequently segregated communities.[4] Moreover, the same pressures in the rental market that drive displacement contribute to—and increase the severity of—overcrowding, rent burden, poor livings conditions, and harassment experienced by tenants in protected classes.[5] These dynamics should receive robust analysis and discussion in the AFH.

We also ask that the AFH consider the presence or absence of tenant protections, including rent stabilization, just cause, and anti-harassment provisions, when analyzing contributing factors related to segregation, access to opportunity, and disproportionate housing need in connection with the rental market. Such laws would protect tenants' access to secure and stable housing in communities of opportunity, and would also mitigate some of the circumstances contributing to overcrowding, poor conditions, and cost burden. Review of the current application and impact of laws that limit evictions and rent increases in East Palo Alto and in County mobilehome parks would be useful to this discussion.

Second, the AFH must analyze segregation and access to opportunity at both a local and a regional level, identifying barriers to affordable housing and comparing the location of affordable housing sites to opportunity indicators and patterns of racial or ethnic concentration. As then-Judge Breyer wrote in a case regarding the duty to affirmatively further fair housing, the affirmative duty "reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases."[6] Both a regional and a local lens are necessary to adequately analyze segregation in the AFH. There is significant variation in the concentration of members of protected classes, together with income and markers of opportunity, within and between cities and unincorporated communities throughout San Mateo County. The same analysis should be repeated at a regional level, comparing demographic and opportunity indicators for San Mateo County with neighboring counties as well as places that are recognized destinations for displaced households (*e.g.* Stanislaus County in the Central Valley). In order to explore these patterns of segregation and disparities in access to opportunity, we recommend that the AFH make full use of the "local data" sets and maps addressing opportunity and segregation in the region, including those set out at the margin.[7]

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[4] *Id.* at 8 ("Households who were displaced [from rental homes in San Mateo County] currently live in neighborhoods with more affordable housing but access to fewer jobs, scoring over 10 points lower on the HUD Job Access index (on a 100-point scale) than the neighborhoods of households who were not displaced."); *see also id.* at 10-11 (discussing negative impacts on transportation access, job opportunities, safety, access to healthcare services, and environmental quality); Kathleen Maclay, *Many in San Mateo County priced, pushed out of affordable housing*, Berkeley News (May 16, 2017), available online at http://news.berkeley.edu/2017/05/16/many-in-san-mateo-county-found-priced-pushed-out-of-affordable-housing/ ("Thirty-three percent of [displaced] households left San Mateo County, generally moving to the Central Valley or eastern communities in the East Bay.").

[5] *Id.* at 2, 4-7, 12. HUD AFFH Data and Mapping Tool, Table 9 (Demographics of Households with Disproportionate Housing Needs). Overcrowding, rent burden, poor living conditions, and housing-related harassment disproportionately affecting members of protected classes are elements of "disproportionate housing need" as that term is used in the AFFH rule. 24 C.F.R. § 1.152 (defining "disproportionate housing need").

[6] *NAACP v. Sec'y of Housing and Urban Development*, 817 F.2d 149, 155 (1st Cir. 1987) (Breyer, J.).

[7] *See* 24 C.F.R. § 1.52 (defining the term "local data") *and* 24 C.F.R. §§ 1.154(c), (d)(2) (requiring use of local data in the AFH analysis). Relevant sources of local data include, but are not limited to, U.C. Berkeley's Urban Displacement project, available online at http://www.urbandisplacement.org/map/sf; U.C. Davis' Regional

As you work to identify the contributing factors to segregation and disparities in access to opportunity on both a local and regional level, we ask that you analyze zoning and planning barriers to affordable housing, multifamily housing, and accessible housing in each of the twenty one jurisdictions and include that analysis in the AFH. Examining current and proposed policies on preservation of mobilehome parks as a source of affordable housing is also an appropriate component of the AFH. Furthermore, we ask that you assess the impact that public opposition has on the development of affordable housing in individual communities throughout the County. Additionally, as one important gauge on the scale of exclusion resulting from San Mateo County's housing crisis, we also recommend that you refer to recent analyses of the "jobs-housing fit" between working class jobs in the county and housing affordable to working class individuals.[8]

To understand how low-income members of protected classes who do live within the county are affected by this geography, the AFH should compare the location of existing affordable housing[9] to the demographic profile and opportunity indicators of the neighborhoods and cities where the housing is located. Additionally, the AFH should review the Housing Elements completed by each of the twenty-one jurisdictions in San Mateo County and compare the location of housing opportunity sites to patterns of racial or other concentration as well as markers of opportunity like transit access, the quality of educational opportunity, environmental quality, and other important opportunities.[10]

Third, the AFH must identify disparities experienced by protected class members in access to high quality transit, access to high quality public education, access to high quality health care, and access to clean environmental conditions.[11] To accomplish this analysis, we ask that you reach out to officials at state, regional, and local agencies charged with administering transit, education, health and environmental protection programs and initiate a collaboration with them to review relevant data and compile information on strategies for reducing disparities connected with their programs that are experienced by members of protected classes. In considering access to transit, for example, the AFH should examine the affordability of bus and train service in the county, the adequacy of transit routes to connect members of protected classes to important job centers like the San Francisco International Airport, and the frequency and quality of transit services that are used by members of protected classes.

Opportunity Index, available online at http://interact.regionalchange.ucdavis.edu/roi/about.html ; and the CalEnviroScreen, available online at https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30.

[8] Chris Benner & Alex Karner, *Low-wage jobs-housing fit: identifying locations of affordable housing shortages*, Urban Geography, (2016) available online at http://www.tandfonline.com/doi/full/10.1080/02723638.2015.1112565; Alex Karner & Chris Benner, *Job growth, housing affordability, and commuting in the Bay Area, Prepared for the Bay Area Regional Prosperity Plan* (2015), available online at http://www.planbayarea.org/sites/default/files/pdf/prosperity/research/Jobs-Housing_Report.pdf.

[9] Existing affordable housing may include units that have some kind of explicit affordability criteria (such as subsidized units, or deed-restricted units), or "naturally occurring" affordable housing in the private market that, although not protected or secured by an affordability requirement, is currently occupied by low-income residents.

[10] The Housing Elements may be accessed via this website: http://hcd.ca.gov/community-development/housing-element/index.shtml .

[11] 24 C.F.R. § 5.154(d)(2)(iii).

Fourth, the AFH must adequately incorporate fair housing analyses from the two participating housing authorities – the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority. As the public housing agency plan conforming amendments to the AFFH regulation state, "All admission and occupancy policies for public housing and Section 8 tenant-based housing programs must comply with Fair Housing Act requirements and other civil rights laws and regulations and with a PHA's plans to affirmatively further fair housing."[12] Accordingly, as part of the AFH process, we ask that that the two PHAs involved evaluate their relevant planning documents, policies, and practices – including, as applicable, those that appear in their Admissions and Continued Occupancy Policy (public housing) and the Section 8 Administrative Plan (Section 8 Housing Choice Voucher program).

Regarding the HACSM, we recommend that the AFH examine the following policies, practices, and circumstances that may impact fair housing choice and access to opportunity for individuals and families served by the housing authority: (1) source of income discrimination by housing providers on the private rental market; (2) the effectiveness of any programs in place to increase landlord participation in the Housing Choice Voucher program; (3) the impact of time limitations on Section 8 voucher participants; (4) the impact on tenant rent burden of Housing Choice Voucher subsidy calculations based on the Tiered Subsidy Table; and (5) the geographic distribution of rental properties using Housing Choice Vouchers relative to high opportunity areas.

For both housing authorities, we urge the County to ensure that there is robust tenant participation by participant and applicant individuals and families served by these PHAs.

2. Qualitative Standards for the AFH Analysis

HUD's regulation governing the AFH process recognizes that "[t]o develop a successful affirmatively furthering fair housing strategy, it is central to assess the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs."[13] The analysis prescribed for the AFH is designed to facilitate a thoughtful, principled report that addresses these issues in a way that can guide planning, policy and investment decisions.

To support this goal, we would like to make a few overarching comments about the approach the AFH should take, consistent with HUD regulations, to analyzing the important and sometimes politically thorny issues listed above.

First, the AFH should rely on grounded, factual analyses of fair housing issues and their contributing factors, avoiding the temptation to please key political stakeholders or seek a middle ground between conflicting positions. Several of the issues discussed in the first part of this letter are politically thorny topics that have previously generated conflict. In particular, we have noticed that opponents of rent stabilization and just cause protection for tenants have used arguments that at best distort basic information about these tenant protections, and at worst rely

[12] 24 C.F.R. § 903.15(d).
[13] 24 C.F.R. § 5.154.

on racially coded language designed to incite opposition to policies that would protect a racially diverse tenant population. Of course, community opposition to policies that would increase housing opportunity for lower income households of color is nothing new—and it is decidedly not a valid basis for a local government averting its eyes from pressing fair housing issues in completing an AFH.[14]

Federal regulation imposes a responsibility on those drafting the AFH to examine issues like the ones discussed above in a factual, data-driven manner that is guided by a civil rights framework. The AFH must analyze, without fear or favor, the contributing factors of disproportionate housing needs, dynamics of segregation, restriction of fair housing choice, and disparities in access to opportunity. This clear-eyed, apolitical analysis must be targeted to informing policies and investments that will strengthen equal housing opportunity regardless of race, national origin, familial status, or disability status. In order to fulfill this function, it is extremely important that the AFH not provide a platform for fearmongering or factually baseless criticisms of policy options. With regard to tenant protections in particular, we encourage you to reach out to respected authorities who have an expertise in the legally permissible forms of rent stabilization and just cause limitations on eviction under California law.

Second, the AFH should assign high priority to pressures in the rental market and barriers to affordable housing as contributing factors that limit and/or deny fair housing choice. HUD regulations require that the AFH give highest priority to those contributing factors "that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance."[15] Displacement resulting from unregulated rent increases and no cause evictions directly denies individuals the most natural housing choice, which is the choice to remain in their homes.[16] Similarly, the inadequate supply of affordable housing throughout San Mateo County denies fair housing choice to many members of protected classes who cannot find housing they can afford within the County.

Third, the AFH should set meaningful fair housing goals with clear "metrics and milestones" that can be used to judge progress.[17] The purpose of the AFH is to lay the groundwork for local governments and public housing authorities to take meaningful actions to achieve fair housing goals. HUD regulations define meaningful actions as "significant actions that *are designed and can be reasonably expected to achieve a material positive change* that affirmatively furthers fair housing."[18] Thus, the fair housing goals set out in the AFH should be selected so as to (1) reflect the scale of the problem they address, (2) target those who are most

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[14] To the contrary, HUD's Guidebook Tool regarding the duty to affirmatively further fair housing and HUD's Local Government Assessment Tool identify "community opposition" or "the opposition of community members to proposed or existing housing developments" as a potential contributing factor. Some of the undersigned organizations previously wrote to you to express the concern, among others, that political organized real estate interests were creating obstacles to fair housing goals by using unsavory tactics and racially coded appeals to oppose tenant protections like rent stabilization and just cause. *See* May 24, 2017 letter re: Special Interests and Civil Rights in Housing (attached).

[15] 24 C.F.R. § 5.155(d)(4)(ii).

[16] *See* 24 C.F.R. § 5.152 (defining fair housing choice to encompass, among other things "[a]ctual choice, which means the existence of realistic housing options").

[17] 24 C.F.R. § 5.155(d)(4)(iii)

[18] 24 C.F.R. § 5.1.52 (emphasis added).

directly affected by the problem, (3) reflect a robust qualitative fit between the nature of the contributing factor and the goals for mitigating or preventing its adverse impact on protected classes. Then, to ensure progress towards fair housing goals, the AFH should set out metrics and milestones for each goal that include specific actions or steps, timelines, and measureable outcomes.

* * *

Thank you for your attention to these comments. We ask that you incorporate these recommendations as you draft the AFH. We look forward to reviewing and providing more detailed feedback regarding the draft AFH in the near future.

Sincerely,

Anne Bellows
Public Advocates

Salimah Hankins
Community Legal Services of East Palo Alto

Doroteo García
El Comité de Vecinos

Thursday Roberts
Fair Rents for Pacifica

Dr. Jennifer Martinez
Faith in Action

Shirley Gibson
Legal Aid Society of San Mateo County

Nikki S. Victoria
Organizing Committee
Migrante-Northern San Mateo County

Karyl Eldridge
One San Mateo

Ann Marquart
Project Sentinel

Tony Samara
Urban Habitat

Tameeka Bennett
Youth United for Community Action

Enc./

Cc: Jen Garner, BBC Research & Consulting
Kenneth Cole, Director, San Mateo County Department of Housing
Jeff Jackson, U.S. Department of Housing and Urban Development

May 24, 2017

Rose Cade
San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Special Interests and Civil Rights in Housing: Ensuring the Assessment of Fair Housing Process Provides an Accurate and Complete Analysis of Resident Experiences in San Mateo County

Dear Ms. Cade:

The ongoing Assessment of Fair Housing ("AFH") in San Mateo County represents a long-delayed step towards fulfilling of one of the promises that this country made when it adopted the Fair Housing Act in the wake of Dr. Martin Luther King's assassination in 1968. That promise was that public authority would be used to affirmatively further fair housing, *i.e.*, to promote equal housing opportunity regardless of race, national origin, and other protected characteristics.[1] The San Mateo AFH process comes at a crucial moment for the region as the racial and ethnic diversity of our cities and communities is being threatened by a housing crisis that is placing relentless pressure on Latino, Asian immigrant, and African American households.

The community participation process for the AFH, as dictated by federal regulation, is intended to encourage the participation of those who are directly and personally affected by housing inequality, in particular low- and moderate-income persons and members of protected classes under the Fair Housing Act.[2] As you know, the San Mateo AFH has several instruments of community participation designed to meet this standard, among them a survey regarding community residents' experiences in housing, several focus groups, larger community meetings, and a public comment period.

It has come to our attention that special interest groups—namely, politically organized landlords and realtors—have been circulating the AFH survey amongst their members in order to bias the survey results away from the experiences and needs of tenants. (Attachments 1 & 2.) In light of this development, we write to provide you with some context regarding civil rights and the current housing crisis affecting renters, and we ask you to take steps to preserve the integrity

[1] 42 U.S.C. § 3608(d) & (e)(5).

[2] 24 C.F.R §§ 91.105(a)(2), 91.105(e)(3) & (4); 91.105(i). As HUD explained in introducing the regulation, the purpose of the AFH community participation process is to "[p]rovide an opportunity for the public, *including individuals historically excluded because of characteristics protected by the Fair Housing Act,* to provide input about fair housing issues, goals, priorities, and the most appropriate use of HUD funds and other investments." 80 Fed. Reg. 42273 (emphasis added).

of the AFH process, facilitate the collection of relevant information, and adhere to the civil rights goals embodied in the duty to affirmatively further fair housing. Specifically, we ask that you:

(1) Evaluate the input that you receive from landlords and realtors with a critical eye, in light of the civil rights goals of the AFH and the information detailed in this letter;
(2) Analyze the survey results to limit the undue impact of any interference;
(3) Create dedicated and tailored focus groups or other forums for gathering information from these two special interest groups;
(4) Ensure that public participation forums are a safe space for vulnerable tenants, where they will not be subject to harassment or intimidation by landlords and realtors; and
(5) Include a robust analysis of pressures in the rental market in the AFH, including a discussion of displacement pressures, disproportionate housing needs affecting tenants who are members of protected classes, and the lack of regulations protecting tenants from large rent increases and no-cause evictions—along with clear, measurable goals in the AFH to alleviate and eventually overcome these market pressures.

While we understand the need to solicit input from all segments of the community, it is crucial that those conducting the Assessment of Fair Housing differentiate between the views of those with a primarily financial stake in the housing market, such as landlords and realtors, and the needs and experiences of members of protected classes under the Fair Housing Act, who the process is intended to engage. Members of protected classes are best situated to describe the challenges they encounter in securing safe, stable housing and equal access to the rich opportunity afforded by San Mateo County's strong economy and good schools. Indeed, bringing landlords and realtors into the same community participation process along with tenants is certain to diminish tenant participation unless this distinction in stakeholder postures is openly acknowledged and appropriate protective measures are taken.

Of course, politically organized landlords and realtors are important players and a proper focus of attention in the AFH. Indeed, their actions are a powerful force in shaping the fair housing issues affecting people of color, immigrants, families with children, and people with disabilities in San Mateo County. In recent years, these special interest groups have perpetuated barriers to fair housing for tenants of color in San Mateo County through their fierce and well-financed opposition to policies that would stabilize housing opportunity and help to stem the displacement crisis. This opposition has been characterized by fear mongering, misinformation and even direct harassment against tenants of color participating in the political process—as described below. We fear that their participation in the AFH may be similar.

The remainder of this letter (1) contextualizes issues related to tenants' rights within the framework of HUD's regulation governing the AFH; (2) summarizes what we know about current participation in the AFH by realtors and landlords; (3) provides some background information about our experiences with these interest groups in the past; and (4) explains why we believe that these interest groups have created significant obstacles to achieving fair housing opportunity.

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1. *HUD Regulations: Civil Rights Issues Relating to Tenants, Housing Needs, and Displacement*

In San Mateo County, where a majority of tenant households are people of color, and more than 60 percent of African American and Latino households are renters, analyzing the state of civil rights in housing by necessity entails an examination of conditions affecting renters in the region.[3]

For example, the "disproportionate housing needs" analysis required by HUD's regulation examines whether members of protected classes under the Fair Housing Act—*i.e.*, people of color, people with disabilities, and families with children—experience problems like "cost burden, severe cost burden, overcrowding, and substandard living conditions" at disproportionate rates.[4] Unquestionably, the high rents and uncontrolled rent increases resulting in high cost burden for the racially diverse tenant population in San Mateo County must be a part of this analysis. Similarly, identifying the contributing causes of overcrowding and substandard conditions affecting tenants of color will also require an analysis of rents, eviction rates, and the presence or absence of laws protecting tenants.

Moreover, in light of the widely acknowledged displacement pressures in San Mateo County's rental market, an adequate Assessment of Fair Housing will analyze the degree to which tenants who are forced to leave the area are at risk of losing access to the many opportunities to be found in San Mateo County's thriving economy and strong public schools in the document's required "access to opportunity" section.[5] Additionally, the loss of Latino, African American, and Asian immigrant renter households from San Mateo County due to displacement pressures should be examined as a significant threat to County's diversity in the portion of the AFH examining dynamics of integration and segregation.[6]

HUD's own guidance regarding the duty to affirmatively further fair housing identifies the "displacement of residents due to economic pressures," including displacement resulting from rising rents, as a potential contributing factor to fair housing issues such as residential segregation.[7] To fairly and adequately analyze these fair housing issues, the AFH must consider the presence or absence of protections available to renters, including rent stabilization and just cause limitations on evictions. Indeed, other jurisdictions in the region that are experiencing similar pressures in the rental market have addressed displacement and inadequate tenant protections in recent Analyses of Impediments or AIs (the predecessor to the AFH).[8]

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[3] HUD AFFH Data and Mapping Tool, Table 16, San Mateo County

[4] 24 C.F.R. §§ 5.152, 5.154(d)(2)(iv) & (d)(4)(ii).

[5] 24 C.F.R. § 5.152, 51.154(d)(2)(iii) & (d)(4)(ii).

[6] 24 C.F.R. § 5.152, 51.154(d)(2)(i) & (d)(4)(ii).

[7] U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf . As the guidance explains: "[s]uch pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristic[s], the displacement of residents due to economic pressures may exacerbate patterns of residential segregation."

[8] *See* Oakland Analysis of Impediments, 83-84 (2015) (discussing displacement due to the loss of naturally occurring affordable units and analyzing gaps in rent regulations); San Jose Analysis of Impediments, 104 (2017)

These neighboring jurisdictions have it right, as do tenant leaders in San Mateo County. Deeply cognizant of the threat to their ability to remain in their homes and communities posed by the unregulated rental market, tenants in cities around the county have been advocating for ordinances that would establish rent stabilization, just cause, and anti-harassment protections for tenants. These policies would prevent or mitigate disproportionate housing needs resulting from uncontrolled rent increases and evictions; they would also stabilize realistic housing choice for tenants of color—helping to maintain the region's diversity and to preserve access to opportunity for residents of color within San Mateo County.

Any suggestion by real estate interest groups that tenant protections or other topics related to the rental market are somehow inappropriate to address in the AFH reveals an effort to suppress important data on fair housing and civil rights. We ask that you ensure that the ongoing federally-required effort to collect information about the occurrence of key challenges related to housing, and their impact on tenants and homeowners who belong to protected classes, are not diluted or distorted by interference from these special interest groups.

2. *Current AFH Participation by Realtors and Landlords*

We understand that at least two emails have sent to members of the San Mateo County Association of Realtors ("SAMCAR") urging their member realtors to fill out the AFH survey, complaining that the survey was not balanced because it was being circulated to renters. (Attachments 1 & 2.) These emails reveal that SAMCAR has identified the AFH as a politically significant terrain for their ongoing battle against tenant protections, and we anticipate that SAMCAR and politically active landlords will continue to search for opportunities to influence the process.

For the reasons mentioned above, we do not oppose gathering the views of realtors and landlords, and in fact we know that their views can be an important data point for the AFH. For example, we understand that the Housing Department of San Mateo County conducted a focus group with landlords in East Palo Alto as part of the Assessment of Fair Housing. According to a representative of Project Sentinel who was present at the focus group, this conversation has already yielded some important data that should be considered in the AFH. Landlords expressed a reluctance to rent units to people with disabilities, particularly people with physical disabilities, because they did not want to shoulder the financial responsibility to make accessibility modifications as required by law. *See* 42 U.S.C. § 3604(f) (prohibiting discrimination against housing applicants with disabilities and requiring housing providers to make reasonable modifications).

Indeed, we believe that more targeted data gathering from those with a financial stake in the housing market could yield important information about the housing-related challenges confronting people of color and other protected classes in San Mateo County. We would encourage you to host additional focus groups with landlords and realtors using questions

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(identifying "displacement of residents due to economic pressures" and the "lack of tenant eviction protection and tenant education" as impediments to fair housing).

tailored to their role.[9] To that extent that SAMCAR realtors may have participated in the AFH survey responsive to the April 21, 2017 "Call To Action" email message, we encourage you to analyze the survey results with this in mind. If there are notable differences in data trends before and after April 21, 2017, the findings should be weighted accordingly.

3. Real Estate Interest Groups and Recent Housing Debates in San Mateo County

The AFH process must be conducted with an open acknowledgement that the power dynamic between tenants as consumers and landlords as housing providers is an extremely lopsided one. Particularly in the current political and economic climate of San Mateo County, landlords and realtors are able to wield tremendous control in individual rental relationships, and their presence in public discourse about the rental market has a chilling effect on renter participation, sometimes to the point of being abusive.

In recent months, landlords and realtors in San Mateo a County have been increasingly explicit in their bias against tenants from protected classes. The rate at which minority tenants are being jettisoned from the local rental market is unprecedented.[10] Trion Properties, upon acquiring a 48-unit building in unincorporated Redwood City in July 2016, served eviction notices to tenants who were primarily Latino families with children after issuing a press release stating that the renovated apartments would "cater[] to young working professionals" from companies like Facebook and Oracle.[11] In April 2017, CityLab reported an increase in immigration related threats against tenants by landlords, citing the example of a property manager for a multi-unit complex in Pacifica threatening a single Latina mother with deportation if she refused to agree to a new lease.[12] These are but a few examples of the increasingly visible prejudice with which protected class tenants are met.

In public forums, the hostility directed toward tenants by opponents of rent control has been ferocious. In September 2015, when the City Council of San Mateo was considering renter protection measures and hearing public comment, the Board of Directors for San Francisco Organizing Project/Peninsula Interfaith Action wrote to the City Council describing the intimidation and harassment experienced by tenants in attendance at an open meeting.

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[9] For example, it may be appropriate to ask landlords about, among other things, (1) number and type of evictions; (2) rent increases; (3) position on tenant protections, such as rent stabilization and just cause limitations on eviction; (4) policies regarding language access and renting to non-English speakers; (5) reasonable accommodation policies; (6) experience providing reasonable accommodations; (7) age of the rental unit; (8) yearly expenditure on repairs and upgrades; (9) outstanding maintenance needs; (10) understanding of fair housing laws and protections; and (11) policies on acceptance of Section 8 vouchers (and, if applicable, reasons for not accepting Section 8 vouchers). Similarly, it may be appropriate to ask realtors about (1) the marketing and sale of occupied rental housing; (2) the probable impact of rent stabilization and just cause protections on sales of rental properties; and (3) whether they have experience with or knowledge of clients evicting tenants in protected classes in order to flip properties.

[10] *See* San Mateo County Eviction Report 2016 (http://www.legalaidsmc.org/eviction_report_2016.html)

[11] *See* "Low-income families face eviction as building 'rebrands' for Facebook workers," by Sam Levin, September 21, 2016 *The Guardian* (https://www.theguardian.com/technology/2016/sep/21/silicon-valley-eviction-facebook-trion-properties)

[12] *See* "In California, Landlords Threaten Immigrant Tenants with Deportations," by Kriston Capps, April 5, 2017 *CityLab* (https://www.citylab.com/housing/2017/04/landlords-are-threatening-immigrant-tenants-with-ice-deportations/521370/)

(Attachment 3). Behavior by landlords and realtors directed to tenants included ridiculing tenants for not speaking English, booing and hissing while tenants were speaking, and physically blocking a tenant from entering the meeting.

Similarly, in recent City Council meetings in Pacifica regarding a proposed ballot measure that would enact tenant protections, the rhetoric by speakers in opposition to the proposed Pacifica ballot measure has mirrored that of the April 21, 2017 "Call To Action" message from SAMCAR (Attachment 1), invoking the prospect of gang members and drug dealers entrenched in neighborhoods because they are impossible to evict.[13] Speakers bemoaned the "problem tenants" who, in the language of the "Call to Action," will "harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity." A passage from a recent op-ed in the Pacifica Tribune is illustrative:

> Why would Pacifica pass rent control? That's not a rhetorical question. Why would we? Rent control takes away property owners [sic] rights to manager their property and removes their financial incentive to keep their places up. *Owners can't remove gangs, drug dealers, loud or dangerous neighbors and deal with overcrowding. Care to live down the street from a rent-controlled property?*
>
> *No thanks! We don't want the same messes rent control created in San Francisco and East Palo Alto, do we?*[14]

Such coded language plays to racial fears and prejudices, directly calling on stereotypes linked to crime, overcrowding, and two majority-minority cities. Such fearmongering tactics are designed to stoke resistance to policies that would promote economic and racial diversity.

