Analysis of Impediments to Fair Housing

Contra Costa County Consortium

2016

Contents

I. Executive Summary

As recipients of funds from the U.S. Department of Housing and Urban Development (HUD), the members of the Contra Costa Consortium are required to conduct an Analysis of Impediments to Fair Housing Choice (AI) and to periodically review that analysis and update it as necessary. Further, each AI is reassessed and reevaluated with each Consolidated Plan. Together, the CDBG entitlement communities of Contra Costa County and the Urban County have formed the Contra Costa Consortium to jointly plan for the housing and community development needs of the County. The City of Richmond has partnered with the Consortium in the development of this AI.

The Consortium and the City of Richmond develop five- year Consolidated Plans and have established processes to request funding and to evaluate requests for funds. The creation of a Consolidated Plan maximizes the impact of available resources and assures a more efficient distribution of funds. This is most notable in the provision of countywide services and the ability to fund large housing projects (using HOME funds) that would be beyond the capacity of any single member. This AI is one of several ways in which the jurisdictions are fulfilling their obligation to affirmatively further fair housing. This document includes an analysis of local factors that may impact fair housing choice, the identification of specific impediments to fair housing choice, and a plan to address those impediments. The Consortium must also assure equal access to services and programs it provides or assists. Please note that each member jurisdiction prepares its own annual Action Plan as well as its own Consolidated Annual Performance Evaluation Report (CAPER). These Action Plans and CAPERs include a description of the efforts made each year to affirmatively further fair housing. These documents may be consulted for an evaluation of actions taken by individual jurisdictions.

What Is Fair Housing?

Federal law prohibits discrimination in the provision of housing or access to housing based on membership in certain protected classes of persons or personal status. These protections apply to race, color, national origin or ancestry, sex, religion, familial status, and mental and physical handicap (disability). California state law codifies the federal protections and adds sexual orientation, marital status, use of language, source of income, HIV/AIDS, and medical condition. State law also prohibits discrimination based on any arbitrary status (the Unruh Act). Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, education, employment, or other goals. Federal and state fair housing laws prohibit discrimination in the sale, rental, lease, or negotiation for real property based on a person's protected status. Fair housing is a condition in which individuals of similar income levels in the same housing market have a like range of choice available to them, regardless of personal status.

What Is an Impediment to Fair Housing Choice?

As defined by the U.S. Department of Housing and Urban Development (HUD) Fair Housing Planning Guide (1996), impediments to fair housing choice are:

> Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.

To affirmatively further fair housing, a community must work to remove impediments to fair housing choice.

Purpose of the Analysis of Impediments

The purpose of an AI is to review conditions in the jurisdictions that may impact the ability of households to freely choose housing and to be treated without regard to race, ethnicity, religion, gender, national origin, source of income, age, disability, or other protected status. The AI reviews the general state of fair housing, the enforcement of fair housing law, efforts to promote fair housing, access to credit for the purpose of housing, and general constraints to the availability of a full range of housing types.

An AI examines the affordability of housing in the jurisdiction with an emphasis on housing affordable to households with annual incomes classified as low income and less. (Low income is defined as equal to or less than 80 percent of the adjusted Area Median Income as most recently published by the U.S. Department of Housing and Urban Development.)

The document has three major goals:

- To provide an overview of the current conditions as they impact fair housing choice.
- To review policies and practices as they impact fair housing choice and the provision of housing, specifically affordable housing and housing for special needs households.
- To identify impediments to fair housing choice and actions that will take to remove those impediments or to mitigate the impact those impediments have on fair housing choice.

Fulfilling these goals includes the following:

- A review of the laws, regulations, and administrative policies, procedures, and practices of the Consortium and the City.
- An assessment of how those laws affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, affecting fair housing choice.

Impediments Identified

This analysis has identified the following impediments and actions to address those impediments.

1. **Education and public perception**. Inadequate information on fair housing issues and a lack of understanding about the potential extent of housing discrimination exists.

2. **Housing affordability**. The high cost of housing and extreme burden those costs place, particularly on renters, present a barrier to fair housing choice. Also, low vacancies and lack of affordable housing options contribute to these issues. Concentration of the limited affordable housing supply is also a fair housing concern.

3. **Home purchase loan denials**. Significant disparity between races and ethnicities in loan denial rates exists. Minorities are more likely to be denied loans than whites, even in high income categories.

4. **Disability and elder care issues**. Availability and access to housing for individuals with physical and mental disabilities is a rapidly emerging impediment to fair housing. Further, insufficient education and enforcement around issues of reasonable accommodations results in discrimination against individuals with disabilities.

5. **Local Building Approvals**. Lengthy, complex and extensive local review and approval processes discourage construction of affordable housing. Local governments sometimes require separate approvals for every aspect of the development process and sometimes stipulate public hearings that invite community opposition, which can have the same effect as exclusionary zoning.

II. Methodology

In order to gain pertinent information on fair housing needs and activities in Contra Costa County, the County collected and analyzed demographic and housing data; conducted and

analyzed Fair Housing Surveys completed by community residents, jurisdictions, and stakeholder organizations across the County and interviewed key stakeholders including advocacy organizations and government officials; and conducted a literature review.

- **Fair Housing Surveys** - Three written surveys were developed to collect perspectives of residents, jurisdictions, and stakeholder groups. The resident survey was also made available in Spanish. The purpose for conducting the survey was to obtain information and insights about fair housing choice in the County. The surveys were posted online and promoted through the member jurisdictions_____. Advocacy groups and community-based organizations were asked to share the survey links as well. A total of 225 residents, 76 individuals representing jurisdictions, and 177 stakeholder organizations completed the surveys.

- **Stakeholder Interviews** – Stakeholders were interviewed in order to gain specific views on topics from experts and to further explore areas of concern. The list of stakeholders interviewed is included as Appendix 1.

- **Analysis of Impediments -** The U.S. Department of Housing and Urban Development requires its CDBG entitlement communities to conduct a Fair Housing Analysis. In the analysis, each entitlement community is required to identify fair housing problems and impediments, courses of action intended to address the impediments, and a schedule to resolve those problems identified. In order to gain relevant data on both statewide and regional housing impediments, a scan of the reports was completed to determine the most prevalent housing impediments, and the courses of action most commonly used by communities to combat housing problems.

- **Housing Data -** This report uses American Community Survey (ACS) data, Census data, and the Home Mortgage Disclosure Act Reporting (HMDA) data to review and analyze state demographics, housing needs, and housing/lending activity.

- **Literature Review -** In order to gain pertinent information on fair housing and related issues, the team conducted a thorough literature review of relevant publications and periodicals. Information gained from the literature review was incorporated in the findings section and was used to support recommendations offered by the team in this report.

Throughout this document the following geographic terms will be used. To assist the reader, below is an explanation of each.

- Contra Costa County "County" (countywide): Includes all 19 jurisdictions within the County (Antioch, Brentwood, Clayton, Concord, Danville, El Cerrito, Hercules, Lafayette, Martinez, Moraga, Oakley, Orinda, Pinole, Pleasant Hill, Pittsburg, Richmond, San Pablo, San Ramon, and Walnut Creek), as well as the unincorporated area of the County.
- Urban County: Includes all jurisdictions which are not entitlement jurisdictions (Antioch, Brentwood, Clayton, Danville, El Cerrito, Hercules, Lafayette, Martinez, Moraga, Oakley, Orinda, Pinole, Pleasant Hill, San Pablo, San Ramon, Richmond, and the unincorporated area of the County).
- Unincorporated County: This includes areas of the County that are not a part of any municipality.
- Entitlement Cities: The CDBG entitlement cities in the County are Antioch, Concord, Pittsburg, and Walnut Creek.
- HOME Consortium: The members of the HOME Consortium are Antioch, Concord, Pittsburg, and Walnut Creek.

III. Past Impediments and Actions Taken

Affordable Housing

1. IMPEDIMENT: Lack of sufficient affordable housing supply.

1.1. Action: Provide assistance to preserve existing affordable housing and to create new affordable housing. Assistance will be provided through the Consolidated Plan programs of the Consortium member jurisdictions. These include CDBG, HOME, and HOPWA.

1.2. Action: Offer regulatory relief and incentives for the development of affordable housing. Such relief includes that offered under state "density bonus" provisions. (See housing element programs.)

1.3. Action: Assure the availability of adequate sites for the development of affordable housing. (See housing element programs.)

2. IMPEDIMENT: Concentration of affordable housing.

2.1. Action: Housing Authorities within the County (Contra Costa County, Richmond and Pittsburg) will be encouraged to promote wide acceptance of Housing Choice Vouchers, and will monitor the use of Housing Choice Vouchers to avoid geographic concentration.

2.2. Action: Consortium member jurisdictions will collaborate to expand affordable housing opportunities in communities in which they are currently limited.

2.3. Action: A higher priority for the allocation of financial and administrative resources may be given to projects and programs which expand affordable housing opportunities in communities in which they are currently limited.

2.4. Action: Member jurisdictions will report on the location of new affordable housing in relation to the location of existing affordable housing and areas of low-income, poverty and minority concentration.

Mortgage Lending

3. IMPEDIMENT: Differential origination rates based on race, ethnicity and location.

3.1. Action: Member jurisdictions will periodically monitor Home Mortgage Disclosure Act (HMDA) data and report significant trends in mortgage lending by race, ethnicity and location.

3.2. Action: When selecting lending institutions for contracts and participation in local programs, member jurisdictions may prefer those with a Community Reinvestment Act (CRA) rating of "Outstanding." Member jurisdictions may exclude those with a rating of "Needs to Improve," or "Substantial Noncompliance" according to the most recent examination period published by the Federal Financial Institutions Examination Council (FFIEC). In addition, member jurisdictions may review an individual institution's most recent HMDA reporting as most recently published by the FFIEC.

4. IMPEDIMENT: Lack of knowledge about the requirements of mortgage lenders and the mortgage lending/home purchase process, particularly among lower income and minority households.

4.1. Action: Member jurisdictions will support pre-purchase counseling and home buyer education programs.

4.2. Action: Member jurisdictions will support home purchase programs targeted to lower income (low and very low), immigrant, and minority households. Minority households include Hispanic households.

4.3. Action: Member jurisdictions will encourage mortgage lenders to responsibly market loan products to lower income (low and very low), immigrant, and minority households. Minority households include Hispanic households.

5. IMPEDIMENT: Lower mortgage approval rates in areas of minority concentration and low-income concentration.

5.1. Action: Member jurisdictions will support home purchase programs targeted to households who wish to purchase homes in Census Tracts with loan origination rates under 50 percent according to the most recently published HMDA data.

5.2. Action: Member jurisdictions will encourage mortgage lenders to responsibly market loan products to households who wish to purchase homes in Census Tracts with loan origination rates under 50 percent according to the most recently published HMDA data.

6. IMPEDIMENT: Lack of knowledge of fair housing rights.

6.1. Action: Support efforts to educate tenants, and owners and agents of rental properties regarding their fair housing rights and responsibilities.

7. IMPEDIMENT: Discrimination in rental housing.

7.1. Action: Support efforts to enforce fair housing rights and to provide redress to persons who have been discriminated against.

7.2. Action: Support efforts to increase the awareness of discrimination against persons based on sexual orientation.

8. IMPEDIMENT: Failure to provide reasonable accommodation to persons with disabilities.

8.1. Action: Support efforts to educate tenants, and owners and agents of rental properties regarding the right of persons with disabilities to reasonable accommodation.

8.2. Action: Support efforts to enforce the right of persons with disabilities to reasonable accommodation and to provide redress to persons with disabilities who have been refused reasonable accommodation.

9. IMPEDIMENT: Lack of information on the nature and basis of housing discrimination.

9.1. Action: Monitor the incidence of housing discrimination complaints and report trends annually in the CAPER.

9.2. Action: Improve the consistency in reporting of housing discrimination complaints. All agencies who provide this information should do so in the same format with the same level of detail. Information should be available by the quarter year.

9.3. Action: Improve collection and reporting information on discrimination based on sexual orientation and failure to provide reasonable accommodation to persons with disabilities.

Government Barriers

10. IMPEDIMENT: Lack of formal policies and procedures regarding reasonable accommodation.

10.1. Action: Jurisdictions which have not done so will adopt formal policies and procedures for persons with disabilities to request reasonable accommodations to local planning and development standards.

11. IMPEDIMENT: Transitional and supportive housing is not treated as a residential use subject only to those restrictions that apply to other residential uses of the same type in the same zone, and is not explicitly permitted in the zoning code.

11.1. Action: Jurisdictions which have not done so will amend their zoning codes to treat transitional and supportive housing types as a residential use subject only to those

restrictions that apply to other residential uses of the same type in the same zone, and to explicitly permit both transitional and supportive housing types in the zoning code.

12. IMPEDIMENT: Permanent emergency shelter is not permitted by right in at least one appropriate zoning district.

12.1. Action: Jurisdictions which have not done so will amend their zoning codes to permit transitional and supportive housing by right in at least one residential zoning district.

IV. Background

This section presents a summary of the demographic profile, economic, income distribution, and housing characteristics for Contra Costa County.

POPULATION

Tables 1 and 2 demonstrate a few notable growth trends in the Bay Area and in Contra Costa County and its cities. The growth rate from 2000 to 2010 increased 10.6 percent according to Census reports in the County as a whole. With projected growth patterns from the Association of Bay Area Governments (ABAG), the population in the County was expected to grow 7.1 percent from 2010 to 2020.

From 2010 to 2020, the growth percentage rates in Hercules (20.1 percent), Oakley (17.4 percent), Pittsburg (13.8 percent), and Richmond (10.5 percent) exceed the percentage growth for the Bay Area (8.9 percent) as a whole.

According to ABAG's latest Projections 2013, the population in Contra Costa County is expected to reach 1,085,700 by 2015 and grow to 1,123,500 by 2020. Between 2015 and 2020 the County's population is estimated to grow by 3.5 percent.

Table 1
Current and Projected Population

Jurisdiction	2010	2015	2020	2025	2030
Bay Area	7,150,739	7,461,400	7,786,800	8,134,000	8,496,800
Urban County					
Brentwood	51,481	52,700	54,000	55,400	56,800
Clayton	10,897	10,900	11,100	11,400	11,400
Danville	42,039	42,700	43,500	44,400	45,100
El Cerrito	23,549	24,100	24,700	25,300	26,000
Hercules	24,060	26,500	28,900	31,300	34,000
Lafayette	23,893	24,500	25,100	25,700	26,400
Martinez	35,824	36,500	37,100	38,000	38,800
Moraga	16,016	16,400	16,900	17,300	17,800
Oakley	35,432	38,500	41,600	44,700	48,200
Orinda	17,643	18,000	18,400	18,800	19,200
Pinole	18,390	18,900	19,500	20,100	20,700
Pleasant Hill	33,152	33,800	34,400	35,100	35,900
San Pablo	29,139	30,300	31,500	32,800	34,200
San Ramon	72,148	74,400	76,800	79,400	82,300
Unincorporated County	159,785	162,900	166,100	169,700	173,500
Urban County Subtotal	593,448	611,100	629,600	649,400	670,300
Entitlement Jurisdictions					
Antioch	102,372	105,600	108,900	112,400	116,200
Concord	122,067	125,300	128,500	141,100	154,000
Pittsburg	63,264	67,600	72,000	76,500	81,300
Richmond	103,701	109,100	114,600	120,300	126,500
Walnut Creek	64,173	67,000	69,900	72,900	76,100
Contra Costa County Total	**1,049,025**	**1,085,700**	**1,123,500**	**1,172,600**	**1,224,400**

Data Source: 2010 Census P1, Association of Bay Area Governments Projections 2013 (2015-2030)

Table 2

Rate of Change in Current and Projected Population

Jurisdiction	2000 to 2010	2010 to 2020	2020 to 2030
Bay Area	5.4%	8.9%	9.1%
Urban County			
Brentwood	121.0%	4.9%	5.2%
Clayton	1.3%	1.9%	2.7%
Danville	0.8%	3.5%	3.7%
El Cerrito	1.6%	4.9%	5.3%
Hercules	23.5%	20.1%	17.7%
Lafayette	-0.1%	5.0%	5.2%
Martinez	-0.1%	3.5%	4.6%
Moraga	-1.7%	5.5%	5.3%
Oakley	38.3%	17.4%	15.9%
Orinda	0.3%	4.3%	4.4%
Pinole	-3.4%	6.0%	6.2%
Pleasant Hill	1.0%	3.7%	4.4%
San Pablo	-3.6%	8.1%	8.6%
San Ramon	61.3%	6.5%	7.2%
Unincorporated County	5.3%	4.0%	4.5%
Urban County Total	15.0%	6.1%	6.5%
Entitlement Jurisdictions			
Antioch	13.1%	6.4%	6.7%
Concord	0.2%	5.3%	19.8%
Pittsburg	11.4%	13.8%	12.9%
Richmond	4.5%	10.5%	10.4%
Walnut Creek	-0.2%	8.9%	8.9%
Contra Costa County Total	**10.6%**	**7.1%**	**9.0%**

Data Source: 2000 Census, 2010 Census, Association of Bay Area Governments Projections 2013 (2020-2030)

POPULATION BY AGE

Table 3 shows population by age group. Of the jurisdictions in Contra Costa County, Walnut Creek had the largest share of persons over 65 (27.2 percent), followed by Orinda (20.1 percent) and Moraga (19.6 percent). San Ramon had the largest percentage of persons under the age of 18 (30 percent), followed by Brentwood (29.5 percent) and Oakley (28 percent). The County had a total of 24.1 percent of persons under 18 and 13.4 percent of persons over 65.

Table 3

Population by Age

Jurisdiction	% Under 18	% Over 18	% Age 20-64	% Over 65
Urban County				
Brentwood	29.5%	70.5%	55.0%	12.8%
Clayton	23.4%	76.6%	56.8%	16.6%
Danville	27.3%	72.7%	54.8%	15.8%
El Cerrito	16.4%	83.6%	62.8%	18.7%
Hercules	22.8%	77.2%	64.0%	10.9%
Lafayette	25.5%	74.5%	55.4%	17.6%
Martinez	20.2%	79.8%	64.2%	13.1%
Moraga	20.6%	79.4%	51.6%	19.6%
Oakley	28.0%	72.0%	61.0%	8.2%
Orinda	24.7%	75.3%	53.7%	20.1%
Pinole	19.6%	80.4%	62.2%	16.7%
Pleasant Hill	19.0%	81.0%	64.4%	14.5%
San Pablo	26.1%	73.9%	61.3%	9.6%
San Ramon	30.0%	70.0%	59.7%	8.5%
Unincorporated County	23.6%	76.4%	60.2%	13.8%
Urban County Total	24.7%	75.3%	59.5%	13.4%
Entitlement Jurisdictions				
Antioch	26.5%	73.5%	60.3%	9.8%
Concord	22.6%	77.4%	62.5%	12.6%
Pittsburg	25.4%	74.6%	61.7%	9.6%
Richmond	24.3%	75.7%	62.8%	10.8%
Walnut Creek	16.6%	83.4%	54.6%	27.2%
Contra Costa County Total	**24.1%**	**75.9%**	**60.1%**	**13.4%**

Data Source: 2010-2014 ACS 5-Year Estimates (DP05)

RACE/ETHNICITY

Although Contra Costa County is generally diverse, the particular racial and ethnic composition varies by community. Please see **Tables 4 and 5**. Of the nineteen cities in the County, there are

three with a White population of over 80 percent (Clayton, Danville, and Lafayette), and six with a minority population near or greater than 50 percent (Hercules, Pinole, San Ramon, Antioch, Pittsburg, and Richmond).

In a similar fashion, seven communities have a Hispanic or Latino population over 25 percent (Brentwood, Oakley, San Pablo, Antioch, Concord, Pittsburg and Richmond), and six have a Hispanic or Latino population of less than 10 percent (Clayton, Danville, Lafayette, Moraga, Orinda and San Ramon).

The communities that are predominantly White tend to be those located in the central portion of the County, in the Interstate Highway 680 corridor. The predominantly minority and Hispanic or Latino communities tend to be in the industrial and agricultural areas of the eastern and western regions of the County.

Areas of Minority Concentration

Concentration is defined as the existence of racial or ethnic minorities in a Census Tract at a rate of 10 percent or higher than the jurisdiction as a whole. Data on race and ethnicity were examined to determine areas of minority and ethnic concentration from 2010-2014 ACS 5-Year Estimates. For the purpose of this analysis, 38 percent of the County's population is non-white. Please see Maps 1 through 5 in Appendix 2. (Please note that census tract area boundaries may not be contiguous with current city boundaries.) Of all the entitlement jurisdictions, Walnut Creek does not have any areas of minority (non-white) concentration; therefore, a map was not included. It should be noted that in all areas that show an overall minority concentration, the predominant minority groups are Asians and/or Blacks and African Americans.

Since the U.S. Census enumerates Hispanic as a distinct ethnic category, this characteristic was examined separately. Census tract areas where the percentage of total Hispanic population exceeds the countywide percentage by at least 10 percentage points are considered to be areas

of Hispanic concentration. The average countywide percentage of Hispanic population is 24.8 percent according to the 2010-2014 ACS 5-Year Estimates. Note that of all the entitlement jurisdictions, Walnut Creek does not have any areas of Hispanic concentration; therefore, a map was not included. Please see Maps 6 through 10 in Appendix 2.