Intimidation tactics against tenants extend beyond racially charged comments in print and at public meetings. Shortly after a tenant named Barbara O'Neil spoke out publicly about a rent increase of $1,100 that she received for her longtime home in San Mateo City, her landlords threatened to evict her, using her pets as pretext—even though she had kept cats there for many years with the knowledge and permission of the owners.[15] We understand that many tenants fear similar consequences if they speak out in public about the challenges they face in connection with their housing.

These examples of recent conduct by landlords and realtors give context for the environment into which you invite feedback for the AFH. To bring landlords into the same community participation process with tenants, as if they merely represent an alternate

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[13] This conduct was observed by Shirley Gibson, a directing attorney at San Mateo Legal Aid, one of the signatories to this letter.

[14] Tom Thompson, *Rent control: Pacifica's big danger*, Pacifica Tribune (April 13, 2017), available online at http://www.pacificatribune.com/opinion/editorials/rent-control-pacifica-s-big-danger/article_21a22500-209a-11e7-83fc-cf3eef08d2ab.html (emphasis added).

[15] Bill Silverfarb, "Lawsuit alleges landlord retaliation: school teacher says she was threatened with eviction after speaking to media," *The Daily Journal* (Feb. 22, 2016), available online at http://www.smdailyjournal.com/articles/lnews/2016-02-22/lawsuit-alleges-landlord-retaliation-school-teacher-says-she-was-threatened-with-eviction-after-speaking-to-media/1776425158856.html .

perspective on tenant issues, would invite this uneven and toxic dynamic into the process. Their participation may give rise to a chilling effect that could corrupt the result. Landlord and realtor perspectives should instead be solicited through the separate, more tailored approach discussed above.

4. *Landlords and Realtors' Actions Are A Contributing Factor to the Displacement of Residents of Color, Loss of Access to Opportunity, and the Perpetuation of Disproportionate Housing Needs*

As the history described above demonstrates, interest groups representing landlords and realtors have used some unsavory tactics and the exercise of significant political muscle to help block policies that would have protected tenants, who are disproportionately members of protected classes, from displacement due to unregulated evictions and large rent increases. Their actions are a contributing cause of the continued loss of equal housing opportunity for members of protected classes resulting from the crisis in the rental market in San Mateo County.

In this way, politically active landlords and realtors are similar to another familiar fair housing obstacle: NIMBYs who oppose the construction of affordable housing in affluent communities. The Guidebook published by HUD on the duty to affirmatively further fair housing, for example, identifies "community opposition"-- i.e., "NIMBY-ism," or "[t]he opposition of community members to proposed or existing [housing] developments," as a potential "contributing factor" to fair housing issues like segregation—whether the opposition is based on factual concerns or on biases.[16]

Moreover, federal courts recognize that NIMBYs' opposition to affordable housing, particularly when expressed via racially charged stereotypes and coded language, can furnish compelling evidence of intentional discrimination on the part of local governments that accede to their demands. *See also Avenue 6E Investments v. City of Yuma*, 818 F.3d 493, 504-06 (9th Cir. 2016) (discussing how community opposition to an affordable housing development based on racially charged stereotypes can support a discrimination claim under the Fair Housing Act); *Smith v. Clarkton*, 682 F.2d 1055, 1066 (4th Cir. 1982) (citing stated community concerns about an "influx of 'undesirables'" resulting from a housing project as evidence supporting a Fourteenth Amendment racial discrimination claim).

Similar to NIMBYs who oppose affordable housing in wealthy suburbs, the landlords and realtors' interest groups in San Mateo County have incited opposition to tenant protections based on untruths and fearmongering, as outlined above, including appeals to racially-charged stereotypes of low-income tenants as gang members and criminals. The actions of these interest groups have contributed to the loss of housing opportunity. Tenants of color have faced unjustified evictions and untenable rent increases without any legal protection, putting the racial diversity of the county at risk. Additionally, by successfully opposing tenant protection policies, landlords and realtors' interest groups have contributed to the increasing incidence of severe housing cost burden and overcrowding affecting members of protected classes who are renters. The discriminatory effects of the political activities of these real estate interest groups compound

[16] U.S. Department of Housing and Urban Development, *AFFH Rule Guidebook*, 208 (Dec. 31, 2015), available online at https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf

the impact of individual instances of discrimination against tenants with disabilities, tenants of color, and immigrants, as described above.

* * *

We hope and expect that the AFH will provide a thorough and factually grounded analysis of the civil rights challenges facing renters of color, tenant families with children, and other members of protected classes caught up in the brutal housing market in San Mateo County. We urge the County to consider this letter and the circumstances described herein when completing the AFH – specifically in identifying contributing factors, prioritizing and justifying the prioritization of these factors to be addressed by fair housing goals, and engaging in goal-setting.[17] Furthermore, we note the AFFH Rule's requirement that "[i]n prioritizing contributing factors, [HUD] program participants shall give highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance."[18]

An honest analysis must identify the fair housing impacts of unregulated rents and evictions, as well as acknowledge the role that real estate interest groups have played in perpetuating displacement pressures and other harms. Local governments who receive funding from HUD, and the consultants they hire to complete the AFH, have the obligation to investigate the causes or contributing factors of fair housing problems, and they cannot shrink from just criticism of interest groups whose actions or views are contrary to fair housing goals.

Sincerely,

Public Advocates

Legal Aid Society of San Mateo County

American Civil Liberties Union of Northern California

American Civil Liberties Union of Northern California - North Peninsula Chapter

Project Sentinel

National Housing Law Project

Enc.

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[17] *See generally* 24 C.F.R. § 5.154.
[18] 24 C.F.R. § 5.154(d)(4)(ii).

CC: Jen Garner, BBC Research & Consulting
John Maltbie, San Mateo County Manager
Kenneth Cole, Director, San Mateo County Department of Housing
Supervisor David Pine, San Mateo County Board of Supervisors
Supervisor Carole Groom, San Mateo County Board of Supervisors
Supervisor Don Horsley, San Mateo County Board of Supervisors
Supervisor Warren Slocum, San Mateo County Board of Supervisors
Supervisor David Canepa, San Mateo County Board of Supervisors
Jeff Jackson, U.S. Department of Housing and Urban Development

Attachment 1

From: Gina Zari [mailto:gina@samcar.org]
Sent: Friday, April 21, 2017 11:53 AM
To: Gina Zari
Subject: MONDAY -- Rent Control Moratorium: Council Vote

CALL FOR ACTION

OPPOSE RENT CONTROL IN PACIFICA

Monday, April 24th, the Pacifica City Council will vote a SECOND & FINAL time on a Rent Control Moratorium, including "just cause" eviction.

How can you help?

1. **PLEASE JOIN US** at a **Reception at Nick's Rockaway, 4:30 PM - 6:30 PM** at 100 Rockaway Beach Ave, Pacifica on Monday, prior to the City Council Meeting; RSVP to me (gina@samcar.org)
2. **THEN, JOIN US** at the Pacifica City Council Meeting at 6:45 PM
3. **COMPLETE THIS SURVEY** being conducted by **San Mateo County** regarding housing, affordable housing, **rent control**, just cause eviction, relocation payments and other housing topics. Unfortunately, this survey has only been seen being circulated among one specific group: renters. *(To ensure balance, if you know renters who believe in property rights, please pass this survey on to them, as well.)* **https://www.research.net/r/LiveSMC2017**

MONDAY, APRIL 24th

4:30 – 6:30 PM

Nick's Rockaway Reception
100 Rockaway Beach Avenue, Pacifica, CA 94044

6:45 PM

Pacifica City Council Meeting
2212 Beach Blvd, Pacifica, CA 94044

PACIFICA RENT CONTROL FACTS

Rent control will create a stagnant housing market in Pacifica. As household incomes naturally increase, instead of buying a home, renters in a rent-controlled environment are incentivized to stay in the subsidized unit – even when they are making well over $150,000 annually, preventing scarce affordable housing from being available to those who really need it.

Rent control will reduce the number and quality of rental housing units available in Pacifica. Rent control exacerbates a housing shortage by incentivizing tenants to stay far longer in more affordable units. When government places an artificial control on rent, property owners are not able to adjust rents to accommodate increased costs or unexpected circumstances and properties deteriorate.

Rent control will lead to higher rents in Pacifica. Although people think rent control will lead to lower rents, the exact opposite is true. The rents of available apartments in rent controlled cities are dramatically higher than rents in cities without rent control. In cities without rent control, available units exist all along the spectrum from low-priced to high-priced. In rent controlled cities, the only units available are the highest priced, far above the median rent.

Rent control will take the investment, life savings, and retirement from people in Pacifica who have invested their money in real estate. Many Pacificans have unconventional retirement plans. Rent control ordinances that prohibit property owners from asking for market rate rents unfairly steal from people's retirements.

Rent control will bankrupt Pacifica. Rent control ordinances create substantial administrative costs. Rent controls require the creation of convoluted bureaucratic systems. Rental property must be registered, detailed information on the rental property must be collected, complex systems for determining rents must be created, and processes for hearing complaints and appeals must be established. In Santa Monica in 1996, the Rent Control Board had a budget of more than $4 million a year to control rents for only 28,000 units.

Rent control will disproportionately harm Pacificans in affordable housing. Poorer families suffer a marked decline in existing housing as the quality of existing housing falls in response to reduced maintenance expenditures. The middle class have greater ability to move out, but poorer families lack this option. In addition, poor families are at a substantial disadvantage when it comes to finding new housing. In a tight market – as we currently have – there are

more people looking for housing than available rental units, giving housing providers far more discretion in choosing among competing potential customers. In rent-controlled markets, housing providers turn to factors such as income and credit history to choose among competing renters.

Rent control means expensive consumer entry costs. In many rent-controlled communities, prospective consumers must pay substantial finder's fees to obtain a rental unit, due to the scarcity of available housing. And, in some rent-controlled areas, a "gray-market" in rental housing has developed in which units are passed among friends or family members, or new consumers may be required to pay "key money" or to make other payments to current consumers to obtain housing. Sub-leasing is common in rent-controlled cities.

Rent control will artificially destroy home values in Pacifica. Plummeting values will adversely impact our schools and city services. As home and apartment values decline, revenue from the county also declines. This will jeopardize the long term health of our schools and city infrastructure such as police, fire, and other services.

PACIFICA "JUST CAUSE" EVICTION FACTS

"Just Cause" Eviction will punish good renters in Pacifica. "Just Cause" Eviction ordinances have the detrimental effect of making " good tenants" endure years of harassment, verbal abuse, inconvenience, or dangerous living circumstances where they live in close proximity to drug dealers, petty thieves, and lewd or offensive individuals. Rarely will the "good tenants" testify in court for fear of

their safety. Instead, they will expect the property owner to handle the problem. When it is not handled, the "good tenants" are forced to leave their homes.

"Just Cause" Eviction provisions dramatically increase the cost to evict problem tenants. With "just cause" eviction, the property owner has to prove that "good cause" exists, which requires witnesses and additional trial time. Under these circumstances, the problem tenant's attorney often requests a jury trial, hoping they can persuade jurors, who are less accustomed to dealing with problem tenants. In one San Francisco case, attorney's fees exceeded $75,000. These costs were passed on to the "good tenants" who suffer because "Just Cause" Eviction ordinances protect the "problem tenant" over the " good tenant."

Month-to-Month leases will be made virtually obsolete in Pacifica. While the tenant can serve the property owner with a 30 day notice, the property owner can only terminate the tenancy if the property owner can prove "just cause" in court. And, while the "just cause" might very well exist, it is extremely difficult to prove this in court, particularly when the good tenants or neighbors are scared or intimidated by going to court and testifying against the problem tenant.

There is no need for "just cause" eviction legislation in Pacifica -

evictions are already costly and time consuming processes for property owners. Evictions can take several months and cost many thousands of dollars. Tenants being evicted often do physical damage to the property. For property owners, eviction is the final alternative to which they turn, not the first.

Gangs and criminal behavior thrive where "just cause" eviction ordinances are in place. In areas where "Just Cause" Eviction ordinances are enacted, it is virtually impossible for property owners to evict gang members due to the burden of proof placed on the property owner. In these situations, it is very unusual that a "good tenant," who is witness to the activities of a gang member, will actually testify in court on what he or she has seen for fear of retribution.

Good renters in Pacifica will experience harassment under the "just cause" eviction ordinance. The worst unintended consequence of all that will be created by this "Just Cause" eviction ordinances is when a property owner – facing several thousands of dollars in attorney's fees and several months in uncollected rent – decides NOT to evict because of this ordinance and leaves the "problem tenant" alone to harass, disturb, threaten, intimidate, or leer at neighboring tenants and neighbors, commit petty crimes, deal drugs, and engage in gang activity.

John Keener, Mayor Pro Tem
(650) 557-9738
keenerj@ci.pacifica.ca.us

Sue Digre, Councilmember
(650) 278-1606
digres@ci.pacifica.ca.us

Deirdre Martin, Councilmember
(215) 806-8217
martind@ci.pacifica.ca.us

Mike O'Neill, Mayor
(650) 302-2470
o'neillm@ci.pacifica.ca.us

Sue Vaterlaus, Councilmember
(650) 291-0470
vaterlauss@ci.pacifica.ca.us

---

850 WOODSIDE WAY, SAN MATEO, CA 94401
Phone (650) 696-8200 | Fax (650) 342-7509 | samcar@samcar.org | www.samcar.org

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Attachment 2

From: Gina Zari, SAMCAR Government Affairs Director [mailto:gina@samcar.org]
Sent: Thursday, May 11, 2017 10:03 AM
To:
Subject: DEADLINE: FRIDAY -- County Rent Control Survey

SAN MATEO COUNTY ASSOCIATION *of* REALTORS®

DEADLINE: FRIDAY AFTERNOON

Please complete the survey being conducted by San Mateo County regarding housing, affordable housing, rent control, "just cause" eviction, mandatory relocation payments, and other housing topics. *The results of this questionnaire are likely to help formulate the County's Affordable Housing and Renter Protection/Property Control priorities.*
Unfortunately, this survey has only been seen being circulated among one specific group: renters. So, to ensure balanced results, please complete the survey and forward it to anyone you know who believes in property rights, particularly renters.

Click HERE to complete the County Affordable Housing Survey.

The County will take down the survey on Friday afternoon.

850 WOODSIDE WAY, SAN MATEO, CA 94401
Phone (650) 696-8200 | Fax (650) 342-7509 | [samcar@samcar.org]samcar@samcar.org | www.samcar.org
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Attachment 3

RECEIVED

2015 SEP 29 P 1:04

OFFICE OF CITY CLERK
CITY HALL
SAN MATEO, CA

September 25, 2015

San Mateo City Council Members
330 W. 20th Ave
San Mateo, CA 94403

Esteemed Council Members,

We are writing on behalf of Peninsula Interfaith Action (now SFOP/PIA) to thank you for the effort you have put into hosting important conversations about the housing and displacement crisis facing our families and seniors in San Mateo and beyond. We appreciate your courage for taking on this issue and standing with the most vulnerable in our community.

We also want to respectfully share some concerns that tenants have raised as they've attempted to be part of these community-wide meetings. We want to submit recommendations for how to make this process even more inclusive going forward:

- Professional translation provided by the City
- Functioning audio systems that allow everyone to hear council proceedings
- If a police presence is necessary, a more relaxed presence (residents, especially those with vulnerable status, found the police presence to be intimidating and felt that renters were singled out when people were asked to disperse from the corridor)

Beyond that which the City has the ability to control, and because your vantage point might not allow you to see all that is going on, we also want to make you aware of the behavior of some landlords and realtors who were disparaging and used intimidation tactics towards renters, particularly immigrant renters.

- ~~Anti-tenant-protection advocates booed and hissed when they heard things they didn't~~ agree with
- Anti-tenant-protection advocates loudly whispered – with the evident intention of being heard by others – "learn English", [with sarcasm] "they're gonna start crying now, get out the tissues…", when immigrant residents gave public testimony
- Anti-tenant-protection advocates refused to give up seats to renters, even when it was evident that no one else was yet using the chairs
- Anti-tenant-protection advocates harassed SFOP/PIA staff for attempting to provide translation, asking her to stop talking and to leave
- Two anti-tenant-protection advocates followed around a group of renters who were trying to have a private conversation and refused to leave them alone
- An anti-tenant-protection advocate grabbed a renter's advocacy sticker, tore it up in front of her and said, "You probably don't even understand what this says."
- One landlord verbally attacked a tenant in the corridor and used physical intimidation, precipitating police intervention

SFOP/PIA is a non-profit 501(c)(3) organization Tax ID #94-2716470 and an affiliate of the PICO National Network
1200 Florida Street, San Francisco, CA 94110-4113 • (415) 821-5000 / 1336 Arroyo Avenue, San Carlos, CA 94070-3913 • (650) 592-9181
www.sfop.org / pia@piapico.org

Many of these behaviors are meant to signal that some voices are less valuable than others. The result of this behavior is that renters, who are already vulnerable and in a lower position of power than the anti-tenant-protection advocates, felt intimidated and excluded and many left early, as a result.

We raise these issues because the City has expressed an interest in bringing all stakeholders to the table. However, this cannot be accomplished if vulnerable stakeholders – renters – don't have equal access and are harassed for participating.

We also raise these issues because the mission of our organization is to create economic and racial equity in the region. While on the face of it, the housing crisis is an economic equity issue, the problem and the political process around it are also being defined by racial inequities. To be clear, all of the experiences mentioned above happened to people of color. White renters and advocates did not report being personally attacked or harassed. SFOP/PIA cannot stay silent in the face of this kind of racism during a public process that should be safe and inclusive for all.

Finally, it should be said that the afore-mentioned pressures to keep renters out of Council Chambers and relegating renters to auxiliary rooms, supported by a police presence, is symbolic of the way renters – particularly renters of color – are excluded from the opportunities that our region has to offer. What does this behavior suggest about the treatment of renters in the intimate power dynamics between renters and landlords?

We hope that the Council will take seriously these concerns and ensure the safe and inclusive participation of all. We are interested in working with the City to find ways that to do this and would be happy to discuss this further. If you would like to do so, our Executive Director Jennifer Martinez will make herself available at 650-796-4160.

Thank you for your consideration,

Members of the Board of Directors
San Francisco Organizing Project/Peninsula Interfaith Action

Liz Jackson-Simpson
Success Center

Aïdah Rasheed
Muslim Community Center

Gloria Stofan
St. Peter Catholic Church

Michael Paul Pulizzano
Star of the Sea Catholic Church

Almudena Bernabeu
St. Dominic's Catholic Church

Cc:
Larry Patterson, City Manager
Shawn Mason, City Attorney
Patrice Olds, City Clerk

From:	Rose Cade
To:	Lindsay Haddix
Cc:	Heidi Aggeler; Jen Garner
Subject:	FW: Initial Input for Draft Assessment of Fair Housing
Date:	Tuesday, June 27, 2017 6:27:04 PM
Attachments:	image001.png

FYI

From: Anne Bellows [mailto:abellows@publicadvocates.org]
Sent: Tuesday, June 27, 2017 5:17 PM
To: Rose Cade <rcade@smchousing.org>; jeff.jackson@HUD.gov; Ken Cole <kcole@smchousing.org>; jgarner@bbcresearch.com
Cc: shankins@clsepa.org; dsaver@clsepa.org; Patricia Wishart <patricia.wishart@gmail.com>; doroteo garcia <doroteogarcia@yahoo.es>; Thursday Roberts <thursday.roberts@gmail.com>; Jennifer Martinez <jennifer@faithinactionba.org>; Shirley Gibson <SGibson@legalaidsmc.org>; nikki.r.santiago@gmail.com; Karyl Eldridge <karyleldridge@gmail.com>; Ann Marquart <AMarquart@housing.org>; tony@urbanhabitat.org; tbennett@youthunited.net; Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>
Subject: Re: Initial Input for Draft Assessment of Fair Housing

Thank you, Rose. We are looking forward to reviewing the draft.

Anne

From: Rose Cade <rcade@smchousing.org>
Sent: Tuesday, June 27, 2017 11:05:44 AM
To: Anne Bellows; jeff.jackson@HUD.gov; Ken Cole; jgarner@bbcresearch.com
Cc: shankins@clsepa.org; dsaver@clsepa.org; Patricia Wishart; doroteo garcia; Thursday Roberts; Jennifer Martinez; Shirley Gibson; nikki.r.santiago@gmail.com; Karyl Eldridge; Ann Marquart; tony@urbanhabitat.org; tbennett@youthunited.net; Sam Tepperman-Gelfant
Subject: RE: Initial Input for Draft Assessment of Fair Housing

Good Morning Anne – I wanted to get back to you regarding the email and letter that you sent to the Department of Housing regarding input for the draft assessment of fair housing. The letter was forwarded to our consultants at BBC and the comments and suggestions outlined in the letter will be taken into consideration as they prepare the draft report.

Thank you and the other signers on the letter for your interest and support for the San Mateo County Assessment of Fair Housing.

Rose Cade
Housing and Community Development Specialist III

Department of Housing, San Mateo County
264 Harbor Blvd., Bldg. A
Belmont, CA 94002
Phone 650-802-3386
Fax 650-802-3373
RCade@smchousing.org

From: Anne Bellows [mailto:abellows@publicadvocates.org]
Sent: Friday, June 16, 2017 10:53 AM
To: Rose Cade <rcade@smchousing.org>; jeff.jackson@HUD.gov; Ken Cole <kcole@smchousing.org>; jgarner@bbcresearch.com
Cc: shankins@clsepa.org; dsaver@clsepa.org; Patricia Wishart <patricia.wishart@gmail.com>; doroteo garcia <doroteogarcia@yahoo.es>; Thursday Roberts <thursday.roberts@gmail.com>; Jennifer Martinez <jennifer@faithinactionba.org>; Shirley Gibson <SGibson@legalaidsmc.org>; nikki.r.santiago@gmail.com; Karyl Eldridge <karyleldridge@gmail.com>; Ann Marquart <AMarquart@housing.org>; tony@urbanhabitat.org; tbennett@youthunited.net; Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>
Subject: Initial Input for Draft Assessment of Fair Housing

Dear Rose:

Please find attached a letter containing some preliminary comments and recommendations on the Assessment of Fair Housing. We would of course be happy to further discuss any of the topics broached in the letter, and we look forward to reviewing and providing additional feedback on the draft AFH in the near future.

Best,

Anne

Anne Bellows
Attorney & Equal Justice Works Fellow
Sponsored by Hewlett-Packard and Morgan, Lewis & Bockius LLP
131 Steuart Street | Suite 300 | San Francisco CA 94105
415.431.7430 x317 (o) | 415.625.8467 (direct)

abellows@publicadvocates.org

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From:	Rose Cade
To:	Anne Bellows; jeff.jackson@HUD.gov; Ken Cole; Jen Garner
Cc:	shankins@clsepa.org; dsaver@clsepa.org; Patricia Wishart; doroteo garcia; Thursday Roberts; Jennifer Martinez; Shirley Gibson; nikki.r.santiago@gmail.com; Karyl Eldridge; Ann Marquart; tony@urbanhabitat.org; tbennett@youthunited.net; Sam Tepperman-Gelfant
Subject:	RE: Initial Input for Draft Assessment of Fair Housing
Date:	Tuesday, June 27, 2017 12:06:02 PM
Attachments:	image001.png

Good Morning Anne – I wanted to get back to you regarding the email and letter that you sent to the Department of Housing regarding input for the draft assessment of fair housing. The letter was forwarded to our consultants at BBC and the comments and suggestions outlined in the letter will be taken into consideration as they prepare the draft report.

Thank you and the other signers on the letter for your interest and support for the San Mateo County Assessment of Fair Housing.

Rose Cade
Housing and Community Development Specialist III

Department of Housing, San Mateo County
264 Harbor Blvd., Bldg. A
Belmont, CA 94002
Phone 650-802-3386
Fax 650-802-3373
RCade@smchousing.org

From: Anne Bellows [mailto:abellows@publicadvocates.org]
Sent: Friday, June 16, 2017 10:53 AM
To: Rose Cade <rcade@smchousing.org>; jeff.jackson@HUD.gov; Ken Cole <kcole@smchousing.org>; jgarner@bbcresearch.com
Cc: shankins@clsepa.org; dsaver@clsepa.org; Patricia Wishart <patricia.wishart@gmail.com>; doroteo garcia <doroteogarcia@yahoo.es>; Thursday Roberts <thursday.roberts@gmail.com>; Jennifer Martinez <jennifer@faithinactionba.org>; Shirley Gibson <SGibson@legalaidsmc.org>; nikki.r.santiago@gmail.com; Karyl Eldridge <karyleldridge@gmail.com>; Ann Marquart <AMarquart@housing.org>; tony@urbanhabitat.org; tbennett@youthunited.net; Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>
Subject: Initial Input for Draft Assessment of Fair Housing

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Best,

Anne

Anne Bellows
Attorney & Equal Justice Works Fellow
Sponsored by Hewlett-Packard and Morgan, Lewis & Bockius LLP
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415.431.7430 x317 (o) | 415.625.8467 (direct)
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Administration

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Rigel S. Massaro
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Staff Attorney

Michelle Pariset
Policy Advocate

Anne Bellows
Attorney & Equal Justice Works
Fellow

Paulina Almanza
Law Fellow

Patty Leal
Finance Manager

Will Roscoe
Grants Manager

Duc Luu
Senior Communications Associate

Ayşe Gürsöz
Digital Communications Associate

Tia Nguyen
Policy & Administrative Coordinator

Madelyn Wargowski
Development Assistant

PUBLIC ADVOCATES
MAKING RIGHTS REAL

July 17, 2017

Ken Cole
Director
Department of Housing
County of San Mateo
264 Harbor Blvd – Building A
Belmont, CA 94002-4017

Re: Scope of the Assessment of Fair Housing

Dear Director Cole:

I am writing to follow up on our recent conversation regarding the scope of the Assessment of Fair Housing ("AFH"). Federal law and administrative guidance require that the analysis in the AFH encompass the entire County, including each of the twenty cities within the County's borders.

As a direct recipient of funding from the U.S. Department of Housing and Urban Development ("HUD"), the County of San Mateo is under a duty to "affirmatively further fair housing," that is, to take meaningful actions "that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics" such as race, national origin, familial status, and disability status.[1] The AFH, which is required by federal regulation, is an essential predicate to compliance with the duty to affirmatively further fair housing. By identifying key fair housing issues, and the contributing factors to those issues, the AFH will lay the groundwork for San Mateo County to meaningfully expand equal housing opportunity for residents throughout the County.

[1] 24 C.F.R. § 5.152 (definition of "affirmatively furthering fair housing").

Programmatically, San Mateo County's duty to affirmatively further fair housing "extends to all of [the County's] activities and programs relating to housing and urban development."[2] The *geographical* scope of the AFH then must at least match the breadth of the County's urban and housing development programs, and indeed extends even further in light of the cross-border and regional influences that affect the housing market, transportation patterns, and access to opportunity within San Mateo County.[3] As the Assessment Tool published by HUD and intended to guide the AFH analysis acknowledges, "fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries."[4]

In particular, as I shared with you in our conversation, the AFH must analyze city zoning, land use, and housing related policies for each of the twenty cities within the County in the course of identifying the contributing factors to fair housing issues like segregation, disproportionate housing needs, or disparities in access to opportunity for people of color, immigrants, families with children, and people with disabilities.[5] Without this analysis, the AFH will be turning a blind eye to some of the most consequential influences on housing and access to opportunity within San Mateo County.

Not only is an analysis of barriers to fair housing opportunity within the twenty San Mateo County cities necessary to enable a substantively adequate analysis of fair housing issues within the County, HUD guidance and related federal law make clear that the regional San Mateo County AFH is legally obligated to complete such an analysis, in addition to the required analysis of the County's unincorporated communities and the two PHAs participating in this regional AFH.

As you know, the County of San Mateo has entered into cooperation agreements with the "non-entitlement" cities (or cities that do not directly receive HUD funding) within its borders for the purpose of submitting a Consolidated Plan to HUD and receiving and distributing HUD funding.[6] Together, the County and those cooperating cities make up the "Urban County." (Four cities in the County, South San Francisco, Daly City, Redwood City, and the City of San Mateo, are direct recipients of HUD funding and are participating in the AFH in order to comply with their own obligations under the Affirmatively Further Fair Housing Rule.)

As a condition of eligibility for participating in the Community Development Block Grant program, HUD guidance requires that the cooperation agreements (1) obligate the County

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[2] *Id.*

[3] 24 C.F.R. § 5.154(d)(2) (requiring a regional analysis of each of the four categories of fair housing issues); *see also* 24 C.F.R. § 5.152 (defining "geographic area"). Indeed, "the inclusion of a larger regional analysis for participants is necessary to put the local fair housing issues into context required by the Fair Housing Act and case law." HUD, Affirmatively Furthering Fair Housing Rule, 80 F.R. 42286 (July 16, 2015).

[4] HUD, Assessment Tool for Local Governments (January 13, 2017), Appendix C: Contributing Factors Description, at 8, available online at https://www.hudexchange.info/resources/documents/Assessment-of-Fair-Housing-Tool-for-Local-Governments-2017-01.pdf .

[5] *See, e.g.*, Assessment Tool, Appendix C at 10-11 for a detailed list of land use and zoning policies that may contribute to fair housing issues.

[6] County of San Mateo FY 2013-2014 to FY 2017-2018 Consolidated Plan, Substantial Amendment to Consolidated Plan, at 3, available online at http://housing.smcgov.org/sites/housing.smcgov.org/files/Con%20Plan%20new%20cover.pdf .

and each cooperating city to "take all actions necessary" to comply with the certification of affirmatively furthering fair housing, and (2) prohibit the County from "funding activities in, or in support of, any local government that does not affirmatively further fair housing within its jurisdiction or that impedes the County's action to comply with its fair housing certifications."[7] As the HUD guidance explains:

> This provision is required because noncompliance by a unit of general local government included in an urban county may constitute noncompliance by the grantee (i.e., the urban county), that can, in turn provide cause for funding sanctions or other remedial actions by the Department.[8]

Plainly, in order comply with the provisions of the cooperation agreements and meet its obligations under the HUD guidance, San Mateo County must analyze in the AFH whether the cities that are parties to the agreements are in fact affirmatively furthering fair housing and whether they are impeding the ability of the County to affirmatively further fair housing.

Instructive guidance can be found in a recent opinion from the protracted litigation between HUD and Westchester County, NY regarding Westchester's failure to affirmatively further fair housing, *County of Westchester v. HUD*, 802 F.3d 413 (2d Cir. 2015). At issue was the decision by HUD to withhold Community Planning and Development funding from Westchester County for fiscal years 2011, 2013, and 2014 based on the inadequacies of the County's Analysis of Impediments (the predecessor to the AFH).[9] Specifically, HUD found that the Analysis of Impediments "failed to address whether zoning practices [within the county] were exclusionary under state and federal law, and lacked adequate strategies for bringing about changes to problematic zoning practices in some of the County's municipalities."[10]

The Second Circuit upheld HUD's withholding of funds from Westchester County, reasoning that "[b]ecause exclusionary zoning and violate the [Fair Housing Act], and because HUD is required to further the policies of that statute, it was reasonable for HUD to require the County to include in its AI an analysis of its municipalities' zoning laws."[11]

In addition to these authorities, I would note that the County is also participating in the Assessment of Fair Housing in its role as the Housing Authority of San Mateo County. Many members of protected classes rely on Housing Choice Vouchers issued by the Housing Authority to secure housing throughout the County, including in non-entitlement cities. Analyzing fair housing issues and their contributing factors within non-entitlement cities is therefore essential to permit the Housing Authority to adequately carry out its duties with regard to the AFH.

I urge you to ensure that the San Mateo County AFH is compliant with HUD guidance and federal law regarding the duty to affirmatively further fair housing by including an analysis

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[7] HUD Notice CPD-17-03, *Instructions for Urban County Qualification for Participation in the Community Development Block Grant (CDBG) Program for Fiscal Years (FYs) 2018-2020*, at 12-13 (April 12, 2017), available online at https://www.hudexchange.info/resources/documents/Notice-CPD-17-03-Instructions-for-Urban-County-Qualification-for-Participation-in-the-CDBG-Program-for-Fiscal-Years-2018-2020.pdf .

[8] *Id.* at 13.

[9] 802 F.3d at 416.

[10] *Id.* at 423.

[11] *Id.* at 432.

of relevant policies, investments, and decisionmaking by each of the twenty cities within the County, in addition to the policies and practices of the County itself. In this way, the County can simultaneously support the entitlement cities and participating public housing authorities in meeting their fair housing duties, ensure that there is adequate fair housing data to guide the County's own policy and investment decisions, and ensure that the County complies with its supervisory obligations *vis a vis* cities in the urban county.

As a starting place—but by no means an exhaustive list—such an analysis should encompass the following:

- A determination of whether and to what extent a city protects tenants from the significant displacement pressures in the region by limiting rent increases and regulating the valid bases for eviction;
- A determination of whether and to what extent a city has acted to address the cost barriers to developing housing affordable to protected class members in high opportunity areas by enacting linkage fees or other revenue raising measures;
- An analysis of whether provisions in a city's zoning code and land use framework create undue barriers to the construction of affordable housing, as guided by the AFH Assessment Tool, Appendix C;[12]
- An analysis of the location of "opportunity sites" in a city's housing element to determine whether the sites are located in high-opportunity neighborhoods, or whether they reflect a perpetuation of segregation patterns;
- A determination of whether a city has implemented policies and programs from its housing element that would strengthen equal housing opportunity for members of protected classes.

Finally, once this analysis is completed, the Assessment of Fair Housing should include goals and strategies that the County will use for overcoming those contributing factors to fair housing issues that have their roots in the policies, practices, and investments of non-entitlement cities within the County.

* * *

I appreciate the hard work that you and your colleagues are doing to produce the San Mateo County AFH. Please take these comments into consideration as you complete your work. I look forward to reviewing the draft AFH and providing additional feedback in the near future.

Sincerely,

Anne Bellows

[12] AFH Assessment Tool, Appendix C, "Land use and zoning laws," at 10-11.

Cc: Jeff Jackson, U.S. Department of Housing and Urban Development
Supervisor Don Horsely
Supervisor Dave Pine
Supervisor Carole Groom
Supervisor Warren Slocum
Supervisor David Canepa

From: Lindsay Haddix <lhaddix@smchousing.org>
Sent: Thursday, August 03, 2017 2:48 PM
To: Barbara Deffenderfer
Subject: FW: South San Francisco

Lindsay Haddix
Management Analyst
Housing & Community Development
County of San Mateo Department of Housing
264 Harbor Boulevard, Building A
Belmont, CA 94002
650.802.3376
lhaddix@smchousing.org

From: Lindsay Haddix
Sent: Thursday, July 27, 2017 12:25 PM
To: 'Anne Bellows' <abellows@publicadvocates.org>
Subject: RE: South San Francisco

Hi again, Anne,
Please try the link below instead of the previous link.
Thanks!
Lindsay

https://www.dropbox.com/home/SMC%20Cooperation%20Agreements

Lindsay Haddix
Management Analyst
Housing & Community Development
County of San Mateo Department of Housing
264 Harbor Boulevard, Building A
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650.802.3376
lhaddix@smchousing.org

From: Lindsay Haddix
Sent: Thursday, July 27, 2017 12:22 PM
To: 'Anne Bellows' <abellows@publicadvocates.org>
Subject: RE: South San Francisco

Hi Anne,
Please see link to dropbox where the requested documents are saved. Please let me know if you have any questions or difficulty accessing the files.
Best,
Lindsay

https://www.dropbox.com/sh/jpibj5ugxrb6o67/AAB8sipmHdL5gindK6Ve07Fca?dl=0

Lindsay Haddix
Management Analyst
Housing & Community Development
County of San Mateo Department of Housing
264 Harbor Boulevard, Building A
Belmont, CA 94002
650.802.3376
lhaddix@smchousing.org

From: Anne Bellows [mailto:abellows@publicadvocates.org]
Sent: Monday, July 24, 2017 3:53 PM
To: Lindsay Haddix <lhaddix@smchousing.org>
Subject: RE: South San Francisco

Thanks Lindsay.

I would like to request copies of all current cooperation agreements executed between the County and other local governments, including the cities within the County's borders, with regard to HUD funding. If there have been amendments to any of those agreements, I would like a copy of those as well.

Thanks, and hopefully see you tomorrow!

Anne

From: Lindsay Haddix [mailto:lhaddix@smchousing.org]
Sent: Monday, July 24, 2017 3:50 PM
To: Anne Bellows
Subject: RE: South San Francisco

Hi Anne,

My understanding is that you are interested in the cooperation agreements around HUD funding executed between the County and jurisdictions.
Could you please provide your request in writing so that the County can be sure to accurately fulfill the request?

Thanks and see you tomorrow (unless I have jury duty).

Lindsay

Lindsay Haddix
Management Analyst
Housing & Community Development
County of San Mateo Department of Housing
264 Harbor Boulevard, Building A
Belmont, CA 94002
650.802.3376
lhaddix@smchousing.org

From: Anne Bellows [mailto:abellows@publicadvocates.org]
Sent: Wednesday, July 12, 2017 2:39 PM
To: Lindsay Haddix <lhaddix@smchousing.org>
Subject: South San Francisco

Hi Lindsay,

Here's an example cooperating agreement that we were able to find online. I don't know whether this one is still valid or whether there's a more current version for SSF. I believe there should be one for each city included in the Consolidated Plan.

Thanks, and I hope this is helpful.

Best,
Anne

Anne Bellows
Attorney & Equal Justice Works Fellow
Sponsored by Hewlett-Packard and Morgan, Lewis & Bockius LLP
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August 3, 2017

San Mateo County Board of Supervisors
c/o San Mateo County Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

Re: Public Comment on Draft Assessment of Fair Housing

Dear Supervisors:

My name is Ann Bruno and I am a resident of San Bruno, California in San Mateo County, where I rent a home. I am 70 years old and disabled. My rent is subsidized by the Housing Authority through a "Section 8" Housing Choice Voucher. I am writing to give feedback on the portions of the draft AFH that address the Housing Authority's Section 8 program and calculation of rent subsidies.

The draft states that voucher program participants expressed "confusion with the housing authority's subsidy table; clients do not understand how it works." One of the stated Goals for the Housing Authority includes the objective, "Continue to analyze subsidy calculation methodology." Both of these statements dramatically understate the problem and the solution to the subsidy calculation problem that tenants like me are facing. The Tiered Subsidy Table that sets our subsidy amounts is not just confusing, it is completely incompatible with the Housing Authority's policy of approving giant rent increases for landlords.

My current situation is a perfect example of how the current Tiered Subsidy Table fails to work. Until March of this year, the total contract rent for my two-bedroom home was $2,000 per month, and my portion of the rent was affordable based on my monthly disability income of $915 per month from Social Security. Then the landlord asked to increase the contract rent to $3,200 per month. The Housing Authority said that this was a reasonable rent based on the market rents in the area, and approved this increase. As of June 2017, my portion of the rent increased to $1062. My monthly rent obligation is 116% of my income, even though I have a Section 8 voucher. This is because of the Tiered Subsidy Table, which limits my subsidy to $2138. The Housing Authority has now given me an obligation that I am obviously incapable of fulfilling, and I can be terminated from the voucher program entirely if I fail to fulfill this obligation or am evicted for failing to pay. What can I do about it? According to the fact sheet provided to me by the Housing Authority (a copy of which I have attached for your reference), I can either: 1) try to convince the landlord to take less than market rent for my home, based on no negotiation power whatsoever; or 2) move to cheaper housing. These are both unrealistic options for a disabled senior like myself. The Housing Authority claims that "there is no possibility that we could decrease your portion," but this certainly is not true: they could increase the subsidy amount. They should increase the subsidy amount, if the Section 8 program is going to succeed in serving its purpose in this community.

The Tiered Subsidy Table is not a "confusing" policy that needs to be clarified, it is a bad policy that hurts tenants, especially disabled tenants, and it needs to be changed. The Housing Authority

must do more than analyze the subsidy calculation methodology, it needs to increase subsidies commensurate with increases in market rents. It's actually pretty simple. For example, if the Housing Authority altered the subsidy amount in my case to account for my limited income of $915 per month, it would look something like this:

	Contract rent to the landlord	My share of rent	% of my $915 income that I spend on rent	Housing Authority subsidy amount
Present TST policy	$3,200	$1,062	116%	$2,138
Appropriate adjusted subsidy calculation	$3,200	$305	33%	$2,895

Thank you for your attention to this matter. I look forward to seeing a final Assessment of Fair Housing that has plans for some real solutions for tenants like me.

Sincerely,

Ann Bruno
869 Third Avenue
San Bruno, CA 94066

Enc.

Housing Authority of the County of San Mateo

Facts about Changes in Contract Rent

Voucher Program

We would like to explain to you the attached *Notice of Change to Lease and Contract*.

Background

Recently your landlord requested a rent increase for your unit. After review, we determined that the requested rent amount met HUD regulations and was comparable to the rents in the open market for comparable unassisted units. Accordingly, we approved the new rent amount.

How does the rent increase affect my portion of the rent?

Because the Housing Authority is already paying the maximum subsidy on your behalf, your portion of rent will be higher as a result of this rent increase. Your portion of rent is the difference between the new contract rent and the maximum subsidy amount.

What can I do about it?

1. Speak with your landlord to see if he/she is willing to reduce the contract rent. Remember, our subsidy amount will not change because of the contract rent. The lower the contract rent, the lower your portion of rent.
   If you are successful in renegotiating the rent, have the landlord confirm the new amount in writing for us. The request must include the new rent amount and the effective date of the rent reduction.
2. You can move to a unit with a rent that is more affordable. To begin the relocation process, issue your landlord proper notice to move, and send a copy of the same notice to your housing worker.

What if I request a review?

You have the right to request a review. However, if your portion of rent increase is entirely attributable to the contract rent increase, there is no possibility that we could decrease your portion as we do not have the legal authority to reduce the rent for the landlord. The rent amount is a lease term between you and the landlord. Absent of a new negotiated amount, the Housing Authority is obligated to approve the increase as long as the increase meets HUD regulations.

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PUBLIC ADVOCATES
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August 23, 2017

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd – Building A
Belmont, CA 94002-4017

Re: Comments on the Draft Assessment of Fair Housing

Dear Director Cole:

Public Advocates welcomes the opportunity to provide comments on the Draft Assessment of Fair Housing ("AFH") for San Mateo County, Daly City, South San Francisco, Redwood City, and the City of San Mateo, and we thank you for your hard work on this important document. This letter describes changes that Public Advocates believes are necessary for the final AFH to comply with applicable legal standards and fulfill its function as a guide for rooting out housing inequality based on race, origin, disability, and other protected classes throughout the county.

As you know, the AFH is rooted in the 1968 Fair Housing Act, one of the most important legislative achievements of the civil rights movement. Enacted in the days following the assassination of Dr. Martin Luther King, Jr., the Fair Housing Act is a sweeping mandate to uproot the legacy of slavery and Jim Crow and to bend the arc of history towards justice. Crucially, Congress did not stop at merely prohibiting discrimination in housing; it required all executive departments and agencies, including the U.S. Department of Housing and Urban Development, to take affirmative steps to dismantle segregation and to

promote fair housing.[1] San Mateo and other local governments must also commit to "affirmatively further fair housing" as a condition of receiving federal funding, whether directly or indirectly.[2]

At bottom, the AFH asks what must still be done to complete the work of the civil rights movement. What urgent action is needed to reverse trends of segregation, narrow gaps in access to opportunity, and alleviate disproportionate housing needs experienced by people of color, immigrants, families with children, and people with disabilities?

While the Draft AFH correctly identifies that displacement pressures—especially evictions and increasing rents—are a key contributing factor to racial inequality in housing and opportunity, the document understates the problem and ignores some of the most important political and regulatory sources of the displacement crisis. It also fails to set out sufficient actions to address these barriers to fair housing.

To be clear: evictions, skyrocketing rents, and other displacement pressures are not merely economic issues—they are urgent civil rights burdens that fall disproportionately on people of color, immigrants, people with disabilities, and other classes protected by the Fair Housing Act.

In light of the urgent civil rights implications of the displacement crisis, San Mateo County, Daly City, South San Francisco, Redwood City, and the City of San Mateo must commit to taking aggressive steps that are reasonably targeted to mitigating displacement pressures and preventing members of protected classes (*i.e.*, people of color, immigrants, families with children, and people with disabilities) from being forced from their homes and communities. First and foremost, each jurisdiction should commit to enacting rent stabilization and just cause. Additionally, local governments in San Mateo County should also gather data on rent increases and evictions, act to allow tenants to purchase their buildings at market rate when the buildings are offered for sale, provide for relocation assistance when tenants are forced to move through no fault of their own, and prohibit discrimination against Section 8 voucher recipients.[3]

Moreover, the Draft AFH does not satisfy either its civil rights purpose or federal legal standards with regard to patterns of exclusion and segregation. Among the shortcomings in this regard, which are described in more detail below, the Draft AFH fails to identify areas of relative racial exclusion in the County, provides almost no analysis of land use and zoning restrictions that may contribute to exclusion,[4] and fails to identify areas of racial/ethnic low-income

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[1] 42 USC 3608.

[2] *See* Draft AFH, Appendix B, Letter re: "Scope of the Assessment of Fair Housing."

[3] In addition, in light of its responsibilities under its cooperating agreements with other cities in the county, San Mateo County should ensure that all cities within the county are affirmatively furthering fair housing by adopting these key anti-displacement policies.

[4] "Entitlement cities" are those cities that receive funding directly from HUD for programs like the Community Development Block Grant program, and include Daly City, South San Francisco, Redwood City, and the City of San Mateo. Entitlement cities and counties are directly required to affirmatively further fair housing, and must complete and submit an AFH. Non-entitlement cities may also be required to affirmatively further fair housing pursuant to contractual agreements entered into as a condition of participating in certain HUD programs. *See generally* Draft AFH, Appendix B, Letter re: "Scope of the Assessment of Fair Housing."

concentration adjusted for the high cost of living of the region. These inadequacies must be remedied before the final AFH is submitted to HUD.

Finally, as an overarching comment, by failing to disaggregate data pertaining to Asian American residents, the Draft AFH obscures fair housing issues relating to subgroups within that community. In particular, the Filipino and Pacific Islander communities are unlikely to enjoy the relatively rosy circumstances regarding housing and access to opportunity portrayed in the Draft AFH for Asian Americans in aggregate.[5] This lack of differentiation is inconsistent with fair housing law, which acknowledges not only race but also national origin as a protected characteristic that must be analyzed in the AFH.[6] The Final AFH must remedy this oversight.

1. **The Analysis of Displacement in the AFH Must Fully Acknowledge its Segregative Effect Within San Mateo County, and Should Identify Regulatory and Political Contributing Factors Linked to Displacement**

While Draft AFH correctly identifies displacement pressures in the rental market as a high-priority contributing factor for segregation, significant disparities in access to opportunity, and disproportionate housing needs, the Draft understates the connection between displacements of low-income renters and segregation. When the AFH states that increasing rents and the concomitant loss of affordable housing units "could lead to increased segregation,"[7] it invites doubt about whether displacement is currently resulting in segregation. Such doubt is inappropriate, particularly in light of evidence regarding the loss of African American households from the county to date, and data reported in the AFH showing that "African American and Hispanic renters are disproportionately likely to be affected by evictions relative to their share of the County's population."[8]

Then, the Draft AFH states "this segregation is most likely to occur . . . in surrounding areas where affordable housing can still be found"—completely failing to acknowledge the segregative effect of displacement pressures within San Mateo County.[9] It is a mistake to conceptualize segregation solely as the concentration of members of protected classes in certain places. Instead, it must be understood also to comprise exclusion of members of protected classes from other places. When African American and Latino residents are disproportionately forced out of their homes and thrown into a rental market that outstrips their income, the exclusionary—and thus segregative—effect of rent increases and evictions is beyond question.

Not only does the AFH understate the current and devastating fair housing impacts of displacement pressures in the rental market, it also fails to adequately investigate the conditions that have allowed this crisis to flourish. The AFH explicitly identifies both rent increases and evictions as a primary cause of displacement, but it does not acknowledge that these problems

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[5] *See* An Equity Profile of the Five-County San Francisco Bay Region for examples of disaggregated data about the Asian American population in the Bay Area, *available at* http://nationalequityatlas.org/sites/default/files/5cntyBayAreaProfile_final.pdf

[6] 24 C.F.R. § 5.154(d) (requiring analysis of fair housing issues in relation to national origin); *see also* 42 U.S.C. § 3604 (providing anti-discrimination protections on the basis of national origin); 24 C.F.R. § 5.152 (defining "protected characteristics" to include national origin).

[7] Draft AFH, V 39.

[8] Draft AFH, V 84, V 97-98.

[9] Draft AFH, V 39.

are a direct consequence of the choices made by San Mateo County local governments not to regulate rents and evictions, even though such regulations would stabilize housing opportunity. Such regulation is essential if the region is going to maintain its diversity. Moreover, the language in the AFH should be adjusted to recognize renting as an important means of obtaining access to housing, rather than suggesting renter status primarily reflects a failure to achieve homeownership.[10]

Worryingly, although community input regarding the AFH identified the deleterious effect of opposition by real estate interest groups to the key anti-displacement policies of rent stabilization and just cause, the Draft AFH does not identify interest group opposition to tenant protections as a contributing factor to segregation, significant disparities in access to opportunity, and disproportionate housing needs. As civil rights advocates have previously communicated to the Housing Department, opponents of tenant protections have resorted to racially charged language and intimidation, drawing on the same political arsenal of exclusion that has long been used to oppose affordable housing, school integration, and other civil rights goals.[11]

In discussing segregation, the AFH must acknowledge that displacement is putting the diversity of the county at risk. And the AFH cannot turn a blind eye to the political and regulatory contributing factors to the displacement crisis.

2. Participating Jurisdictions Must Commit to Taking Meaningful Action to Overcome Displacement Pressures Impacting Members of Protected Classes.

Because displacement is an urgentfair housing challenge throughout the County, and has justly been denoted as high priority in the AFH, jurisdictions participating in the AFH must identify goals and strategies that reflect a commitment to take "meaningful action" to counteract displacement.[12] Daly City, Redwood City, and South San Francisco have, as they should, identified a goal of preventing or minimizing the displacement of low-income residents.[13] San Mateo County and the City of San Mateo should adopt a similar goal. Each of the five jurisdictions should also commit to an accelerated timeline for meaningful actions to address displacement pressures in the rental market, as specified below.

The Assessment of Fair Housing is designed to serve as a guide for the far more important obligation of local jurisdictions to undertake meaningful actions "that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."[14] Meaningful actions are defined as "significant actions that are designed and can be reasonably expected to achieve a material positive change

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[10] *See, e.g.*, Draft AFH, II 5, II 8, V 88.

[11] AFH, Appendix B, Letter re: Special Interests and Civil Rights in Housing, at 5-7.

[12] 24 C.F.R. §§ 5.154(d)(4)(ii) ("In prioritizing contributing factors, program participants shall give highest priority to those factors that limit or deny fair housing choice or access to opportunity"); 5.154(d)(4)(iii) (requiring jurisdictions to "[s]et goals for overcoming the effects of [prioritized] contributing factors"); 25 C.F.R. § 5.152 (specifying that taking "meaningful actions" to address fair housing issues is an integral component of the duty to affirmatively further fair housing.)

[13] Draft AFH, page II 17, II 18, & II 22.

[14] 24 C.F.R. § 5.152; *see also* 24 C.F.R. § 91.255(a)(1) ("Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the AFH conducted in accordance with the requirements of 24 CFR 5.150 through 5.180, and that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.").

that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity."[15]

As Public Advocates and other organizations have previously written, the meaningful action standard requires that participating jurisdictions must take actions that "(1) reflect the scale of the problem they address, (2) target those who are most directly affected by the problem, and which (3) reflect a robust qualitative fit between the nature of the contributing factor and the goals for mitigating or preventing its adverse impact on protected classes."[16]

Public Advocates joins others in urging the jurisdictions participating in the AFH to commit to adopting rent stabilization and just cause protections as the most fitting "meaningful action" that can be taken to address displacement pressures. (Daly City has taken a half step in this direction by committing to "[e]xplore policies pertaining to just cause eviction" in seeking to minimize displacement of low income renters.)[17] As a regulatory approach, rent stabilization and just cause can reach a far larger number of households at risk of displacement than funding or programmatic approaches. Additionally, those tenant protections would give a direct, legal benefit to renters who those who are bearing the brunt of regional displacement pressures, and by shielding them from two of the most common causes of displacement, it is precisely targeted to further the goal.