Table 4

Race as Percentage of Total Population

Jurisdiction	White	Black or African American	American Indian Alaskan Native	Asian	Native Hawaiian Pacific Islander	Some other race	Two or more races
Urban County							
Brentwood	74.5%	5.1%	0.5%	8.3%	0.2%	4.8%	6.7%
Clayton	84.0%	2.0%	1.2%	6.9%	0.2%	1.0%	4.6%
Danville	83.4%	1.1%	0.2%	11.5%	0.1%	0.4%	3.4%
El Cerrito	57.4%	6.7%	0.3%	25.0%	0.2%	3.6%	6.9%
Hercules	27.1%	18.0%	0.3%	43.7%	0.5%	2.7%	7.6%
Lafayette	84.2%	1.2%	0.0%	9.0%	0.0%	0.6%	4.9%
Martinez	79.3%	3.0%	0.8%	7.3%	0.4%	3.6%	5.5%
Moraga	75.6%	4.2%	0.1%	14.9%	0.3%	0.6%	4.3%
Oakley	67.4%	8.1%	1.5%	8.7%	0.2%	7.6%	6.6%
Orinda	79.8%	1.5%	0.6%	10.4%	0.0%	2.0%	5.6%
Pinole	50.2%	10.7%	0.8%	23.1%	0.0%	10.7%	3.3%
Pleasant Hill	76.6%	1.8%	0.3%	13.5%	0.2%	5.7%	0.5%
San Pablo	53.7%	16.1%	0.6%	14.7%	0.3%	3.9%	0.8%
San Ramon	49.3%	2.3%	0.3%	40.5%	0.4%	5.5%	0.4%
Unincorporated County	68.7%	6.3%	0.3%	12.3%	0.3%	6.4%	5.6%
Urban County Total	66.9%	5.6%	0.5%	16.9%	0.3%	4.2%	5.7%
Entitlement Jurisdictions							
Antioch	49.7%	17.9%	0.9%	10.4%	0.8%	12.0%	8.3%
Concord	69.5%	4.2%	0.6%	11.0%	0.7%	8.1%	5.8%
Pittsburg	36.3%	18.4%	0.4%	16.4%	1.7%	20.4%	6.5%
Richmond	41.8%	23.7%	0.4%	14.0%	0.5%	13.9%	5.7%
Walnut Creek	79.9%	1.8%	0.3%	13.0%	0.2%	1.3%	3.5%
Contra Costa County Total	**62.1%**	**9.0%**	**0.5%**	**14.9%**	**0.5%**	**7.2%**	**5.9%**

Data Source: 2010-2014 ACS 5-Year Estimates (DP05)

Table 5

Hispanic Origin as a Percentage of Total Population

Jurisdiction	Hispanic or Latino	Hispanic or Latino (%)	Not Hispanic or Latino	Not Hispanic or Latino (%)
Urban County				
Brentwood	13,934	25.8%	40,128	74.2%
Clayton	890	7.9%	10,438	92.1%
Danville	2,467	5.8%	40,424	94.2%
El Cerrito	2,786	11.5%	21,350	88.5%
Hercules	3,640	14.8%	20,956	85.2%
Lafayette	2,252	9.1%	22,433	90.9%
Martinez	6,048	16.4%	30,828	83.6%
Moraga	1,123	6.8%	15,426	93.2%
Oakley	13,789	36.9%	23,602	63.1%
Orinda	1,152	6.3%	17,238	93.7%
Pinole	4,424	23.6%	14,330	76.4%
Pleasant Hill	4,844	14.3%	28,998	85.7%
San Pablo	16,233	55.0%	13,283	45.0%
San Ramon	6,362	8.6%	67,464	91.4%
Unincorporated County	38,000	22.9%	127,590	77.1%
Urban County Total	117,944	19.3%	494,488	80.7%
Entitlement Jurisdictions				
Antioch	35,946	34.0%	69,684	66.0%
Concord	37,616	30.1%	87,401	69.9%
Pittsburg	26,457	40.2%	39,304	59.8%
Richmond	43,216	40.6%	63,253	59.4%
Walnut Creek	6,680	10.1%	59,243	89.9%
Contra Costa County Total	**267,859**	**24.8%**	**813,373**	**75.2%**

Data Source: 2010-2014 ACS 5-Year Estimates (DP05)

INCOME

In this plan, income will be discussed using the terms as defined in **Table 6** below. These terms correspond to the income limits published annually by HUD. HUD bases these income categories on the Decennial Census with adjustment factors applied using the annual ACS. Income categories take into consideration family size. The income limit for a family of four is shown for illustration.

Table 6

Income Categories

Term	Percentage AMI	2015 Income Limit (family of 4)
Extremely Low Income	30%	$27,850
Very Low Income	50%	$46,450
Low Income	80%	$71,600

Data Source: HUD FY 2015 Income Limits Documentation System, Contra Costa County

Table 7 provides a summary of income statistics as reported by the 2010-2014 ACS 5-Year Estimates for all jurisdictions within Contra Costa County except the unincorporated area of the County. The ACS does not provide information for the unincorporated area but does include data for a Census-designated place (CDP). A CDP comprises a densely settled concentration of population that is not within an incorporated place but is locally identified by a name. Contra Costa County has 34 different CDPs. To get a better idea of the incomes for the unincorporated area, **Table 8** provides data for each CDP in the unincorporated County.

The communities of Contra Costa County have a significant disparity of household income between them. Seven cities and thirteen CDPs have annual median household incomes above $100,000 (Clayton, Danville, Hercules, Lafayette, Moraga, Orinda, San Ramon, Acalanes Ridge, Alamo, Blackhawk, Camino Tassajara, Castle Hill, Diablo, Discovery Bay, Kensington, Norris Canyon, Reliez Valley, San Miguel, Saranap and Shell Ridge). None of these communities are

CDBG entitlement jurisdictions.

Two cities and seven CDPs have annual median household incomes (MHI) near or below $50,000 (San Pablo, Richmond, Bay Point, Bethel Island, Clyde, Mountain View, Pacheco, North Richmond and Rollingwood).

Higher income communities in the County tend to be in the central region, and lower income communities are more likely to be in the industrial and agricultural communities of the eastern, northern and western regions.

Table 7

Income Characteristics for Incorporated Jurisdictions

Jurisdiction	Median Household Income	Per Capita Income
Urban County		
Brentwood	$88,697	$33,357
Clayton	$131,136	$54,740
Danville	$140,616	$65,783
El Cerrito	$88,380	$45,190
Hercules	$100,267	$37,978
Lafayette	$138,073	$67,896
Martinez	$85,736	$39,701
Moraga	$132,651	$60,576
Oakley	$78,597	$27,993
Orinda	$166,866	$84,985
Pinole	$74,379	$34,219
Pleasant Hill	$81,556	$43,580
San Pablo	$42,746	$16,874
San Ramon	$129,062	$51,569
Entitlement Jurisdictions		
Antioch	$65,770	$25,499
Concord	$67,122	$31,404
Pittsburg	$60,376	$23,330
Richmond	$54,857	$25,769
Walnut Creek	$80,399	$51,998
Contra Costa County Total	**$79,799**	**$38,770**

Data Source: 2010-2014 ACS 5-Year Estimates (DP03)

Table 8

Income Characteristics for Unincorporated Areas

Census Designated Place	Median Household Income	Per Capita Income
Acalanes Ridge	$160,000	$62,314
Alamo	$163,151	$77,281
Alhambra Valley	$62,000	$41,738
Bay Point	$41,749	$17,385
Bayview	$82,431	$29,636
Bethel Island	$36,845	$30,388
Blackhawk	$167,875	$85,049
Byron	$75,673	$29,962
Camino Tassajara	$142,371	$64,980
Castle Hill	$113,952	$54,105
Clyde	$41,382	$27,403
Contra Costa Centre (Waldon)	$87,721	$57,385
Crockett	$81,667	$42,310
Diablo	$167,188	$113,989
Discovery Bay	$112,063	$43,649
East Richmond Heights	$68,185	$32,733
El Sobrante	$60,732	$30,822
Kensington	$136,625	$67,369
Knightsen	$78,672	$29,127
Montalvin Manor	$64,778	$22,652
Mountain View	$43,077	$27,903
Norris Canyon	$196,726	$59,374
North Gate	$96,333	$52,891
North Richmond	$35,288	$16,194
Pacheco	$48,024	$30,011
Port Costa	$94,018	$54,767
Reliez Valley	$126,458	$77,832
Rodeo	$68,701	$27,318
Rollingwood	$48,974	$14,782
San Miguel	$136,346	$57,644
Saranap	$102,054	$49,107
Shell Ridge	$120,163	$54,179
Tara Hills	$57,708	$23,890
Vine Hill	$62,857	$21,948

Data Source: 2010-2014 ACS 5-Year Estimates (DP03)

Areas of Low- and Very Low-Income Concentration

Data on income were examined at the Census Tract level to determine areas of low- (80 percent AMI) and very low- (50 percent AMI) income concentration.

Low-income areas are those that have 80 percent or more low-income persons. In those communities, the HUD income limits were used to determine low-income areas. Please see Maps 11 through 16 in Appendix 2. Very low-income areas are those that have 50 percent or more very low-income persons or a percentage of very low-income persons that exceeds the applicable exception threshold.

POVERTY

In addition to reporting income, the 2010-2014 ACS 5-Year Estimates reports the number of persons and families that have incomes that fall below the federal poverty level. The poverty level is adjusted for family size and composition making it a more relative measure than household income. Persons and families that are below the poverty level are generally very poor. Please see **Table 9** for data on persons and families who fall below the poverty line. The table also shows persons under 18 years old who are below the poverty line.

The cities of San Pablo, Pittsburg and Richmond are notable for the level of poverty (over 17 percent) as compared to the rest of the County. San Pablo, Antioch, Pittsburg and Richmond are all notable for having a poverty level over 20 percent for persons under the age of 18 years.

Table 9

Share of Population Below Poverty

Jurisdiction	Persons (%)	Persons Under 18 Years old (%)	Families (%)
Urban County			
Brentwood	6.3%	6.9%	3.7%
Clayton	3.9%	6.4%	2.3%
Danville	4.2%	4.4%	2.6%
El Cerrito	8.2%	5.5%	4.6%
Hercules	6.1%	7.6%	4.1%
Lafayette	4.7%	2.0%	1.6%
Martinez	6.0%	4.9%	5.0%
Moraga	4.7%	2.7%	2.4%
Oakley	9.4%	7.4%	7.3%
Orinda	1.4%	0.7%	0.8%
Pinole	8.8%	10.0%	5.7%
Pleasant Hill	9.5%	5.3%	4.3%
San Pablo	20.7%	24.5%	18.2%
San Ramon	3.6%	3.5%	2.8%
Unincorporated County	11.2%	16.4%	8.4%
Urban County Total	7.9%	8.8%	5.8%
Entitlement Jurisdictions			
Antioch	14.7%	21.0%	10.5%
Concord	13.1%	17.9%	9.9%
Pittsburg	18.1%	26.9%	14.6%
Richmond	17.1%	25.3%	14.6%
Walnut Creek	6.0%	6.0%	3.5%
Contra Costa County Total	**10.7%**	**13.9%**	**7.7%**

Data Source: 2010-2014 ACS 5-Year Estimates (S1701, S1702)

EDUCATION

Education level plays a critical role in determining the income level of a household. **Table 10** provides a summary of educational attainment for persons aged 25 years and older for the share of the population in the state and in each jurisdiction. Eight cities (Clayton, Danville, Lafayette, Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek) reported more than 95 percent of persons aged 25 years and older as having at least a high diploma. San Pablo (24.4 percent), Pittsburg (11.6 percent) and Richmond (12.9 percent) had the greatest number of persons who reported as having less than a 9th grade education. For the share of persons having a bachelor's degree or higher, 6 of the 19 jurisdictions in Contra Costa County (Brentwod, Oakley, San Pablo, Antioch, Pittsburg, and Richmond) were below the state percentage (31 percent).

Table 10

Education Attainment for Persons Aged 25 Years and Over

Jurisdiction	Less than 9th grade (%)	9th to 12th grade, no diploma (%)	High School Graduate, equivalent	Some college, no degree (%)	Associate's Degree (%)	Bachelor's Degree (%)	Graduate Degree (%)
California (State)	10.1%	8.4%	20.7%	22.0%	7.8%	19.6%	11.4%
Urban County							
Brentwood	4.9%	5.3%	20.2%	28.1%	12.6%	21.8%	7.3%
Clayton	0.4%	0.7%	14.6%	23.1%	10.2%	33.6%	17.3%
Danville	0.9%	1.5%	9.0%	17.0%	7.5%	41.0%	23.2%
El Cerrito	2.9%	3.6%	11.3%	17.5%	5.7%	29.8%	29.2%
Hercules	3.8%	2.6%	14.6%	26.5%	10.3%	32.3%	9.9%
Lafayette	0.9%	1.3%	6.2%	12.5%	5.1%	38.2%	35.8%
Martinez	2.6%	4.0%	18.2%	28.0%	9.9%	25.5%	11.8%
Moraga	0.3%	1.3%	5.6%	12.1%	6.1%	37.6%	36.9%
Oakley	7.8%	7.3%	31.3%	29.9%	8.3%	11.7%	3.8%
Orinda	0.8%	1.2%	4.8%	11.2%	3.9%	44.0%	34.2%
Pinole	5.3%	5.5%	20.0%	25.1%	10.2%	22.2%	11.6%
Pleasant Hill	1.6%	2.4%	13.8%	22.2%	8.3%	35.2%	16.4%
San Pablo	24.4%	12.9%	24.2%	20.4%	5.6%	9.4%	3.2%
San Ramon	1.1%	1.4%	8.7%	15.7%	8.1%	39.5%	25.5%
Unincorporated County	5.7%	5.1%	19.8%	21.5%	7.6%	25.4%	14.9%
Urban County Total	4.5%	4.0%	16.0%	19.6%	8.1%	28.9%	17.3%
Entitlement Jurisdictions							
Antioch	5.8%	7.2%	28.7%	29.0%	9.1%	15.0%	5.2%
Concord	6.2%	6.3%	23.5%	24.3%	8.8%	21.6%	9.4%
Pittsburg	11.6%	8.6%	26.3%	26.6%	8.7%	13.1%	5.1%
Richmond	12.9%	10.2%	21.4%	22.0%	7.8%	16.4%	9.3%
Walnut Creek	0.9%	1.8%	10.5%	17.8%	7.1%	37.0%	24.9%
Contra Costa County Total	**5.7%**	**5.3%**	**18.9%**	**22.4%**	**8.2%**	**25.2%**	**14.3%**

Data Source: 2010-2014 ACS 5-Year Estimates (S1501)

EMPLOYMENT

Table 11 provides a summary of the civilian labor force for individuals 16 years and over, the percent in the labor force, employment (percent employed), and the unemployment rate for 2014 for all jurisdictions in Contra Costa County. Data were collected through the 2005-2009 and 2010-2014 ACS 5-Year Estimates. When comparing the 2009 data to the 2014 data for Contra Costa County as a whole, the unemployment rate has increased dramatically from 7.2 percent in 2009 to 9.8 percent in 2014 – an increase of 36 percent. This increased unemployment rate is the trend for all but two jurisdictions in the County (Hercules and Pleasant Hill). The jurisdiction that had the greatest increase in unemployment rate was Moraga (268 percent increase) going from 2.2 percent in 2009 to 8.1 percent in 2014.

As shown in **Table 12**, management, business, science and art occupations represent the largest share of occupations for the Urban County jurisdictions and entitlement jurisdictions, followed by sales and office occupations. People employed in farming, fishing, and forestry make up the smallest share of the workforce.

Table 11

Employment Statistics

Jurisdiction	Population 16 years and over	Labor Force (%)	Employed (%)	Un-employed (%)	Population 16 years and over	Labor Force (%)	Employed (%)	Un-employed (%)
Urban County	**2009**	**2009**	**2009**	**2009**	**2014**	**2014**	**2014**	**2014**
Brentwood	32,935	64.0%	60.3%	5.8%	40,568	63.9%	58.2%	8.8%
Clayton	8,626	67.9%	64.3%	5.0%	9,157	62.5%	56.7%	9.3%
Danville	30,734	64.0%	60.4%	5.6%	32,565	63.5%	59.4%	6.4%
El Cerrito	18,785	65.1%	61.1%	6.2%	20,481	66.6%	60.5%	9.1%
Hercules	19,756	72.2%	67.0%	7.1%	19,659	68.3%	64.4%	5.7%
Lafayette	19,230	63.4%	60.6%	4.4%	19,273	61.6%	58.0%	5.9%
Martinez	28,910	67.7%	62.9%	7.1%	30,409	68.4%	62.4%	8.5%
Moraga	13,463	59.9%	58.6%	2.2%	13,555	53.7%	49.4%	8.1%
Oakley	21,432	67.8%	62.8%	7.3%	28,206	67.7%	60.4%	10.7%
Orinda	14,159	60.7%	59.1%	2.7%	14,394	59.8%	56.9%	4.9%
Pinole	14,924	64.4%	60.8%	5.6%	15,456	62.2%	57.0%	8.3%
Pleasant Hill	26,699	69.1%	64.0%	7.1%	28,246	64.3%	59.8%	6.9%
San Pablo	22,621	63.1%	56.5%	10.5%	22,715	64.8%	55.7%	14.1%
San Ramon	36,949	74.8%	70.8%	5.4%	54,089	72.0%	67.6%	6.0%
Entitlement Jurisdictions								
Antioch	72,825	65.8%	59.9%	8.9%	81,082	64.7%	56.0%	13.4%
Concord	95,647	68.9%	64.2%	6.7%	99,798	67.5%	60.1%	10.8%
Pittsburg	46,358	65.4%	59.6%	8.2%	50,787	66.0%	57.3%	13.1%
Richmond	78,118	65.2%	57.8%	11.3%	83,372	65.8%	58.0%	11.8%
Walnut Creek	53,965	58.8%	55.8%	5.1%	56,257	58.7%	54.5%	7.1%
Contra Costa County Total	**788,352**	**65.8%**	**61.0%**	**7.2%**	**851,619**	**65.2%**	**58.7%**	**9.8%**

Data Source: 2010-2014 ACS 5-Year Estimates (S2301)

Table 12

Occupation

Jurisdiction	Civilians Employed Over 16 Years Old	Management Business, Science &Art	Service	Sales and Office	National Resources, Construction Maintenance	Production, Transportation Material Moving	Farming, Fisheries, & Forestry
Urban County							
Brentwood	23,620	37.3%	16.7%	28.2%	11.2%	6.6%	0.7%
Clayton	5,190	58.4%	10.9%	23.2%	2.3%	5.2%	0.0%
Danville	19,339	63.3%	8.2%	23.6%	2.4%	2.5%	0.0%
El Cerrito	12,391	59.3%	13.0%	19.6%	4.2%	3.9%	0.1%
Hercules	12,660	46.7%	13.9%	28.2%	4.1%	7.1%	0.2%
Lafayette	11,173	67.3%	8.6%	18.3%	2.8%	2.9%	0.1%
Martinez	18,984	44.7%	16.0%	25.3%	8.5%	5.5%	0.0%
Moraga	6,698	67.1%	8.6%	20.5%	1.5%	2.2%	0.0%
Oakley	17,026	27.0%	22.1%	26.1%	13.5%	11.3%	1.0%
Orinda	8,188	69.8%	7.1%	18.6%	2.6%	1.8%	0.0%
Pinole	8,811	39.5%	17.2%	26.7%	6.3%	10.2%	0.3%
Pleasant Hill	16,901	52.3%	12.7%	24.5%	6.7%	3.8%	0.0%
San Pablo	12,641	20.5%	28.7%	21.1%	13.8%	15.9%	2.5%
San Ramon	36,587	62.5%	9.1%	20.9%	3.9%	3.5%	0.0%
Unincorporated County	72,068	42.8%	16.7%	23.9%	8.3%	8.3%	0.2%
Urban County Total	282,277	48.4%	14.5%	23.6%	7.2%	6.4%	0.3%
Entitlement Jurisdictions							
Antioch	45,383	29.8%	21.2%	28.1%	9.7%	11.2%	0.3%
Concord	59,938	36.1%	21.8%	24.3%	9.5%	8.3%	0.2%
Pittsburg	29,097	26.0%	26.0%	26.3%	11.7%	10.0%	0.2%
Richmond	48,318	31.6%	25.1%	20.8%	11.2%	11.2%	0.8%
Walnut Creek	30,676	58.5%	11.7%	21.8%	3.8%	4.2%	0.0%
Contra Costa County	**499,984**	**42.9%**	**17.5%**	**23.9%**	**8.1%**	**7.6%**	**0.4%**

Data Source: 2010-2014 ACS 5-Year Estimates (DP03, S2401)

HOUSEHOLDS

The type, size, and composition of a household can affect the type of housing and services that are needed. The following section provides an analysis of the household profiles in Contra Costa County.

Table 13 presents household size, percentage of persons living alone, and percentage of persons over age 65. Oakley had the largest average household size (3.4 persons) of all the jurisdictions, with the second largest household size (3.3 persons) reported in Pittsburg. Based on the 2010-2014 ACS 5-Year Estimates, Walnut Creek had the largest share of persons living alone (37.6 percent) and householders over the age of 65 (20.3 percent).

Table 13

Household Composition 2016

Jurisdiction	Avg Household Size (persons)	Householder Living Alone (%)	Householder Living Alone 65 Years & over (%)
Urban County			
Brentwood	3.2	15.5%	7.3%
Clayton	2.7	17.9%	7.6%
Danville	2.7	20.7%	10.6%
El Cerrito	2.4	26.9%	10.8%
Hercules	3.0	20.0%	6.3%
Lafayette	2.7	18.3%	8.1%
Martinez	2.5	26.8%	8.0%
Moraga	2.6	20.6%	12.4%
Oakley	3.4	15.6%	5.7%
Orinda	2.8	18.2%	10.8%
Pinole	2.8	22.1%	9.5%
Pleasant Hill	2.4	32.3%	12.2%
San Pablo	3.2	19.6%	6.8%
San Ramon	2.9	18.6%	5.1%
Unincorporated County	2.8	22.1%	8.5%
Urban County Total	2.8	21.3%	8.3%
Entitlement Jurisdictions			
Antioch	3.2	18.6%	6.1%
Concord	2.8	23.3%	8.8%
Pittsburg	3.3	18.0%	5.8%
Richmond	2.9	27.7%	7.9%
Walnut Creek	2.1	37.6%	20.3%
Contra Costa County Total	**2.8**	**23.1%**	**9.0%**

Data Source: 2010-2014 ACS 5-Year Estimates (S1101)

Table 14 presents the number of family households and the share of family households that are married, single parents, and have children under 18 years of age for all jurisdictions in Contra Costa County.

Of the 380,183 households in the County, 269,678 (70.9 percent) were family households. Of the family households, 76 percent were married, 36.4 percent were with children under 18 years old and 24 percent were single parent households. When looking closer at the jurisdictions in the County, Orinda (92.5 percent) and San Ramon (88.3 percent) had the largest share of families that were married; San Ramon (49.4 percent) and Oakley (47.1 percent) had the largest share of households with children under 18 years old; and Richmond (40.6 percent) and San Pablo (39.6 percent) had the largest share of single parents.

Table 14

Family Household Composition

Jurisdiction	Family Households	Married (%)	W/ Children under 18yrs old	Single Parent (%)
Urban County				
Brentwood	13,949	80.2%	46.2%	19.8%
Clayton	3,286	85.8%	33.7%	14.2%
Danville	11,896	87.8%	38.6%	12.2%
El Cerrito	6,386	79.3%	25.2%	20.7%
Hercules	6,180	76.8%	39.7%	23.2%
Lafayette	6,830	87.8%	38.4%	12.2%
Martinez	9,198	77.2%	30.2%	22.8%
Moraga	4,325	87.2%	32.8%	12.8%
Oakley	8,895	71.2%	47.1%	28.8%
Orinda	5,251	92.5%	34.5%	7.5%
Pinole	4,839	74.5%	29.5%	25.5%
Pleasant Hill	8,065	80.9%	27.7%	19.1%
San Pablo	6,690	60.4%	44.8%	39.6%
San Ramon	19,261	88.3%	49.4%	11.7%
Unincorporated County	42,462	77.5%	36.5%	22.5%
Urban County Total	157,513	80.3%	38.6%	19.7%
Entitlement Jurisdictions				
Antioch	25,240	69.1%	41.3%	30.9%
Concord	30,984	73.8%	34.6%	26.2%
Pittsburg	14,845	65.6%	44.0%	34.4%
Richmond	24,244	59.4%	35.9%	40.6%
Walnut Creek	16,852	83.3%	21.7%	16.7%
Contra Costa County Total	**269,678**	**76.0%**	**36.4%**	**24.0%**

Data Source: 2010-2014 ACS 5-Year Estimates (S1101, S2501)

SPECIAL NEEDS POPULATIONS – NON-HOMELESS

Certain groups may have more difficulty finding housing and may require specialized services or assistance. Owing to their special circumstances, they are more likely to have extremely low, very low, low, or moderate incomes. These groups include the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, victims of domestic violence, large households (i.e. Households of five or more who are related), and single parent-headed (female and male) households.

Elderly and Frail Elderly

The three jurisdictions with the largest share of senior households were Walnut Creek (27.2 percent), Orinda (20.1 percent), and Moraga (19.6 percent). Please see **Table 15**.

San Pablo (48.2 percent) and Pittsburg (49.4 percent) had almost half of their senior population reporting a disability, compared to the total County with 34.1 percent of the senior population reporting a disability.

Seniors are among several groups especially adversely impacted by the increase in evictions beginning in 2008 and 2009 that resulted from property owners being foreclosed upon. There is little legal recourse for tenants who are evicted during foreclosure. Seniors are more likely to be on fixed incomes and fall into a low-income category, making it more difficult to find new housing that they can afford.[1]

[1] Bay Area Legal Aid, Contra Costa County, September 17 and 18, 2009; Contra Costa Senior Legal Services, September 17 and 18, 2009; Loaves and Fishes of Contra Costa County, September 17 and 18, 2009.

Table 15

Senior Households

Jurisdiction	Senior Population 65 over (%)	Senior Households (%)	Owner Households (%)	Renter Households (%)	With a Disability (%)
Urban County					
Brentwood	12.8%	20.9%	24.4%	11.2%	35.8%
Clayton	16.6%	27.0%	26.3%	34.0%	19.8%
Danville	15.8%	26.0%	25.5%	29.5%	31.3%
El Cerrito	18.7%	28.1%	37.2%	14.2%	33.6%
Hercules	10.9%	16.8%	17.2%	15.3%	29.3%
Lafayette	17.6%	27.7%	34.0%	8.8%	18.2%
Martinez	13.1%	19.6%	25.0%	9.0%	25.9%
Moraga	19.6%	34.5%	38.8%	15.1%	21.7%
Oakley	8.2%	14.1%	13.7%	15.2%	44.9%
Orinda	20.1%	33.5%	35.3%	20.0%	25.6%
Pinole	16.7%	26.7%	32.0%	12.3%	40.0%
Pleasant Hill	14.5%	22.3%	25.4%	18.1%	41.5%
San Pablo	9.6%	16.3%	24.2%	10.5%	48.2%
San Ramon	8.5%	12.8%	13.8%	10.2%	28.1%
Unincorporated County	13.8%	23.1%	28.8%	10.6%	30.0%
Urban County Total	13.4%	21.9%	25.7%	12.8%	31.2%
Entitlement Jurisdictions					
Antioch	9.8%	17.1%	21.0%	10.9%	41.4%
Concord	12.6%	21.2%	27.4%	12.1%	37.4%
Pittsburg	9.6%	16.9%	21.7%	10.5%	49.4%
Richmond	10.8%	18.9%	29.7%	8.5%	37.4%
Walnut Creek	27.2%	39.0%	48.3%	22.1%	33.4%
Contra Costa County Total	**13.4%**	**22.3%**	**27.4%**	**12.6%**	**34.1%**

Data Source: 2010-2014 ACS 5-Year Estimates (DP05, S2501, S1810)

Persons with Disabilities

Table 16 presents data from the 2010-2014 ACS 5-Year Estimates for persons with disabilities in the state, in the Urban County (all non-entitlement jurisdictions), and in the entitlement jurisdictions. Of the jurisdictions in Contra Costa County, Pinole (14.3 percent) had the greatest share of the persons with a disability for all persons, followed by Pittsburg (14.1 percent). The smallest share of persons with a disability is in San Ramon (5.0 percent), followed by Lafayette (5.8 percent) and Moraga (6.5 percent).

Of the disabled persons in the County, 26.4 percent reported a physical disability that involved hearing and 16.9 percent reported a physical disability that involved vision. Over one-third of the disabled population reported a cognitive disability and over half of the disabled population reported an ambulatory disability. Approximately 36.3 percent of the disabled population over 16 years old in the County was employed. County percentages were generally consistent with the state as a whole.

Disabled persons are among several groups especially adversely impacted by the increase in evictions beginning in 2008 and 2009 that resulted from property owners being foreclosed upon. There is little legal recourse for tenants who are evicted as a result of foreclosure. Disabled persons find it more difficult to find housing that can accommodate their needs than nondisabled persons and are more likely to fall into a low-income category, making it more difficult to find new housing that meets their needs and that they can afford.[2]

[2] Bay Area Legal Aid, Contra Costa County, September 17 and 18, 2009; Contra Costa Senior Legal Services, September 17 and 18, 2009; Loaves and Fishes of Contra Costa County, September 17 and 18, 2009.

Table 16

Disability Status

Jurisdiction	Number of Disabled (persons)	Percent Disabled Persons	Disabled Type– Hearing (all ages)	Disabled Type– Vision (all ages)	Disabled Type– Cognitive (5yrs +)	Disabled Type– Ambulatory (5 yrs+)	Disabled Type– Self-care (5 yrs +)	Disabled Type– Independent living (18 yrs +)	% of Disabled Population over 16 yrs Employed
California (State)	3,851,442	10.3%	27.8%	18.8%	38.3%	52.7%	22.0%	39.6%	32.7%
Urban County									
Brentwood	4,796	8.9%	27.9%	14.7%	32.6%	52.8%	21.8%	40.4%	36.3%
Clayton	810	7.2%	37.2%	7.4%	33.8%	36.0%	13.7%	20.4%	47.3%
Danville	3,491	8.2%	38.5%	10.2%	42.5%	43.9%	23.2%	43.0%	57.3%
El Cerrito	2,400	10.0%	35.5%	11.9%	33.7%	55.3%	26.9%	44.0%	36.8%
Hercules	1,916	7.8%	25.3%	16.6%	36.6%	46.3%	22.6%	47.8%	43.2%
Lafayette	1,426	5.8%	33.4%	12.6%	30.9%	49.2%	23.6%	36.9%	43.8%
Martinez	3,808	10.6%	20.8%	19.1%	32.7%	54.6%	19.7%	28.5%	41.1%
Moraga	1,075	6.5%	27.3%	14.7%	30.0%	54.0%	27.7%	38.5%	27.8%
Oakley	3,694	9.9%	30.3%	16.7%	36.0%	56.4%	25.1%	41.7%	32.8%
Orinda	1,371	7.5%	35.7%	12.8%	40.5%	41.3%	24.1%	37.2%	33.6%
Pinole	2,670	14.3%	24.8%	11.7%	49.1%	45.1%	28.6%	50.1%	38.0%
Pleasant Hill	4,039	12.0%	19.5%	18.8%	43.9%	51.9%	22.6%	43.5%	34.7%
San Pablo	3,461	11.9%	24.1%	20.2%	45.9%	48.3%	19.1%	36.3%	31.1%
San Ramon	3,677	5.0%	31.5%	19.2%	32.3%	46.9%	16.5%	32.1%	52.0%
Unincorporated County	16,828	10.1%	27.0%	17.3%	37.3%	48.4%	21.4%	36.1%	36.4%
Urban County Total	55,462	9.0%	27.9%	16.1%	37.6%	49.5%	22.1%	38.4%	38.9%
Entitlement									
Antioch	14,105	13.4%	21.8%	18.5%	39.7%	51.2%	19.0%	35.3%	29.2%
Concord	14,314	11.5%	28.4%	17.9%	37.4%	51.1%	17.5%	32.6%	42.8%
Pittsburg	9,244	14.1%	19.9%	19.0%	42.6%	53.6%	21.4%	35.0%	31.8%
Richmond	11,149	10.6%	20.4%	15.8%	38.5%	58.4%	23.0%	40.1%	29.8%
Walnut Creek	8,033	12.3%	34.9%	15.7%	28.5%	55.5%	18.7%	37.7%	49.6%
Contra Costa County Total	**112,307**	**10.4%**	**26.4%**	**16.9%**	**37.6%**	**51.6%**	**19.4%**	**37.0%**	**36.3%**

Data Source: 2010-2014 ACS 5-Year Estimates (S1810, S2301)

Note: Survey participants may have reported multiple disabilities, resulting in percentages over 100% for each geographic region

5-Year Estimates5-Year Estimates

Large Households

Large family households are defined as households of five or more persons who are related. Large family households are considered a special needs group because there is a limited supply of adequately sized housing to accommodate their needs.

Table 17 provides data for large households for all jurisdictions in Contra Costa County. The jurisdictions with the greatest share of large households (households with five or more persons) were Pittsburg (21.5 percent), Oakley (20.4 percent), and Brentwood (18.9 percent). Walnut Creek had the smallest share of large households (3.9 percent) followed by El Cerrito (4.4 percent).

As shown in **Table 17**, housing units with three or more bedrooms make up 82.8 percent of all owner-occupied housing units and 35.3 percent of all renter-occupied housing units. The supply of housing units with three or more bedrooms available for ownership and rental is greater than the number of large owner and rental households. This suggests that there is not a numerical shortage of available housing units to meet the needs of large households. However, lower-income large households may be priced out of the larger housing units.

Some service providers noted that there has been growth in large households, as households have been adversely financially impacted by job loss and reduction in work hours. Increasingly, multi-generational family members are living together as large households to reduce housing costs.

Large households are also among several groups impacted by the increase in evictions during 2008 and 2009 that resulted from property owners being foreclosed upon. There is little legal recourse for tenants who are evicted as a result of foreclosure. Large households find it more difficult to find housing that can accommodate their household size and are more likely to fall into a low-income category, making it more difficult to find new housing that meets their needs and that they can afford. [3]

[3] Bay Area Legal Aid, Contra Costa County, September 17 and 18, 2009; Contra Costa Senior Legal Services, September 17 and 18, 2009; Loaves and Fishes of Contra Costa County, September 17 and 18, 2009.

Table 17
Large Households

Jurisdiction	Large Households (estimate)	Large Households (%)	Owner Occupied Households (%)	Renter Occupied Households (%)	% of Total Owner Occupied Housing units w/ 3+ bedrooms	% of Total Renter Occupied Housing units w/ 3+ bedrooms
Urban County						
Brentwood	3,245	18.9%	12.6%	6.3%	81.8%	69.8%
Clayton	424	10.3%	8.2%	2.1%	93.8%	52.2%
Danville	1,503	9.6%	7.9%	1.7%	91.7%	55.7%
El Cerrito	445	4.4%	2.6%	1.8%	69.1%	20.5%
Hercules	1,204	14.7%	10.2%	4.5%	82.4%	46.5%
Lafayette	812	8.9%	6.5%	2.4%	91.2%	29.7%
Martinez	1,024	6.9%	4.8%	2.1%	80.8%	36.6%
Moraga	386	6.7%	5.5%	1.2%	88.3%	32.2%
Oakley	2,271	20.4%	15.2%	5.2%	93.1%	60.4%
Orinda	844	12.7%	11.6%	1.1%	90.7%	69.6%
Pinole	747	11.1%	8.1%	3.0%	88.8%	35.5%
Pleasant Hill	784	5.7%	4.0%	1.7%	82.5%	26.9%
San Pablo	1,591	17.7%	8.8%	8.9%	62.3%	20.8%
San Ramon	2,255	8.9%	7.1%	1.8%	89.5%	26.3%
Unincorporated County	6,996	12.0%	7.4%	4.6%	83.3%	39.8%
Urban County Total	24,531	11.4%	7.9%	3.5%	85.1%	37.6%
Entitlement Jurisdictions						
Antioch	5,780	17.6%	9.1%	8.5%	92.8%	51.4%
Concord	4,869	10.8%	5.1%	5.7%	83.1%	31.3%
Pittsburg	4,221	21.5%	12.2%	9.3%	89.2%	43.9%
Richmond	5,080	14.0%	6.1%	7.9%	69.4%	28.1%
Walnut Creek	1,169	3.9%	2.8%	1.1%	63.8%	16.5%
Contra Costa County Total	**45,650**	**12.0%**	**7.3%**	**4.7%**	**82.8%**	**35.3%**

Data Source: 2010-2014 ACS 5-Year Estimates (B25124, B25042)

Single-Parent Households

Approximately 17.1 percent of the total family households in Contra Costa County are single female-headed households. As shown in **Table 18**, single female-headed households have a higher poverty rate than family households as a whole in the County. The poverty rate for single male-headed households was not available through the 2010-2014 ACS 5-Year Estimates.

Of the entitlement jurisdictions, all but Walnut Creek have a poverty rate for single headed-female households higher than the countywide rate of 21.5 percent – with Richmond the highest at 28.3 percent.

When compared to the State, the share of single female-headed households at or below the poverty level in California (27.9 percent) is higher than in the County. Of the entitlement jurisdictions, only Richmond has a higher poverty rate for single female-headed households than the State as a whole.

Table 18

Single Parent Households

Jurisdiction	Total Families	Percent in Poverty	Single Male Headed	Single Male Headed in Poverty (%)	Single Female Headed	Single Female Headed in Poverty (%)
Antioch	25,240	10.5%	1,919	n/a	5,879	24.8%
Concord	30,984	9.9%	2,560	n/a	5,545	22.1%
Pittsburg	14,845	14.6%	1,500	n/a	3,612	23.6%
Richmond	24,244	14.6%	2,238	n/a	7,607	28.3%
Walnut Creek	16,852	3.5%	988	n/a	1,831	7.9%
Contra Costa County Total	**269,678**	**7.7%**	**18,724**	**n/a**	**46,094**	**21.5%**
California (State)	8,666,286	12.3%	751,106	n/a	1,719,242	27.9%

Data Source: 2010-2014 ACS 5-Year Estimates (S1702)

HOUSING CHARACTERISTICS

The most significant trend in the Contra Costa County housing market, as with many other jurisdictions throughout the state, has been the decrease in single-family home sales prices and the corresponding decrease in the value of single-family housing. Between 2006 and 2011, the median sale price of a residential home dropped from $566,000 to $241,093. Since then, there has been a steady increase in the median sale price but it has not returned to 2006 levels. The value of owner-occupied homes has followed a similar pattern, in 2009 the median value was $574,000 and in 2014 it was $417,400. Combined with an environment of historically low interest rates, this has reduced the gap between the cost to buy a home and the price which households at the lower end of the range of incomes can afford. Although this "affordability gap" has been reduced when it comes to home purchase, the combination of instability in the job market, stagnating real wages, and the general tightening of credit has not necessarily made home purchase easier for lower income households.

The rental market has seen continued low vacancy rates and rents have been trending upward.

The following discussion identifies housing characteristics, trends, and needs for County jurisdictions.

Housing Growth

Between 2000 and 2014 the number of housing units in the state increased 12.83 percent. **Table 19** displays housing growth in all jurisdictions in Contra Costa County. Of all the jurisdictions in Contra Costa County, Brentwood had the largest increase in housing units (131.1 percent). Second to that was San Ramon with an increase of 47.9 percent. Of the entitlement cities, Antioch had the largest increase with 18.5 percent.

Tenure

Housing tenure refers to whether a unit is owner-occupied or renter-occupied. **Table 20** provides a summary of housing tenure for all jurisdictions in Contra Costa County. As shown, Clayton had the greatest share of owner-occupied households and San Pablo had the greatest share of renter-occupied housing units. It is important to note that the level of single-family foreclosures may have significantly shifted the owner/renter distribution as more families have moved into rental housing since 2000.

Table 19

Housing Units, 2000-2014

Jurisdiction	2000 Housing Units	2014 Housing Units	Percentage Change 2000-2014
Urban County			
Brentwood	7,788	18,000	131.1%
Clayton	3,924	4,272	8.9%
Danville	15,130	16,134	6.6%
El Cerrito	10,462	10,578	1.1%
Hercules	6,546	8,510	30.0%
Lafayette	9,334	9,558	10.2%
Martinez	14,597	14,839	1.7%
Moraga	5,760	5,899	2.2%
Oakley	7,946	11,640	46.5%
Orinda	6,744	6,729	-0.2%
Pinole	6,828	7,176	5.1%
Pleasant Hill	14,034	14,242	1.5%
San Pablo	9,340	9,775	4.7%
San Ramon	17,552	25,965	47.9%
Unincorporated County	57,609	63,395	10.0%
Urban County Total	193,608	226,712	17.1%
Entitlement Jurisdictions			
Antioch	30,116	35,702	18.5%
Concord	45,084	47,740	5.9%
Pittsburg	18,300	20,924	14.3%
Richmond	36,044	39,772	10.3%
Walnut Creek	31,425	32,599	3.7%
Contra Costa County Total	354,577	403,449	13.8%

Source: 2000 Census, 2010-2014 ACS 5-Year Estimate

Table 20

Housing Table

Jurisdiction	Owner-Occupied	Renter-Occupied
Urban County		
Brentwood	73.5%	26.5%
Clayton	91.4%	8.6%
Danville	84.3%	15.7%
El Cerrito	60.2%	39.8%
Hercules	78.0%	22.0%
Lafayette	74.8%	25.2%
Martinez	65.5%	34.5%
Moraga	81.7%	18.3%
Oakley	74.7%	25.3%
Orinda	89.2%	10.8%
Pinole	73.5%	26.5%
Pleasant Hill	57.5%	42.5%
San Pablo	42.4%	57.6%
San Ramon	68.5%	31.5%
Unincorporated County	68.5%	31.5%
Urban County Total	70.2%	29.8%
Entitlement Jurisdictions		
Antioch	61.0%	39.0%
Concord	59.0%	41.0%
Pittsburg	57.5%	42.5%
Richmond	49.4%	50.6%
Walnut Creek	64.6%	35.4%
Contra Costa County Total	65.0%	35.0%

Source: 2010-2014 ACS 5-Year Estimate, DP04

Housing Type

Table 21 exhibits the percentage of housing units by type as a share of total housing units for all jurisdictions in Contra Costa County. The table separates the Urban County jurisdictions and entitlement jurisdictions. Demand for owner-occupied housing is primarily met through the supply of single-family housing, while renter-occupied housing demand is primarily met through a combination of single-family housing and multi-family units.

Table 21

Tenure By Units In Structure

Jurisdiction	Owner-Occupied					Renter-Occupied				
	Single-Family Homes	Multi-Family (2-4 units)	Multi-family (>5 units)	Mobile Homes	Boat, RV, Van, etc.	Single-Family Homes	Multi-Family (2-4 units)	Multi-family (>5 units)	Mobile Homes	Boat, RV, Van, etc.
Urban County										
Brentwood	98.9%	0.1%	0.2%	0.9%	0.0%	82.2%	6.4%	11.4%	0.1%	0.0%
Clayton	98.5%	0.7%	0.0%	0.8%	0.0%	79.2%	5.6%	14.9%	0.0%	0.0%
Danville	97.9%	0.9%	1.0%	0.1%	0.0%	80.1%	4.0%	15.9%	0.0%	0.0%
El Cerrito	98.0%	1.2%	0.6%	0.1%	0.1%	44.7%	24.0%	31.3%	0.0%	0.0%
Hercules	93.9%	2.6%	3.3%	0.2%	0.1%	68.5%	8.9%	22.5%	0.1%	0.1%
Lafayette	99.5%	0.3%	0.1%	0.1%	0.0%	47.3%	13.0%	39.7%	0.0%	0.0%
Martinez	97.6%	1.4%	0.8%	0.1%	0.0%	60.0%	13.8%	26.2%	0.0%	0.0%
Moraga	95.0%	1.5%	3.5%	0.0%	0.0%	42.5%	26.4%	31.1%	0.0%	0.0%
Oakley	97.8%	0.1%	0.0%	2.1%	0.0%	74.2%	6.8%	12.2%	6.6%	0.2%
Orinda	99.7%	0.1%	0.2%	0.0%	0.0%	86.1%	2.9%	11.0%	0.0%	0.0%
Pinole	97.0%	1.5%	1.5%	0.0%	0.0%	52.9%	9.6%	37.5%	0.0%	0.0%
Pleasant Hill	96.3%	0.1%	2.3%	0.2%	0.0%	42.2%	14.8%	43.0%	0.0%	0.0%
San Pablo	88.0%	3.0%	4.4%	4.2%	0.4%	45.4%	16.9%	36.8%	1.0%	0.0%
San Ramon	95.7%	2.0%	2.3%	0.1%	0.0%	37.5%	8.5%	54.0%	0.0%	0.0%
Unincorporated County	94.6%	0.4%	1.0%	43.9%	0.1%	62.1%	10.0%	24.7%	3.2%	0.1%
Urban County Total	96.3%	1.0%	1.3%	1.4%	0.1%	57.7%	11.4%	29.6%	1.4%	0.1%
Entitlement Jurisdictions										
Antioch	98.2%	0.4%	0.2%	1.1%	0.1%	71.8%	8.9%	18.9%	0.3%	0.1%
Concord	91.9%	1.9%	3.9%	2.2%	0.2%	40.6%	12.6%	45.0%	1.6%	0.1%
Pittsburg	96.5%	0.1%	0.4%	3.0%	0.1%	62.2%	14.6%	22.0%	1.2%	0.0%
Richmond	95.2%	2.0%	1.9%	0.8%	0.1%	47.8%	26.9%	25.0%	0.2%	0.1%
Walnut Creek	82.0%	6.6%	11.3%	0.1%	0.0%	28.7%	13.0%	43.6%	0.2%	0.3%
Contra Costa County Total	95.1%	1.4%	2.1%	1.4%	0.1%	54.1%	14.0%	30.8%	1.0%	0.1%

Source: 2010-2014 ACS 5-Year Estimate B25033

Vacancy Rate

Vacancy trends in housing are analyzed using a "vacancy rate" which establishes the relationship between housing supply and demand. For example, if the demand for housing is greater than the available supply, then the vacancy rate is low and the price of housing will most likely increase. Additionally, the vacancy rate indicates whether or not the community has an adequate housing supply to provide choice and mobility. HUD standards indicate that a vacancy rate of 5 percent is sufficient to provide choice and mobility.