San Mateo County, Daly City, South San Francisco, Redwood City and the City of San Mateo should consider adopting the following strategies as a means of affirmatively furthering fair housing in addressing the displacement crisis:

(1) *Rent stabilization and just cause.* Enacting these policies can immediately extend important legal protections to renters, protecting them from and stabilize housing opportunity.

(2) *Data gathering*. Local governments in San Mateo County should undertake the collection of important data regarding displacement by requirement landlords to submit notices of rent increases or evictions to the local government.[18]

(3) *Tenants' First Right of Refusal.* Local governments in San Mateo County should build on a model from Washington, D.C. by adopting a rule that permits tenants to buy their buildings at market price when those buildings are offered for sale, or to assign that right to a nonprofit that would agree to manage the building as protected affordable housing. Paired with meaningful funding, this would provide a mechanism to stabilize housing for tenants at risk of displacement, and it may be more cost effective than relying solely on new construction to increase the number of protected affordable units in the county.

(4) *Relocation assistance.* Local governments in San Mateo County should also act to soften some of the harms of displacement by requiring landlords to provide relocation

[15] 24 C.F.R. § 5.152.
[16] Draft AFH, Appendix B, Letter re: "Initial Input for Draft Assessment of Fair Housing" at 6-7.
[17] Draft AFH, II 17.
[18] In order to ensure compliance, those notices should be deemed invalid if they are not provided to the local government.

assistance, building on a model from Portland, Oregon. This kind of financial assistance can aid displaced tenants in overcoming some of the cost barriers to securing housing in neighborhoods of opportunity. Redwood City has identified relocation assistance as a strategy to address displacement in the AFH.

(5) *Section 8 nondiscrimination.* Currently, landlords can choose not to accept Section 8 vouchers, limiting housing options for voucher recipients and sometimes forcing voucher recipients to look outside San Mateo County for housing options. Adopting a nondiscrimination ordinance would open up more housing opportunity within San Mateo County and remove one source of displacement pressure.

Please note that for the reasons outlined in Public Advocates' letter dated July 17, 2017, San Mateo County has a further obligation to ensure that other cities in the county that are not directly participating in the Assessment of Fair Housing are nonetheless fulfilling their contractual duties to affirmatively further fair housing.[19] Therefore, San Mateo County should not only set out a timeframe to adopt meaningful anti-displacement policies itself, it should also act to promote the adoption of such policies throughout the county.

3. The AFH Must Strengthen Its Analysis of Segregation, Significant Disparities in Access to Opportunity, and Racially and Ethnically Concentrated Areas of Poverty and Refine the Goals and Strategies Accordingly.

The Draft AFH does not identify geographical areas of exclusion within the county, or identify the factors contributing to that exclusion. For example, while the population of the entire county is majority non-Hispanic white at 51%, the populations of Daly City, South San Francisco, San Mateo, and Redwood City are all majority-minority (some by significant margins), suggesting that there must be other areas of the county where members of protected classes are underrepresented.[20] Yet those areas, which should receive prominent focus any analysis of segregation, are not identified, much less analyzed in the Draft AFH. Similarly, the AFH reports that African American residents experience the highest degree of segregation in the county, but it does not identify the cities or neighborhoods that exclude African Americans, much less analyze the contributing factors to such exclusion.

This failure extends to the analysis of significant disparities in access to opportunity as well. The HUD-provided indices show white residents (and to a lesser extent Asian residents) far outstripping African American and Latino residents in access to low poverty neighborhoods and proficient schools.[21] These results suggest geographical patterns of exclusion which the AFH fails to identify: where are the low-poverty neighborhoods in the county that African American and Latino residents do not have access to? What school districts or catchments contain high quality schools that African American and Latino children do not have access to? What barriers to access have been erected by policy, land use, or planning by the relevant cities and school districts, intentionally or otherwise?

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[19] *See* Draft AFH, Appendix B, Letter re: "Scope of the Assessment of Fair Housing."
[20] AFT Draft, V 4-9.
[21] Draft AFH, V44.

A related concern is that the Draft AFH does not adequately analyze racially and ethnically concentrated areas of economic hardship. While HUD's algorithm did not identify any racially or ethnically concentrated areas of poverty (R/ECAPs) in San Mateo County based on the federal poverty standard, this is not the end of the required analysis. It is necessary to use more locally sensitive indicators that rely on area median income to identify areas where segregation and economic hardship intersect, especially in high cost areas such as San Mateo County. The AFH Assessment Tool published by HUD explicitly asks jurisdiction to provide "additional relevant information" related to the R/ECAP analysis.[22] In San Mateo County, it would be misleading not to disclose that due to the high cost of living in the area, a formula linked to federal poverty standards fails to provide an adequate map of economic hardship—supplementing the HUD-provided data with local knowledge and data is therefore essential.

Once the geography of exclusion and hardship is more specifically identified, the AFH should then investigate the contributing factors that "create[], contribute[] to, perpetuate[], or increase[] the severity of" geographic patterns of housing inequality.[23]

Without question, key determinants of exclusion and housing opportunity in San Mateo County are land use and zoning practices that may block the construction of affordable multifamily housing. HUD anticipated the significance of zoning and land use practices by listing it as a contributing factor that should be considered with regard to each of the major areas of analysis in the AFH except fair housing enforcement.[24] Yet the Draft AFH does little if anything to grapple with these barriers. Figure V-79, which indicates what cities have adopted which housing policies, is unaccompanied by any meaningful analysis or interpretation.[25] The brief discussion of "where the policies and programs differ the most" refers only to jurisdictions participating in the AFH and does not posit any connection between the listed policies and the fair housing issues the AFH is meant to analyze.[26] The perspectives of affordable housing developers on land use and zoning practices reported in the Draft AFH are more helpful, and identify long waits for entitlements, parking requirements and height limitations, a lack of funding a developable land, and municipal preferences for commercial development as barriers they face in multiple jurisdictions.[27] Brisbane, Millbrae, and Menlo Park are mentioned as particularly inclined to prefer commercial to housing development. The AFH should take those comments as a starting point and, using the chart in Figure V-79 as a guide, conduct an analysis that specifically names cities or parts of cities that are protected by exclusionary zoning practices, and connects those practices to patterns of segregation, disparities in opportunity, and racially and ethnically concentrated areas of economic hardship.

The AFH will be substantially incomplete, and should not be accepted by HUD, if it does not include a definite analysis of land use and zoning practices in each of the twenty-one jurisdictions of the county that create barriers to housing opportunity for members of protected classes.[28] Not only is such an analysis necessary to provide an accurate assessment of the

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[22] AFH Assessment Tool at 3.
[23] 24 C.F.R. § 5.152,
[24] AFH Assessment Tool at 2, 3, 6, 7, 9, & 11.
[25] Draft AFH at V 106-07.
[26] *Id.* at 107.
[27] Draft AFH, V 107.
[28] *See* 24 C.F.R. § 5.162 ("HUD will not accept an AFH if HUD finds that the AFH or a portion of the AFH is inconsistent with fair housing or civil rights requirements or is substantially incomplete.").

contributing factors to fair housing issues for those jurisdictions that are participating in the AFH, each of the sixteen remaining cities is contractually obligated to affirmatively further fair housing pursuant to cooperating agreements with the County of San Mateo entered into as a condition of participating in the Community Development Block Grant Program.[29] San Mateo County is responsible for ensuring that they comply with this requirement, and to adequately carry out its duties in this regard it should analyze potentially exclusionary land use and zoning practices in the AFH.[30]

Once an adequate analysis of exclusionary land use and zoning practices has been completed, each of the participating jurisdictions should set a goal of reducing land use and zoning barriers to affordable multifamily housing, including a commitment by San Mateo County to work with other cities in the county to reduce those barriers as well.

4. Conclusion

The duty to affirmatively further fair housing requires that local governments that receive HUD funding take "meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws."[31]

San Mateo County's landscape, along with the rest of the country, has been shaped by forces of discrimination and exclusion to the detriment of communities of color—from blockbusting[32] to mortgage discrimination[33], and from infrastructure built at the cost of communities of color to exclusionary zoning practices[34]. At a time when civil rights are increasingly threatened with erosion at the federal level, and when income inequality in the Bay Area is heightening barriers to opportunity for low-income communities of color and other vulnerable groups, the leadership of San Mateo County's local governments is sorely needed to protect and advance the cause of equal housing opportunity.

Today, the most significant civil rights challenges in San Mateo County include brutal displacement pressures in the rental market—which disproportionately impact people of color, immigrants, and people with disabilities—and the landscape of exclusion carved by land use and zoning policies of cities within the county. Public Advocates joins others in asking that the final

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[29] These cooperating agreements are on file with the County of San Mateo. The requirements for these agreements are laid out in HUD Notice CPD-17-03, *Instructions for Urban County Qualification for Participation in the Community Development Block Grant (CDBG) Program for Fiscal Years (FYs) 2018-2020,* at 12-13 (April 12, 2017), *available online at* https://www.hudexchange.info/resources/documents/Notice-CPD-17-03-Instructions-for-Urban-County-Qualification-for-Participation-in-the-CDBG-Program-for-Fiscal-Years-2018-2020.pdf .
[30] *See generally* Draft AFH, Appendix B, Letter re: "Scope of the Assessment of Fair Housing."
[31] 24 C.F.R.§ 5.152.
[32] Draft AFH, V 36 (describing blockbusting and steering as discriminatory practices used in San Mateo County).
[33] Draft AFH, IV 2 (reporting that HMDA data showed higher rates of mortgage denials or subprime loans for women and racial and ethnic minorities, even after accounting for income)
[34] Draft AFH, V 36 ("Builders with intentions to develop for all types of buyers (regardless of race) found that their development sites were rezoned by planning councils, required very large minimum lot sizes, and\or were denied public infrastructure to support their developments.").

AFH squarely analyze these issues and commit the participating jurisdictions to take meaningful actions to overcome these barriers to equal housing opportunity.

Sincerely,

Anne Bellows
Attorney & Equal Justice Works Fellow

Cc: Jeff Jackson, U.S. Department of Housing and Urban Development
Supervisor Don Horsley
Supervisor David Pine
Supervisor Carole Groom
Supervisor Warren Slocum
Supervisor David Canepa

September 7, 2017

Re: Transportation Issues and Actions in the Draft San Mateo County Assessment of Fair Housing

Dear Members of the Board of Supervisors:

We write on behalf of the undersigned community-based organizations, nonprofits, and service providers to share our comments on the analysis of transportation access and equity in the Draft Assessment of Fair Housing (AFH). This AFH is the first of its kind completed in San Mateo County under HUD's 2015 regulation on "Affirmatively Furthering Fair Housing."[1] The AFH is an important first step toward improving housing choices and access to opportunity for people of color, immigrants, families with children, people with disabilities, and others whose lives and housing choices have been burdened by discrimination.

We request that San Mateo County analyze access to transportation for members of protected classes[2], consistent with HUD guidance, according to type or mode of transit, availability (including cost), frequency, reliability, and the risk of harm, as described below.[3] In light of the importance of transportation equity to securing access to transportation for members of protected classes, we also ask that the AFH goals and strategies be updated to include the following:

- Increased operating funding for public transit;
- A specific timeframe and outcomes for addressing serious problems in paratransit services used by people with disabilities;
- Ensure that significant numbers of affordable units are preserved or constructed in Priority Development Areas;
- Ensure that PDAs are adequately served by affordable, high frequency transit that reaches a range of important destinations, including high quality bus service that can satisfy requirements for affordable housing funding like LIHTC;
- A commitment to studying and addressing the burden of air quality impacts from mobile sources on protected classes.

As you know, federal law requires the AFH to include an analysis of disparities in access to key opportunities for protected classes, including access to jobs, quality education, and

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[1] U.S. Department of Housing and Urban Development, Affirmatively Furthering Fair Housing,
[2] Protected classes under the Fair Housing Act include those who are protected on the basis of "race, color, religion, sex, familial status, [] national origin" or disability status." 42 U.S.C. § 3604.
[3] HUD Assessment of Fair Housing Tool, Appendix C, at 2, available online at https://www.hudexchange.info/resources/documents/Assessment-of-Fair-Housing-Tool.pdf (last accessed Aug. 15, 2017) ("AFH Tool")

transportation.[4] This is because, as HUD has noted, "housing units are part of a community and do not exist in a vacuum," and therefore "fair housing choices are not limited to transactions relating to rental ownership of housing."[5] Transportation is of particular importance in assessing disparities in access to opportunity because, as the gateway to access to other opportunities, amenities and community assets, it is integral to equal opportunity and upward mobility. In its commentary on the 2015 Affirmatively Furthering Fair Housing regulation, HUD framed the importance of transportation to equal housing opportunity in this way:

> Transportation is a key factor in assessing total housing affordability, and, specifically, access to public transportation options can be critical to providing access to jobs, education, health care, and other amenities and community assets for low-income families, the elderly, and persons with disabilities. Increasingly, planners and policymakers are taking transportation into account for purposes of both new development and prioritizing preservation of existing affordable housing. Reviewing available data can also assist planners in identifying existing communities in need of improved transportation options.[6]

As one of the first counties nationwide to complete an AFH under the 2015 regulation, San Mateo County has the opportunity to model for the rest of the country the kind of robust transportation equity analysis that HUD requires within the AFH framework. Here at home, moreover, a transportation equity analysis will be a vital resource for the Board of Supervisors, which plays an important role in shaping transportation investments and policy through its representation on key transit agencies both in San Mateo County and in the region.

We are pleased that the Draft AFH reflects the beginnings of serious attention to equitable access to transportation within San Mateo County, and we strongly urge you to strengthen and improve the analysis in the document so that the final AFH can serve its intended purpose of shaping investments and policies to meaningfully improve equitable access to opportunity. To the extent that you are not able to complete a full analysis of the transportation issues identified in this letter before the submission of the final AFH to HUD, we ask that San Mateo County commit as part of its AFH goals and strategies to completing that full analysis by January 2018. The County should also identify more specific actions to address gaps in access to transportation at that time as well.

Although the Draft AFH correctly identifies the importance of transportation, we are concerned that the data included does not provide adequate information to permit a realistic evaluation of the issue—and as a result, incorrectly concludes that there are not significant disparities in access to transportation in San Mateo County. For example, although the survey

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[4] 24 C.F.R. § 5.152 (defining "significant disparities in access to opportunity" to mean "substantial and measurable differences in access to educational, transportation, economic, and other important opportunities in a community, based on protected class related to housing"); & § 5.154(d) (requiring an analysis of significant disparities in access to opportunity).
[5] Affirmatively Furthering Fair Housing Rule, 80 Fed. Reg. at 42281, 42286.
[6] *Id*. at 42337.

administered as part of the AFH process asked a question about transportation, the way in which the data is reported in the Draft AFH obscures what information may be available from the survey.[7] First, the survey does not distinguish between the types or modes of transportation that respondents rely on. Second, the data from the survey is not disaggregated by protected class. So while the Draft AFH reports that a majority of respondents indicated that they do not have transportation problems, we do not know whether Latinos, African Americans, and Pacific Islanders reported transportation problems at higher rates than white respondents, for example. Indeed, the Draft AFH does reveal that a significant proportion—forty percent—of Spanish-speaking respondents indicated that they encounter some degree of transportation difficulty.[8] This is a concerning result, and the final AFH should explore the issue further and give it the attention it deserves.[9]

In the sections that follow, we set out guiding principles for analyzing transportation equity in the AFH and address some concerns related to the treatment of transportation in the Draft AFH; identify other studies and planning documents that the AFH should draw from; and make specific recommendations about the goals and strategies that the AFH should commit to with regard to transportation.

I. Guiding Principles for Assessing Transportation Equity in the AFH

HUD's Assessment Tool for the AFH identifies four areas of inquiry related to transportation, namely type, availability, frequency, and reliability.[10] To this framework, which focuses on the extent to which the needs of protected class members for transportation access are fairly met, we recommend adding a fifth area of inquiry: whether those same residents bear an unfair share of the harms resulting from transportation infrastructure and operations.[11] These

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[7] Draft AFH at V-69 to V-70.

[8] Draft AFH at V-69.

[9] We are also concerned that the relatively high scores on the transit trips index and the low-cost transportation index are deceptive. The high number of transit trips likely reflect high rate (compared to the rest of the country) at which higher-income professionals rely on fast rail transit services, like BART and Caltrain, to commute, but that is not a good proxy for accessibility or availability for members of protected classes. The low-cost transportation index is linked to income, but it does not consider the combined costs of housing and transit, and therefore fails to account for the relationship between income and the extremely high housing costs in our region. In other words, to the extent a median renter household in San Mateo County has a higher income than median renter households elsewhere in the country, all or most of that difference in income is likely absorbed by higher housing costs. Because of the potential for misleading results from nation-wide indexes, HUD requires that the AFH also include local data to provide a necessary check and more accurate information on disparities in access to transportation. AFH Tool at 4.

[10] AFH Tool, Appendix C, at 2.

[11] Indeed, we applaud the Draft AFH for acknowledging that the widening of Highway 101 in the 1960s had a negative impact on the then majority African American community of East Palo Alto. Draft AFH at V-66.

areas of inquiry should guide the AFH's analysis regarding access to transportation. Importantly, this analysis should focus not on the needs of the general public, but instead on the needs of members of protected classes, including Latino, African American, Pacific Islander and Filipino populations, youth, and people with disabilities.[12]

a. Type

"Type" of transportation refers to different modes of transportation, such as bus, rail, paratransit, active transportation (walking and biking) or personal vehicle.[13]

Under the rubric of "type," the AFH should first identify which modes of transportation Latinos, African Americans, Pacific Islanders, youth, and people with disabilities, use most frequently, as compared with more racially and economically privileged groups. This breakdown is crucial to enable a more meaningful assessment of deficits, needs, and barriers that may limit access and mobility for members of protected classes within each mode or type of transportation. The AFH should then assess the availability, frequency, and reliability of the modest of transportation most relied on by Latinos, African Americans, Pacific Islanders, youth, and people with disabilities. The AFH should also use information about mode(s) of transportation most relied on by members of protected classes to identify whether there are modes from which these groups are disproportionately excluded (*e.g.*, as a result of cost barriers), and whether equitable investments are flowing to the modes of transportation they most heavily rely on.

Unfortunately, this analysis is missing from the Draft AFH altogether.[14] This absence significantly reduces the utility of the information in the document. For example, the maps showing the percent of residents living with a half-mile or a quarter mile of High Frequency Transit provide information neither on race or national origin of those living near transit.[15] Equally important, the maps do not distinguish between higher-cost, long-haul transit modes like Caltrain, which may be practically inaccessible to low-income protected class members living close to it and may not meet their travel needs, and modes of transit like bus that may be more frequently used by members of protected classes.[16]

To develop a more accurate picture of protected class ridership than currently exists, we suggest that you collect and integrate the following ridership demographic data by transit mode into the AFH:

Race/National Origin of Transit Users

[12] 24 C.F.R. §§ 5.152, 5.154(d).
[13] AFH Tool, Appendix C, at 2.
[14] Draft AFH at V-66 to V-70.
[15] *Id.* at V-68.
[16] *Id.*

SamTrans Riders[17]	Caltrain Riders[18]
25% White 33% Hispanic or Latino 21% Filipino 9% African American	53% White 36% Asian 11% Hispanic or Latino 4% African American 2% Native Hawaiian or other Pacific Islander

This data reveals that SamTrans riders are disproportionately Latino, Filipino, or African American, and that Latino residents are underrepresented on Caltrain compared to their share of population in San Mateo County. We recommend that you also identify the demographics of BART riders that use stations in San Mateo County, and of those who bike to work in the county[19], and of commuters who travel to work in single occupancy vehicles and as well as of commuters who carpool. In addition to race and national origin, we recommend that you identify rates of limited English proficiency,[20] the extent to which riders of each transit mode are transit dependent,[21] and the proportion of riders receiving discounted fares.[22]

Moreover, given the level of housing insecurity related to residential displacement in San Mateo County, we suggest that transit agencies conduct more frequent and flexible on board survey methods including the use of "travel diaries" that better capture the precise composition of transit trips.[23] The planned update of the SamTrans Business Plan provides a key opportunity to update on board ridership surveys and methodologies.

b. Availability

[17] SamTrans Fast Facts (Fiscal Year 2017), available online at http://www.samtrans.com/Assets/SamTrans+Fact+Sheet.pdf (last accessed August 10, 2017)
[18] Caltrain Triennial Survey, Summary Report, at 50 (2016), available online at http://www.caltrain.com/Assets/_MarketDevelopment/pdf/Caltrain+2016+Triennial+Summary+Report.pdf (last accessed August 10, 2017).
[19] Available from the U.S. Census.
[20] Riders who speak a language other than English at home according to the 2017 SamTrans System Fact Sheet: 41%.
[21] Transit dependent ridership according to the 2017 SamTrans System Fact Sheet: 61%.
[22] Riders eligible for discounts based on senior, disabled, and Medicare eligibility according to the 2017 SamTrans System Fact Sheet: 21.2%.
[23] Travel diaries are a standard transportation data collection methodology used by the Federal Transit Administration as part of their National Household Travel Survey: http://nhts.ornl.gov. Additionally, the FTA requires demographic data collection and analysis in order to determine whether underserved residents are benefiting from federally funded transit programs and services. FTA, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, Ch. IV, Sec. 5.

"Availability" of transportation, according to HUD's Assessment Tool, refers to factors such as "geographic proximity, cost, safety, and accessibility, as well as whether the transportation connects individuals to places they need to go, such as jobs, schools, retail establishments, and healthcare."[24] As mentioned above, this analysis should be disaggregated to address the availability of different modes or types of transportation to key protected classes, including Latinos, African Americans, Pacific Islanders, youth, and people with disabilities.

In considering "geographic proximity" the AFH should analyze whether there are neighborhoods that have significant representation of African Americans, Latinos, Pacific Islanders, or people with disabilities, which are not served by High Frequency Transit, other robust public transit options, or active transportation options/infrastructure. For example, the High Frequency Transit maps in the Draft AFH reveal relatively low transit access on the coast.[25] The Draft AFH should therefore consider, for example, whether Latino residents of cities like Half Moon Bay have adequate access to public transit.

With respect to the places that are served by transit, the Draft AFH must go on to address the remaining issues HUD identifies. The first of those is cost, and the draft AFH does not include any analysis. An analysis of transportation costs (including transit fares), and their impact on accessibility by members of protected classes, should be added. Specifically, in considering "cost," the AFH should examine fares for SamTrans, Caltrain, BART and other transit services, and the costs of auto ownership, the costs of bicycle ownership, and then analyze the affordability of those costs to members of protected classes based on income data.[26] In light of the underrepresentation of Latino residents on Caltrain compared to their representation in the county, and the lower Caltrain ridership rates among African Americans compared with their use of SamTrans, we strongly recommend that the AFH examine whether fares create a barrier to these populations accessing Caltrain.

We also recommend that the AFH consider the additive nature of fares, leading to steep increases in costs for riders who need to switch between bus and rail systems. Additionally, as HUD suggests in its commentary to the Affirmatively Furthering Fair Housing Rule, information on transportation cost can then be combined with housing costs to better understand "total housing affordability."[27]

Next, the AFH must analyze "safety." Again, this analysis is missing in the current draft. In this regard, the AFH should gather data on whether the transit stops on which protected class members disproportionately rely are well-lit, whether they are paved and covered with shelter,

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[24] AFH Tool, Appendix C, at 2-3.
[25] Draft AFH at V-68.
[26] One useful affordability metric is combined housing and transportation costs. According to a data resource maintained by the Center for Neighborhood Technology, the average combined costs of housing and transportation for a "moderate" San Mateo County household with an income of $62,310 is 70% of household income. Center for Neighborhood Technology, H+T Index, available at http://htaindex.cnt.org/map/ (last access August 10, 2017).
[27] Affirmatively Furthering Fair Housing Rule, 80 Fed. Reg. at 42337.

and whether bus stops are located at busy intersections or other locations where people accessing the bus may be at risk of being struck. We also ask that you review data on whether law enforcement creates safety risks for riders, either based on their immigration status or through the use of force. Finally, the safety analysis should consider whether there are safe routes for bicyclists, pedestrians and persons with disabilities, and whether pick up and drop off policies expose persons with disabilities to other safety risks.[28]

The Draft AFH does contain some important information about the next factor, "accessibility," with respect to persons with disabilities. The Draft AFH reflects that there are "[c]ountywide challenges with persons with disabilities accessing SamTrans," and that transportation improvements are needed to improve access to employment opportunities, health care services, community amenities, and services and facilities for people with disabilities.[29] A participant in the disability focus group, according to the Draft AFH, also reported that "El Camino Real is not always accessible which is particularly inconvenient because this is where the main bus routes are located. People will get off the bus and not be able to get around."[30] And the Draft AFH reports that paratransit users experience much more significant transportation problems than other members of the community.[31]

Finally, the availability analysis should consider whether public transit provides access to essential destinations, including jobs, educational institutions, grocery stores, parks, and medical and social services, for members of protected classes. This part of the analysis is critical to identifying important gaps in transit services, as low-income people of color statistically take shorter trips, drive less, and are more likely to depend on transit and walking and biking to get to many local destinations that cannot be accessed on rail services like BART and Caltrain.

c. Frequency:

"Frequency" refers to "the interval at which the transportation runs."[32] As with availability, this analysis must be disaggregated by mode, and further, by geography, so as to reflect services available to neighborhoods where there is a relative concentration of Latino, African American and Pacific Islander residents. Guiding questions for the frequency analysis should include whether buses and trains run frequently enough to allow riders to get to their destinations in a timely manner, and whether they meet the goal of "around the clock," frequent and reliable transit service.

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[28] According the report "Safer People, Safer Streets" by the U.S. Department of Transportation, "residents of low-income and minority neighborhoods are disproportionately represented in bike and pedestrian injuries and fatalities, and low-income neighborhoods often have fewer sidewalks and other safe infrastructure. Safe non-motorized travel, and safe access to transit stops, is essential for disadvantaged Americans seeking to reach jobs, schools, and other opportunities."
[29] Draft AFH at V-72, Figure V-51; *Id.* at V-134.
[30] *Id.* at V-133.
[31] *Id.* at V-134.
[32] AFH Tool, Appendix C at 3.

A now-outdated resource targeted to identifying transit service gaps that could offer some guidance was MTC's 2001 Lifeline Transportation Network report. That report identified both spatial gaps – places where transit service was absent, or routes had been cut – and temporal gaps. The latter included both excessive "headways" on existing routes during peak commute hour and gaps where service was inadequate or entirely unavailable during evening and weekend hours. This gap analysis should be included in the AFH so that actions to identify and close gaps that most significantly harm protected class members can be crafted and implemented.

Finally, we would note that the high frequency transit maps in the Draft AFH reveal a lack of access to high frequency transit for communities on the Pacific coast, potentially resulting in transportation challenges for members of protected classes living in those communities.

d. Reliability

HUD defines "reliability" to include "such factors as how often trips are late or delayed, missed runs, and whether the transportation functions in inclement weather."[33] At bottom, this area of inquiry considers whether a transit system has adequate on-time performance to allow users to reliably plan trips to essential destinations. The reliability of SamTrans and Caltrain is not addressed in the Draft AFH; we ask that this omission be rectified in the final AFH. This information should be readily available from the transit operators, as the Federal Transit Administration (FTA) "requires all fixed route transit providers to develop quantitative standards for all fixed route modes of operation" for indicators that include "on-time performance for each mode."[34]

In terms of the reliability of non-fixed-route transit, particular attention should be paid to paratransit services. For example, do paratransit services arrive in a timely manner and enable people with disabilities to arrive at medical appointments, classes, and other events on time? Are paratransit services consistently dropping people off in the correct location? If they are not, are the drivers able to quickly remedy this without the person having to schedule another paratransit pick up? The Draft AFH indicates that there is cause for concern that RediWheels does not demonstrate reliability on these metrics.[35] We are pleased to see that San Mateo County set a transportation goal related to paratransit in the Assessment of Fair Housing, and we look forward to seeing progress on these issues.[36]

e. Harm

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[33] AFH Tool, Appendix C, at 3.
[34] FTA, Circular 4702.1B, "TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS" (2012) at p. IV-5. Crowding and headways are also required to be assessed by mode.
[35] Draft AFH at V-134 (reporting longer than expected wait times and scheduling errors including wrong addresses).
[36] Draft AFH at II-15.

Finally, with regard to harm, the AFH should inquire whether there are environmental, health, or displacement harms that either currently result from transportation infrastructure and operations, or that are the foreseeable consequence of planned transportation investments. The Draft AFH has already taken a first step towards this analysis by recognizing that past construction on Highway 101 caused harm to what was at the time a majority African American community of East Palo Alto. We urge you to deepen this analysis by considering whether protected class members are disproportionately exposed to air pollution from cars and trucks. The AFH should also examine whether indirect displacement of protected class members may result from transportation-linked investments in Priority Development Areas (PDAs)[37] that are not accompanied by adequate tenant protections and investments in affordable housing.

II. Other Sources of Information

The Assessment of Fair Housing can build on other transit studies and planning documents already on existence. While this is not intended to be an exclusive list, we recommend that you look at these sources:

a. *Countywide Transportation Plan for Low-Income Riders (2012).*[38] This study's objective was to "identify, assess, and develop strategies to bridge gaps in the transportation needs of [certain] disadvantaged communities," with the goal of influencing "project and program development and funding decisions that will increase transportation options for low-income residents."[39] The study developed eight transportation strategies to address identified needs.[40] Those strategies ranged from providing "free or discounted fares for low-income transit users," to improving connections and service, and creating additional shuttle services and vanpools. The AFH should review whether the strategies identified by the study have been implemented.

b. *Transit Desert Study (2017).* We understand that the San Mateo County Department of Health is studying transit deserts, or areas with high numbers of transit dependent riders that have infrequent, restricted, or nonexistent service. We encourage you to work with the Health Department to ensure that their study reflects whether African Americans, Latinos, Pacific Islanders, youth transit riders, or people with disabilities are disproportionately reflected in transit deserts. And, once the study is completed,

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[37] PDAs are designated areas for public investment and intensified development under the aegis of Plan Bay Area. To qualify, PDAs must be located within walking distance of frequent transit service. Association of Bay Area Governments, *Priority Development Areas*, available online at http://abag.ca.gov/priority/development/ (last accessed August 10, 2017).

[38] C/CAG, Countywide Transportation Plan for Low-income Populations (2012), available online at http://ccag.ca.gov/wp-content/uploads/2014/05/FINAL_CountywideLowIncomeTransportationPlan.pdf (last access August 11, 2017).

[39] *Id.* at 1.

[40] *Id.* at 4.

its findings should inform the implementation of AFH goals and strategies regarding equitable transportation access.

c. To the extent that new Community-Based Transportation Plans are developed under MTC's CBTP program, we recommend that the priorities and recommendations of those plans be consulted and implemented. Previous CBTPs were adopted in several communities (Bayshore (2008), East Palo Alto (2004), North Central San Mateo (2011), and San Bruno/S. San Francisco (2012)), but do not necessarily reflect current community priorities and needs.

III. Recommended Goals and Strategies

Once you have completed the analysis above, we are confident that the AFH will reflect a high priority need to increase access to transportation services for members of protected classes. Investment in public transit service and active transportation yields rich benefits in terms of upward mobility and access to other opportunities for communities that have been burdened by discrimination. We therefore strongly recommend that the final AFH include robust goals and strategies to strengthen access to transportation. The final AFH should include at least the following strategies to strengthen access to transportation and to a healthy environment:

a. **Increase operating funding for public transit** to ensure affordability and adequate service for members of protected classes. For example, increased operating funding could provide reduced bus and train fare passes for targeted groups, increase the frequency and reliability of bus service, expand transit options to include van pools and similar strategies where appropriate, and increase service to fill temporal gaps and to reach transit deserts.

b. **A plan for addressing serious problems in paratransit services** used by people with disabilities, including a timeframe and specific outcomes, as well as a commitment to improving accessibility of the full range of transit services.

c. **Ensure that significant numbers of affordable units are preserved or constructed** in Priority Development Areas (PDAs).

d. **Ensure that PDAs are adequately served by affordable, high frequency transit** that reaches a range of important destinations, including high quality bus service that can satisfy requirements for affordable housing funding like LIHTC.

e. **Commit to studying the burdens of air quality impacts of mobile sources on protected classes** living near Highway 101 and other congested roads, and set out a timeline for developing and implementing strategies that alleviate this impact.

IV. Conclusion

The AFH is only the first step towards improving equitable access to opportunity in San Mateo County. When completed, the AFH should serve as a guide for the more important

component of the duty to affirmatively further fair housing: the requirement that local governments take *meaningful actions* to address disparities in opportunity affecting communities of color, immigrant communities, people with disabilities, and families with children in San Mateo County. The analysis outlined in this letter, which we ask you to complete as part of the Assessment of Fair Housing process, should be detailed enough to allow the Board of Supervisors, through its representation in the governance structure of local transit agencies, to target expenditures and policies to addressing the deficits and needs impacting members of protected classes.

Thank you for your attention to these important topics. We look forward to working you in strengthening access to transportation—and through increased mobility, access to other important opportunities—for African Americans, Latinos, Pacific Islanders, youth, and people with disabilities, in San Mateo County.

Sincerely,

Menlo Spark

Public Advocates

San Mateo Behavioral Health & Recovery Services

Transform

Urban Habitat

Youth Leadership Institute

CC: Ken Cole, Director of the San Mateo County Housing Department
Jeff Jackson, HUD Region IX
John Maltbie, San Mateo County Manager

From: DOH_fairhousing <Fairhousing@smchousing.org>
Sent: Friday, September 08, 2017 10:01 AM
To: Lindsay Haddix; Barbara Deffenderfer; Rose Cade
Subject: AFH Comment Fw: International money / lots of rentals / driving out locals, families, first time buyers

One more AFH comment from an individual, Stephanie Barrales!

Best,
Ying

From: Stephanie Barrales <sbarrales@hotmail.com>
Sent: Friday, September 8, 2017 3:45 PM
To: DOH_fairhousing
Cc: Stephanie Barrales
Subject: International money / lots of rentals / driving out locals, families, first time buyers

Are you submitting this comment on behalf of an organization (yes or no)? No

Are you submitting this form on behalf of yourself (yes or no)? Yes

If yes, please state your jurisdiction of residence. North Fair Oaks

What is being done to keep all cash international money from taking over communities. I was qualified for a home in North Fair Oaks and was outbid by an international buyer with all cash who will not even live in the home and rent it out for an outrageous price? I have lived in North Fair Oaks all my life and can't compete with the international buyers. Is that okay to have communities full of rental properties by international buyers? Anything being done to manage this?

September 12, 2017

Ken Cole, Director
San Mateo County Department of Housing
264 Harbor Boulevard – Building A
Belmont, CA 94002-4017

Dear Ken Cole,

Faith in Action Bay Area is a network of faith communities in San Francisco and San Mateo Counties committed to ensuring that the dignity of all members of our community is upheld. Through leadership development, civic engagement, and lifting up of our faith values we strive to make sure that every person receives the respect, justice, and opportunity they deserve. One of the issues that have caused the most pain and destabilization to our families and communities is the rising cost of rents and the no-fault evictions driven by market forces. We have been working for years to provide community support to affected families, and at the same time to advocate for measures that would protect housing for the most vulnerable people in our cities, working families, people of color, people living with disabilities and seniors. It is on behalf of our congregations and the vulnerable communities among us, that we urge you to ensure that the Assessment of Fair Housing directly addresses the need to adopt rent stabilization and just cause in San Mateo County. We see it as hopeful step in the right direction to see that the Draft AFH acknowledges displacement, evictions, and rising rents as a threat to fair housing and the values we hold as a community around equal opportunity, racial justice, and care for the vulnerable among us. San Mateo County and the cities within it must now act to address these serious problems by passing laws that directly protect tenants from rising rents and no cause evictions.

In addition to rent stabilization and just cause, we urge you to include other policies in the AFH to address displacement and renters' rights. Local governments should collect data on rent increases and evictions so they can monitor the problem (and landlords who fail to submit this information should not be allowed to proceed with the rent increase or the eviction). Additionally, tenants should have the first right of refusal to buy their buildings, and if tenants are forced to move without fault, they should be given relocation assistance. Finally, landlords should not be allowed to reject a tenant merely because that tenant receives a Housing Choice Voucher.

Thank you for reading these comments.

Sincerely,

Lorena Melgarejo
Executive Director
Faith In Action Bay Area

Faith In Action Bay Area is a non-profit organization, tax ID# 94-2716470 and an affiliate of the PICO National Network
1336 Arroyo Avenue, San Carlos, CA 94070-3913 / Telephone 650-592-9181

September 13, 2017

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd., Bldg. A
Belmont, CA 94002-4017

Re: Incorrect information in Draft AFH

Dear Director Cole:

I am writing as a member of a stakeholder organization, El Comité de Vecinos del Lado Oeste, E.P.A., to inform you that there is some incorrect information in the Draft AFH.

There are two areas with erroneous information:

1. **Community Participation Process, Section II, Page 3**
   Methods of Engagement, "Resident Focus Group": *"Legal Aid Society of San Mateo County provided $25 grocery gift cards to participants in the Spanish language, Filipino and Section 8 focus groups."*

   Community Legal Services of East Palo Alto (CLSEPA) provided twenty-dollar ($20) Target gift cards to the Spanish language focus group. El Comité spoke of CLSEPA's donation in a May 2, 2017 email to Jen Garner of BBC entitled "Concerns re: 4/29/17 Spanish language focus group" (in Draft AFH's Appendix B. – Comments and Communications section and attached to this letter as Attachment A). BBC seems to have disregarded this fact.

2. **Figure III-2, Section III, Page 7**
   Housing Choices and Needs: community engagement by the numbers: *"44 resident focus group participants"*

   El Comité has the names and contact information of the ten (10) Spanish-speaking individuals who participated in the 4/29/17 Spanish-language focus group. These individuals' participation can be verified. However, as highlighted in our above-mentioned email ("Concerns re: 4/29/17 Spanish language focus group"), El Comité, along with Noelia Corzo of Faith In Action, expressed concern to BBC over BBC's carelessness with the sign-in sheet for participants. This carelessness has resulted in the incorrect number of participants being recorded.

   In the PowerPoint presentation dated July 18, 2017 that BBC provided on July 19, 2017 to stakeholders (Attachment B), their slide entitled "Community Engagement Summary" gives the number of focus groups as four (4), instead of five (5). The omitted Section 8 focus group had seven (7) participants. It also gives the number of Spanish-speaking participants as nine (9). The correct number of ten (10) Spanish-speaking participants would bring the number of resident focus group participants to forty-five (45), not forty-four (44).

Breakdown of resident focus group participants:

Filipino	16
Spanish-speaking	**10**
African Americans	05
Disabled	07
Section 8	07
Total	**45**

Figure III-2, Section III, Page 7 (Attachment C) in the Draft AFH needs to be corrected.

So, why should these errors matter? This is why: The Spanish-language focus group is a microcosm of the macrocosm that is the Draft AFH. It raises doubt as to the care that was taken with the Draft AFH's data collection, amalgamation, and reporting, especially with regard to vulnerable populations. Actions taken as a result of this assessment's information will affect lives.

Sincerely,

Patricia M. Garcia
Member, El Comité de Vecinos del Lado Oeste, E.P.A.

Attachments: A: Email dated May 2, 2017 to BBC Consultants: "Concerns re: 4/29 Spanish-language focus group"
B: "Community Engagement Summary" slide, BBC's July 18, 2017 Presentation
C: Figure III-2, Section III, Page 7 of Draft AFH

Cc: Jeff Jackson, U.S. Department of Urban Housing and Development
San Mateo County Board of Supervisors (Horsley, Pine, Groom, Slocum, and Canepa)

ATTACHMENT A

Gmail

Patricia Wishart <patricia.wishart@gmail.com>

Concerns re: 4/29/17 Spanish-language focus group

14 messages

Patricia Wishart <patricia.wishart@gmail.com> Tue, May 2, 2017 at 8:07 AM
To: Jen Garner <jgarner@bbcresearch.com>, Mehgie Tabar <MTabar@bbcresearch.com>, Salimah Hankins <shankins@clsepa.org>
Cc: Shirley Gibson <sgibson@legalaidsmc.org>, Naomi Young <nyoung@baylegal.org>, Scott Hochberg <shochberg@clsepa.org>, Tameeka Bennett <tbennett@youthunited.net>, Sam Tepperman-Gelfant <stepperman-gelfant@publicadvocates.org>, Tony Roshan Samara <tony@urbanhabitat.org>, Kirsten Spalding <kss@well.com>, Leora Tanjuatco <leora@hlcsmc.org>, Diana Reddy <diana.94062@yahoo.com>, Adriana Guzman <adriana@faithinactionba.org>, Doroteo <doroteogarcia@yahoo.es>, Jaqueline Ramirez <JRamirez@housing.org>, Evelyn Stivers <estivers@hlcsmc.org>, Daniel Saver <dsaver@clsepa.org>, "sstern@nhlp.org" <sstern@nhlp.org>, Adriana Guzman <adriana@sfop.org>, Melinda Dart <aft3267@gmail.com>, "Eldridge, Karyl" <keldridge@cbnorcal.com>, Molly Current <mcurrent@housing.org>, Nikki Santiago-Victoria <nikki.r.santiago@gmail.com>, Mark Leach <markjleach4@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Renee Williams <rwilliams@nhlp.org>, Sergio Robledo-Maderazo <Robledo-Maderazo@aft1481.org>, Patricia Wishart <patricia.wishart@gmail.com>, Belén Seara <searamb@gmail.com>, Jeremias David <jeremias.h.david@gmail.com>, David Zisser <dzisser@publicadvocates.org>, Javanni Munguia-Brown <javannibrown@gmail.com>, "kbrodfuehrer@nhlp.org" <kbrodfuehrer@nhlp.org>

Dear BBC Consultants:

My name is Patricia (Patty) Garcia and I am a member of El Comité de Vecinos del Lado Oeste in East Palo Alto, CA. I am writing, along with Noelia Corzo of Faith in Action Bay Area, to express concerns about the 4/29/17 Spanish-language focus group conducted by BBC Consultants.

1. <u>No childcare was provided</u>

The focus group participants brought eight (8) children with the understanding that childcare would be provided. There was none.

The lack of childcare impacted the participants' ability to listen, focus, and respond, as well as the translator's and moderator's ability to conduct the session. At one point, the translator, Ms. Teresa Mendivil, stopped translating so she could dig earbuds out of her purse and give them to a child whose phone was too loud. Participants had to divide their attention between listening and participating and peripherally watching their kids. Ms. Garner had to pause at another point because of the children's noise.

The setting for this focus group was in a government building. A licensed agency with individuals who are trained in first aid and have been background-checked should have been engaged, with a safe adult to child ratio. As government-paid consultants, what was your rationale for not providing childcare to this group as promised?

2. <u>Style of focus group</u>

The style of the focus group was popcorn style and random. Participants who wanted to share a story were skipped because Ms. Garner would ask the next question before

letting everyone share. This created confusion and it was pretty much a free for all.

3. Questions

Noelia and I were very frustrated when Ms. Garner continued to insinuate that learning English was the solution to not being able to afford the cost of living. Ms. Garner was asking, if one knew that better English skills were a pathway to a better job, why someone did not get resources to listen to on the walk to church or riding the bus, etc., after participants had explained that a lot of people were already working crazy hours, sometimes two or three jobs. Laura Rubio, one of the participants, explained at one point that it was hard to concentrate and learn when you are working so many hours. This question from Ms. Garner was met with confusion and folks found it hard to know what to say. It really came off as why weren't these people working harder. When Ms. Corzo responded and stated something along the lines of "the question shouldn't be how can people who are already working extremely hard work harder but how can our laws and policies be more just", Ms. Garner then asked the group, "What are the right questions to ask then?". Noelia and I were surprised and frustrated by that question. Other folks responded a bit and then Ms. Garner ended the focus group early at that point. Noelia and I hope that Ms. Tabar captured this exchange in her notes.

4. Carelessness with sign-in sheet for participants

CLSEPA was generous enough to provide $20 gift cards as a thank you for participants' time at the end of the focus group. While I (Patty) was circulating with the cards and the sign-off sheet for CLSEPA, I noticed the consultants' sign-in sheet had not been signed by everyone, so I started circulating that as well. That sign-in sheet is the proof that the number of participants, etc., is not fabricated. Those individuals can also corroborate what was said. Noelia said she did not even know there was a sign-in sheet until I handed it to her. This struck both Noelia and I as concerning.

We are hoping these comments will inform how things are run at BBC's future AFH community meetings.

Regards,

Patty Garcia, El Comite de Vecinos
Noelia Corzo, Faith in Action - Bay Area

Daniel Saver <dsaver@clsepa.org> Tue, May 2, 2017 at 8:21 AM
To: Patricia Wishart <patricia.wishart@gmail.com>, Noelia Corzo <noelia@faithinactionba.org>, Salimah Hankins <shankins@clsepa.org>

ATTACHMENT B

COMMUNITY ENGAGEMENT SUMMARY

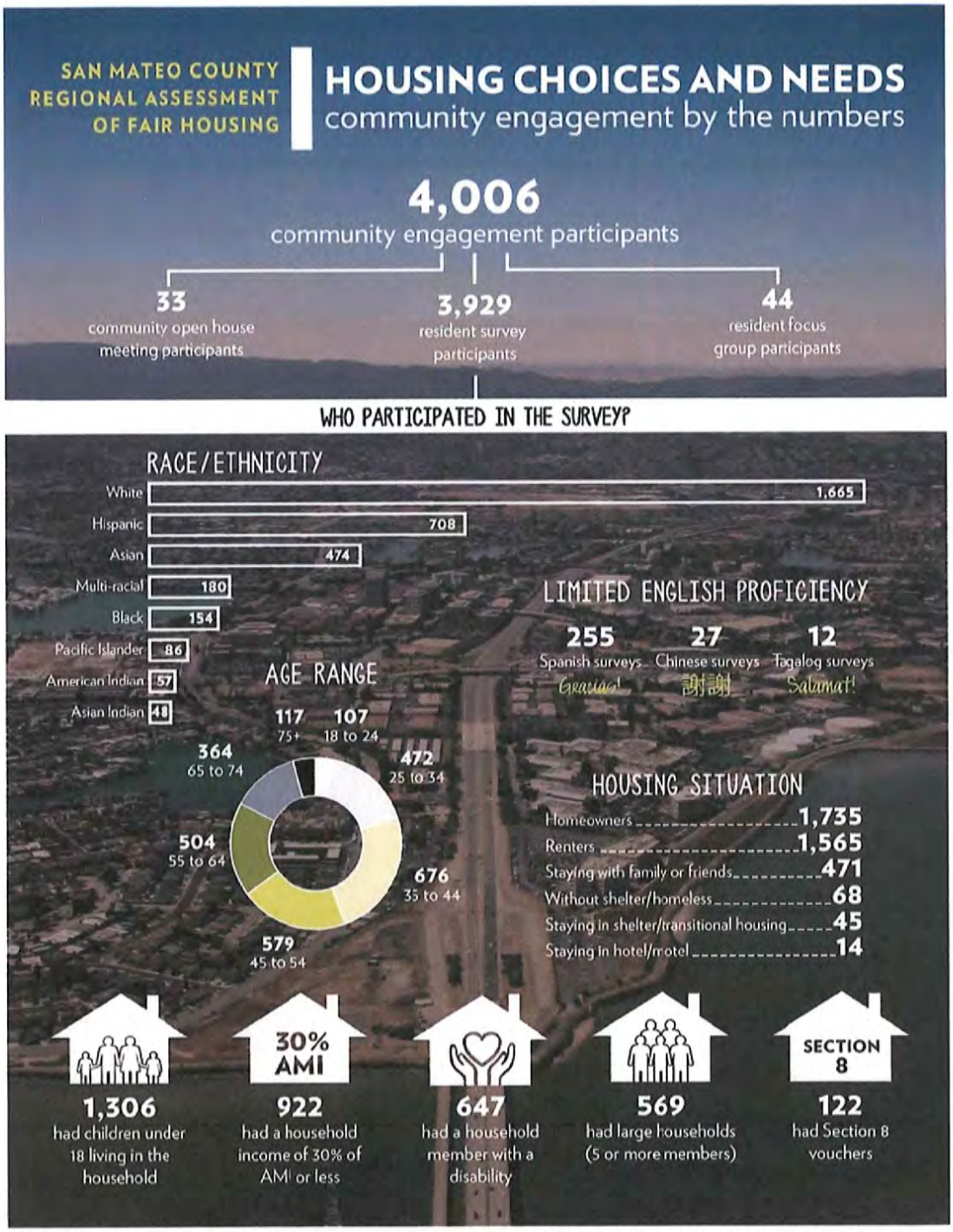
Engagement efforts:

- **One focus group with stakeholders**
- **Four resident focus groups** conducted with residents most vulnerable to fair housing discrimination and barriers to housing choice—Filipino residents (16); Spanish speakers (9); African American* residents (5), residents with a disability (7)
- **A community survey on housing needs and barriers to housing choice**—3,929 surveys including 255 in Spanish, 12 in Tagalog and 27 in Chinese
- **Two community open house meetings** held on June 17
- **Additional outreach efforts** — County-led landlord focus group, developers/real estate professionals

***Project Sentinel used the Community Engagement in a Box Guide to facilitate the African American focus group**

ATTACHMENT C

Figure III-2.



Source: BBC Research & Consulting from the Regional AFH Resident Survey, resident focus groups and Community Open House meetings.

Youth United for Community Action

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EXECUTIVE DIRECTOR

Tameeka Bennett

September 14, 2017

Director Ken Cole
Department of Housing
San Mateo Countu\y
264 Harbor Blvd, Bldg A
Belmont CA 94002-4017

The power to make change must be in the hands of those who need it the most. At Youth United for Community Action, our work is designed to bring the voices & experiences of those most affected and underrepresented to the limelight through comprehensive organizing strategies that include education, policy creation and reform in order to create change on the local level. The larger region will be enriched by the knowledge of those who most experience the brunt of poverty, in both identifying the barriers to economic growth & the solutions that can benefit all.

Our mission is to equip young people to be vanguards of the change they wish to see in their immediate community and beyond. We strive to provide a safe space for young people to empower themselves and work on environmental and social justice issues that will establish positive systemic change through grassroots community organizing. In a world full of opposition, we aim to lift up the young people we serve and instill a spirit of self-determination.

After reading through the Draft AFH and discussing it with our colleagues, we were happy to see that it acknowledges displacement, evictions, and rising rents as a threat to fair housing and the values we hold around equal opportunity, racial justice, and care for the most vulnerable among us. In order to affirmatively further fair housing, our local governments need to act to make sure that groups that have suffered discrimination are not pushed out of our communities. The time for action is now. San Mateo County and the cities within it must work now to address these grave conditions by *passing laws* that directly and explicitly protect tenants from rising rents and no cause evictions.

East Palo Alto (EPA) residents live in one of the richest areas in the state, yet struggle with the brunt of poverty. A community that is 94% people of color, EPA has a median income far below the county's ($50,137 compared to the county at $87,633), a poverty rate more than double than the county's (17% compared to 7%) and a per capita money income nearly three times below the county's ($18,014 compared to $45,346.) The impacts of poverty are magnified by the rising cost of housing. The average price of a house in San Mateo County rose to $635,000 in March 2013, a 28.9% increase over February 2012, and a near $30,000 jump from the median sale price in the county in January of 2015.

that the average market rent for a one-bedroom apartment is now $2,053 a

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EXECUTIVE DIRECTOR

Tameeka Bennett

With the median income in EPA at $50,137, it's no wonder San Mateo County experienced a 16.5% drop in the number of homes sold between February 2013 and February 2012. between February 2013 and February 2012. Similarly, the booming rental market exacerbates the inequities caused by rising costs of living and stagnating wages for low-to-moderate-income (LMI) families.