Table 22 provides the total number of vacant housing units as well as the percentage of vacant housing units in 2014 for all of the jurisdictions in Contra Costa County, separating out the Urban County jurisdictions and the entitlement jurisdictions. Please note the state Department of Finance (DOF) estimate is for all housing unit types and does not exclude seasonal, recreational, or occasional use and all other vacant units. The DOF also does not provide vacancy by tenure. To provide vacancy by reason for vacancy, 2010 Census data was used (**see Table 23).**

Overall, the 2014 data **(Table 22)** indicate that the County has a very low vacancy rate. All but three of the communities in the Urban County have vacancy rates below 5 percent, which is extremely low. Historical data from the 2010 Census **(Table 23)** indicate that in eight communities (El Cerrito, Pinole, Pleasant Hill, San Pablo, Antioch, Concord, Pittsburg, and Richmond) the share of vacant units that are for rent is above the overall County total (36.3 percent).

Table 22

Vacancy Status, 2014

Jurisdiction	Total Vacant Housing Units	% of Total Housing Units Vacant
Urban County		
Brentwood	862	4.8%
Clayton	138	3.2%
Danville	449	2.8%
El Cerrito	551	5.2%
Hercules	326	3.8%
Lafayette	408	4.3%
Martinez	647	4.4%
Moraga	180	3.1%
Oakley	504	4.3%
Orinda	82	1.2%
Pinole	497	6.9%
Pleasant Hill	468	3.3%
San Pablo	808	8.3%
San Ramon	750	2.9%
Unincorporated County	4,086	6.4%
Urban County Total	10,756	4.7%
Entitlement Jurisdictions		
Antioch	2,802	7.8%
Concord	2,783	5.8%
Pittsburg	1,295	6.2%
Richmond	3,359	8.4%
Walnut Creek	2,271	7.0%
Contra Costa County Total	**23,266**	**5.8%**

Source: 2010-2014 ACS 5-Year Estimates B25002

Table 23

Vacancy Status, 2010

Jurisdiction	Total Vacant Housing Units	% of Total Housing Units Vacant	% of Total Vacant Units That Are for Rent	% of Total Vacant Units That Are for Sale	% of Total Vacant Units that Are Rented/Sold, Not Occupied	% of Total Vacant Units that Are Vacant for Other Reasons
Urban County						
Brentwood	1,029	5.9%	24.6%	34.1%	5.3%	30.2%
Clayton	80	2.0%	18.8%	31.3%	4.7%	26.3%
Danville	514	3.2%	26.3%	20.6%	15.0%	21.0%
El Cerrito	574	5.4%	40.1%	11.8%	7.8%	31.7%
Hercules	438	5.1%	25.1%	34.7%	7.3%	25.1%
Lafayette	428	4.4%	32.5%	12.9%	8.9%	30.8%
Martinez	689	4.6%	35.1%	20.0%	5.2%	32.9%
Moraga	184	3.2%	20.7%	18.5%	8.2%	38.0%
Oakley	757	6.6%	19.9%	38.6%	8.5%	26.9%
Orinda	251	3.7%	12.0%	27.5%	8.4%	30.7%
Pinole	383	5.4%	43.9%	19.1%	7.3%	26.1%
Pleasant Hill	613	4.3%	46.0%	18.1%	6.0%	23.3%
San Pablo	810	8.5%	52.0%	16.5%	4.6%	23.5%
San Ramon	938	3.6%	32.1%	26.0%	13.3%	19.6%
Unincorporated County	4,695	7.2%	27.8%	19.9%	6.0%	46.3%
Urban County Total	12,383	5.4%	31.0%	22.6%	7.3%	39.1%
Entitlement Jurisdictions						
Antioch	2,597	7.5%	39.5%	22.3%	6.4%	28.5%
Concord	2,847	6.0%	45.7%	18.8%	5.8%	24.4%
Pittsburg	1,599	7.6%	36.8%	28.4%	5.4%	25.6%
Richmond	3,235	8.2%	47.7%	14.8%	4.5%	29.1%
Walnut Creek	2,238	6.8%	33.0%	22.8%	8.4%	19.3%
Contra Costa County Total	**24,899**	**6.2%**	**36.3%**	**21.3%**	**6.6%**	**26.1%**

Source: 2010 US Census Vacant Housing Units

Age of Housing Stock

Table 24 displays the share of housing units constructed by age and tenure for the state and for all jurisdictions in Contra Costa County. With the exception of El Cerrito, Lafayette and Orinda, most of the housing in each jurisdiction was built after 1960.

Table 24

Age Of Housing By Tenure

Jurisdiction	1939 or earlier			1940 to 1959			1960 to 1979			1980 to 1999			2000 or later		
	Total	Renter	Owner	Total	Renter	Owner	Total	Renter	Owner	Total	Renter	Owner	Total	Renter	Owner
State of California	**9.3%**	4.9%	4.4%	**20.4%**	8.6%	11.8%	**31.8%**	15.5%	16.3%	**26.0%**	11.3%	14.7%	**12.5%**	4.9%	7.6%
Urban County															
Brentwood	0.9%	0.4%	0.5%	2.0%	0.7%	1.3%	6.3%	2.4%	3.9%	36.5%	10.2%	26.3%	54.3%	12.8%	41.5%
Clayton	0.2%	0.0%	0.3%	3.5%	0.3%	3.2%	41.5%	2.8%	38.7%	48.0%	4.6%	43.4%	6.7%	0.8%	5.9%
Danville	0.6%	0.1%	0.5%	8.9%	1.3%	7.6%	46.3%	6.1%	40.2%	38.0%	6.4%	31.6%	6.2%	1.8%	4.4%
El Cerrito	12.8%	2.9%	9.9%	51.7%	15.5%	36.2%	25.3%	14.7%	10.6%	7.6%	4.6%	3.0%	2.7%	2.2%	0.5%
Hercules	0.5%	0.0%	0.5%	1.7%	0.2%	1.5%	18.3%	4.4%	13.9%	56.9%	12.9%	44.0%	22.5%	4.6%	17.9%
Lafayette	3.4%	0.4%	3.0%	46.7%	8.6%	38.1%	36.9%	11.9%	25.0%	10.0%	3.5%	6.5%	3.1%	0.8%	2.3%
Martinez	10.7%	4.4%	6.3%	13.5%	6.3%	7.2%	40.0%	12.1%	27.9%	32.2%	10.7%	21.5%	3.8%	1.1%	2.7%
Moraga	1.0%	0.1%	0.9%	7.0%	1.0%	6.0%	75.0%	12.5%	62.5%	15.1%	3.9%	11.2%	1.7%	0.7%	1.0%
Oakley	1.5%	0.8%	0.7%	3.1%	1.0%	2.1%	14.9%	5.3%	9.6%	50.4%	10.5%	39.9%	30.2%	7.8%	22.4%
Orinda	5.7%	0.7%	5.0%	49.2%	3.8%	45.4%	26.1%	2.4%	23.7%	13.5%	3.1%	10.4%	5.5%	0.9%	4.6%
Pinole	4.3%	2.1%	2.2%	18.7%	4.7%	14.0%	42.8%	9.2%	33.6%	29.8%	8.3%	21.5%	4.4%	2.3%	2.1%
Pleasant Hill	0.6%	0.3%	0.3%	28.9%	5.5%	23.4%	35.0%	19.1%	15.9%	31.0%	15.0%	16.0%	4.5%	2.7%	1.8%
San Pablo	6.1%	3.0%	3.1%	36.0%	18.5%	17.5%	26.8%	19.1%	7.7%	22.0%	13.2%	8.8%	9.3%	3.8%	5.5%
San Ramon	0.5%	0.2%	0.3%	0.9%	0.3%	0.6%	25.5%	5.3%	20.2%	37.5%	14.0%	23.5%	35.6%	11.6%	24.0%
Unincorporated County	6.6%	2.4%	4.2%	26.2%	7.6%	18.6%	25.6%	7.6%	18.0%	30.9%	10.2%	20.7%	10.8%	3.7%	7.1%
Urban County Total	4.1%	1.4%	2.7%	19.1%	5.2%	13.9%	29.0%	8.5%	20.5%	31.7%	9.8%	21.9%	16.0%	4.8%	11.2%
Entitlement Jurisdictions															
Antioch	3.4%	2.3%	1.1%	12.9%	6.7%	6.2%	26.6%	10.3%	16.3%	39.5%	13.9%	25.6%	17.6%	5.7%	11.9%
Concord	1.5%	0.7%	0.8%	25.2%	7.3%	17.9%	50.0%	21.1%	28.9%	18.3%	9.9%	8.4%	4.9%	2.0%	2.9%
Pittsburg	3.2%	1.1%	2.1%	13.9%	6.4%	7.5%	31.1%	12.0%	19.1%	30.5%	13.9%	16.6%	21.3%	9.1%	12.2%
Richmond	11.5%	5.8%	5.7%	34.8%	14.5%	20.3%	23.3%	14.1%	9.2%	20.1%	10.4%	9.7%	10.2%	5.7%	4.5%
Walnut Creek	1.4%	0.5%	0.9%	14.6%	4.1%	10.5%	58.7%	20.3%	38.4%	19.8%	8.2%	11.6%	5.5%	2.3%	3.2%
Contra Costa County Total	**4.5%**	**1.7%**	**2.5%**	**20.3%**	**6.5%**	**13.8%**	**33.3%**	**11.9%**	**21.4%**	**28.6%**	**10.3%**	**18.3%**	**13.7%**	**4.6%**	**9.1%**

Source: 2010-2014 ACS 5-Year Estimates B25036

Housing Cost

Table 25 provides a summary of home sales prices for all jurisdictions. The County has experienced an increase in the median sales price for homes over the last year. The two exceptions are Clayton and Orinda, which have both seen a year-to-year decrease in median sales price. It is important to note that as a measure of central tendency, median sales price is sensitive to sales volume in market sub-sectors as much as it is to overall price trends. An increase in the volume of sales of higher priced homes relative to overall sales volume can lead to an increase in median sales price even though overall prices remain low. As shown, as of March 2016, San Pablo had the lowest median sales price ($314,000) and Lafayette the highest ($1,370,750).

Table 26 presents the average rent in the region**.** According to ACS 5-Year Estimates, average rental rates in San Ramon are the most expensive at $1,678, followed by Lafayette at $1,598 and Pleasant Hill at $1,448. The most expensive rents occur in the central portion of Contra Costa County.

HUD publishes annual Fair Market Rents (FMR), which include an estimated utility cost, and the annual income required to afford them. **Table 27** shows the Fair Market Rents for 2015 for Contra Costa County.

Table 25

Median Home Sale Listings

Jurisdiction	Three Month Median Sales Price (Dec 2015 – Mar 2016)	Year-to-Year Change (March 2015 – March 2016)		Number of Homes for Sale (February 2016)
		Dollars	**Percentage**	
Urban County				
Brentwood	$490,000	$11,000	2%	164
Clayton	$575,000	-$88,250	-13%	32
Danville	$1,100,000	$130,000	13%	154
El Cerrito	$750,000	$102,000	16%	50
Hercules	$485,000	$60,000	14%	65
Lafayette	$1,370,750	$143.250	12%	58
Martinez	$499,500	$29,500	6%	113
Moraga	$1,050,000	$120,000	13%	24
Oakley	$385,000	$35,000	10%	125
Orinda	$1,180,000	-$49,000	-4%	33
Pinole	$430,000	$60,000	16%	46
Pleasant Hill	$621,000	$87,000	16%	99
San Pablo	$314,000	$34,000	12%	66
San Ramon	$832,500	$39,250	5%	177
Entitlement Jurisdictions				
Antioch	$348,500	$47,000	16%	343
Concord	$440,000	$20,000	5%	355
Pittsburg	$345,000	$50,000	17%	122
Richmond	$367,750	$44,000	14%	277
Walnut Creek	$682,500	$71,500	12%	241

Source: Trulia.com, Accessed March 17, 2016

Table 26

Median Rental Listings

Jurisdiction	Median Rent
East	
Antioch	$1,213
Bay Point	$1,047
Pittsburg	$1,197
Central	
Concord	$1,218
Lafayette	$1,598
Martinez	$1,345
Pleasant Hill	$1,448
San Ramon	$1,678
Walnut Creek	$1,442
West	
El Cerrito	$1,380
El Sobrante	$1,152
Pinole	$1,292
Richmond	$1,099
San Pablo	$989
Contra Costa County	**$1,289**

Table 27

Fair Market Rents (Fmr), 2014

Unit Size	FMR	Annual Income to Afford
Studio	$1,039	$41,560
1-bedroom	$1,260	$50,400
2-bedroom	$1,585	$63,400
3-bedoom	$2,213	$88,520
4-bedroom	$2,716	$108,640

Source: U.S. Dept. Housing and Urban Development, 2015 FMR;

Housing Affordability by Tenure and Household Type

The assessment of Contra Costa County's housing needs relies on custom tabulations of U.S. ACS by HUD. These tabulations are referred to as the "CHAS" tables obtained using HUD's "State of the Cities Data System" (SOCDS). These data are presented in two main tables, one presenting "housing problems" by households and the other presenting "affordability mismatch" by housing units. **Tables 28 and 29** provide a summary, and the full tables can be found in **Appendix 3**. The needs of renter and owner households are examined separately.

The CHAS housing problems table presents the number of households paying more than 30 percent and 50 percent of gross income for housing by tenure, household type, and income category. This cost of housing as a percentage of gross income is referred to as the housing "cost burden." According to HUD, a household which has a housing cost burden over 30 percent has a "high" housing cost burden. Those with a cost burden over 50 percent have a "severe" cost burden.

Overpayment is a concern for low-income households since they may be forced to live in overcrowded situations or cut other necessary expenditures, such as health care, in order to afford housing. The HUD definition of housing cost includes not only monthly rent and mortgage payments but an estimate of utilities.

<u>Renter Households</u>

<u>Household Type</u>

Overall, approximately 45 percent of renter households in the County have a high cost burden. Less than 25 percent have a severe cost burden. This is roughly consistent in all jurisdictions.

Elderly one- and two-person renter households tend to experience a higher degree of high cost burden (56.3 percent) and severe cost burden (27.6 percent) countywide. Concord has the highest degree of cost burdened elderly renters with a high cost burden of 70.1 percent and

severe cost burden of 38.1 percent. Both Walnut Creek and Richmond have a lower number experiencing severe cost burden (24.6 percent and 24.4 percent, respectively).

Large renter households (five or more persons) experience cost burdens at a higher rate than all renter households, with 51.5 percent of large families facing a high cost burden and 28.9 percent with severe cost burden.

Income Groups

Low-income renter households in the County (>50 to ≤80 percent area median income [AMI]) experience a high cost burden at a rate of 57.4 percent. The severe cost burden is significantly lower (11.2 percent). Comparatively, 71.7 percent of very low-income (>30 percent to ≤50 percent AMI) and 69.4 percent of extremely low-income renter households (≤30 percent AMI) have a high cost burden. 40 percent of the very low-income population is severely cost burdened, and percent of the extremely low-income population that is severely cost burdened (59.7 percent) is nearly three times the rate of all renters countywide. The rate of high cost burden for renter households with incomes above low income (>80 percent AMI) is 16 percent.

Cost burden rates among the income groups in Concord tend to be slightly better than the County as a whole. The three populations in which Concord does not have better rates are Very Low-Income High Cost Burden, Very Low-Income Severe Cost Burden, and Extremely Low-Income High Cost Burden. In these groups, however, the variation from the County is very small and within a margin of error.

Antioch is similar to the County as a whole with the exception of a higher rate of high cost burden for very low-income (76.1 percent).

Pittsburg is very close to the County as a whole, except for one segment in which Pittsburg has a significantly lower cost burden. The rate of Very Low-Income households who are severely cost burdened is 33 percent, approximately 7 percent lower than the County as a whole.

Richmond has much lower rates of cost burden for lower-income renter households across all income categories except in the category of extremely low-income: 57.6 percent high cost burden and 27.4 percent severe cost burden for very low-income; 49.3 percent high and 4.2 percent severe for low-income. Out of the eight cost burden and income categories Richmond has the lowest rate in five of them.

Although the cost burden for extremely low-income households is consistently high across the County as a whole, Walnut Creek stands out with a rate of 74 percent high cost burden and 64 percent severe cost burden for extremely low-income households. It is also higher for cost burden rates in the categories of very low-income households (77.5 percent high, 48.3 percent severe) and low-income households (70.8 percent and 12.8 percent). Out of the eight cost burden and income categories, Walnut Creek has the highest cost burden in seven of them as compared to the other jurisdictions and the County as a whole.

Owner Households

Household Type

Over one-third (38.5 percent) of owner households in the County have a high cost burden. Approximately 15 percent have a severe cost burden. This is generally consistent across all jurisdictions.

Elderly one- and two-person owner households tend to experience a slightly lower degree of cost burden (28.7 percent high and 12.9 percent severe) countywide.

At the County level, large owner households (five or more persons) and small related households (two to four persons) experience a cost burden at a slightly higher rate compared to all owner households. Concord has a lower rate of severe cost burden for large owner households (10.2 percent) than other jurisdictions.

Income Groups

Low-income owner households (>50 to ≤80 percent AMI) experience a high cost burden at a higher rate (55.9 percent) than do all households countywide. The severe cost burden is twice as high for low-income owners (31.6 percent) as for all owners. Very low-income owners (>30 percent to ≤50 percent AMI) experience high and severe cost burdens much higher than the general population (61.2 percent and 42.5 percent). Extremely low-income households (≤30 percent AMI) are even more cost burdened (75.1 percent high, 63.6 percent severe). The rate of cost burden for owner households with incomes above low income (>80 percent AMI) is lower than the overall population (30.6 percent high, 6.8 percent severe).

The cost burdened population in Antioch is similar to the County as a whole. The one stand out is Antioch has a noticeably higher rate of severe cost burden among extremely low-income homeowners (72.8 percent).

Concord has a pattern similar to the County as a whole with the exception of extremely low-income households having a lower rate of severe cost burden (55.1 percent).

Pittsburg is also very similar to the County as a whole but it has a higher rate of high cost burden for very low-income households (72.5 percent).

Richmond has a generally lower rate of cost burden for owner households, particularly low-income severe cost burden (16.6 percent).

Walnut Creek has lower rates of cost burden for above low-income and low-income households than the County as a whole, but it has higher rates of cost burden for very low-income and extremely low-income households.

Table 28

Cost Burden Summary, Renters

Jurisdiction	All Renters		Elderly		Large		Above Low-Income		Low-Income		Very Low-Income		Extremely Low-Income	
	High	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**
Antioch	52.2%	28.6%	50.5%	30.9%	56.4%	25.6%	15.7%	0.0%	56.0%	7.8%	76.1%	41.4%	70.0%	59.5%
Concord	44.8%	23.6%	70.1%	38.1%	58.2%	26.2%	11.5%	0.9%	51.1%	3.3%	72.0%	42.8%	70.0%	59.1%
Pittsburg	48.8%	26.0%	56.8%	35.1%	66.3%	46.0%	15.5%	0.0%	56.1%	11.5%	68.7%	33.3%	66.8%	55.8%
Richmond	44.1%	24.3%	40.8%	24.6%	53.7%	27.0%	9.3%	0.0%	49.3%	4.2%	57.6%	27.4%	68.9%	59.0%
Walnut Creek	40.1%	18.7%	48.8%	24.4%	36.8%	15.8%	14.1%	1.0%	70.8%	12.8%	77.5%	48.3%	74.0%	64.0%
Countywide	45.3%	23.5%	56.3%	27.6%	51.5%	28.9%	16.2%	0.9%	57.4%	11.2%	71.7%	40.0%	69.4%	59.7%

Table 29

Cost Burden Summary, Owners

Jurisdiction	All Owners		Elderly		Large		Above Low-Income		Low-Income		Very Low-Income		Extremely Low-Income	
	High	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**	**High**	**Severe**
Antioch	43.2%	16.6%	25.9%	14.6%	54.4%	24.9%	34.2%	4.4%	59.4%	28.3%	58.0%	44.5%	78.7%	72.8%
Concord	38.8%	14.8%	26.8%	11.9%	40.2%	10.2%	30.2%	5.9%	58.1%	29.4%	56.0%	38.0%	74.7%	55.1%
Pittsburg	44.8%	18.4%	37.4%	19.9%	49.1%	23.7%	31.6%	3.7%	59.3%	30.6%	72.5%	42.5%	74.4%	66.7%
Richmond	37.7%	15.8%	17.9%	11.3%	45.5%	22.2%	29.2%	6.8%	46.7%	16.6%	56.7%	45.5%	65.9%	50.2%
Walnut Creek	34.6%	16.4%	26.7%	12.4%	34.5%	19.7%	24.3%	6.7%	49.5%	23.0%	73.3%	47.9%	81.2%	75.8%
Countywide	38.5%	15.7%	28.7%	12.9%	46.9%	18.9%	30.6%	6.8%	55.9%	31.6%	61.2%	42.5%	75.1%	63.6%

Overcrowding

Table 30 illustrates the share of households by person per room for owners and renters in the state and entitlement cities. Households with more than 1 person per room are considered overcrowded. Households with more than 1.5 persons per room are considered severely overcrowded. As shown in **Table 30**, renter-occupied households have a higher incidence of overcrowding than owner-occupied households. In both categories (owner and renter), Walnut Creek has the smallest share of overcrowded households.

Table 30

Persons Per Room

Jurisdiction	Owner Occupied			Renter Occupied		
	<1.0 persons	**1.01 to 1.5 persons**	**>1.5 persons**	**<1.0 persons**	**1.01 to 1.5 persons**	**>1.5 persons**
State of California	95.9%	3.1%	1.0%	86.7%	8.2%	5.0%
Contra Costa County (countywide)	98.0%	1.6%	0.4%	90.9%	6.9%	2.2%
Antioch	97.7%	1.7%	0.6%	90.6%	7.5%	1.9%
Concord	98.5%	1.2%	0.3%	87.7%	10.7%	1.6%
Pittsburg	94.7%	5.0%	0.3%	87.0%	10.3%	2.7%
Richmond	96.1%	2.6%	1.3%	85.6%	10.2%	0.5%
Walnut Creek	99.6%	0.4%	0.0%	96.5%	2.0%	1.5%

Source: 2009-2014 ACS 5-Year Estimates S2501

Foreclosures

Foreclosure is a term used to describe the procedure followed in enforcing a creditor's rights when a debt secured by any lien on property is in default. The Contra Costa County Recorder keeps an inventory of notices of defaults, notices of trustee sales, and trustee's deed upon sale (see definitions of each below). **Table 31** provides the number of homes with each status for the entire year. Please note that one housing unit may be counted more than once per year.

- Notice of Default: A written document that gives constructive notice of a trustor's failure to perform his/her obligation under a deed of trust. This document must be recorded.
- Notice of Trustee's Sale: A written document that sets forth the day, date, and time of the trustee's sale and describes the property to be sold. This document is prepared by the trustee and must be recorded with the county recorder in the county in which the property is located at least 14 days prior to the scheduled sale date.
- Trustee's Deed Upon Sale: A written document which is prepared and signed by the trustee when the secured property is sold at a trustee's sale. This document transfers ownership to the successful bidder at the sale and must be recorded with the county recorder in the county in which the property is located.

Table 31

Foreclosure Activity

Year	Total Notices of Defaults	Total Notices of Trustee Sales	Total Trustee's Deed Upon Sale
2015	1,959	1,508	643
2014	2,351	1,904	834
2013	3,077	3,070	1,444
2012	7,842	7,518	3,874
2011	11,021	10,935	6,839
2010	13,226	13,496	7,565
2009	18,323	14,623	8,360
2008	17,714	14,932	11,679
2007	11,837	6,666	4,189
2006	4,380	1,479	502
2005	2,519	777	131
2004	2,413	864	163
2003	2,713	1,020	205
2002	2,815	1,076	190
2001	2,351	881	209
2000	2,207	1,034	398

One of the most significant increases in demand for a range of services has come as a result of low-income tenants being evicted from their homes because the property owner has been

foreclosed upon. Most often the tenants are unaware that the foreclosure is under way and find themselves without housing. Due to the costs of moving, security deposit requirements, and the rent qualification process, they find it difficult or impossible to find new housing, particularly if they have experienced a job loss and have little or no income to qualify for a new rental and little in the way of savings. Seniors, disabled persons, and large families are especially adversely impacted when evicted. There is little legal recourse for tenants who are evicted as a result of foreclosures.[4]

[4] Bay Area Legal Aid, Contra Costa County, September 17 and 18, 2009; Contra Costa Senior Legal Services, September 17 and 18, 2009; Loaves and Fishes of Contra Costa County, September 17 and 18, 2009.

V. Mortgage Lending (Home Mortgage Disclosure Act Data)

Lending Practices

An analysis of lending practices is possible through an examination of data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and Metropolitan Statistical Area (MSA)); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more MSAs, and originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: is a federally insured or regulated institution; originates a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originates a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if:

their value of home purchase or refinancing loans exceeds 10 percent or more of their total loan originations or equals or exceeds $25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding $10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic operates in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the Federal Financial Institutions Examination Council (FFIEC), "with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups." Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower- related factors and the lender, "is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending." The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for Contra Costa County, summarizing 2014 HMDA data (the most recent year for which data are available), and data between 2007 and 2014 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the

HMDA reporting process.

2014 County Overview

In 2014, there were just over 55,000 applications for loans to purchase, refinance or make improvements to single family homes in Contra Costa County. Of those applications, over 30,500 or 55 percent were approved and originated. Of the remaining 24,500 applications, approximately 7,750 or 14 perfect of all applications were denied for reasons identified below. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, this analysis refers to the primary reason for the denial of each loan. The balance of the 16,750 applications that were neither originated nor denied were closed for one reason or another including, a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower, or c) in many instances the application may have been withdrawn by the applicant.

Table 32

Disposition Of Application By Loan Type And Purpose, 2014

Single Family Homes (Excluding Manufactured Homes)

	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	14,609	28,891	2,458
	FHA	4,508	1,656	157
	VA	1,132	1,575	61
	FSA/RHS	29	3	0
Loans Originated				
	Conventional	9,340	15,464	1257
	FHA	2,386	614	58
	VA	641	757	39
	FSA/RHS	10	0	0
Loans Approved but not accepted				
	Conventional	613	816	87
	FHA	156	44	8
	VA	41	48	4
	FSA/RHS	1	1	0
Applications Denied				
	Conventional	1,298	4,597	666
	FHA	420	384	33
	VA	91	253	6
	FSA/RHS	6	1	0
Applications Withdrawn				
	Conventional	1,266	3,500	187
	FHA	353	281	29
	VA	89	222	6
	FSA/RHS	4	0	0
Files Closed for Incompleteness				
	Conventional	267	1,382	86
	FHA	76	91	18
	VA	15	107	0
	FSA/RHS	2	1	0

Source: 2014 HMDA

Of the home purchase loans for single-family homes that were originated in 2014, (12,377 loans originated or just over 40 percent of the County's total) approximately 75 percent of these originations were provided by conventional lenders. The remaining 25 percent were provided by federally-backed sources including the Federal Housing Administratioin (FHA), Department of Veterans Affairs (VA) and Farm Service Agency/Rural Housing Service (FSA/RHS). The VA and RHS lenders had an application/approval ratio of 52 percent and 31 percent respectively. Conventional lenders originated home purchase loans at a rate of 57 percent of all applications while 48 percent of the FHA home purchase loan applications resulted in origination.

A further examination of the 7,755 denials indicates that just over 5,200 or 68 percent of all denials were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was debt-to-income ratio (29 percent of refinance denials) followed by credit history (21 percent of refinance denials). Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and therefore refinancing is not an option – these homes are commonly referred to as "under-water" or the borrowers are "upside-down" in their mortgage.

Home Purchase Applications and Race/Ethnicity

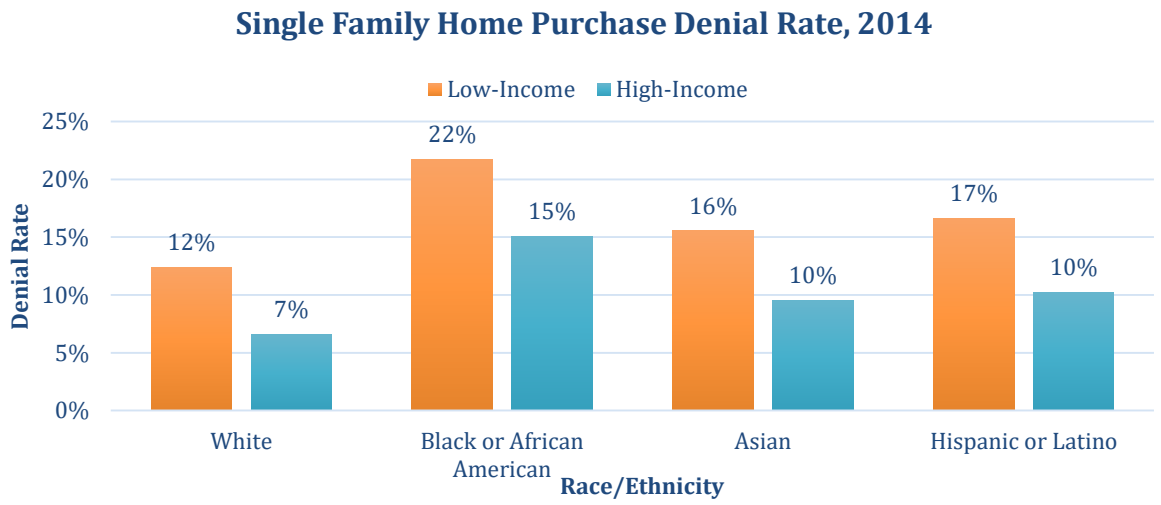
The denial rate for traditional home purchase loans for one-to-four family housing in the County varies significantly among Whites, Blacks, and Hispanics. In 2014, Blacks were more than twice as likely to be denied for conventional single-family home purchases as Whites, with respective denial rates of 18 percent and 8 percent. Hispanics and Asians were denied at a rate that falls between the other two groups, at 14 percent and 11 percent, respectively.

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Contra Costa County, shown below, demonstrates that high-income Blacks (having

greater than 120 percent of Area Median Income) were more likely to be denied for a single-family home purchase, at 15 percent, than low-income Whites (having 80 percent or less of Area Median Income), at 12 percent. Low-income Hispanics were denied at a rate of 17 percent, slightly higher than high-income Blacks. Additionally, high-income Hispanics and high-income Asians were denied at rates slightly below low-income Whites, at 10 percent. White applicants demonstrated the lowest disparity in denial rates between their low- and high-income applicants at 5 percent, compared to 7 percent for Blacks and Hispanics.

GRAPHIC 1

SINGLE FAMILY HOME PURCHASE DENIAL RATE, 2014



Upon a review of denial reasons for federally supported loan products, the most common reason for Black and Hispanic denials was credit history, at respective rates of 36 percent and 28 percent, while the top denial reason for Whites and Asians was debt-to-income ratio, at respective rates of 35 percent and 43 percent. Reviewing the denial reasons provided by conventional lenders shows that as of 2014 the top denial reason for Whites, Blacks, and Asians was debt-to-income ratio while for Hispanics it was credit history.

Table 33
Home Purchase (Single Family - Owner Occupied)

Denials By Race, Ethnicity, And By Reason

Home Purchase (Single Family - Owner Occupied) Denials by Race, Ethnicity, and by Reason			
	Primary Reason for Denial	**Percentage of Conventional Loan Denials**	**Percentage of Federally Supported Loan Denials**
Race			
Whites	Collateral	15%	11%
	Application Incomplete	13%	6%
	Credit History	14%	23%
	Debt to Income Ratio	27%	35%
	Employment History	2%	2%
	Insufficient Cash	7%	5%
	Mortgage Insurance Denied	0%	0%
	Unverifiable Information	7%	3%
	Other	16%	16%
African American/Black	Collateral	4%	18%
	Application Incomplete	7%	7%
	Credit History	30%	36%
	Debt to Income Ratio	34%	23%
	Employment History	2%	0%
	Insufficient Cash	5%	2%
	Mortgage Insurance Denied	0%	2%
	Unverifiable Information	0%	9%
	Other	18%	2%
Asian	Collateral	18%	9%
	Application Incomplete	12%	2%
	Credit History	13%	17%
	Debt to Income Ratio	31%	43%
	Employment History	3%	9%
	Insufficient Cash	7%	0%
	Mortgage Insurance Denied	0%	0%
	Unverifiable Information	8%	4%
	Other	8%	15%

Home Purchase (Single Family - Owner Occupied) Denials by Race, Ethnicity, and by Reason			
	Primary Reason for Denial	**Percentage of Conventional Loan Denials**	**Percentage of Federally Supported Loan Denials**
Ethnicity			
Hispanic or Latino	Collateral	24%	23%
	Application Incomplete	12%	9%
	Credit History	27%	28%
	Debt to Income Ratio	20%	20%
	Employment History	2%	5%
	Insufficient Cash	5%	4%
	Mortgage Insurance Denied	1%	0%
	Unverifiable Information	2%	3%
	Other	7%	7%
Source: 2014 HMDA			

Contra Costa County's Single Family Lending Market, 2007-2014

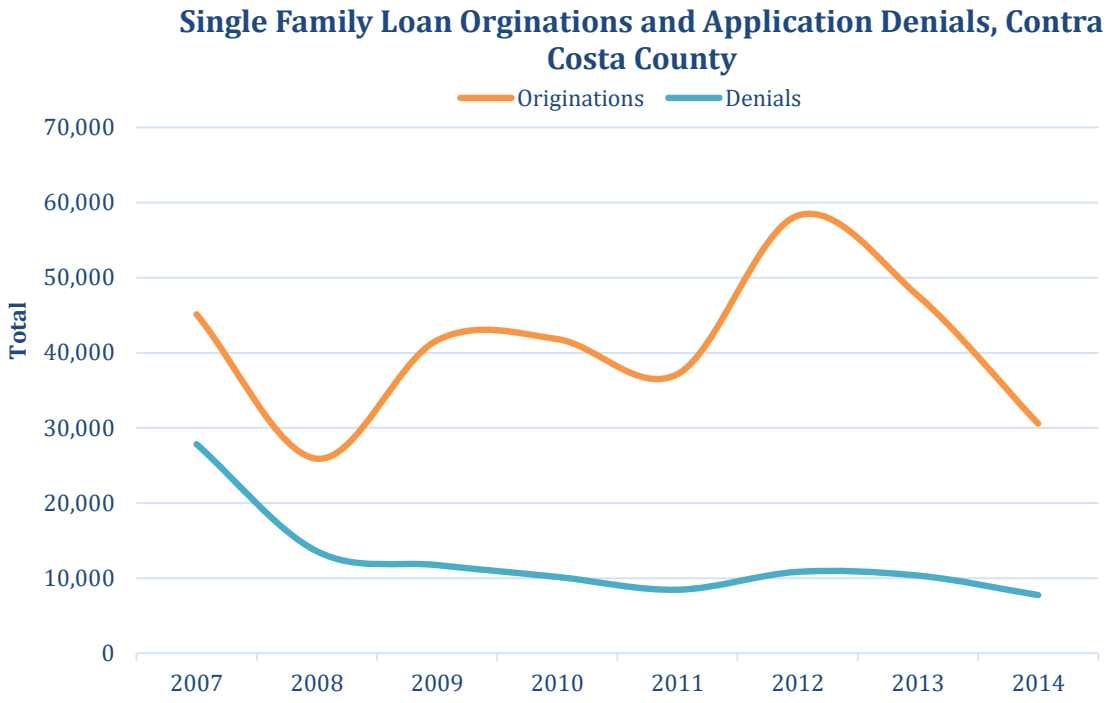
The following section will examine HMDA data over the time period 2007-2014 for single-family properties in Contra Costa County. Multifamily and manufactured housing properties have been excluded because on average between 2007 and 2014, these property types represented less than one half of one percent of the total applications submitted (applications) and total loans made (loan originations) within Contra Costa County.

Highlighted below, the trajectory of single-family loan originations within Contra Costa County between 2007 and 2014 did not exhibit a consistent trend, though between 2012 and 2014 the total number of originations trended steadily downward after a dramatic rise between 2011 and 2012. While the 2014 level of originations was 32 percent below that of 2007, originations in both 2012 and 2013 surpassed 2007 levels. In contrast to the inconsistency of originations, the number of denials demonstrated a relatively steadier

downward trend between 2007 and 2014, falling by 72 percent – more than twice the rate of originations. As a percent of the sum of originations and denials, the share of denials decreased substantially, falling from nearly 40 percent to just over 20 percent.

GRAPHIC 2

SINGLE FAMILY LOAN ORIGINATIONS AND APPLICATION DENIALS

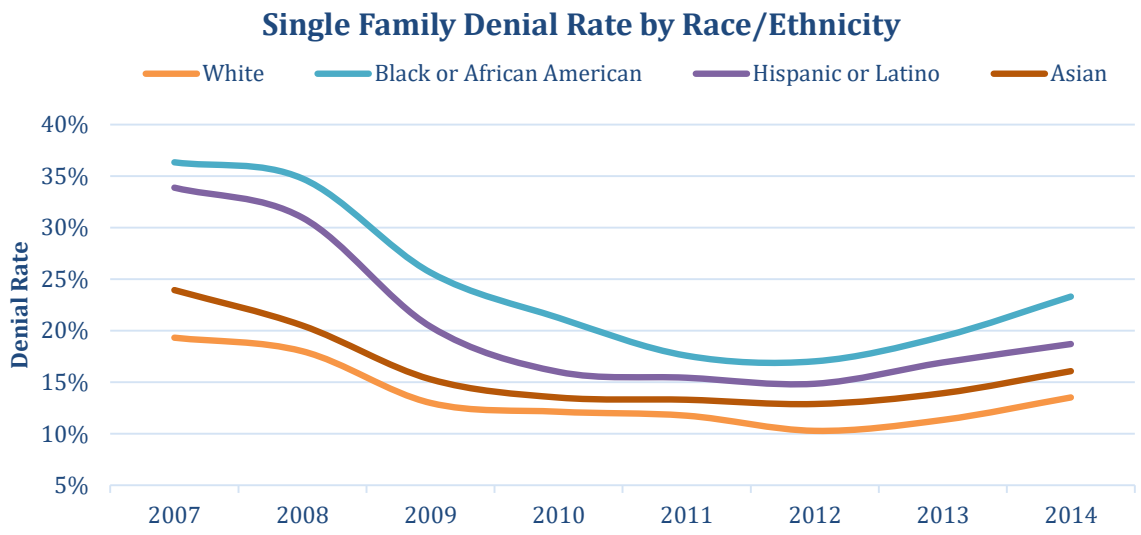


Income, Race, and Single Family Loan Denials Over Time

Denial rates for single-family loans in Contra Costa vary by race and ethnicity. The chart below shows that between 2007 and 2014, Blacks were consistently denied at the highest rate relative to the other groups, with Hispanics consistently denied at the second-highest rate. Though the spread between the denial rate of Blacks and Hispanics relative to Whites narrowed significantly between 2007 and 2011, a mild uptick occurred between 2012 and 2014.

GRAPHIC 3

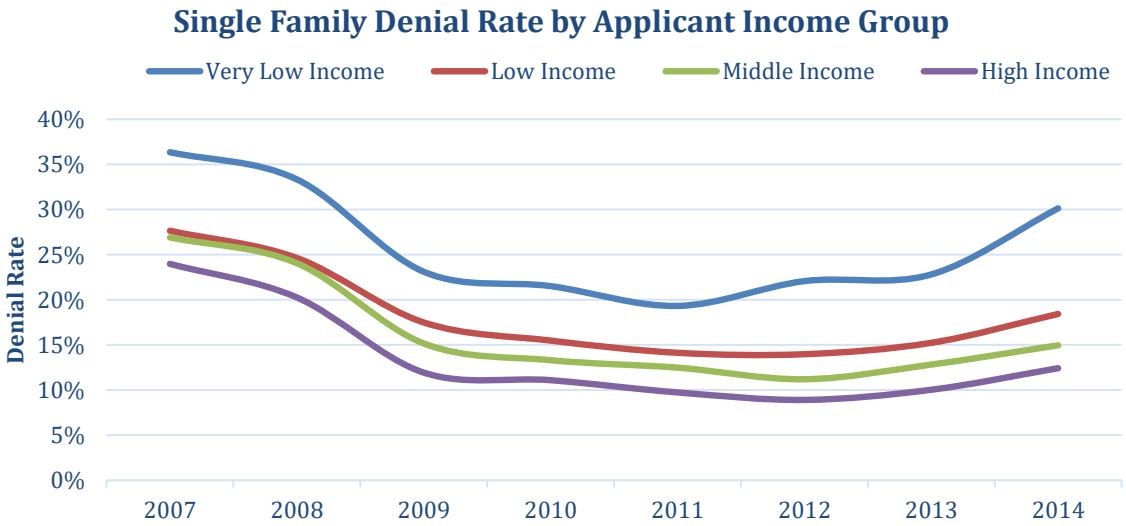
SINGLE FAMILY DENIAL RATE BY RACE/ETHNICITY



A view of single-family denial rates by applicant income group within Contra Costa County, highlighted below, shows the expected outcome that higher income groups have lower denial rates than lower income groups. Between 2007 and 2014, applicants in the Very Low-Income category (50 percent or less of Area Median Income), were consistently more likely to be denied for a single-family loan than any other income group. Low-Income applicants (between 50 percent and 80 percent of Area Median Income) were denied at the second highest rate, though remained closer to higher income groups between 2007 and 2014 relative to Very Low-Income applicants. Middle-Income applicants (80 to 120 percent of Area Median Income), in a manner similar to Low-Income and High-Income applicants, saw a relatively strong drop in denial rates between 2007 and 2012, from 27 percent to 11 percent, though the denial rate has since trended mildly upward to 15 percent as of 2014. The lowest denial rate in every year examined belonged to the High-Income group (greater than 120 percent of Area Median Income). Consistent with an overall countywide decline in the single-family denial rate, every income group's denial rate fell between 2007 and 2012, and between 2012 and 2014, the denial rates for every income group increased.

GRAPHIC 4

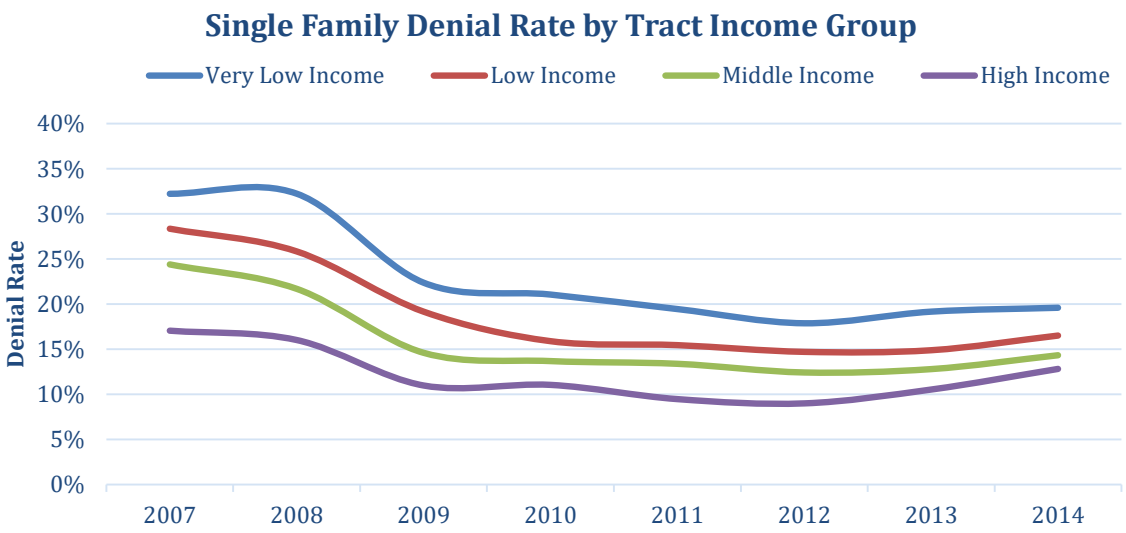
SINGLE FAMILY (SF) DENIAL RATE BY APPLICANT INCOME GROUP



A view of denial rates by income level of the property's Census tract (shown in the chart on the following page) reveals a similar trend, though Very Low-Income Census tracts have avoided the post-2011 denial rate increase that Very Low-Income applicants experienced.

GRAPHIC 5

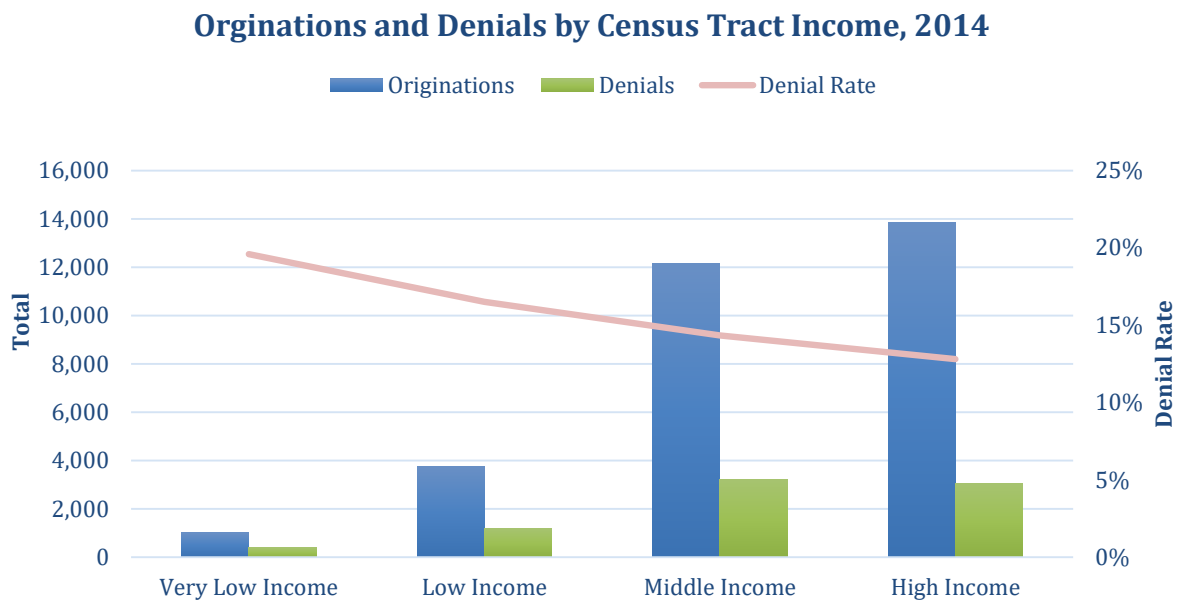
SINGLE FAMILY DENIAL RATE BY TRACT INCOME GROUP



Though Very Low-Income tracts represent nearly 10 percent of all Census tracts within Contra Costa County, they are represented by approximately 3 percent of total originations and 5 percent of total denials in the County as of 2014. Further, loans for single-family properties within these tracts were denied at a rate of 20 percent – higher than any other group. Loan originations within Contra Costa County are disproportionately likely to occur for properties in Middle- and High-Income tracts. Middle- and High-Income tracts represent 55 percent of the County total, but they account for 85 percent of all single-family loans originations throughout the County in 2014. Relatedly, Low- and Very Low-Income tracts represent 45 percent of all tracts, but account for roughly 16 percent of all single-family loan originations during the same year.