Rental data released by the San Mateo County Department of Housing reveals that the average market rent for a one-bedroom apartment is now $2,053 a month; this is an 8.2% increase from last year. Even historical bastions of affordable housing such as EPA are quickly becoming inaccessible to the region's working poor. Low to Moderate Income (LMI) workers are being pushed further away from job-rich cities and forced to undertake long commutes.

While we know there are existing efforts, such as Plan Bay Area, aimed at integrating equity into the development process by building on local and regional planning efforts, it is not enough. Plan Bay Area provides a strategy for meeting 80% of the region's future housing needs in Priority Development Areas (PDAs), areas within walking distance of frequent transit services and with common amenities and a variety of housing options. But what about the neighborhoods like EPA that are not considered a PDA because we are not within walking distance of these transit hubs but rather are slightly outside these perimeters?

A couple years ago, Youth United for Community Action youth set out to determine the barriers preventing LMI workers from achieving equity in gainful employment. After engaging 345 residents through online surveys, door-to-door interactions, and two community planning workshops, YUCA tabulated affordable housing as the top barrier with language and lack of access to education/training following. Without a designated funding source, East Palo Alto, a safe-haven for low-to-moderate-income workers, is being left with little-to-no solution to find quality, affordable housing.

The City witnessed is first wave of change in the early 2000's with the .com boom; residents becoming former residents, moving to the outskirts of the Bay Area. Once again, East Palo Alto must now position itself in the light of the tech boom where seemingly indomitable market forces have already displaced nearly 8,500 LMI EPA residents out of the region entirely! At the very least, if our residents, LMI workers, are not at the table in discussions of equity in affordable housing, the EPA as we know it could be wiped out in five to eight years. The Draft AFH did nod to displacement, but we have to do more. Elected officials within San Mateo County need to work alongside LMI families to come up with real solutions to the lack of affordable housing and the displacement crisis.

Youth United for Community Action

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Black Awareness Community Development Organization

EXECUTIVE DIRECTOR

Tameeka Bennett

We sincerely hope you will read this letter and take our words to heart. We have talked this issue to death. We have created subgroup after subgroup. It is not enough to simply acknowledge that displacement is a civil rights issue: San Mateo County and the cities within its borders need to take authentic and intentional steps to protect families from displacement. The best option to keep families in their homes is the enactment of rent stabilization and just cause for eviction ordinances. We urge you to ensure that San Mateo County, Daly City, Redwood City, South San Francisco, and San Mateo commit to adopting rent stabilization and just cause as a strategy for addressing segregation, significant disparities in access to opportunity and disproportionate housing needs in the Assessment of Fair Housing. The County should strategize not only around the promoting of rent stabilization and just cause, but also the tools and technical assistance needed for implementation throughout the San Mateo County.

Thank you for reading and considering our comments,

Tameeka Bennett
Executive Director
Youth United for Community Action

2135 Clarke Avenue East Palo Alto Ca 94303
www.youthunited.net * info@youthunited.net

ONE SAN MATEO

September 15, 2017

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd., Building A
Belmont, CA 94002-4017

Dear Director Ken Cole:

One San Mateo is an all-volunteer, grassroots organization whose vision is to create a city of, by and for all of its people. We are homeowners and renters, teachers and students, mechanics and professors, recent immigrants and longtime residents, business people and nonprofit leaders, all of whom have come together to work for housing justice. We support both supply side solutions—in other words, the construction of new permanently affordable housing—and the enactment of policies to protect renters in San Mateo.

We are writing to offer our comments on the Draft Assessment of Fair Housing for San Mateo County, Daly City, South San Francisco, Redwood City, and the City of San Mateo. We believe the draft report correctly identifies the displacement pressures that are disfiguring our communities. However, we also believe that the report fails to set forth the policies that have the greatest promise of alleviating the pressures and stemming the exodus from our community that is currently under way.

The report describes in some detail a host of measures that will eventually generate new units of affordable housing. Such construction, however, will take many years, and the problem we are facing is an immediate and urgent one. Additionally, the number of units that can be created—even at its most optimistic—comes nowhere near to matching the dimensions of the community need.

In the face of a housing emergency such as we currently face, we are called upon to use every tool at our disposal in the effort to mount an effective response. Individuals and families are facing steep rent increases and no-fault evictions on a massive scale. In addition to supply-side solutions, the AFH report needs to advance a set of policies that have the potential to bring relief to renters now and extend help on a far wider scale.

Following are the policies we encourage the County to identify as potentially effective responses to the problem of displacement: (1) rent stabilization to create stability in rents and predictability in human lives, (2) just cause for eviction to prevent landlords from capriciously evicting responsible tenants, (3) relocation assistance to help displaced tenants meet the costs of moving their families and securing new housing, (4) data gathering on rent increases and evictions to provide a comprehensive understanding of the true nature and scope of the displacement

problem, and (5) a Source of Income ordinance to prevent discrimination against renters with Section 8 vouchers.

The displacement pressures resulting from widespread evictions and sharp rent increases have inevitably fallen most heavily on members of our community who are considered protected classes under federal law—people of color, immigrants, families with children, and people with disabilities. We have witnessed the disproportionate impacts at close range here in the City of San Mateo. The members of One San Mateo therefore submit that in keeping with the spirit and letter of the AFH, it is incumbent upon our local governments, both in San Mateo and elsewhere, to take aggressive action to reverse these trends and enact policies that offer the promise of doing so. We urge you to include in your final report the policies outlined above.

Sincerely,

Karyl Eldridge on behalf of
One San Mateo, A Community Coalition
P.O. Box 6038
San Mateo, CA 94403

ONE
SAN MATEO

NATIONAL HOUSING LAW PROJECT
advancing housing justice

1663 Mission St., Suite 460
San Francisco, CA 94103
Telephone: 415-546-7000
nhlp@nhlp.org
www.nhlp.org

September 15, 2017

Submitted via E-mail

Ken Cole, Director
Department of Housing
County of San Mateo
264 Harbor Blvd—Building A
Belmont, CA 94002-4017
fairhousing@smchousing.org

Re: The Draft Assessment of Fair Housing

Dear Director Cole:

These comments are submitted on behalf of the National Housing Law Project (NHLP). NHLP is a legal advocacy center focused on increasing, preserving, and improving affordable housing; expanding and enforcing rights of low-income tenants and homeowners; and increasing housing opportunities for racial and ethnic minorities. Our organization provides technical assistance and policy support on a range of housing issues to legal services and other advocates nationwide. Since 1968, NHLP has been dedicated to advancing housing justice for low-income individuals and families.

We wish to sincerely thank San Mateo County, its staff, and the County's participating partners for the work they have done on the Assessment of Fair Housing (AFH) thus far. We offer the following comments and recommendations for the final AFH. This letter mainly focuses upon the publicly supported housing aspects of the AFH, specifically the analysis for the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority.

We look forward to the implementation of a finalized AFH that reflects the ultimate objective of a fair and inclusive County for all residents.

Community Participation

While the draft does outline the outreach completed by the County, including a helpful breakdown on the number of survey takers from jurisdictions throughout the County, the draft AFH does not detail any outreach completed by the South San Francisco Housing Authority. It is the only participating partner that did not list its individual community participation activities. The final AFH should include a description of how both participating housing authorities met the individual public

participation requirements outlined in 24 C.F.R. part 903.[1] Furthermore, the final AFH should describe involvement by any Resident Advisory Board or other resident organization members.

Fair Housing Analysis

The final AFH should more closely examine possible contributing factors of disproportionate housing needs in publicly supported housing, specifically concerning the Section 8 Housing Choice Voucher program administered by HACSM. For example, survey responses received during the community participation process indicate survey participants encounter considerable difficulties in using their vouchers. According to the draft AFH, *77 percent* of survey respondents who are Section 8 voucher holders reported experiencing landlords with policies of not renting to voucher holders.[2] Furthermore, "[n]early three in four resident survey respondents who have Section 8 vouchers found it 'very difficult' to find a landlord that accepts Section 8 and 15 percent found it 'somewhat difficult.'"[3] A large number of voucher holders also reported difficulty finding out information about landlords that will accept Section 8 (61 percent); not having enough time to locate a unit before the voucher expired (45 percent); and an insufficient payment standard (43 percent). Furthermore, 57 percent of survey respondents with Section 8 vouchers who had searched for housing in San Mateo County within the last five years experienced a denial.[4] Additionally, participants in the focus group for persons experiencing disabilities reported that source of income discrimination is a "huge issue" in the region.[5] Forty-three percent of survey takers reported that the voucher payment standard was insufficient to cover the rent, compared with 77 percent of respondents who reported encountering landlords that do not accept vouchers; thus, there seem to be additional reasons why voucher holders cannot lease up beyond simply the payment standard being insufficient. This should be further explored in the final AFH. Furthermore, the differences between how the source of income protections in East Palo Alto versus Foster City function, and why there are different degrees of voucher usage in the two cities, should also be explored to get a better understanding of the barriers faced by voucher holders.

In spite of the local data and knowledge that indicate barriers to fair housing choice for voucher holders, the possible contributing factor of "source of income discrimination" is not identified as a contributing factor within the publicly supported housing section, nor is it identified as a contributing factor by HACSM. The only place source of income discrimination is identified as a contributing factor is in the disability and access section. And even though source of income discrimination is identified in the disability and access section, only one jurisdiction (Daly City) mentions source of income discrimination in its goals' metrics and milestones. This seems to indicate that the final AFH would benefit from a more detailed examination of source of income discrimination and its implications for fair housing choice (specifically, the protected groups who rely on Section 8 vouchers, including but not limited to persons with disabilities), and possible ways to address it.

While the draft AFH mentions that HACSM does provide landlord incentives, it does not evaluate the extent to which HACSM has found this approach to be successful. However, the draft AFH does mention that the voucher lease up rate has been consistently below 50 percent over a three-year period.[6] Providing this additional context would be helpful in evaluating the potential efficacy of

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[1] *See also* 24 C.F.R. § 5.158(a)(2) (PHA community participation requirements).
[2] Draft AFH, at Section V, page 119.
[3] *Id*.
[4] Draft AFH, Appendix A, at 12.
[5] Draft AFH, Appendix A, at 28.
[6] Draft AFH, Section V, at 119.

one of HACSM's stated proposed goals, which is to allocate funds for the Lease Success Program to support "housing locator services and landlord incentives."[7]

Furthermore, the publicly supported housing section, while discussing the Moving to Work (MTW) vouchers, identified a concern by advocates that the hardship exemptions were "not working to exempt persons with disabilities and seniors from the MTW work requirement."[8] However, while the fair housing analysis discusses the MTW program, there is no further discussion as to the extent the MTW program is impacting members of protected classes in addition to persons who experience disabilities. Such an assessment seems important particularly because the housing authority, as an MTW agency, maintains considerable discretion in its program administration. Furthermore, such an assessment is key because it may help identify additional contributing factors concerning publicly supported housing, such as the placement of time limitations on vouchers in an exceedingly tight rental market where even participants with a voucher have difficulties locating affordable housing—and the impact such time limitations have on members of protected groups. It would also be helpful to know if those residents who ported out of San Mateo County did so because they wanted to move to another jurisdiction, or because they would not otherwise be able to afford to remain in San Mateo County. This is unclear from the current analysis.

Additionally, some participants within the focus group of Section 8 voucher holders reported "reluctance to report condition issues out of fear of being displaced," and needing to contact inspectors to "motivate landlords to make necessary repairs."[9] However, HACSM does not name either of these problems in identifying contributing factors, those it does identify displacement of residents more generally as a contributing factor. Failure to identify these problems when identifying contributing factors results in a lack of goals by HACSM in the draft AFH to address these important issues that create, perpetuate, contribute to, or increase the severity of disproportionate housing needs in publicly supported housing (specifically, the Section 8 voucher program).

Finally, the publicly supported housing analysis says very little about the public housing units administrated by the South San Francisco Housing Authority. The final AFH should include additional discussion about the fair housing issues faced by residents served by the South San Francisco Housing Authority.

Goals

<u>Housing Authority of the County of San Mateo</u>

Overall, the goals for HACSM need to be more specific and need to more directly address the contributing factors identified. For example, it is unclear how the metrics and milestones mentioned in Goal #2 ("working with program partners to provide resource assistance and guidance for customers") specifically address the contributing factors of a lack of affordable housing, displacement, or the growing importance of publicly-supported housing. Perhaps expanding on what assistance and guidance is contemplated would help clarify how such guidance and assistance would address the lack of affordable housing. For example -- does such guidance include mobility counseling? Furthermore, again, it is unclear how providing more "efficient" services would address resident displacement.

[7] Draft AFH, Section VI (Goals), at 6.
[8] Draft AFH, Section V, at 120.
[9] Draft AFH, Appendix A, at 23.

Additional elaboration on how the goals relate back to the contributing factors would provide helpful context, and allow stakeholders to evaluate success down the road.

Goal #1 regarding addressing HACSM's voucher utilization rate needs to be more specific. Several of the metrics and milestones, for example, need to specify what is actually trying to be achieved through each item. For instance, HACSM states that it will allocate $250,000 for the Leasing Success Program to provide incentives and housing locator services. While the identification of funds to conduct these tasks is a very positive step, it would be helpful if the goal estimated what the division would be between the landlord incentives and the housing locator services. Given HACSM's experiences with its current incentive program, does it plan to increase the amount of individual landlord incentives? What would housing locator services entail? How many estimated voucher families does HACSM aim to help through the Leasing Success Program? While NHLP would certainly defer to local housing advocates on how these funds should be allocated and how the Leasing Success Program should be administered, providing more detail in the AFH itself would improve subsequent evaluation of this goal.

HACSM also states the metric/milestone of securing additional project-based units, which would establish longer-term affordable units within the County. It would be helpful to know the location of where HACSM is considering project-basing vouchers. And, if HACSM is in the process of identifying such locations, if it has not done so already, it should ensure advocate and resident input on identifying these locations to ensure that the vouchers are project-based in accordance with resident needs.

Furthermore, the goals for HACSM do not explicitly address the issue raised by advocates concerning whether the hardship exemption is sufficient to adequately serve the needs of persons experiencing disabilities with time-limited vouchers. While the goal concerning customer service includes metrics of evaluating internal processes to provide "more efficient services to voucher holders experiencing difficulty," this does not directly address how time-limitations on vouchers are impacting persons with disabilities. The goals do not address the "revolving door effect" experienced by persons with disabilities who do not receive an exception (i.e., losing vouchers and going back on the waitlist), described in the Disability and Access Section.[10]

If HACSM seeks to meaningfully evaluate its "internal processes,"[11]it should denote in the goals specifically how it will do so, and which processes will be evaluated. We propose that this evaluation should be extended to include HACSM policy documents (e.g., Administrative Plan), and that internal policies and practices should be evaluated in response to concerns raised in the resident survey (and, to the extent applicable to the housing authority, concerns raised in the broader AFH). Evaluation of the time-limited MTW vouchers should be included within this evaluation of policies and practices. Any such review should not only focus on improving customer service (which has been identified by residents as an issue)[12], but also needs to focus on removing fair housing barriers for members of protected classes in San Mateo County (e.g., racial and ethnic minorities, families with children, and persons with disabilities).

[10] Draft AFH, Section V, at 136.
[11] Draft AFH, Section VI (Goals), at 6.
[12] Draft AFH, Appendix, at 13.

Finally, to the extent goals (such as Goal #6 and #20 for San Mateo County, #6 for Daly City, and #9 for City of San Mateo) involve HACSM, those should be reflected in the matrix with HACSM's goals as well, as HACSM will presumably play a key role in implementation. This allows for readers of the AFH to see the entire picture, and how these proposed goals interact with the identified fair housing problems.

South San Francisco Housing Authority

There do not appear to be any goals listed on the goal tables for the South San Francisco Housing Authority. While we understand that this housing authority is relatively small, there are no size cutoffs for compliance with the AFFH Rule for PHAs.[13] Identification of goals is a requirement for all individual participants in an AFH,[14] even a regional AFH.[15] While the City of South Francisco mentions the housing authority in its goals, the Housing Authority itself does not appear to have submitted goals that it is responsible for. Therefore, the final version of the AFH should include one or more goals for the South San Francisco Housing Authority.

Conclusion

Thank you again for all of your work in drafting the AFH, and for your efforts to affirmatively further fair housing in San Mateo County. We look forward to the final AFH.

Sincerely,

Renee Williams, National Housing Law Project

cc: Mr. Jeff Jackson, HUD Office of Fair Housing and Equal Opportunity, Region IX (via e-mail)

[13] 24 C.F.R. § 5.154(b)(2); AFFH Rule, Preamble, 80 Fed. Reg. 42,272, 42,308 (July 16, 2015) ("The duty to affirmatively further fair housing and the requirement to conduct an AFH applies to all PHAs, regardless of the HUD program or initiative in which they are participating.")

[14] 24 C.F.R. § 5.154(d)(4) (identification of priorities and goals).

[15] 24 C.F.R. § 5.156(e) ("A joint or regional AFH must include the elements required under § 5.154(d). A joint or regional AFH *does not relieve each collaborating program participant from its obligation to* analyze and address local and regional fair housing issues and contributing factors that affect housing choice, and to *set priorities and goals for its geographic area to overcome the effects of contributing factors and related fair housing issues*.") (emphasis added).

To Our Elected Officials:

As members of the For North County (4NC) coalition, we write to provide our comments on the Draft Assessment of Fair Housing and to ask that you take immediate and aggressive actions to address the displacement of residents of color in Daly City, the City of South San Francisco, and throughout the rest of San Mateo County.

Migrante-Northern San Mateo County (NSMC) is a grassroots, non-profit, Filipino migrants organization advancing the rights and welfare of overseas Filipinos especially Filipino workers and their families in Northern San Mateo County, the Bay Area, and the entire United States. LAYA Migrant Youth for Change and Action is a youth-based organization in Northern San Mateo County that empowers, organizes, and mobilizes the Filipino youth and community to uphold the rights and welfare of our migrant families and fellow kababayans. Both Migrante-NSMC and LAYA Migrant Youth for Change and Action are housed at the Liwanag Kultural Center in the Hillside Park neighborhood of Daly City.

Filipinos have historically migrated to Daly City and its surrounding areas. Filipinos are the biggest Asian population in Daly City, and we live, work, own businesses and contribute to this city we've called home for generations. We know firsthand that rent increases and evictions are an urgent racial justice and civil rights issue in our communities, and particularly in the Filipino community in North County. We see that our members, clients, friends, and family are frequently forced to transition between residences as increasing rents or other forms of displacement push them out of their homes. Even though the local market is not sustainable or affordable, we have seen families, individuals, and students using all the resourcefulness they can muster to find a new way to stay in their community, close to their jobs, their family, and their schools. Often they are forced to accept higher housing costs than they can afford, and worse conditions and less housing stability than anyone should have to experience.

As the Filipino community and other residents of color shoulder these increasingly heavy burdens, we know that equal housing opportunity is not a reality in North County. We are profoundly worried about what will happen to our community if nothing is done to ensure that renters and low-income residents have access to stable, affordable housing. We want the Filipino community to continue to thrive and be productive in Daly City and in North County as a whole.

We welcome the focus that the Assessment of Fair Housing, or AFH, brings to these issues. The Draft AFH identifies the significance of rising rents and evictions as serious problems affecting communities of color—as it must, in light of the unquestionable adverse impacts on working class residents of the county, who are disproportionately of color.

Unfortunately, the experiences of the Filipino community are not reflected in the AFH because the analysis does not disaggregate the Asian American population in the county. This

failure is a serious problem, and we strongly request that it be remedied in the final AFH. We know that members of our community are experiencing harm because of the serious problems in the unregulated rental market, and we believe that the AFH will not meet its legal requirements if it obscures this reality.

The civil rights duty to "affirmatively further fair housing" requires that Daly City, South San Francisco, and other jurisdictions in San Mateo County must take immediate, effective action to address the civil rights crisis in our rental market.

We welcome Daly City's commitment in the AFH "Goals and Strategies" to considering policies pertaining to just cause eviction and prohibiting source of income discrimination—and we ask Daly City to consider strengthening its goals by adding other anti-displacement policies to that list. Similarly, we are pleased to see that South San Francisco has identified a goal of preventing displacement of households, and we would ask that the City strengthen that goal by identifying specific anti-displacement policies that it will consider. Namely, we encourage both Daly City and South San Francisco, and the County of San Mateo, to adopt the following policies:

- Rent stabilization and just cause protection for renters.
- Tenants' first right of refusal, allowing tenants to purchase their buildings at market price when the buildings are offered for sale.
- A program requiring landlords to submit information regarding rent increases and evictions.
- Relocation assistance for tenants who receive no cause eviction notices or significant rent increases.
- Section 8 non-discrimination

Thank you for considering our comments. We look forward to working together to ensure equal housing opportunity for all San Mateo County residents.

Sincerely,

Migrante - Northern San Mateo County

LAYA Migrant Youth for Change and Action

LEGAL AID SOCIETY
OF SAN MATEO COUNTY

Via email at Fairhousing@smchousing.org

September 15, 2017

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd—Building A
Belmont, CA 94002-4017

Re: Comments on Draft Assessment of Fair Housing

Dear Director Cole:

The following comments are submitted regarding the 2017 Draft "San Mateo County Regional Assessment of Fair Housing" for San Mateo County and participating partners. In particular, I wish to highlight concerns with the Publicly Supported Housing Analysis (Section V, pages 112-122), and the inadequacy of the Fair Housing Goals and Priorities (Section VI) as they relate to the obligations of the South San Francisco Public Housing Authority ("South San Francisco PHA") and the Housing Authority of the County of San Mateo ("HACSM") within this assessment. Legal Aid Society of San Mateo County is a non-profit legal services organization providing assistance with housing issues for more than 1200 low income households each year. A significant percentage of our client households reside in publicly supported housing, such that Legal Aid staff have developed extensive knowledge of the various publicly supported housing programs and sources within our County.

Rent Increases for Voucher Holders

The Publicly Supported Housing Analysis notes that average contract rent for voucher-assisted households has increased 14% over the past year, and that increases in rents paid by voucher holders in 2016 and 2017 were $250-$300 per month. (Section V, page 120). These trends are remarkable in their presumed impact in undermining the efficacy of the voucher program overall, but are all the more notable in the context of how the hardship of these steep increases is bourne by the voucher holders. The analysis fails to discuss the Moving To Work policies that have resulted in the program-wide elimination of the usual 40% affordability cap and implementation of a Tiered Subsidy Table in determining the portion of rent paid by voucher holders. The escalation of contract rents noted in the analysis has outpaced any adjustments to Fair Market Rents, and by extension, to the subsidy amounts provided to voucher holders pursuant to the Tiered Subsidy Table. This results in a wide gap for many tenants between the contract rents

approved by the Housing Authority and the subsidy that will be provided through the voucher, imposing extreme rent burdens upon tenants and rendering the voucher useless for its intended purpose of providing access to high opportunity housing. Instead, voucher holders are driven to search for low cost housing where their rent burden can be reduced. This is almost certainly the primary factor contributing the to high concentration of voucher usage in East Palo Alto, where lower cost housing opportunities are to be found. The very structure of the voucher subsidy calculation and distribution of cost burden between tenant and Housing Authority is a cause of segregation in our County. This factor is inadequately addressed in the analysis and completely overlooked in the HACSM Goals and Priorities. The HACSM goals do not address the pervasive contributing factor identified in Figure V-87, "[d]isplacement of residents due to economic pressures."

MTW Self-Sufficiency Enrollment and Hardship Policy

The analysis mentions the time-limited vouchers provided through the Moving To Work program, and the "hardship exemption" available to elderly and disabled voucher holders that can provide up to three one-year extensions to the time limit. Over the past two years as the number of time limited five-year vouchers expanded and all new voucher program participants were enrolled in the Family Self-Sufficiency Program (FSS), Legal Aid staff have observed many such elderly and disabled tenants place in FSS with time-limited vouchers who were clearly unsuited to the intent of this program. Many permanently disabled clients will never be gainfully employed and free of welfare assistance. The Housing Authority's approach to addressing the obstacles of the elderly and disabled participants is to make extensions of time available through the Hardship Exemption Policy, yet it is difficult to imagine how additional time alleviates the hardship of permanent obstacles to self sufficiency for elderly and disabled tenants. For many such tenants a temporary subsidy is actually a *destabilizing* influence in their lives, since use of the voucher in most instances requires a move to new housing and loss of the voucher then requires another move five years later. To advance the housing stability of vulnerable populations, enrollment in the time-limited voucher program should be limited to appropriate households with the capacity to succeed in the program, or the Hardship Exemption Policy should be sensibly expanded to include the potential to shift a household to permanent voucher status where clear criteria are met. HACSM goals in the AFH should specifically address the application of hardship exemptions to disabled and elderly tenants.

South San Francisco Public Housing Authority

The draft AFH utterly fails to set forth goals and priorities of the South San Francisco PHA, or articulate how the South San Francisco PHA will address the fair housing challenges identified in the AFH. Although the City of South San Francisco states among its goals, "The City shall support the South San Francisco PHA in its continued operation and rental of 80 units of public housing," the draft is silent on policies or actions that might be taken by this PHA itself responsive to the demographics and disparities noted in the findings. At a minimum, the final AFH must incorporate goals specifically attributable to the South San Francisco PHA.

I appreciate the opportunity to provide these comments, and value our collaboration with both Housing Authorities in serving the needs of low income residents in San Mateo County.

Sincerely,

Shirley E. Gibson
Directing Attorney

cc: Jeff Jackson: jeff.jackson@hud.gov
Don Horsely: dhorsley@smcgov.org
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HOUSING
LEADERSHIP
COUNCIL

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd—Building A
Belmont, CA 94002-4017

Dear Mr. Cole:

First, we'd like to express our gratitude for your department's efforts in our County. It's quite rare and wonderful to have a group of individuals so dedicated to providing high-quality housing to their residents. We're also lucky to have a Board of Supervisors who are particularly sensitive and attentive to the high cost of housing in our area.

We understand that the County does not have land use control within the cities, but smaller communities still benefit from federal investments and it is critical that smaller communities further fair housing goals. For example, the City of Millbrae has delayed a hearing on a project that includes veterans housing, even though the development is consistent with a community plan and environmental review. Brisbane has delayed the decision over allowing housing on a large-scale development adjacent to the Caltrain station on the edge of San Francisco. The City of Menlo Park only allows for new housing on their west side, which is historically a marginalized community with some of the worst schools in the state. The more affluent areas with one of the best public schools in the country, have no sites available for affordable housing.