GRAPHIC 6

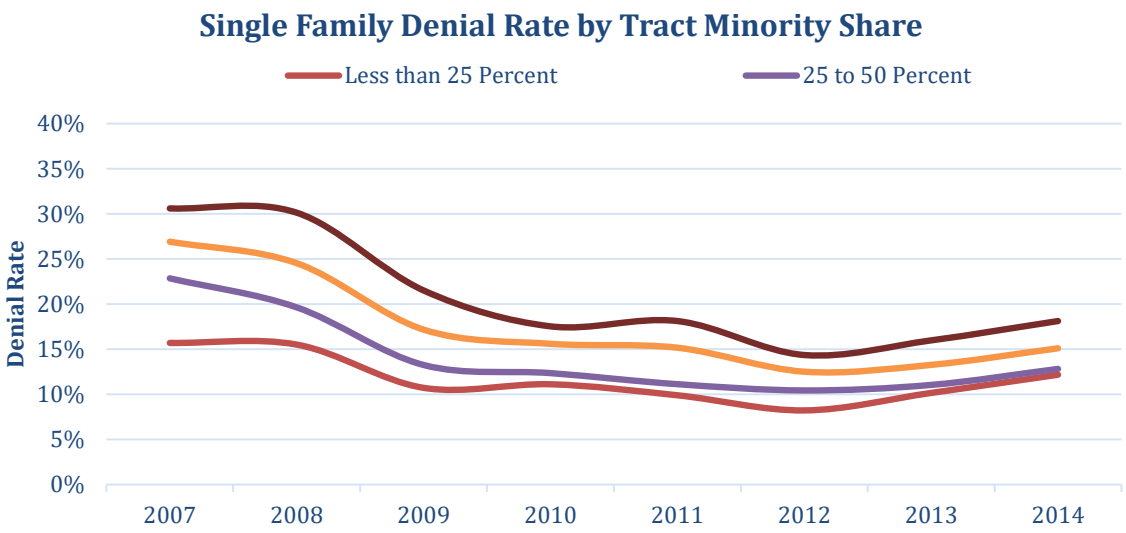
ORIGINATIONS AND DENIALS BY CENSUS TRACT INCOME, 2014



In addition to contrasting mortgage market outcomes by applicant and tract income, denial rates also differ depending on the share of minority residents in a housing unit's Census tract. Majority-minority tracts, and particularly those with a share greater than 75 percent, have experienced higher denial rates than majority-White tracts for all study years. Though denial rates for all share groups increased between 2012 and 2014, the gap between denial rates for the highest minority tracts (greater than 75 percent) and the lowest minority tracts (less than 25 percent) has decreased significantly since the onset of the economic downturn.

GRAPHIC 7

SINGLE FAMILY DENIAL RATE BY TRACT MINORITY SHARE

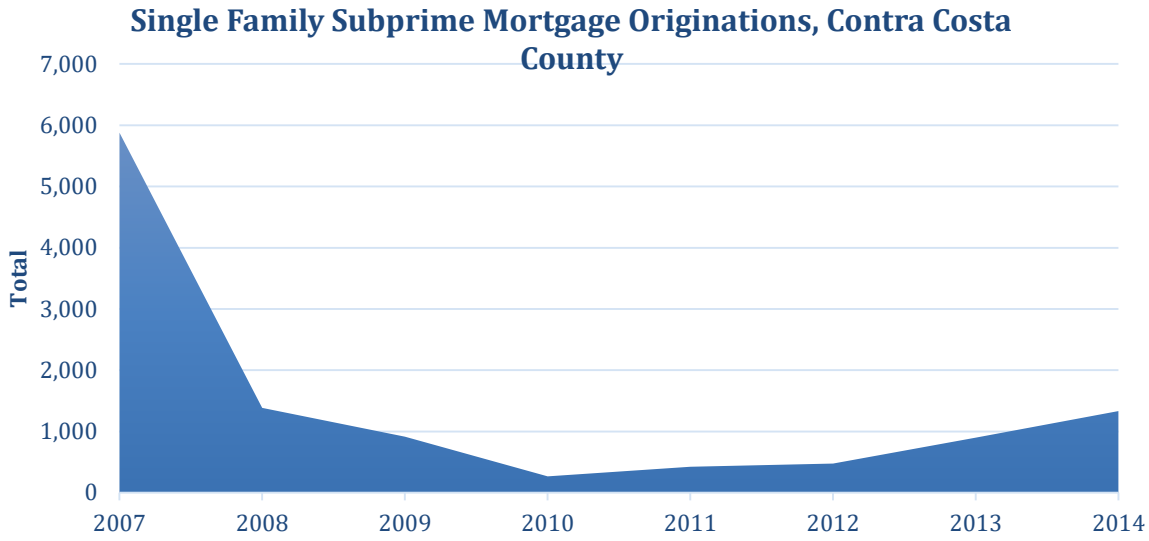


The Subprime Market in Contra Costa County

Illustrated below, the subprime mortgage market in Contra Costa County has declined significantly relative to 2007 levels, though it has gradually increased since bottoming out in 2010. The total number of subprime loan originations fell by nearly 80 percent between 2007 and 2014 – much higher than the total origination decline of 32 percent.

GRAPHIC 8

SINGLE FAMILY SUBPRIME MORTGAGE ORIGINATIONS

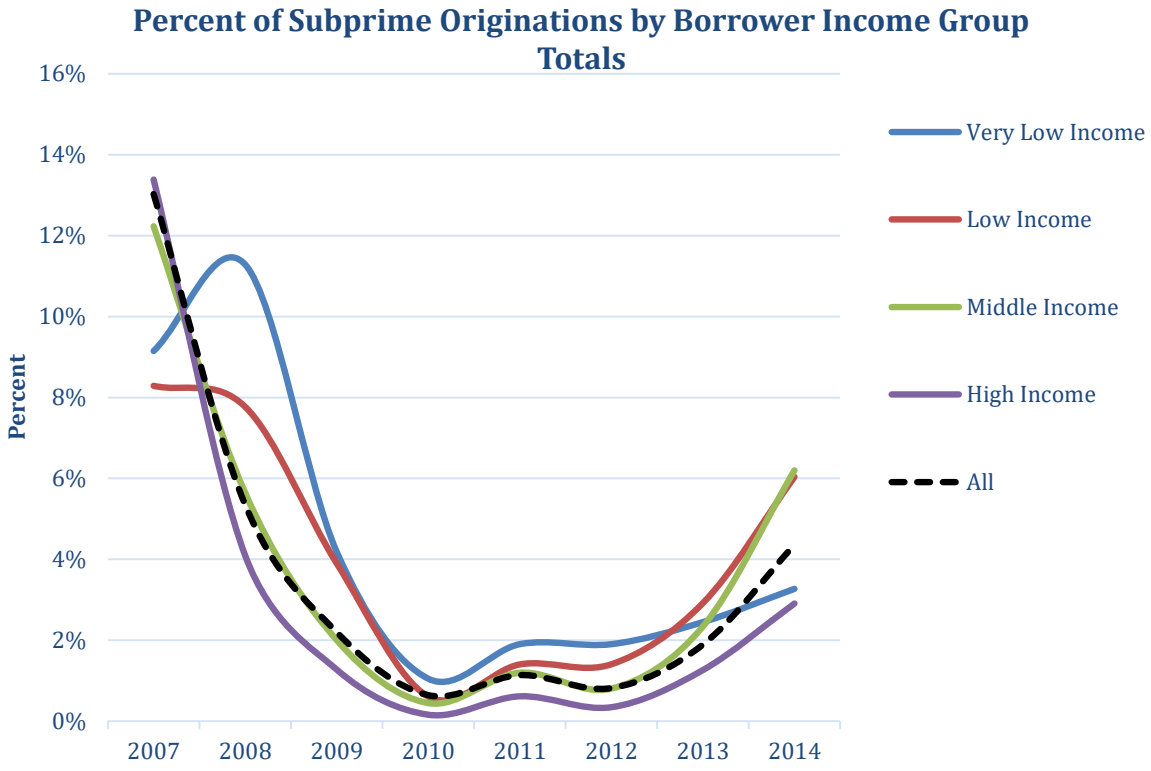


As a percentage of total single family-loan originations, Contra Costa County experienced a substantial decline between 2007 and 2010, falling from 13 percent to less than 1 percent. However, in recent years the subprime share has trended upward to 4.4 percent as of 2014. Subprime originations as a percent of borrower income group follow a similar pattern. While all income groups, and also the County as a whole, have demonstrated an upward trend in the share of subprime originations since 2012, they remain well below 2007 levels as of 2014 despite recent acceleration.

Subprime origination trends in Contra Costa County are consistent with the tightened credit conditions and heightened home lending standards that have taken place in the aftermath of the financial crisis and Great Recession.

GRAPHIC 9

PERCENT OF SUBPRIME ORIGINATIONS BY BORROWER INCOME GROUP TOTALS


Percent of Subprime Originations by Borrower Income Group Totals
16%
14%
12%
10%
8%
6%
4%
2%
0%
Percent
2007
2008
2009
2010
2011
2012
2013
2014
Very Low Income
Low Income
Middle Income
High Income
All

VI. Laws, Policies and Furthering Fair Housing

Overview of Federal Fair Housing Laws and Executive Orders

Both federal and state fair housing laws establish protected classes, govern the treatment of these individuals, and are designed to affirmatively further access to housing and community development resources to members of protected classes. This section provides an overview of these laws.

Title VI of the Civil Rights Act of 1964: Prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance.

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act) and as amended 1988: Prohibits discrimination in the sale, rental and financing of dwellings, and in other housing-related transactions, based on:

- Race;
- Color;
- National origin;
- Religion;
- Sex;
- Familial status (including children under the age of eighteen living with parents or legal custodians, pregnant women and people securing custody of children under the age of eighteen, or discrimination based on age); and
- Persons with physical, mental, and developmental disabilities.

Specifically, in the sale and rental of housing no one may take any of the following actions based on these protected classes:

- Refuse to rent or sell housing;
- Refuse to negotiate for housing;

- Make housing unavailable;
- Deny a dwelling;
- Set different terms, conditions, or privileges for sale or rental of a dwelling;
- Provide different housing services or facilities;
- Falsely deny that housing is available for inspection, sale, or rental;
- For profit, persuade owners to sell or rent (blockbusting);
- Deny anyone access to or membership in a facility or service (such as multiple listing service) related to the sale or rental of housing;
- Refuse to allow reasonable modifications to dwelling or common use areas, at the expense of the renter or owner, if necessary, for a person living with disabilities to use the housing; or
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the disabled person to use the housing

In Mortgage Lending: No one may take any of the following actions based on these protected classes:

- Refuse to make a mortgage loan;
- Refuse to provide information regarding loans;
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property;
- Refuse to purchase a loan; or
- Set different terms or conditions for purchasing a loan

In addition, it is illegal for anyone to:

- Threaten, coerce, intimidate, or interfere with anyone exercising a fair housing right or assisting others who exercise that right; or
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition

against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Section 504 of the Rehabilitation Act of 1973: Prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974: Prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs or activities receiving financial assistance from HUD's Community Development Block Grant Program. Sections 104(b) and 106 (d) (5) specifically require CDBG Program grantees to certify that they will affirmatively further fair housing. This requirement was also included in Section 105 (c) (13) of the National Affordable Housing Act of 1990.

Title II of the Americans with Disabilities Act of 1990: Prohibits discrimination based on disabilities, services, or activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals.

Architectural Barriers Act of 1968: Requires that buildings and facilities designed, constructed, altered or leased with certain federal funds after September 1969 must be accessible to, and usable by, handicapped persons.

Age Discrimination Act of 1975: Prohibits discrimination of basis of age in programs or activities receiving federal financial assistance.

Equal Credit Opportunity Act of 1974: Prohibits discrimination in lending based on race, color, religion, national origin, sex, marital states, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.

Community Reinvestment Act (CRA) of 1977: According to the Federal Office of the Comptroller of the Currency, the CRA provides a framework for financial institutions, state and local governments and community organizations to jointly promote banking services to all members of a community. The CRA:

- Prohibits redlining (denying or increasing the cost of banking to residents of racially defined neighborhoods); and
- Encourages efforts to meet the credit needs of all community members, including residents of low- and moderate-income neighborhoods.

The Community Reinvestment Act (CRA) provides that "regulated financial institutions have continuing and affirmative obligations to help meet the credit needs of the local communities in which they are chartered." CRA establishes federal regulatory procedures for monitoring the level of lending, investments and services in low- and moderate-income neighborhoods defined as underserved by lending institutions. CRA creates an obligation for depository institutions to serve the entire community from which its deposits are garnered, including low- and moderate-income neighborhoods.

Home Mortgage Disclosure Act (HMDA) of 1975: Requires banks, savings and loan associations and other financial institutions to publicly report detailed data on their home lending activity. Under HMDA, lenders are required to publicly disclose the number of loan applications by census tract, income, race and gender of the borrower, the type of loan and the number and dollar amount of loans made. Starting in 1993, independent mortgage companies were also required to report HMDA data. HMDA creates a significant and publicly available tool by which mortgage-lending activity in communities can be assessed. HMDA data can be analyzed to determine bank performance and borrower choices.

Executive Order 11063: Prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 12892 (as amended): Requires federal agencies to affirmatively further fair housing in their programs and activities and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, chaired by the Secretary of HUD.

Executive Order 12898: Requires each federal agency conduct its program, policies and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166: Eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217: Requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

Equal Access Rule (24 CFR 5.105(a)(2) and 5.106): Under 24 CFR 5.105(a)(2), the regulations provide protections for HUD-assisted or insured housing (including local housing programs funded with CDBG, HOME, etc. whether run by grantees or subrecipients) on the basis of gender identify, sexual orientation, and marital status and generally prohibits owners and program administrators from making inquiry about such characteristics. Further, 24 CFR 5.106 specifically requires providers to establish, amend, or maintain program admissions, occupancy, and operating policies and procedures (including policies and procedures to protect individuals' privacy and security), so that equal access is provided to individuals based on their gender identity. This requirement includes tenant selection and admission preferences. Such policies must ensure that an individual is placed, served, and accommodated in accordance with the

individual's gender identity and not subjected to intrusive questioning or asked to provide anatomical information or documentation to evidence the individual's gender.

Review of State Laws

The following is a list of California's statues, rules and plans that have or might have an impact on fair housing choice. This section provides an overview of these statutes, policies, and/or plans.

California Government Code section 12955 et seq - Fair Employment and Housing Act (FEHA): Prohibits all housing providers, including local governments, from discriminating in housing development and all actions related to the provision of housing based on:

- Age (40 and over)
- Ancestry
- Color
- Religious Creed
- Denial of Family and Medical Care Leave
- Disability (mental and physical) including HIV and AIDS
- Marital Status
- Medical Condition (cancer and genetic characteristics)
- Genetic Information
- National Origin
- Race
- Religion
- Sex (which includes pregnancy, childbirth and medical conditions related to pregnancy or childbirth)
- Gender, Gender Identity, and Gender Expression
- Sexual Orientation

Specifically, Government Code section 12955(l) prohibits discrimination through public or private land use practices, decisions and authorizations. Government Code section 12955.8

prohibits land use policies and practices that have a disproportionate impact on persons protected by the fair housing laws unless they are necessary to achieve an important purpose sufficiently compelling to override the discriminatory effect and there is not less restrictive means to achieve the purpose.

The FEHA also incorporates the **Unruh Act (Civil Code section 51)**, the **Ralph Act (Civil Code section 51.7)** and **Bane Act (Civil Code section 52.1)** as follows:

- The Unruh Civil Rights Act (California Civil Code section 51) provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.
- The Ralph Civil Rights Act (California Civil Code section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute (California Civil Code section 51.7). Hate violence can be: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage. providing civil and administrative remedies for those who are victims of this type of violence, or of violence directed against any particular class of persons. The Ralph Act provides that all persons have the right to be free from violence committed against themselves or their property because of their race, color, religion, ancestry, national origin, political affiliation, sex, sexual orientation, age, disability, position in a labor dispute, or because another person perceives them to have one or more of these characteristics.
- The Bane Civil Rights Act (California Civil Code section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference

by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing.

Government Code sections 11135, 65008, and 65580- 65589.8: Prohibit discrimination in programs funded by the State and in any land use decision as follows:
Government Code section 11135 - 11139.7: Provides protection from discrimination of protected classes from any program or activity that is conducted, funded directly by, or receives any financial assistance from the State. Specifically, whenever a state agency that administers a program or activity has reasonable cause to believe a contractor, grantee, or local agency has violated the provisions of Section 11135, or has adopted any regulation to implement such section, the head of the state agency shall notify the contractor, grantee, or local agency of such violation. If it is determined that a contractor, grantee, or local agency has violated the provisions of this article, the state agency that administers the program or activity involved shall take action to curtail state funding in whole or in part to such contractor, grantee, or local agency.

Welfare and Institutions Code sections 5115 and 5116 (The Lanterman Developmental Disabilities Services Act): Declares that mentally and physically disabled persons are entitled to live in normal residential surroundings and grants to each person in the State with a developmental disability a right to services and support in the "least restrictive environment."

In addition, the Act provides that the use of property for the care of six or fewer mentally disordered or otherwise handicapped persons is required by State law. Specifically, the act states a State authorized or certified family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use to be permitted in all residential zones.

Housing Accountability Act (Government Code section 65589.5): Prohibits a jurisdiction from disapproving a housing development project, including housing for farmworkers and for very low, low, or moderate-income households, or conditioning approval in a manner that renders

the project infeasible for development for the use of very low, low, or moderate-income households, including through the use of design review standards, unless it makes at least one of five specific written findings based on substantial evidence in the record (Government Code Section 65589.5).

Pursuant to the Housing Accountability Act, a local government is prohibited from making the finding regarding zoning and general plan inconsistency (Section 65589.5(d)(5)) to disapprove a development if the jurisdiction identified the site in its general plan (e.g., housing or land-use element) as appropriate for residential use at the density proposed or failed to identify adequate sites to accommodate its share of the regional housing need for all income groups.

Chapter 633, Statutes of 2007, extended these provisions to emergency shelters and transitional housing, and prohibits the use of the zoning and general plan inconsistency finding to disapprove an emergency shelter if the jurisdictions have:

- not identified a zone(s) where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit,
- not demonstrated the identified zone(s) include sufficient capacity to accommodate the need for emergency shelter, or
- not demonstrated the identified zone(s) can accommodate at least one emergency shelter.

This provision applies to any site identified in any element of the general plan for industrial, commercial, or multifamily residential uses. In any court action, the burden of proof is on the local jurisdiction to demonstrate its housing element satisfies the above requirements.

HUD Office of General Counsel Guidance

HUD Office of General Counsel Memorandum on Criminal History. In April 2016, HUD issued legal guidance from the Office of General Counsel (OGC) regarding the likely violation of the

Fair Housing Act when housing providers employ blanket policies in refusing to rent or renew a lease based on an individual's criminal history, because such policies may have a disparate impact on racial minorities.[18] The guidance states, "[b]ecause of widespread racial and ethnic disparities in the U.S. criminal justice system, criminal history-based restrictions on access to housing are likely disproportionately to burden African-Americans and Hispanics."

The guidance states that when a housing provider's seemingly neutral policy or practice has a discriminatory effect, such as restricting access to housing on the basis of criminal history, and has a disparate impact on individuals of a particular race, national origin, or other protected class, the policy or practice is unlawful under the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the housing provider, or if the interest could be served by another practice that has a less discriminatory effect.

The guidance states, "bald assertions based on generalization or stereotype that any individual with an arrest or conviction record poses a greater risk than those without such records are not sufficient." Landlords and property managers must be able to prove through reliable evidence that blanket policies actually assist in protecting residents and property.

The guidance also states that a housing provider with policies of excluding people because of a prior arrest without conviction cannot satisfy its burden of showing such a policy is necessary to achieve a "substantial, legitimate, nondiscriminatory interest," since an arrest is not a reliable basis upon which to assess the potential risk to residents or property. In instances when a person has been convicted, the policy must be applied on a case-by-case basis considering the nature and severity of the conviction, what the individual has done since conviction, and how long ago the conviction took place.

OGC Memorandum on Fair Housing Act Protections for Persons with Limited English Proficiency. In September 2016, HUD issued legal guidance discussing how the Fair Housing Act

applies to a housing provider's consideration of a person's Limited English Proficiency (LEP), or the person's limited ability to read, write, speak or understand English.

The memorandum clarifies that while people with limited English proficiency are not a protected class under the Fair Housing Act, the Fair Housing Act prohibits discrimination on seven protected bases, including national origin, which is closely linked to the ability to communicate proficiently in English. Housing providers are, therefore, prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination. The law also prohibits landlords from using limited English proficiency in a way that causes an unjustified discriminatory effect.

The guidance addresses how various legal approaches, such as discriminatory effects and disparate treatment, apply in Fair Housing Act cases in which a housing-related decision – such as a landlord's refusal to rent or renew a lease – involves a person's limited ability to speak, read, write, or understand English.

Discriminatory practices, for example, could include applying a language-related requirement to people of certain races or nationalities; posting advertisements that contain blanket statements, such as "all tenants must speak English;" or immediately turning away applicants who are not fluent in English. Targeting racial or national origin groups for scams related to housing also constitutes intentional discrimination.

A housing provider also violates the Fair Housing Act when the provider's policies or practices have an unjustified discriminatory effect, even when the provider had not intended to discriminate. Determining whether a practice has a discriminatory effect involves a three-step legal evaluation of the statistical evidence of a discriminatory effect; whether the housing provider's policy or practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest; and, if so, whether there is a less discriminatory alternative policy or practice.

OGC Memorandum on Application of Fair Housing Act Standards to the Enforcement of Local

Nuisance and Crime-Free Housing Ordinances Against Victims of Domestic Violence, Other Crime Victims, and Others Who Require Police or Emergency Services. In September 2016, HUD issued guidance to explain how the Fair Housing Act applies to ensure that the growing number of local nuisance ordinances and crime-free housing ordinances do not lead to discrimination in violation of the Act.

This memorandum's guidance focuses primarily on the impact these ordinances may have on domestic violence victims, but the Act and the standards apply equally to victims of other crimes and to those in need of emergency services who may be subjected to discrimination prohibited by the Act due to the operation of these ordinances. The guidance further addresses the obligation of HUD-funded recipients to consider the impacts of the ordinances in assessing how they will fulfill their affirmative obligation to further fair housing.

The memorandum describes that a growing number of local governments are enacting a variety of nuisance ordinances that can affect housing in potentially discriminatory ways. These ordinances often label various types of conduct associated with a property—whether the conduct is by a resident, guest or other person—a "nuisance" and require the landlord or homeowner to abate the nuisance under the threat of a variety of penalties. The conduct defined as a nuisance varies by ordinance and has ranged from conduct affecting the appearance of the property to general prohibitions related to the conduct of a tenant or guest. Nuisance ordinances have included what is characterized by the ordinance as an "excessive" number of calls for emergency police or ambulance services, typically defined as just a few calls within a specified period of time by a tenant, neighbor, or other third party, whether or not directly associated with the property.

In some jurisdictions, an incident of domestic violence is defined as a nuisance without regard to whether the resident is the victim or the perpetrator of the domestic violence. In other jurisdictions, incidents of domestic violence are not specifically defined as nuisances, but may still be categorized as such because the ordinance broadly defines nuisance activity as the violation of any federal, state or local law, or includes conduct such as disturbing the peace,

excessive noise, disorderly conduct, or calls for emergency services that exceed a specified number within a given timeframe. Even where ordinances expressly exclude victims of domestic violence or other crimes, victims are still frequently deemed to have committed nuisance conduct because police and other emergency service providers may not log the call as domestic violence, instead categorizing it incorrectly as property damage, disturbing the peace or another type of nuisance conduct.

The ordinances generally require housing providers either to abate the alleged nuisance or risk penalties, such as fines, loss of their rental permits, condemnation of their properties and, in some extreme instances, incarceration. Some ordinances may require the housing provider to evict the resident and his or her household after a specified number of alleged nuisance violations—often quite low—within a specific timeframe.

The memorandum explains that the Fair Housing Act prohibits both intentional housing discrimination and housing ordinances, policies or practices that have an unjustified discriminatory effect because of protected characteristics. While the Act does not prohibit local governments from appropriately considering nuisance or criminal conduct when enacting laws related to housing, governments should ensure that such ordinances and related policies or practices do not discriminate in violation of the Fair Housing Act.

Where the enforcement of a nuisance or crime-free ordinance penalizes individuals for use of emergency services or for being a victim of domestic violence or other crime, a local government bears the burden of proving that any discriminatory effect caused by such policy or practice is supported by a legally sufficient justification. Such a determination cannot be based on generalizations or stereotypes. Selective use of nuisance or criminal conduct as a pretext for unequal treatment of individuals based on protected characteristics violates the Act. The memorandum advises that repealing ordinances that deny access to housing by requiring or encouraging evictions or that create disparities in access to emergency services because of a protected characteristic is one step local governments can take to avoid Fair Housing Act violations and as part of a strategy to affirmatively further fair housing.

VII. Private Sector Analysis

This section discusses the efforts to determine and evaluate the practices of the private sector as they relate to fair housing choice, including the policies and practices of real estate agents, property managers, and mortgage lenders. Mortgage lending patterns are discussed in the preceding Section

Real Estate Sales Practices

In the State of California, to engage in the business of real estate sales, a broker or salesperson must be licensed by the Department of Real Estate (DRE). The DRE also enforces violations of California real estate law.

The real estate industry in California is highly professionalized. Almost all real estate brokers and salespersons are affiliated with a real estate trade association. The two largest are the California Association of Realtors (CAR), associated with the National Association of Realtors (NAR), and the California Association of Real Estate Brokers (CAREB), associated with the National Association of Real Estate Brokers (NAREB). Members of NAREB are licensed to use the professional designation "Realtist." The use of the term "Realtor" is restricted by NAR as a registered trademark.

NAR has a professional code of conduct which specifically prohibits unequal treatment in professional services or employment practices on the basis of, "race, color, religion, sex, handicap, familial status, or national origin" (Article 10, NAR Code of Ethics). Both prohibit members from promulgating deed restrictions or covenants based on race.

Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex,

handicap, familial status, or national origin."

A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations upon Realtors and is also a firm statement of support for equal opportunity in housing. A Realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase, or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards procedures and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

The California Association of Realtors has many local associations. Contra Costa County is served by the Contra Costa Association of Realtors, the Bay East Association of Realtors, the Delta Association of Realtors, and the West Contra Costa Association of Realtors.

CAR offers continuous online courses dealing with fair housing requirements and issues. According to the course description, the course will provide an overview of the federal fair housing laws and an in-depth discussion of the individual laws and their application to the practice of real estate. The course also provides CAR members with a study of the State of California fair housing laws and regulations. The course emphasizes anti-discriminatory conduct which all licensees should practice and concludes by discussing the voluntary affirmative action marketing program and why promoting fair housing laws is a positive force at work in California and throughout the nation.

NAREB Realtists follow a strict code of ethics that states "any Realtist shall not discriminate against any person because of Race, Color, Religion, Sex, National Origin, Disability, Familial Status or Sexual Orientation" (Part I, Section 2, NAREB Code of Ethics):

- In the sale or rental of real property.

- In advertising the sale or rental of real property.
- In the financing of real property.
- In the provision of professional services.

Part I, Section 2 of the NAREB Code of Ethics continues to state that any "Realtist shall not be instrumental in establishing, reinforcing or extending any agreement or provision that restricts or limits the use or occupancy of real property to any person or group of persons on the basis of race, color, religion, sex, national origin, disability, familial status or sexual orientation."

Rental and Property Management

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who together manage more than 1.5 million rental units.

CAA supports the spirit and intent of all local, state, and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. Members of the California Apartment Association agree to abide by the following provisions of their Code for Equal Housing Opportunity:

- We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;
- We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;

- We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and
- We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing. The CAA offers a Certificate in Residential Management (CRM), which includes a course on fair housing law. In addition, the CAA website provides links to the Fair Housing Institute and Fair Housing Network. CAA has a local association with offices in Pleasant Hill. The CAA of Contra Costa /Napa/Solano serves Contra Costa County, Napa, and Solano counties. Rental and Property Management

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Public Outreach

Public Survey

The Consortium conducted two online public surveys to gather input about fair housing in Contra Costa County from the public and interest groups. There were two target groups for the surveys: non-profit and government stakeholder groups with an interest in fair housing, and residents of the County.

Stakeholder Interviews

Stakeholders were engaged through targeted interviews to explore topics that were not fully covered through other outreach or to clarify information gathered through other efforts. A list of individuals interviewed is included as Appendix 1.

A. Methodology

The survey questionnaires are included at Appendix 4. The first survey question asked respondents which of the two target groups they belong to, and then directed them to the proper questionnaire based on their response. The survey for County residents was also available in a Spanish-language version. Stakeholder respondents were asked to complete the survey from an organizational, and not personal, viewpoint, but were invited to complete the resident survey separately.

Survey participants were not required to answer most of the survey items. As a result, survey questions were answered by a varied number of respondents. While not preferable, not requiring a response to all items allowed the respondent to skip over sections of the survey that may not have been applicable and still respond to subsequent questions. The alternative option of requiring all questions was considered an invitation for respondents to quit the survey before their responses were recorded.

The surveys were administered electronically using Survey Monkey as a host platform from April 26, 2016 to June 2, 2016. The Consortium distributed the survey link to its stakeholders and requested that they pass it on to colleagues, partners, and the general public. A link to the survey was also posted online.

B. Results and Analysis

A total of 240 individuals accessed the survey and at least answered the required question about target group. The number of respondents by target group is shown in Table 34.

Table 34: Responses by Survey	
Survey	**No. Participants**
Resident, English	115
Resident, Spanish	40
Stakeholder	85
Total	**240**

Below is a detailed summary of the survey results. As mentioned above, the number of respondents for each survey item varied greatly. The population considered for each question is the number of respondents who replied to the item (i.e. percentages refer to the percentage that replied to the question, not the percentage of all who access the survey for that target group).

1. Resident Survey

A total of 155 individuals provided responses for the resident survey. Forty of these completed the Spanish-language version of the survey. Nearly half (47 percent) of respondents lived in Concord, the County's largest city. The remaining respondents were spread among the County's other communities. In many ways the demographic characteristics of the survey respondents were very disproportionate to the County as a whole (as reported in U.S. Census Bureau data).[5] The County is just over 50 percent female, for example, but 80 percent of survey respondents were female. While both survey respondents and County residents were 65 percent white, only 25 percent of County residents reported Hispanic/Latino heritage, compared to over half of survey respondents (54 percent). Twelve percent of respondents claimed to be disabled, higher than the 6 percent County-wide.

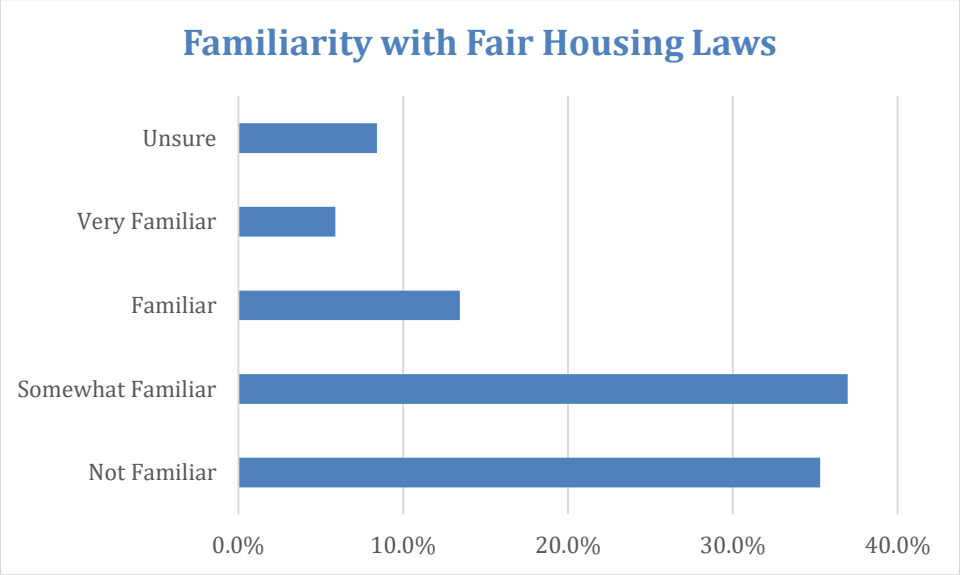
[5] Source: Census Bureau Quick Facts

Income and housing characteristics follow this trend as well. According to the Census Bureau, 65 percent of County housing units are owner occupied, but only 45 percent of survey respondents were homeowners. About half of respondents reported annual household income of below $46,750. In fact, of the income brackets offered, the one selected most was the lowest—29 percent of respondents reported annual household income less than $28,000. This is in stark contrast to the County-wide population, where the median household income was nearly $80,000 per year in 2014. Finally, 61 percent of survey respondents reported spending more than 30 percent of their income on housing.

The survey asked participants to provide insights about the conditions in their neighborhood and home. Respondents had a general positive feeling toward their own neighborhood. When asked to rate on a ten-point scale a number of neighborhoods characteristics (schools, parks, public safety, infrastructure, public transit, grocery stores, hospitals, and sense of community), a majority of respondents answered on the positive side of the scale for all characteristics. Schools received a particularly high rating, with 18 percent rating them as “10 or best,” the only characteristic where the most positive selection was chosen most often. These results were mirrored when respondents were asked to report the incidence of specific neighborhood issues in the previous two years. While 41 percent indicated an increase in crime and one-third a lack of upkeep of neighborhood homes, all other items were selected by less than a quarter of respondents. This same question format was used to ask about the incidence of specific issues in the home in the previous two years. More than a third indicated no experience with any of the issues, except for difficulty paying rent or mortgage (41 percent). Overall, survey respondent did not report many issues with their neighborhoods or homes.

GRAPHIC 10

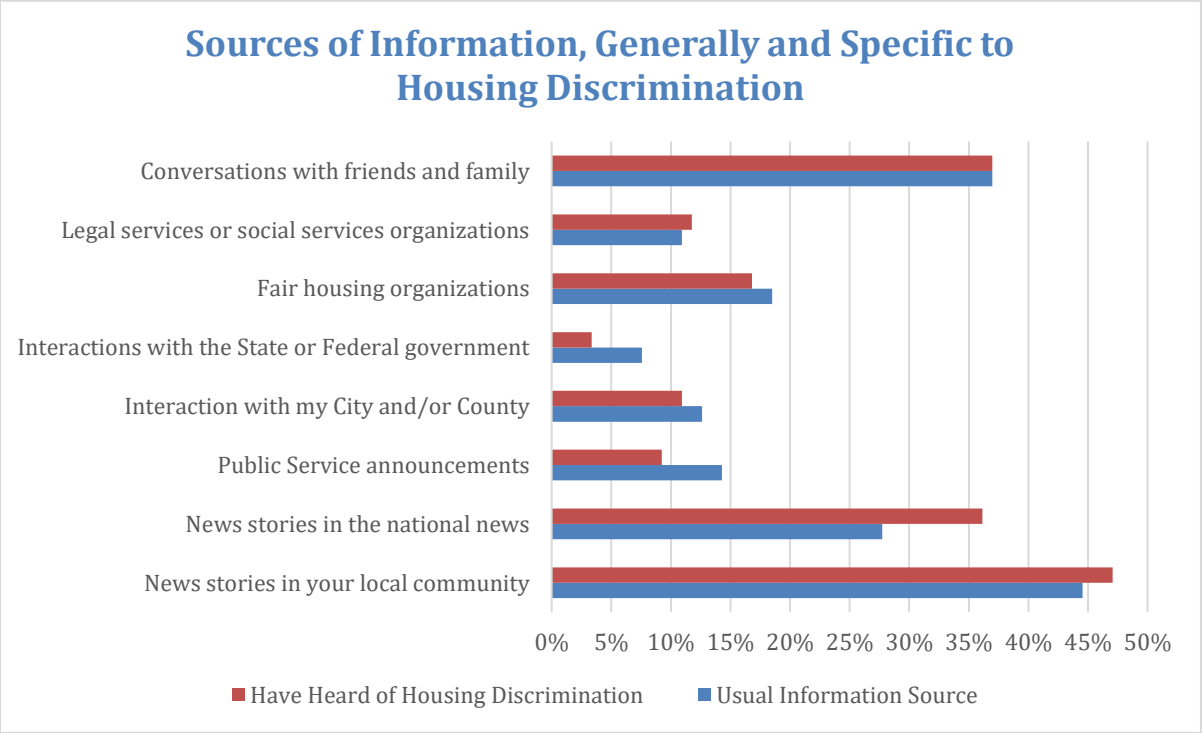
FAMILIARITY WITH FAIR HOUSING LAWS



Graphic 10 shows participant familiarity with fair housing laws, and only a small portion reported great knowledge of the subject. Over 70 percent of respondents reported no familiarity or only somewhat familiarity with the subject. Similarly, 34 percent indicated an awareness of their rights under the federal Fair Housing Act and related California state laws. Only 36 percent reported knowledge of the protections the law generally provides against housing discrimination, and 28 percent knew where to go for help if they experienced housing discrimination.

GRAPHIC 11

SOURCES OF INFORMATION, GENERALLY AND SPECIFIC TO HOUSING DISCRIMINATION



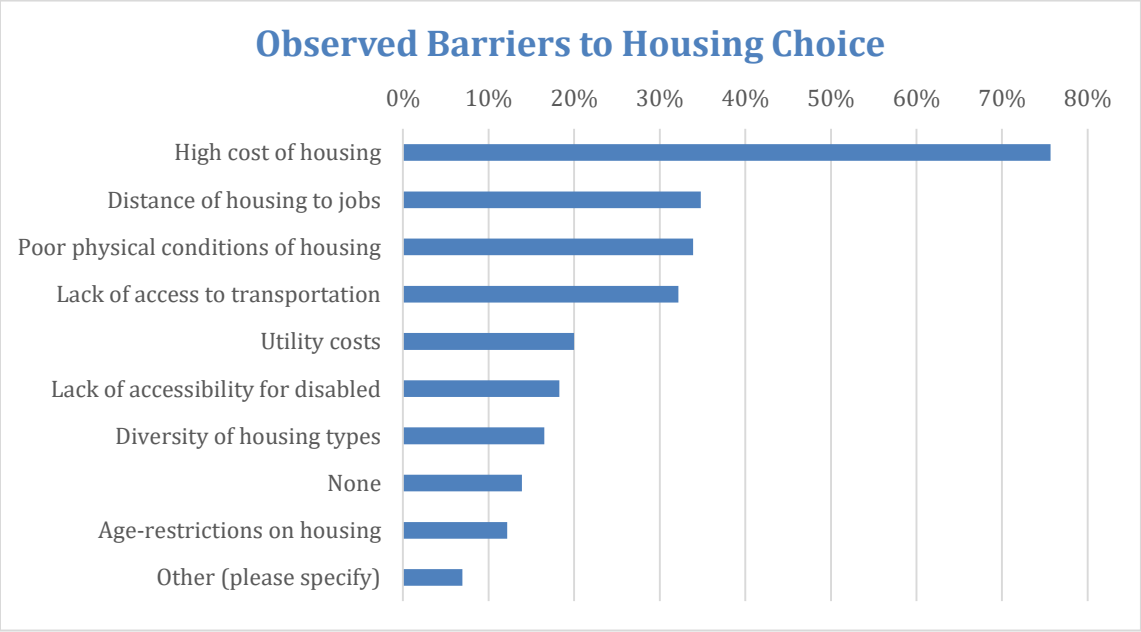
If a small portion of respondents are aware of fairing housing generally, where are they hearing about the subject? **Graphic 11** shows where respondents get information about laws and news generally, and where they have heard about housing discrimination.[6] In general, respondents reported getting information about fair housing from the same sources they get other news and information. News stories in local news media is the most common source of news generally and specific to fair housing, followed by conversations with friends and family. More respondents reported hearing of fair housing in national news stories than usually go to this source for information. However, less reported hearing of fair housing in PSAs and interactions with government than usually use these as a source of information. These may be areas were the Consortium can look to increase fair housing marketing.

[6] Note: the general information question included the option of internet research, but this option was not included in the question "where have you heard about housing discrimination?" so it was excluded from the chart.

One survey item listed barriers to housing choice and asked respondents to select those they have observed or experienced in their community. **Graphic 12** shows the results of this question. Over three-quarters (76 percent) of respondents observed or experienced high cost of housing as a barrier. The next highest selection was distance of housing to employment at 35 percent, followed by poor condition of available units (34 percent) and lack of access to public transportation (32 percent). Clearly cost of housing is the most obvious barrier to housing choice in the County.

GRAPHIC 12

OBSERVED BARRIERS TO HOUSING CHOICE



One third of survey participants reported observing housing discrimination in their community. In addition, 13 percent indicated a personal experience with housing discrimination. It is also noteworthy that 12 percent indicated they did not know if they had experience housing discrimination—it is possible that some victims of housing discrimination do not know enough about the issue to self-report. The leading reasons for experienced housing discrimination are race (cited in 44 percent of incidents), national origin (28 percent), and familial status (28

percent). Almost three-quarters (72 percent) of incidents occurred in rental housing by a landlord or property manager, and half occurred in multi-family apartment complexes (only a quarter in single family homes). This suggests that housing discrimination is occurring more often in larger developments. None of the respondents who had experienced housing discrimination had reported the incident to a government agency or fair housing group. When asked why they failed to report the discrimination, about a quarter selected each of the options: no knowledge of where to report, fear of retaliation, unsure of rights, and did not think it would make a difference. It is important to note that every respondent that chose "did not know where to report" completed the Spanish-language survey; there may be a need to market fair housing reporting options in the Spanish-language community.

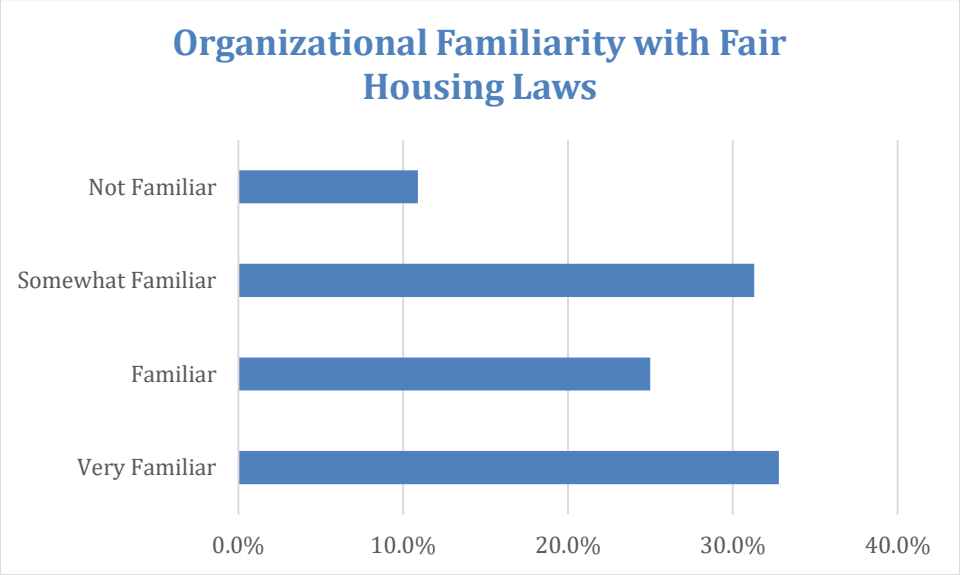
Finally, only 21 percent of respondents reported an awareness of fair housing trainings and workshops in their communities. Only 10 percent of respondents had participated in these opportunities in the past.

2. Stakeholder Survey

A total of 85 individuals accessed the stakeholder survey. However, no more than 65 answered any one survey question. The majority (58 percent) worked for non-profit organizations, and another 17 percent worked in local government. The remainder worked in a variety of other fields. Forty percent of respondents reported working in Concord, with another 14 percent in Martinez and 12 percent in Richmond.