These are clearly fair housing challenges, and while they are not the County's responsibility, we hope the AFH will identify education efforts, incentives, and support for communities to help them affirmatively further fair housing goals.

We also echo the concerns of our partners, who are calling for tenant protections such as just cause eviction and relocation assistance. These measures are also valuable tools to protecting diversity and inclusion in San Mateo County.

Respectfully submitted,

Leora Tanjuatco
Organizing Director
Housing Leadership Council of San Mateo County

Housing Leadership Council of San Mateo County
2905 S. El Camino Real, San Mateo, CA 94403 • (650) 242-1764 • hlcsmc.org

Fair Rents 4 Pacifica
PO Box 1489
Pacifica, CA 94044
FairRents4Pacifica@gmail.com

Ken Cole, Director
San Mateo County Department of Housing
264 Harbor Boulevard – Building A
Belmont, CA 94002-4017

Dear Director Cole:

Fair Rents 4 Pacifica is an all-volunteer, grassroots group that has come together to support efforts to enact rent stabilization and just cause in Pacifica. We know that these protections are urgently needed to protect housing opportunity for some of the most vulnerable residents in our community, including seniors, people of color, and people with disabilities. For that reason, we call on you to ensure that the Assessment of Fair Housing directly addresses the need to adopt rent stabilization and just cause in Pacifica and throughout the county.

We were pleased to see that the Draft AFH acknowledges displacement, evictions, and rising rents as a threat to fair housing and the values we hold as a community around equal opportunity, racial justice, and care for the vulnerable among us. In the spirit of affirmatively furthering fair housing—which we understand means that our local governments need to act to make sure that groups that have suffered discrimination are not pushed out of our communities—San Mateo County and the cities within it must now act to address these serious problems by passing laws that directly protect tenants from rising rents and no cause evictions.

Renters in Pacifica are being hit hard by the regional housing crisis. The median rent in Pacifica increased a shocking 122 percent between 2010 and 2015—nearly five times the U.S. average of twenty-five percent. (U.S. Census Bureau)

Evictions without cause have also increased in Pacifica. Our community recently experienced a particularly catastrophic mass eviction when at least 77 households, including multiple people with disabilities, veterans, and seniors, were evicted without cause from Pacific Skies Estates in 2015 and 2016. Pacific Skies Estates is our town's only mobile home park, and as such it had been a critical source of housing that was affordable to many of our most vulnerable residents. Shortly after a massive private equity firm (the Carlyle Group) invested in the mobile home park, they began to evict the existing residents to pave the way for redevelopment of the park into luxury housing. This not only displaced scores of our residents, it also has eliminated a substantial portion of our affordable rental housing stock. The story of Pacific Skies Estates shines a dramatic spotlight on how the lack of renter protections will lead our town to become less

accessible to people in protected classes, and thus only reduce our already tenuous access to opportunity and further entrench the segregation in our county.

Although Pacifica is majority white, we have a sizable population of immigrants and we know that failing to protect renters' rights to remain in their homes will only further reduce the diversity that does exist in our community. We know that people of color, as well as people with disabilities and seniors, are feeling a lot of pain from rent increases and evictions. Additionally, UC Berkeley research shows that the areas in our community where people of color live are also the places that have the most renter households. (UC Berkeley Urban Displacement Maps, attached)

I also want to share with you that Fair Rents 4 Pacfica has seen firsthand how those who oppose rent stabilization and just cause are willing to go to any lengths—and say anything, no matter how ugly—to prevent these policies from being passed.

Fair Rents 4 Pacifica has been working to support rent stabilization and Just Cause since 2015. First, we sought support from the City Council. At multiple City Council meetings, opponents of rent stabilization and just cause made numerous racially charged comments, suggesting that tenants who had security in their tenure and rent were likely to engage in crime and lower property values, among other things. These are the same types of claims that were used in block-busting schemes in the middle of the 20th century to maintain racial segregation in our housing markets. The same ugly rhetoric has now appeared in our City Hall and in opinion columns in our local newspapers.

In February 2017, the Pacifica City Council directed staff to draft an ordinance that could be placed on the ballot that would allow citizens of Pacifica to vote to enact rent stabilization and just cause. The City Council took this action in part to address the displacement crisis.

Then, in April 2017, the City Council voted to enact a temporary moratorium on rent increases and no cause evictions, to protect tenants from evictions or rent increases imposed in anticipation of the upcoming November vote on tenant protections. Immediately after this, the opponents of rent stabilization began collecting signatures to subject the temporary moratorium to a referendum in November. While this seems like an apparently illogical act, since the moratorium would only have lasted until November, in fact the apparent purpose of the referendum drive was to prevent the moratorium from ever going into effect. Unfortunately, they achieved their purpose when they delivered the requisite number of signatures in May 2017. Fair Rents has received an avalanche of reports from Pacifica residents who claimed that the paid signature gatherers obtained the signatures in part through lies and misrepresentation, telling many people that signing the petition would protect renters and/or allow them to vote for rent stabilization on the November ballot. More than fifty citizens have come forward saying that they were misled into signing the petition, and they have requested that their signatures be removed.

It is extremely sad to see this kind of fierce opposition to granting tenants the right to feel secure in their homes and know that they will not be forced to move so long

as they pay a reasonable rent and abide by the terms of their lease. Those of us working with Fair Rents 4 Pacifica believe that this opposition is driven in no small part by prejudice—and whatever its motivation, if the opposition is successful, we know that it will hurt some of the groups our country's civil rights laws are designed to protect, *i.e.*, people of color and people with disabilities.

I hope you will take Pacifica's experience into account. It is not enough to recognize that displacement is a civil rights crisis: San Mateo County and its cities need to take real, meaningful action to protect people from displacement. The most meaningful action that realistically can be taken is the enactment of rent stabilization and just cause. Therefore, we call on you to ensure that San Mateo County, Daly City, Redwood City, South San Francisco, and San Mateo commit to adopting rent stabilization and just cause as a strategy for addressing segregation, significant disparities in access to opportunity, and disproportionate housing need in the Assessment of Fair Housing. Moreover, the County should add a strategy of promoting rent stabilization and just cause throughout the County, including by providing technical assistance to cities like Pacifica.

Thank you for reading these comments.

Sincerely,

Ellen Hage, on behalf of Fair Rents 4 Pacifica
pacificaellen@hotmail.com

COMMUNITY
LEGAL SERVICES
IN EAST PALO ALTO

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September 15, 2017

Director Ken Cole
Department of Housing
County of San Mateo
264 Harbor Blvd—Building A
Belmont, CA 94002-4017

Re: Comments on the Draft Assessment of Fair Housing

Dear Director Cole:

Community Legal Services in East Palo Alto (CLSEPA) writes to provide our comments on the Draft Assessment of Fair Housing ("AFH") for Daly City, South San Francisco, San Mateo, Redwood City, and San Mateo County. CLSEPA assists thousands of Bay Area residents each year—many of whom are in the protected classes—with housing issues including those who are being evicted from their homes due to quickly rising rents and no-cause eviction notices. We see first-hand the dire need for laws making it easier for families to remain in their homes, which impacts their ability to stay at their jobs, in their schools, and their communities. All tenants, regardless of their identity, should have full and fair access to affordable housing in San Mateo County.

It is our goal, in participating in this process, to ensure that the AFH and the 1968 Fair Housing Act achieve Dr. Martin Luther King, Jr.'s vision of ensuring housing access free from all forms of discrimination. It is the task of the entitlement jurisdictions to pick up the mantle laid down by this landmark civil rights legislation—passed in the wake of Dr. King's assassination—and ensure that local families are protected from unfair and unjust treatment.

Though highlighting intentional forms of housing discrimination (e.g., historical patterns of segregation, denial of access to housing based on status in a protected class) is a key component of the AFH and must be assessed, the public must be made aware that the AFH

must include assessments of unintentional forms of discrimination as well. What must be made clearer, both in the AFH itself an in the Executive Summary, is that some housing problems are civil rights violations if members of a protected class are disproportionately impacted.[1]

Under the Fair Housing Act, communities have been able to prove race and national origin discrimination, for example, even when there is no intent to discriminate. This disparate impact theory has been upheld by the Supreme Court and means that a policy may be considered discriminatory if it has a "disproportionately adverse impact" against a protected class when there is no legitimate, non-discriminatory business need for the policy.[2] Similarly, under the Assessment of Fair Housing, the target jurisdictions must "affirmatively further fair housing" by not only investigating intentional discrimination, but by analyzing whether there are "significant disparities in the proportion of members of a protected class experiencing a category of housing need" and creating a plan to proactively address those fair housing impediments contributing to the disparities.[3]

While we understand that the AFH looks at (i) Segregation/Integration, (ii) Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs), and (iii) Disparities in Access to Opportunity, we will focus our comments on issues related to (iv) Disproportionate Housing Needs.[4] Factors that determine disproportionate housing needs include "severe cost burden, overcrowding, and substandard housing conditions."[5]

Many of the families we serve—a majority of whom are in at least one protected class—regularly experience one or more of the listed "housing needs." Many of our clients experience extreme cost burden [6] where they work two or three jobs to make ends meet and they pay upwards of 50% of their income on housing. Further, when families receive large rent increases, they are faced with having to either (1) leave their homes, schools, jobs, and communities, or (2) spend a larger percentage of their income on housing, requiring them to go without other basic necessities and experience devastating health impacts. Our clients often experience housing need in the form of severe overcrowding and substandard housing conditions as well.[7] Due to the high cost of housing, it is not

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[1] 24 C.F.R. § 5.154.

[2] *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.,* 135 S. Ct. 2507 (2015). Protected classes include race, national origin, color, religion, sex, familial status, or disability.

[3] 24 C.F.R. § 5.152.

[4] Draft AFH, V 1.

[5] 24 C.F.R. § 5.152.

[6] *See* Comprehensive Housing Affordability Strategy: Background (Cost burden is monthly housing costs exceeding 30% of monthly income, severe cost burden is monthly housing costs exceeding 50% of monthly income.), *available at* https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html.

[7] *Id.* ("There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. A household is said to have a housing problem if they have any 1 or more of these 4 problems." Overcrowding is more than 1 person per room and severe overcrowding is more than 1.5 persons per room).

uncommon for our clients to live in a single unit which houses multiple families. Many families can only afford a room in a home, which results in sometimes three or four people sharing one bedroom or living room. Our clients are also likely to not report substandard conditions such as plumbing issues, mold, and pest infestations for fear of retaliation from unscrupulous landlords. Families endure these conditions because, as we have seen time after time, many landlords respond to health and safety complaints by issuing either (1) a no-cause, 60-day eviction notice, or (2) a rent increases of hundreds, or even thousands, of dollars per month. Indeed, CLSEPA has provided representation for entire buildings where every unit has received rent increases or no-cause eviction notices, as well as buildings where families with young children are tormented by pests because they do not want to risk eviction. This trend is likely to continue because no-cause evictions and predatory rent increases are perfectly legal in every city in San Mateo County other than East Palo Alto, limited only by retaliation laws that tenants must prove during risky eviction trials. As the Draft AFH points out, East Palo Alto has the most affordable housing in the county, in part because it has rent stabilization and just cause for eviction protections.[8]

1. To Ensure Continued Community Participation in the Implementation Efforts, the Draft AFH Should be Reworked to Emphasize Key Findings on Disproportionate Housing Needs Affecting Displacement.

As you are aware, the Draft Assessment of Fair Housing is a 376-page document, making it inaccessible to many community members who may not have the time or resources to commit to reviewing the entire document. To ensure that this is a useful document that can inform policy and planning efforts, the Executive Summary should be concise, and provide an accurate reflection of the assessment's findings. This will help to facilitate continued community engagement in implementation efforts.

As it is currently written, both the Draft AFH and the Executive Summary severely minimize the devastating impact of displacement pressures in the rental market and its fair housing implications. Though the AFH explicitly identifies both rent increases and evictions as a primary cause of displacement, it does very little to further analyze the causes and impacts of this displacement.

As an example of the way that the Executive Summary (and the AFH itself) underplays the impact and causes of displacement, you correctly state that some of the primary fair housing issues are that "African Americans and Hispanic residents have the highest rates of housing problems (50-60% of households experience housing problems, largely cost burden)" and that "African American and Hispanic residents are disproportionately likely to be affected by evictions (both No Cause and Just Cause). The threat of eviction can have "silencing" effect on residents who fear being evictions (undocumented, LEP, foreign-born); they tolerate very poor housing conditions [t0] remain housed." Yet, with regard to factors that contribute to such outcomes, you state that "Displacement of residents [is] due to market pressures (gap between supply and demand)" and the

[8] Draft AFH, V 117-118.

"[d]evelopment of investor driven markets". [9] While these factors are important, your reference to the market in explaining displacement pressures suggests that this is a purely economic issue with no discussion of San Mateo County and the entitlement jurisdictions' failure to enact any meaningful rental protections to regulate rents and evictions that would stabilize communities.

Further, as explained above, the Executive Summary should clearly explain why the displacement of communities of color is a fair housing issue, as many community members believe that fair housing issues are limited to intentional forms of discrimination.

2. The Fair Housing Goals, Metrics and Milestones Identified by the Participating Jurisdictions Must Be Designed to Sufficiently Address the Specific Contributing Factors Prioritized in the Assessment of Fair Housing.

The Affirmatively Furthering Fair Housing rule sets forth the following legal requirements, "[f]or each goal, a program participant must identify one or more contributing factors that the goal is designed to address, describe how the goal relates to overcoming the identified contributing factor(s) and related fair housing issue(s), and identify the metrics and milestones for determining what fair housing results will be achieved."[10]

While we applaud the efforts that San Mateo County and the participating cities have made in allocating funds for the production of affordable housing, it is not clear that the fair housing goals, metrics and milestones identified in the Draft AFH will sufficiently address the specific contributing factors that these jurisdictions have identified and prioritized. For example, while San Mateo County identifies both "loss of affordable housing supply" and "high housing costs" as fair housing impediments causing "displacement due to rent increases for Spanish speaking and large families" the corresponding commitments to address these issues—such as allocating money for the development of affordable housing—does not sufficiently target the fair housing issue.[11] Absent rental protections, vulnerable families are not likely to be able to remain in communities for the years that it takes to develop affordable housing. There are no goals related to preventing displacement and regulating housing costs for vulnerable families currently living in tenuous housing situations. We applaud Daly City's commitment to "[e]xplore policies pertaining to just cause eviction" but it and the other jurisdictions must do more during this time of crisis.[12]

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[9] Draft AFH, II 6-7.
[10] 24 C.F.R. § 5.154.
[11] Draft AFH, II 13.
[12] Draft AFH, II 17.

3. The Assessment of Fair Housing Must Include Effective and Common Sense Solutions Like Rent Stabilization, Just Cause for Eviction Protections, and Other Measures to Truly Address Fair Housing Issues in San Mateo County.

CLSEPA urges the jurisdictions participating in the AFH to commit to adopting rent stabilization and just cause protections as the most targeted and effective actions to address displacement pressures. These policies can protect thousands of families immediately, including those who we see in our legal practice regularly. We see first-hand that providing legal benefits to vulnerable populations in a targeted way can remove the fear of retaliation that families have when complaining about substandard housing issues; regulate rents to make overcrowding less of a necessity; and allow families to spend more of their income in the community on food and other basic needs. Most importantly, these policies can keep families in their homes, near their jobs and schools, and in their communities.

Other policies that San Mateo County, Daly City, South San Francisco, Redwood City and the City of San Mateo should consider adopting are:

(1) Data gathering to get an accurate sense of who is being displaced in their jurisdictions, (2) Tenants' First Right of Refusal which permits tenants to buy their buildings at market price when those buildings are offered for sale, or to assign that right to a nonprofit that would agree to manage the building as protected affordable housing, (3) Relocation assistance to aid displaced tenants in overcoming some of the cost barriers to securing housing in neighborhoods of opportunity, and (4) laws prohibiting discrimination against Section 8 voucher-holders to open up more housing opportunity so that landlords cannot discriminate against otherwise qualified tenants based on their source of income.

Thank you for considering these comments.

Sincerely,

Salimah K. Hankins
Senior Attorney

Cc: Jeff Jackson, U.S. Department of Housing and Urban Development
Supervisor Don Horsley
Supervisor David Pine
Supervisor Carole Groom
Supervisor Warren Slocum
Supervisor David Canepa

APPENDIX C.

Community Outreach Materials

DOH
DEPARTMENT OF HOUSING
COUNTY OF SAN MATEO

Main Office - Department of Housing
264 Harbor Blvd., Building A, Belmont, CA 94002-4017

Housing & Community Development (HCD)
Tel: (650) 802-5050

Housing Authority of the County of San Mateo (HACSM)
Tel: (650) 802-3300

Board of Supervisors:
Dave Pine
Carole Groom
Don Horsley
Warren Slocum
Adrienne J. Tissier

Director: Ken Cole

HUD's Affirmatively Furthering Fair Housing Rule and the Assessment of Fair Housing

Assessment of Fair Housing (AFH): What it is & Why It Is Important

Efforts to combat ongoing discrimination and increase housing choice and access to opportunity are at the core of HUD's fair housing efforts. The Assessment of Fair Housing (AFH) is a HUD–required analysis that results in a report of fair housing issues within our region. The results of this report will incorporated in our planning processes.

The AFH will include a standardized assessment through which The County and entitlement jurisdictions evaluate fair housing issues, and factors contributing to fair housing issues. The AFH is an assessment of historical and existing fair housing conditions, focusing specifically on:

1. Patterns of integration and segregation;
2. Racially and ethnically concentrated areas of poverty;
3. Disparities in access to opportunity; and
4. Disproportionate housing needs.

Why Participate?

Countywide participation in the Assessment of Fair Housing's community and stakeholder engagement process will provide the 21 jurisdictions an opportunity to be part of the process that analyzes and develops solutions to fair housing issues and equal opportunity access that directly align with the Closing the Jobs-Housing Gap Task Force's action items. Examining fair housing issues county-wide and obtaining relevant community input will provide an opportunity for a robust approach to mitigating fair housing issues and increasing access to housing for all. HUD and local public advocates have called for the participation of both entitlement and non-entitlement jurisdictions.

Request for Participation

The County seeks:

1. A point person from each jurisdiction to provide data related to housing, integration and segregation and disparities in access to opportunity at the local level.

2. An opportunity to assist each jurisdiction in hosting a community listening session. The goal of these sessions is to provide community feedback at the micro-local level, to supplement the macro feedback that we'll be collecting through our planned (larger format) community meetings.

For more information about the Assessment of Fair Housing process please contact Rose Cade at rcade@smchousing.org or Alessandra Thompson at athompson@smchousing.org

San Mateo County Wants YOUR Housing Story!

Diverse, inclusive communities with access to good jobs, schools, health care, transportation, and housing are crucial to San Mateo County's economic and cultural success.

The cities of Daly City, San Mateo, South San Francisco, Redwood City and the County of San Mateo along with the Housing Authority of the County of San Mateo and the South San Francisco Housing Authority invite County residents to **participate in a ten-minute survey** to better understand your housing decisions and your experiences living, working, or going to school in San Mateo County. This survey will inform San Mateo County and our partners about barriers to housing opportunities and will help the County to develop strategies to improve fair access to housing.

To start the survey in English, **please click on this link**: https://www.research.net/r/LiveSMC2017 or copy and paste the URL into your internet browser. The survey is available in four languages: English, Spanish (español), Tagalong, and Chinese (中文), and all can be found at this link: http://housing.smcgov.org/get-involved

We also invite you to **join a community meeting on June 17th** to tell us your housing story and hear from other residents of San Mateo County about their housing decisions and experiences living, working, or going to school in the County.

What: North County Assessment of Fair Housing Community Meeting
Where: Gellert Park Clubhouse, 50 Wembley Drive, Daly City, 94015
When: Saturday, June 17, 10:00 am – 11:30 am

What: South County Assessment of Fair Housing Meeting
Where: Fair Oaks Community Center, 2600 Middlefield Road, Redwood City, 94063
When: Saturday, June 17, 1:30 pm – 3:00 pm

EVERYONE IS WELCOME TO ATTEND EITHER OF THESE MEETINGS!

The survey and the community meetings are being conducted by BBC Research on behalf of the County and our partners. Please note, your survey participation is completely confidential. The information you provide in the survey and/or the community meetings will be combined with other responses and used for statistical purposes only.

More information about San Mateo County's Fair Housing study can be found at this link: http://housing.smcgov.org/assessment-fair-housing

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

What is your housing story?

What is your story of living in San Mateo County?

FAIR HOUSING OPEN HOUSE

All are Welcome! We invite anyone living anywhere within San Mateo County to join us at either location below.

Saturday June 17, 2017

NORTH COUNTY:

Gellert Park Clubhouse
50 Wembley Dr.
Daly City, CA 94015

10 - 11:30 am

SOUTH COUNTY:

Fair Oaks Community Center
2600 Middlefield Rd.
Redwood City, CA 94063

1:30 - 3 pm

Drop in anytime! Kids are welcome. Se habla Español.

Tell your story. Share your ideas.

Prioritize issues. Identify solutions.

Contribute to the Assessment of Fair Housing Study.*

Need a reasonable accommodation for a disability? Contact Lindsay Haddix at 650-802-3376 or lhaddix@smchousing.org.

* For more information on the Assessment of Fair Housing go to:
http://housing.smcgov.org/assessment-fair-housing

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

您有什么住房经历？

您在圣马刁县有什么住房经历？

公平住房开放日

欢迎大家参加！我们邀请凡是居住在圣马刁县任何地方的任何人到以下两处之一来加入我们。

2017 年 6 月 17 日星期六

县北部：

帝利市温布利车道

50 号盖勒特公园会所

10 – 11:30 am

县南部：

雷德伍德城米德弗尔德路

2600号费尔奥克斯社区中心

1:30 – 3 pm

随时欢迎光临！欢迎孩子们来玩！

讲述您的经历。分享您的理念。

优先处理问题。确定解决方案。

促成公平住屋研究的评估。*

需要合理的残疾膳宿？请联系 Lindsay Haddix: 650-802-3376 或 lhaddix@smchousing.org。

* 欲详细了解公平住屋研究评估: http://housing.smcgov.org/assessment-fair-housing

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

¿Cuál es su experiencia con la vivienda?

¿Cuál es su historia viviendo en el Condado de San Mateo?

SESIONES ABIERTAS PARA HABLAR SOBRE LA VIVIENDA JUSTA

¡Todos son bienvenidos! Invitamos a toda persona que viva en cualquier parte del Condado de San Mateo para que nos acompañe asistiendo a una de las siguientes reuniones.

Sábado, 17 de junio de 2017

ÁREA NORTE DEL CONDADO:

Gellert Park Clubhouse
50 Wembley Dr.
Daly City, CA 94015

de 10 a 11:30 am

ÁREA SUR DEL CONDADO:

Fair Oaks Community Center
2600 Middlefield Rd.
Redwood City, CA 94063

de 1:30 a 3 pm

¡Venga en cualquier momento! Los niños son bienvenidos.

Cuente sus experiencias. Comparta sus ideas.

Ayude a priorizar los problemas y a identificar las soluciones.

Contribuya al estudio para Evaluar la Vivienda Justa.*

¿Necesita una adaptación razonable debido a una discapacidad? Por favor comuníquese con Lindsay Haddix llamando al 650-802-3376 o enviando un mensaje por correo electrónico a lhaddix@smchousing.org.

*Para obtener más información sobre el estudio para Evaluar la Vivienda Justa, visite http://housing.smcgov.org/assessment-fair-housing

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

Ano ang iyong kuwento sa pabahay?

Ano ang iyong kwento ng paninirahan sa County ng San Mateo?

BUKAS NA PAGPUPULONG SA MAKATARUNGANG PABAHAY

Iniimbitahan ang lahat! Inaanyayahan ang sinumang nakatira sa kahit saan sa loob ng county ng San Mateo upang sumali sa amin sa alinman sa mga lokasyon sa ibaba.

Sabado Hunyo 17, 2017

NORTH COUNTY:

Gellert Park Clubhouse
50 Wembley Dr.
Daly City, CA 94015

10 - 11:30 am

SOUTH COUNTY:

Fair Oaks Community Center
2600 Middlefield Rd.
Redwood City, CA 94063

1:30 - 3 pm

Sumaglit anumang oras! Iniimbitahan ang mga bata.

Sabihin ang iyong kuwento. Ibahagi ang iyong mga ideya.

Isaayos ayon sa kahalagahan ang mga isyu. Kilalanin ang mga solusyon.

Mag-ambag sa Pagtatasa ng Makatarungang Pabahay na pag-aaral.*

Kailangan ng makatwirang tulong para sa kapansanan? Makipag-ugnay kay Lindsay Haddix sa 650-802-3376 o lhaddix@smchousing.org.

*Para sa karagdagang impormasyon sa Pagtatasa ng Makatarungang Pabahay na pag-aaral: http://housing.smcgov.org/assessment-fair-housing

COUNTY OF SAN MATEO

What Do You Think About Barriers to Housing and Opportunities? We want to hear from you!

The cities of Daly City, San Mateo, South San Francisco, Redwood City and the County of San Mateo along with the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority are conducting a study to better understand residents' housing decisions and their experiences living, working and/or going to school in the region by conducting an **Assessment of Fair Housing (AFH)** as required by the U.S. Department of Housing and Urban Development (HUD).

The Housing Leadership Council is hosting a focus group made up of affordable housing developers to better understand your experiences developing, owning, managing and marketing properties throughout San Mateo County. Diverse, inclusive communities with access to good jobs, schools, health care, transportation and housing are critical to San Mateo County's economic and cultural success,

Please join us for this critical discussion about the existing barriers to housing opportunities and to help inform strategies to improve fair access to housing for all!

Developer Focus Group
Wednesday, June 14, 2017
Time TBD
Place TBD

More information about San Mateo County's Assessment of Fair Housing (AFH) can be found at http://housing.smcgov.org/assessment-fair-housing

Responses are completely confidential and will only be reported in combination with other responses.

Date: June 14th, 2017

County of San Mateo Assessment of Fair Housing
Affordable Housing Developer Focus Group
Public Sign-In Sheet

Initials	First Name	Last Name	Organization	Telephone	Email Address
EB	Evelyn	Stivers	HLC	510-334-3362	estivers@hlcsmc.org
LT	LEORA	TANJUATCO	HLC	650 2019889	LEORA@HLCSMC.ORG
LH	Lindsay	Haddix	SMC DOH		lhaddix@smchousing.org
BD	Barbara	Defferdorfer	SMC DOH		bdefferdorfer@smchousing.org
JR	Jaqueline	Ramirez	Project Sentinel	4153991956	jramirez@housingorg
	Dareen	Palmer	CORE		
	Amy	Baily	Mercy		
	Nathan	Ho	Eden		

COUNTY OF SAN MATEO

Are you a Landlord in East Palo Alto? We want to hear from you!

The cities of Daly City, San Mateo, South San Francisco, Redwood City and the County of San Mateo along with the Housing Authority of the County of San Mateo (HACSM) and the South San Francisco Housing Authority are conducting a study to better understand residents' housing decisions and their experiences living, working and/or going to school in the region.

Landlord Focus Group
To Discuss Fair Housing Issues in East Palo Alto

Monday, April 10, 2017
11:00 am – 1:00 pm

Community Room @ City Hall
2415 University Avenue

Not able to attend the focus group? You can still participate!
Please visit the San Mateo County Department of Housing website to take a survey regarding your experience with housing in San Mateo County. The survey is available at the following link: https://www.research.net/r/LiveSMC2017

Responses are completely confidential and will only be reported in combination with other responses.

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

We need your help!

Do you live in San Mateo County?

What is your housing story?

Take the Live|San Mateo County survey and help the cities of Daly City, San Mateo, Redwood City, South San Francisco and the County of San Mateo understand the housing choices residents like you have made.

Take the Live|San Mateo County survey by **May 12!**

https://www.research.net/r/LiveSMC2017

Inform policy.

Feel good.

Enter to win $100.

For more information about the study go to:
http://housing.smcgov.org/assessment-fair-housing

If you have a disability and would like to request assistance or an alternative format, contact Jen Garner at:
jgarner@bbcresearch.com or 1-800-748-3222 x236.

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

我们需要您的帮助！

您住在圣马刁县吗？

您有什么住房经历？

请参加 Live|SanMateoCounty 调查并帮助帝利市、圣马刁、雷德伍德城、南旧金山诸城和圣马刁县了解像您这样之居民所做的住房选择

请在5月12日之前参加 Live|San Mateo County 调查！

https://www.research.net/r/LiveSMC2017c

通知政策

感觉良好

请参加以赢得 **$100.**

欲详细了解本研究，请访问：
http://housing.smcgov.org/assessment-fair-housing

如果您身患残疾而且想要申请补助或替代方案，请联系
Jen Garner: jgarner@bbcresearch.com
或者 00-748-3222 转 236

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

¡Necesitamos su ayuda!

¿Vive en el Condado de San Mateo?

¿Cuál es su experiencia con la vivienda?

Conteste la encuesta Live|SanMateoCounty y ayude a las ciudades de Daly City, San Mateo, Redwood City y South San Francisco, y al Condado de San Mateo, a entender las decisiones de vivienda que los residentes como usted han tomado.

¡Conteste la encuesta Live|San Mateo County antes del

12 de Mayo!

https://es.research.net/r/LiveSMC2017s

Contribuya a la creación de políticas.

Siéntase bien.

Participe en un sorteo para ganar $100.

Para obtener más información sobre el estudio, visite:
http://housing.smcgov.org/assessment-fair-housing

Si tiene alguna discapacidad y le gustaría pedir ayuda o utilizar un formato diferente, por favor comuníquese con Jen Garner a jgarner@bbcresearch.com o al 1-800-748-3222 x236.

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

Kailangan namin ang iyong tulong!

Nakatira ka ba sa San Mateo County?

Ano ang iyong kuwento sa pabahay?

Gawin ang Live|SanMateoCounty na survey at tulungan ang mga lungsod ng Daly City, San Mateo, Redwood City, Timog San Francisco at County ng San Mateo na maunawaan ang mga pagpipilian sa pabahay na mga residente tulad ng ginawa mo.

Gawin ang Live|San Mateo County na survey hanggang

12 Mayo!

https://www.research.net/r/LiveSMC2017t

Alamin ang patakaran.

Magkaroon ng masarap na pakiramdam.

Pumasok upang manalo ng $100.

Para sa karagdagang impormasyon tungkol sa pag-aaral pumunta sa:
http://housing.smcgov.org/assessment-fair-housing

Kung ikaw ay may kapansanan at gustong humiling ng tulong o isang alternatibong pormat kontakin si Jen Garner a jgarner@bbcresearch.com o 1-800-748-3222 x236.

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

ASSESSMENT OF FAIR HOUSING PUBLIC HEARING

Tuesday July 25th, 2017

Hall of Justice
400 County Center
Redwood City, CA 94063
9:00 am

- Presentation on the Assessment of Fair Housing (AFH) to the Board of Supervisors
- Opportunity for the public to share thoughts and feedback with the Supervisors at the Public Hearing
- All Board of Supervisors Meeting agendas are available here: https://sanmateocounty.legistar.com/Calendar.aspx

Share your comments on the Draft Assessment of Fair Housing!

Even if you are unable to attend the Board of Supervisors Meeting, we'd still like to hear from you!

Please visit our website

http://housing.smcgov.org/get-involved

to read the Draft AFH and submit anonymous comments.

OR

Visit the San Mateo County Department of Housing Office

located at 264 Harbor Blvd Bldg. A Belmont, CA 94002

to read a copy of the Draft AFH and submit your written comments anonymously.

The Draft AFH will be available for review and comment beginning August 1st, 2017 and ending September 15th, 2017

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

Evaluación de la Vivienda Justa
Audiencia Pública

el martes, el 25 de julio

Hall of Justice
400 County Center
Redwood City, CA 94063
9:00 am

- Presentación sobre la Evaluación de la Vivienda Justa a la Junta de Supervisores
- Oportunidad para que el público comparta pensamientos y comentarios con la Junta
- Se encuentran todas las agendas de la Junta de los Supervisores aquí: https://sanmateocounty.legistar.com/Calendar.aspx

¡Comparta sus comentarios sobre la Evaluación de la Vivienda Justa!

Incluso si usted no puede asistir a la reunión de la Junta, todavía nos gustaría saber de usted

Visita a nuestro sitio de web:

http://housing.smcgov.org/get-involved

para una copia del borrador del y entregar comentarios anónimos.

O

Visite la Oficina del Departamento de Vivienda del Condado de San Mateo situado en 264 Harbor Blvd Bldg. A Belmont, CA 94002 para leer una copia del borrador y enviar sus comentarios por escrito de forma anónima.

El borrador estará disponible para revisión y comentarios a partir del 1 de agosto hasta el 15 de septiembre de 2017

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

ASSESSMENT OF FAIR HOUSING PUBLIC COMMENT

San Mateo County is conducting an analysis of the contributing factors that you, as a community member, might be facing in your housing choices and access to opportunities .

Share your comments on the Draft Assessment of Fair Housing!

The Draft AFH will be available for review and comment beginning August 1st, 2017 and ending September 15th, 2017

Please visit our website

http://housing.smcgov.org/draft-afh

to read the Draft AFH and submit anonymous comments.

OR

Visit the San Mateo County Department of Housing Office

located at 264 Harbor Blvd Bldg. A Belmont, CA 94002

to read a copy of the Draft AFH and submit your written comments anonymously.

{ Please contact us with any questions or requests for assistance

Fairhousing@smchousing.org }

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

Evaluación de la Vivienda Justa
Comentario Público

El Condado de San Mateo está llevando a cabo un análisis de los factores contribuyentes que usted, como miembro de la comunidad, podría enfrentar en sus opciones de vivienda y acceso a oportunidades.

¡Comparta sus comentarios sobre la Evaluación de la Vivienda Justa!

El borrador estará disponible para revisión y comentarios a partir

del 1 de agosto hasta el 15 de septiembre de 2017

Visita a nuestro sitio de web:

http://housing.smcgov.org/get-involved

para una copia del borrador del y entregar comentarios anónimos.

O

Visite la Oficina del Departamento de Vivienda del Condado de San Mateo situado en 264 Harbor Blvd Bldg. A Belmont, CA 94002 para leer una copia del borrador y enviar sus comentarios por escrito de forma anónima.

Póngase en contacto con nosotros para cualquier pregunta o solicitud de asistencia

Fairhousing@smchousing.org

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

征集对《公平住房评估》的意见

作为社区成员，您在选择住房和获得相关机会时可能受到一些因素的影响，圣马特奥县正在对此展开调查和分析。

我□期待您分享□《公平住房□估(草案)》的意□！

自 **2017** 年 **8** 月 **1** 日至 **2017** 年 **9** 月 **15** 日期间，《公平住房评估（草案）》可供公开查阅和评论。

请访问我们的网站：

http://housing.smcgov.org/draft-afh

阅读《公平住房评估（草案）》并提交匿名评论。

或者

拜访圣马特奥县房屋办公室住房署

（地址：**264 Harbor Blvd Bldg. A Belmont, CA 94002**）

阅读《公平住房评估（草案）》副本，并匿名提交您的书面评论。

{如有任何问题或协助请求，请联系我们

Fairhousing@smchousing.org}

COUNTY OF SAN MATEO
ALL OF CALIFORNIA IN ONE COUNTY

KOMENTO NG PUBLIKO SA PAGTATASA NG PATAS NA PABAHAY

Nagsasagawa ang San Mateo County ng pagsusuri sa mga nag-aambag na kadahilan-an na ikaw, bilang miyembro ng komunidad, ay maaring hinaharap sa iyong pagpili ng pabahay at paglapit sa mga pagkakataon.

Ibahagi ang iyong mga komento sa Planong Pagtatasa ng Patas na Pabahay!

Ang planong AFH ay magagamit sa pagrepaso at komento umpisa Agosto 1, 2017 at magtatapos Setyembre 15, 2017

Mangyaring bumisita sa aming website

http://housing.smcgov.org/draft-afh

upang basahin ang Planong AFH at magsumite ng anonimong mga komento.

O

Bisitahin ang Tanggapan ng Departamento ng Pabahay ng San Mateo County

na matatagpuan sa 264 Harbor Blvd Bldg. A Belmont, CA 94002

upang basahin ang kopya ng Planong AFH at anonimong isumite ang iyong nakasulat na mga komento.

{ Mangyaring makipag-ugnay sa amin para sa tulong sa anumang mga katanungan o kahilingan Fairhousing@smchousing.org }

DOH
DEPARTMENT OF HOUSING
COUNTY OF SAN MATEO

Main Office - Department of Housing
264 Harbor Blvd., Building A Belmont, CA 94002-4017

Housing & Community Development (HCD)
Tel: (650) 802-5050

Housing Authority of the County of San Mateo (HACSM)
Tel: (650) 802-3300

Board of Supervisors:
Dave Pine
Carole Groom
Don Horsley
Warren Slocum
David Canepa

Director: Ken Cole

HUD's Affirmatively Furthering Fair Housing Rule and the Assessment of Fair Housing

Assessment of Fair Housing (AFH): What it is & Why It Is Important:

The Fair Housing Act of 1968 calls for HUD and its program participants to abide by the Act's intent of promoting fair housing and equal opportunity. Efforts to not only combat ongoing discrimination, but increase housing choice and access to opportunity are at the core of HUD's fair housing efforts.

HUD's Affirmative Furthering Fair Housing (AFFH) Final Rule requires The County and entitlement jurisdictions to incorporate the policies of The Fair Housing Act into their planning processes.

The Assessment of Fair Housing (AFH) is a HUD-required analysis of barriers to housing opportunity and access throughout the County of San Mateo. This assessment will tell the story of fair housing barriers throughout the County using HUD data, local data and local knowledge. In order to obtain local knowledge, we are planning a robust community participation process including two large scale community meetings and a number of smaller focus groups.

The Process:

The County is partnering with Housing Authority of San Mateo County, Daly City, Redwood City and the Cities of San Mateo and South San Francisco to conduct a regional analysis. We have enlisted a consultant to help us lead this process. We are currently analyzing HUD data and are planning for large scale community meetings to present this data and to explore:

1. Patterns of integration and segregation;
2. Racially and ethnically concentrated areas of poverty;
3. Disparities in access to opportunity; and
4. Disproportionate housing needs.

To date, we have hired a consultant and hosted several meetings with community advocates who have assisted us in developing the community participation process (including a resident survey). The community participation process will conclude at the end of April and a draft report will be presented to the Board of Supervisors in July of 2017.

Invitation to Participate:

Members of the HCDC Committee are encouraged to attend community meetings to examine HUD data and to hear stories from community members. Following the community participation process, the County and our participating jurisdiction partners will work to develop strategies to address the barriers highlighted through our analysis of HUD data and the community engagement process. We will be inviting members of the HCDC committee to participate in that goal setting process.

Resources:

http://housing.smcgov.org/assessment-fair-housing

Next Steps:

1. Later this month you will be notified about upcoming community meetings.
2. In a few months, we will invite you to participate in the goal setting process.

To indicate your interest and for more information about the Assessment of Fair Housing process please contact Alessandra Thompson at athompson@smchousing.org

Good Morning 21 Elements Participants,

You may recall that back in November, Rose and I presented on the regional Assessment of Fair Housing (AFH) the County is conducting in partnership with other entitlement jurisdictions. To recap, the AFH is a HUD-required analysis of barriers to housing opportunity and access throughout the County of San Mateo. This assessment will tell the story of fair housing barriers throughout the County using HUD data, local data and local knowledge. In order to obtain local knowledge, we are planning a robust community participation process including two large scale community meetings and a number of smaller focus groups.

To expand our community outreach, we are requesting assistance from local jurisdictions. We are inviting you to host informal listening sessions to engage in the Access to Opportunity discussion. We will be sending out "Community Engagement in a Box" materials to jurisdictions who are willing to help us have a robust engagement process by participating in this aspect of the outreach. We will also schedule a call to walk you through the contents of the box, provide tips for how to best use the "Community Engagement in a Box" tools, and answer any questions that you might have. We intend to send these materials within two weeks.

Additionally, we are finalizing our Fair Housing survey. The survey will be available online and on paper (translated into multiple languages). We are requesting your assistance in distributing and/or marketing the survey on your websites, in your office and at community events.

With today's email we are asking for the following:

_____ Let us know if you are able to be a part of the broader community outreach process by using the Community Engagement in a Box materials to host an informal listening session.

_____ Let us know if you are able to link to the online survey and/or provide locations or events to distribute paper surveys.

Please email Aley Thompson at acthompson@smchousing.org with this information.

Visit our website to learn more - http://housing.smcgov.org/assessment-fair-housing

Thank you,

Aley Thompson

Attend the Assessment of Fair Housing Public Hearing at the San Mateo County Board of Supervisors Meeting!

Attend the Board of Supervisors Meeting on July 25th for the presentation of the Assessment of Fair Housing. You will have the opportunity to share your thoughts and feedback with the Supervisors at the Public Hearing.

What: Board of Supervisors Meeting to Present the Assessment of Fair Housing and Open a Public Hearing
Where: Hall of Justice, 400 County Center Redwood City, CA 94063
When: Tuesday, July 25th 9:00am***

Beginning August 1st, you will have the opportunity to read the Draft Assessment of Fair Housing and provide your comments during the 45-day public review period. The draft AFH with instructions on how to comment will be made available on August 1st at our website: http://housing.smcgov.org/get-involved

If you are unable to attend the Board of Supervisors Meeting, you may view the livestream video, archived video, and archived agenda at this link: https://sanmateocounty.legistar.com/Calendar.aspx , and refer to the July 25th Meeting date.

***Please note, the Presentation of the Assessment of Fair Housing is one item on the Board of Supervisors Meeting on July 25th. The meeting starts at 9:00am and ends at 12:00pm; the exact time of our presentation depends on where the item falls on the agenda. After the agenda is posted, you will be able to view it at this link: https://sanmateocounty.legistar.com/Calendar.aspx

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The Fair Housing Act of 1968 calls for HUD and its program participants to abide by the Act's intent of promoting fair housing and equal opportunity. Efforts to not only combat ongoing discrimination, but increase housing choice and access to opportunity are at the core of HUD's fair housing efforts.

HUD's Affirmative Furthering Fair Housing (AFFH) Final Rule **requires The County and entitlement jurisdictions to incorporate the policies of The Fair Housing Act into their planning processes**.[1]

The Assessment of Fair Housing (AFH) is a HUD–required analysis that results in a report of fair housing issues within our region. The results of this report will incorporated in our planning processes.

The AFH will include a standardized assessment through which The County and entitlement jurisdictions evaluate fair housing issues, and factors contributing to fair housing issues. The new AFH is an assessment of historical and existing fair housing conditions, focusing specifically on:

1. Patterns of integration and segregation;
2. Racially and ethnically concentrated areas of poverty;
3. Disparities in access to opportunity; and
4. Disproportionate housing needs.

Why Participate?

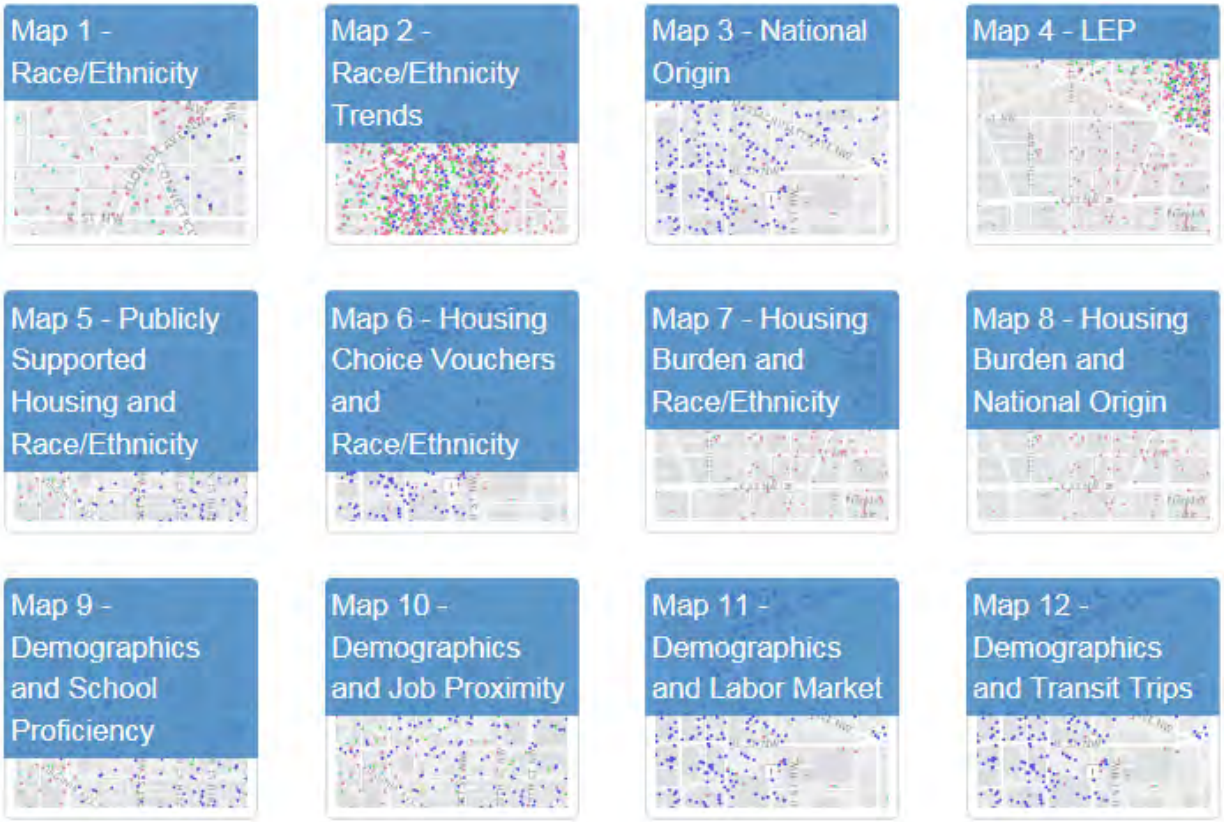
Countywide participation in the Assessment of Fair Housing's community and stakeholder engagement process will provide the 21 jurisdictions an opportunity to be part of the process that analyzes and develops solutions to fair housing issues and equal opportunity access that directly align with the Closing the Jobs-Housing Gap Task Force's action items. Examining fair housing issues county-wide and obtaining relevant community input will provide an opportunity for a robust approach to mitigating fair housing issues and increasing access to housing for all.

For more information about the Assessment of Fair Housing process please contact Rose Cade at rcade@smchousing.org or Alessandra Thompson at athompson@smchousing.org

[1] Previous strategies to ensure compliance, required program participants to complete an Analysis of Impediments to Fair Housing (AI) every 5 years. The new AFH requirement replaces the AI and will also be completed every 5 years.

Affirmatively Furthering Fair Housing Tool

Choose a Map :



Back | Go to Map

APPENDIX D.

Guide to HUD Access to Opportunity Indicators

San Mateo Access to Opportunity Map Guide

Map/Table Name	What is on the map?	What is the map telling me?
Map 1 Race/Ethnicity	Where residents live by their race and Hispanic descent	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.*
Map 2 Race/Ethnicity Trends	How residential patterns have changed over time	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.*
Map 3 National Origin	Where residents born outside of the U.S. live by country of birth	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.*
Map 4 LEP (Limited English Proficiency)	Where residents who do not speak English well live by primary language spoken	Starting point for understanding if certain residents face barriers to housing choice. Can indicate segregation.*
Map 5 Publicly Supported Housing and Race and Ethnicity	Location of affordable rental housing developments and where residents live by race and Hispanic descent	Are affordable rentals located throughout a community or only in certain neighborhoods?
Map 6 Housing Problems	Residents who struggle to afford housing costs and are living in housing in poor condition. Darker shading = more housing challenges.	Which residents have the greatest housing needs?
Map 7 Demographics and School Proficiency	School quality measured by elementary test scores compared to where residents live by race, Hispanic descent and country of birth. Darker shading = higher test scores.	Do all residents have access to good schools? Note: the map does not account for school choice programs.
Map 8 Demographics and Job Proximity	Where jobs are located compared to where residents live by race, Hispanic descent and country of birth. Darker shading = more jobs.	Where are jobs located compared to where residents live?
Map 9 Demographics and Labor Market	Neighborhood unemployment and where residents live by race, Hispanic descent and country of birth	Is unemployment higher for certain residents and neighborhoods?
Map 10 Demographics and Transit Trips	How often low income families use transit and where residents live by race, Hispanic descent and country of birth	How much do low income residents use public transportation?
Map 11 Demographics and Low Transportation Cost	How much transportation costs for low income families and where residents live by race, Hispanic descent and country of birth	How much do low income residents pay in transporation costs?
Map 12 Demographics and Poverty	Level of poverty and where residents live by race, Hispanic descent and country of birth	How likely is it that certain residents live in high poverty neighborhoods?
Map 13 Demographics and Environmental Health	Level of air pollution and where residents live by race, Hispanic descent and country of birth	Do some residents live in neighborhoods with unclean air?
Map 14 Disability by Type	Where residents with disabilities live by type of disability	Where do residents who have disabilities live? Does where they live provide access to transit, services and health care they need?
Map 15 Disability by Age Group	Where residents with disabilities live by age	Are most residents with disabilities seniors? Children?
Map 16 Housing Tenure	"Tenure" means renting or owning. Where residents who rent or own live.	Where is rental and homeownership housing located?
Map 17 Location of Affordable Rental Housing	Location of rental housing affordable to renters earning about $40,000 and less	Is affordable rental housing distributed throughout the city or county?
Table 1 Demographics	Demographic characteristics of residents in the city, county and region	How diverse is the city and county compared to the region?
Table 2 Demographic Trends	How demographics have changed over time	How has diversity changed over time?
Table 3 Racial/Ethnic Dissimilarity Trends	The "dissimilarity index" is a measure of segregation which compares where residents live compared to White residents. A score of more than 55 = high segregation.	How segregated is the city or county? Is this different for racial groups and residents of Hispanic descent?
Table 4 R/ECAP Demographics	R/ECAPs are neighborhoods with high levels of poverty and concentrations of non-White, Hispanic residents	What are the characteristics of R/ECAPs? Use this with the maps to understand if residents in R/ECAPs have access to good schools, transportation and jobs
Table 5 Publicly Supported Housing Units by Program Category	Publicly-supported housing by type of program	What type of public housing is available?
Table 6 Publicly Supported Households by Race/Ethnicity	Occupants of publicly-assisted housing by race and ethnicity	Who lives in public housing? Do public housing residents represent residents in the city/county or are some more likely to need public housing? Why?
Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category	Occupants of publicly-assisted housing by residence in R/ECAP	Do demographics of residents differ by R/ECAP? Why?
Table 8 Demographics of Publicly Supported Housing Developments, by Program Category	Occupants of publicly-assisted housing by type of housing program	Do different types of public housing serve different residents? Why?
Table 9 Demographics of Households with Disproportionate Housing Needs	Demographics of residents who struggle to afford housing costs and are living in housing in poor condition.	Which types of residents have the greatest housing needs?
Table 10 Demographics of Households with Severe Housing Cost Burden	Demographics of residents who struggle the most to afford housing costs	Which types of residents need the most help managing housing costs?
Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children	Occupants of publicly-assisted housing by size and children	Does publicly-supported housing serve families with children, who often need larger units?
Table 12 Opportunity Indicators, by Race/Ethnicity	Index that measures access to good schools, jobs, transportation, neighborhoods with clear air. A higher index value is always better.	Use to evalute where different types of residents live compared to access to good schools, jobs, transporation, and clean air
Table 13 Disability by Type	Types of disabilities that residents report	What types of housing and services are needed to serve persons with disabilities?
Table 14 Disability by Age Group	Age of persons with disabilities	What types of housing and services are needed to serve persons with disabilities--especially children, people of working age, seniors?
Table 15 Disability by Publicly Supported Housing Program Category	Occupants of publicly-assisted housing by disability	Is public housing serving people with disabilities?
Table 16 Homeownership and Rental Rates by Race/Ethnicity	Homeownership rates by race and Hispanic descent	Do some groups have lower homeownerships? Starting point to determine why.

Note: *Concentrations of residents by demographics may be due to factors other than segregation. Segregation occurs when a policy or practice restricts housing choice for certain groups of people.
Source: BBC Research & Consulting Housing and Community Development.
bbcresearch.com