GRAPHIC 13

ORGANIZATIONAL FAMILIARITY WITH FAIR HOUSING LAWS



Graphic 13 shows stakeholder respondent familiarity with fair housing laws. Only 11 percent of respondents claimed no familiarity with fair housing laws, while a full one-third said they were "very familiar" with laws on this subject.

The survey asked about the frequency of client-reported discrimination based on a variety of characteristics. For none of the characteristics did a majority of respondents claim that clients had responded discrimination. Over one-third of respondents noted mental disability (39 percent), physical disability (38 percent), and familial status (38 percent), while 31 percent mentioned race. For race, 11 percent (4 respondents) also claimed that they have received over 7 reports of incidents in the past year.

Several survey items asked about impediments to fair housing related to different topics. For every impediment related to services and opportunities, a majority of respondents reported the occurrence as "somewhat frequent" or "very frequent." The leading impediment was "insufficient information about housing availability" at 75 percent somewhat or very frequent occurrence, but the other impediments were not far behind: inadequate access to technology

(66 percent), inadequate info about fair housing rights (63 percent), inadequate access to employment (63 percent), inadequate access to transportation (59 percent), and inadequate access to public and social services (58 percent).

The results were similar with economic impediments to housing choice. Almost a three-quarters (72 percent) of respondents said an inability to secure subsidies for affordable housing developments occurred very frequently, and another 16 percent reported somewhat frequent occurrence. Next was lack of affordable housing developers at 69 percent and high cost of land at 66 percent. very or somewhat frequent occurrence. Despite these results, impediments related to the real estate market did not receive similar high reported frequency. It seems that stakeholders may find economic impediments to housing choice related to developing affordable housing, but not as much in the homebuyer market.

The survey also asked about impediments to housing choice related to government actions and policies. For the nine possible impediments offered, a majority indicate somewhat or very frequent occurrence for just two of them—lack of fair housing knowledge at the local level (62 percent very or somewhat frequent) and lack of designated officer to handle fair housing issues (53 percent). In addition, exactly half of respondents indicated local land-use controls and zoning prohibiting higher density housing very or somewhat frequently. But the other six impediments did not receive a majority of responses about higher frequency, in contrast to the other areas of impediments on the survey. This could be because the local government respondents and non-profit respondents with close ties to local government are not self-reporting issues related to their own organizations.

In a related item, participants were asked to evaluate the effectiveness of nine different government actions related to fair housing. In almost every case, a plurality of respondents indicated that the action was “somewhat effective.” Most of these items dealt with coordination and siting affordable housing near different services. However, in two cases the plurality chose “not at all effective”: increasing housing choice for HCV recipients (45 percent)

and allocating local funds for affordable housing (38 percent); the items related to increasing housing supply were deemed least effective.

Respondents offered their opinions on the effectiveness of other efforts to promote fair housing as well. When asked about fair housing marketing practices, however, a majority of respondents indicated uncertainty about the effectiveness or that it was not used in their area for all practices listed. The results were the same when asked to evaluate the effectiveness of educational outreach efforts related to fair housing. Clearly these efforts are not occurring or their use is not widespread in the County.

A majority of respondents (63 percent) reported having clients who have complained about being victims of housing discrimination. The leading reason for this discrimination were race in 47 percent of cases, national origin and familial status each in 37 percent of cases, and physical handicap and age each in 32 percent of cases.[7]

Lastly, asked about questionable practices in different housing markets and policy areas. The only area a plurality of respondents said they know of questionable practices was rental housing market. The leading response for all other areas (real estate market, lending market, minority populations serving on local boards, and other housing services) was “don’t know.”

[7] Respondents were allowed to select multiple reasons for the act of housing discrimination.

VIII. Government Barriers to Fair Housing

Public policies established at the state, regional, and local levels can affect housing development and, therefore, may have an impact on the range and location of housing choices available to residents. This section discusses the public policies enacted by jurisdictions within Contra Costa County and their potential impacts on housing development. Zoning and housing-related documents (e.g., housing elements, previous fair housing assessments, consolidated plans) were reviewed to identify potential impediments to fair housing choice and affordable housing development.

Housing Element Law and Compliance

California state housing element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community.

California state housing element law requires each jurisdiction to:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with the services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the city's regional housing needs.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.
- Conserve and improve the condition of the existing affordable housing stock.
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

Housing for Persons with Special Needs

Housing for Persons with Disabilities

Persons with special needs such as the elderly and those with disabilities must have access to housing in a community. Community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent these types of facilities from locating in a community may impede equal access to housing for the special needs groups.

Licensed Community Care Facilities

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116 of the California Welfare and Institutions Code) states that mentally and physically disabled persons are entitled to live in normal residential surroundings and that the use of property for the care of six or fewer disabled persons is a valid residential use for zoning purposes.

Housing element law requires that jurisdictions permit community care facilities with six or fewer persons by right in all residential zones. Group homes of seven or more residents, however, are often subject to special requirements. Current housing element law requires local governments to permit group homes of seven or more in at least one zone; a conditional use permit can be required.

There are many different types of licensed care facilities within the County. Below is a description of the different types of care facilities within these jurisdictions.

- Adult day care facilities (ADCF) provide programs for frail elderly and developmentally disabled and/or mentally disabled adults in a day care setting.
- Adult residential facilities (ARF) are facilities of any capacity that provide 24- hour nonmedical care for adults ages 18 through 59, who are unable to provide for their own daily needs. Adults may be physically handicapped, developmentally disabled, and/or mentally disabled.

- Group homes are facilities of any capacity and provide 24-hour nonmedical care and supervision to children in a structured environment.
- Residential care facilities for the elderly (RCFE) provide care, supervision, and assistance with daily living activities to persons 60 years of age and over and persons under 60 with compatible needs.
- Small family homes (SFH) provide care 24 hours a day in the licensee's family residence for six or fewer children who are mentally disabled, developmentally disabled, or physically handicapped and who require special care and supervision as a result of such disabilities.
- A social rehabilitation facility is any facility that provides 24-hour-a-day nonmedical care and supervision in a group setting to adults recovering from mental illnesses who temporarily need assistance, guidance, or counseling.
- The Transitional Housing Placement Program provides care and supervision for children at least 17 years of age participating in an independent living arrangement.

Reasonable Accommodation

Under state and federal law, local governments are required to "reasonably accommodate" housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but they are not required to fundamentally alter their zoning ordinance. Although most local governments are aware of state and federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction, disabled residents may be unintentionally displaced or discriminated against. All of the jurisdictions examined provide flexibility in development standards to reasonably accommodate the housing needs of residents with disabilities. The degree of formalization varies by jurisdiction.

Housing for the Homeless

Transitional and Supportive Housing

Transitional housing is defined by U.S. Department of Housing and Urban Development (HUD) as a project that is designed to provide housing and appropriate support services to homeless persons to facilitate movement to independent living within 24 months.

Permanent supportive housing is defined by HUD as long-term community-based housing and supportive services for homeless persons with disabilities. The intent of this type of supportive housing is to enable this special needs population to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or provided by other public or private service agencies. There is no definite length of stay.

California Senate Bill 2 requires that both the transitional and supportive housing types be treated as a residential use and be subject only to those restrictions that apply to other residential uses of the same type in the same zone. Both transitional and supportive housing types must be explicitly permitted in the zoning code.

California Senate Bill 2 also requires jurisdictions to allow emergency shelters without any discretionary action in at least one zone that is appropriate for permanent emergency shelters (i.e., with commercial uses compatible with residential or light industrial zones in transition).

The goal of SB 2 is to ensure that local governments are sharing the responsibility of providing opportunities for the development of emergency shelters. To that end, the legislation also requires that jurisdictions demonstrate site capacity in the zone identified to be appropriate for the development of emergency shelters. Within the identified zone, only objective development and management standards may be applied, given they are designed to encourage and facilitate the development of or conversion to an emergency shelter.

Building Code

Building codes are essential to preserve public health and safety and to ensure the construction of safe housing. On the other hand, excessive standards can constrain the development of housing. Building codes are typically reviewed on an ongoing basis to evaluate whether changes are necessary or desirable and consistent with changing state law.

A review of the building codes for local jurisdictions in the County was completed, and it was found that none of the building codes or amendments to the building codes create an undue constraint on housing development. Please see Appendix 5 for a description of the local building codes currently adopted.

Resources and Incentives for Affordable Housing

Local jurisdictions may provide resources and incentives for the development of affordable housing in order to assure the greatest possible availability of housing types for all persons and all income groups. Resources include local, state, and federal funding as well as local programs that provide incentives for the development of affordable housing. Please see Appendix 6 for a listing of the funding programs available.

Two of the most significant incentive programs are inclusionary housing and the so- called density bonus.

Inclusionary Housing

An inclusionary housing program requires a percentage of new residential housing units to be offered for sale or rent at prices affordable to lower-income households. In an effort to generate a mix of income levels within residential areas and to offer access to public and commercial services without regard to economic status and income level, the affordable units are expected to be dispersed throughout the development. The number of inclusionary units is determined as a percentage of the total units in the development. Developers may choose to

pay a fee or to provide a combination of fee and units in lieu of providing the units on-site. Fees collected are allocated to an Affordable Housing Trust Fund.

Density Bonus

Senate Bill 1818 (Hollingsworth, 2004) altered the state density bonus provisions. Effective January 1, 2005, SB 1818 increased the maximum bonus from 25 to 35 percent and changed the eligibility thresholds for projects. The bill also required localities to grant additional incentives and allowed bonuses for land donation. Under the new density bonus law, there are provisions for projects that include affordable housing (to low- and very low-income households), senior housing, donations of land, condominium conversions, and child-care facilities. The law also allows for concessions and incentives that have the effect of reducing the cost of development. A developer may apply for one to three concessions or incentives depending on how many affordable units are being constructed. Such concessions or incentives may include modification of or relief from development standards such as minimum parking requirements, minimum building setback and separation distances, maximum floor area ratios, architectural design requirements, or others.

IX. Findings, Impediments, and Recommendations

This AI broadly analyzes actions and conditions that may have the effect of restricting housing choice for people protected under State and Federal fair housing laws. The AI not only identifies impediments to fair housing choice, but also makes recommendations to overcome the effects of those impediments and will serve as the basis for fair housing planning, providing essential information to staff, policy makers, housing providers, lenders, and fair housing advocates, and assisting with garnering community support for fair housing efforts.

Findings

The study's principal findings are as follows:

Overall, approximately 45 percent of renter households in the County have a high cost burden. Less than 25 percent have a severe cost burden. This is roughly consistent in all jurisdictions except Antioch (high: 52.2%/ severe: 28.6%) and Pittsburg (high: 48.8%; severe: 26%). Elderly one - and two - person renter households tend to experience a higher degree of high cost burden (56.3 percent) and severe cost burden (27.6 percent) countywide. Concord has the highest percentage of cost-burdened elderly households with 70.1% having a high cost burden and 38.1% having a severe cost burden.

Over one - third (38.5 percent) of owner households in the County have a high cost burden. Approximately 15 percent have a severe cost burden. This is generally consistent across all jurisdictions except Pittsburg (high: 44.8%/ severe: 18.4%) and Antioch (high: 43.2%/ severe: 16.6%). Elderly one - and two - person owner households tend to experience a slightly lower degree of cost burden (28.7 percent high and 12.9 percent severe) countywide.

The above findings on cost burden are supported by survey responses from residents. Sixty-one percent of survey respondents reported spending more than 30% of their income on

housing. Over three-quarters (76%) of respondents observed or experienced high cost of housing as a barrier.

Higher income communities in the County tend to be in the central region, and lower income communities are more likely to be in the industrial and agricultural communities of the eastern, northern and western regions. The cities of San Pablo, Pittsburg and Richmond are notable for the level of poverty (over 17%) as compared to the rest of the County. San Pablo, Antioch, Pittsburg and Richmond are all notable for having a poverty level over 20% for persons under the age of 18 years.

When comparing the 2009 data to the 2014 data for Contra Costa County as a whole, due to the current economic condition the unemployment rate has increased dramatically from 7.2 percent in 2009 to 9.8 percent in 2014 – an increase of 36 percent. This increased unemployment rate is the trend for all but two jurisdictions in the County (Hercules and Pleasant Hill), with almost all jurisdictions seeing an increase in the unemployment rate. The jurisdiction that had the greatest increase in unemployment rate was Moraga (268 percent increase) going from 2.2 percent in 2009 to 8.1 percent in 2014.

In stakeholder interviews, numerous stakeholders reported that the lack of sufficient affordable housing supply and concentration of affordable housing remain relevant findings from the previous AI. Survey results support this finding in that 72% of stakeholder respondents said an inability to secure subsidies for affordable housing developments occurred very frequently, and another 16% reported somewhat frequent occurrence. Further, 75% said lack of information about housing availability is a very frequent or somewhat frequent impediment. Additionally, 41% of resident respondents indicated difficulty paying rent or mortgage (41%).

Overall, the 2014 data indicate that the County has a very low vacancy rate. With the exception of three communities, all communities in the Urban County have vacancy rates below 5 percent, which is extremely low. The three communities within the Urban County that have

vacancy rates above 5% are San Pablo (8.3%), Pinole (6.9%), and El Cerrita (5.2%). All entitlement jurisdictions have vacancy rates above 5% (Richmond 8.2%; Antioch- 7.7%; Walnut Creek-6.8%; Pittsburg- 6.2%; and Concord 5.8%;).

The denial rate for traditional home purchase loans for one - to - four family housing in the County varies significantly among Whites, Blacks, and Hispanics. In 2014, Blacks were more than twice as likely to be denied for conventional single-family home purchases as Whites, with respective denial rates of 18% and 8%. Hispanics and Asians were denied at a rate that falls between the other two groups, at 14% and 11%, respectively.

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Contra Costa County demonstrates that high-income Blacks (having greater than 120% of Area Median Income) were more likely to be denied for a single-family home purchase, at 15%, than low-income Whites (having 80% or less of Area Median Income), at 12%. In contrast, high-income Hispanics and high-income Asians were denied at rates slightly below low-income Whites, at 10%. White applicants demonstrated the lowest disparity in denial rates between their low- and high-income applicants at 5%, compared to 7% for Blacks and Hispanics.

Over 70% of respondents reported no familiarity or only somewhat familiarity with fair housing laws. Thirty-four percent indicated an awareness of their rights under the federal Fair Housing Act and related California state laws. Only 36% reported knowledge of the protections the law generally provides against housing discrimination, and 28% knew where to go for help if they experienced housing discrimination. Respondents reported that, to the extent they know about housing rights, they get information from community news stories and family/friends.

Twelve percent of resident survey respondents reported that they did not know if they had experience housing discrimination. It is possible that some victims of housing discrimination do not know enough about the issue to self-report.

Only 21% of resident respondents reported an awareness of fair housing trainings and workshops in their communities. Sixty-three percent of stakeholder survey respondents said that inadequate information about fair housing rights was a somewhat frequent or very frequent impediment to fair housing.

Disabled persons are especially impacted by the increase in evictions that resulted from property owners being foreclosed upon beginning in 2008 and 2009. There is little legal recourse for tenants who are evicted as a result of foreclosure. Disabled persons find it more difficult to find housing that can accommodate their needs than nondisabled persons and are more likely to fall into a low - income category, making it more difficult to find new housing that meets their needs and that they can afford.

Several jurisdictions studied have greater percentages of persons who are disabled than the County average of 10.4%, which is in line with the state average of 10.3%. These jurisdictions include Pinole (14.3%), Pittsburg (14.1%), Antioch (13.4%), Walnut Creek (12.3%), Pleasant Hill (12%), San Pablo (11.9%), and Concord (11.5%).

Stakeholders reported that a lack of formal policies and procedures regarding reasonable accommodation remains an issue, especially as applied to small rental property owners. They also noted that transitional and permanent supportive housing faces resistance throughout the County.

Among resident survey respondents, the leading reasons for experienced housing discrimination are race (cited in 44% of incidents), national origin (28%), and familial status (28%). Almost three-quarters (72%) of incidents occurred in rental housing by a landlord or property manager. However, among stakeholder survey respondents over one-third of respondents noted mental disability (39%), physical disability (38%), and familial status (38%), while 31% mentioned race.

Half of stakeholder respondents to the survey indicated that local land-use controls and zoning "very frequently" or "somewhat frequently" prohibit the development of multi-family housing.

Stakeholders that were interviewed indicated that local processes for building approvals can be complicated and discourage construction of affordable housing. Rather than having a system of building approvals "by right" where approvals can be obtained if all regulatory conditions are met, local governments sometimes require separate approvals for every aspect of the development process and stipulate public hearings that invite community opposition.

Impediments

6. **Education and public perception**. Inadequate information on fair housing issues and a lack of understanding about the potential extent of housing discrimination exists.

7. **Housing affordability**. The high cost of housing and extreme burden those costs place, particularly on renters, present a barrier to fair housing choice. Also, low vacancies and lack of affordable housing options contribute to these issues. Concentration of the limited affordable housing supply is also a fair housing concern.

8. **Home purchase loan denials**. Significant disparity between races and ethnicities in loan denial rates exists. Minorities are more likely to be denied loans than whites, even in high income categories.

9. **Disability and elder care issues**. Availability and access to housing for individuals with physical and mental disabilities is a rapidly emerging impediment to fair housing. Further, insufficient education and enforcement around issues of reasonable accommodations results in discrimination against individuals with disabilities.

10. **Local Building Approvals**. Lengthy, complex and extensive local review and approval processes discourage construction of affordable housing. Local governments sometimes require separate

approvals for every aspect of the development process and sometimes stipulate public hearings that invite community opposition, which can have the same effect as exclusionary zoning.

Recommendations

To address impediments identified in the study, the report offers a set of recommendations for consideration.

Recommendation # 1: Increase Public Awareness of Fair Housing Rights

The Contra Costa County Consortium could strengthen efforts to make the public aware of fair housing rights and further emphasize how reporting fair housing violations can have positive outcomes. This would include providing communities information on fair housing laws and policies, model zoning ordinances, and advice from other communities that have succeeded in overcoming regulatory impediments to fair housing choice.

Recommendation # 2: Improve and Better Utilize Financial Assistance for Housing

High housing costs and cost burdens to both buyers and renters can be reduced through financial assistance programs. The variety and volume of programs available to low/moderate-income persons is large. Realtors, lenders and rental property owners often do not know what is available and what the qualifications are for the various programs. All could benefit from more information on the availability of home financing and rental subsidy programs. In addition, federally supported programs could be better designed and targeted. Members of the Contra Costa County Consortium could provide more information and realign its housing finance policies to more directly confront housing affordability issues.

Recommendation # 3: Review Home Purchase Loan Denial Figures with Local Lenders

Significant disparity between races and ethnicities in loan denial rates exists. Minorities are more likely to be denied loans than whites, even in high income categories. The Contra Costa County Consortium should further research the extent of these issues and review this information with Fair Housing Organizations and local lenders. Both members of the

Consortium and the Fair Housing Organizations should report the disparate impact to lenders, encourage them to examine loan approval policies and procedures within that context and indicate what affirmative steps, as appropriate, that they might take to address this apparent issue. Members of the Consortium have some established networks such as the Home Equity Preservation Alliance and lists of preferred lenders that may be able to serve as a base for growing outreach on these issues.

Recommendation # 4: Increase Access to Special Needs Housing

The Contra Costa County Consortium should gather more information of this emerging impediment and determine the extent to which the available supply of supportive housing is limited particularly for individuals with physical and mental disabilities. Members of the Consortium should examine and develop more formal policies and procedures regarding reasonable accommodation and better inform landlords, especially small rental property owners. Promoting best practices for alternative types of special needs/elderly housing and considering policy changes may be in order. Shaping community attitudes as described in the first recommendation may also be necessary to confront this barrier.

Recommendation #5: Review Municipalities Planning Code and Offer Incentives

The Contra Costa County Consortium should encourage local governments to examine the review and approval processes that discourage construction of affordable housing with respect to elements that have the unintended consequence of impeding such development. As observed in the findings, local governments sometimes require separate approvals for every aspect of the development process and sometimes stipulate public hearings that invite community opposition, which can have the same effect as exclusionary zoning. Local building and zoning codes could be modified to simplify local processes for building approvals and more effectively encourage construction of affordable housing as well as special needs housing.

X. Fair Housing Action Plan

Based on the Analysis of Impediments to Fair Housing Choice, the Contra Costa Consortium (CCC) proposes specific goals and action aimed at overcoming barriers to fair housing choice and expanding public awareness of fair housing issues throughout Contra Costa County, CA. This plan contains long- and short -term goals. Its supporting actions are specific, measurable, attainable and realistic, and they correspond directly with impediments identified in the preceding section. Appropriate maps are available in the AI to support all recommendations.

The plan is informed by a report on the progress and the success of actions to affirmatively further fair housing taken by the County as well as accomplishments of other jurisdictions and organizations that address fair housing issues. As described in the body of the AI, the CCC has made significant progress in addressing impediments since the last AI was published in 2010. Data analysis, survey results, focus groups, and interview records indicate past barriers are being removed. There is increased investment in affordable housing and the creation of assistance programs for low income households, greater outreach to community partners working to address fair housing concerns, and progress on strengthening policies and local ordinances to protect rights and encourage best practices. Nonetheless, the following impediments remain and present barriers which this plan is designed to address:

- Inadequate information on fair housing issues and a lack of understanding about the potential extent of housing discrimination exists.
- The high cost of housing and extreme burden those costs place, particularly on renters, present a barrier to fair housing choice. Also, low vacancies and lack of affordable housing options contribute to these issues. Concentration of the limited affordable housing supply is also a fair housing concern.
- Significant disparity between races and ethnicities in loan denial rates exists. Minorities are more likely to be denied loans than whites, even in high income categories.

- Availability and access to housing for individuals with physical and mental disabilities is a rapidly emerging impediment to fair housing. Further, insufficient education and enforcement around issues of reasonable accommodations results in discrimination against individuals with disabilities.
- Lengthy, complex and extensive local review and approval processes discourage construction of affordable housing. Local governments sometimes require separate approvals for every aspect of the development process and sometimes stipulate public hearings that invite community opposition, which can have the same effect as exclusionary zoning.

A set of tables containing the specific goals and actions appear on the following pages.

Goal	Duration	Action Steps	Responsibility	Completion	Deliverable	Comments
Goal # 1: To Increase Public Awareness of Fair Housing Rights	Long-term					
		a) Contract with Fair Housing Services or consultant(s) to educate County residents, tenants, and owners and agents of rental properties regarding their fair housing rights and responsibilities	CCC Members	2017	Service contracts with each jurisdiction in County; assignments related to standardizing public information materials Countywide	Expect to renew contracts every fiscal year; plan joint semiannual meetings with fair housing providers
		b) Update existing guidance on fair housing rights to include recent changes in protected classes and equal access	Fair Housing Services	2017	Content for website and brochures with consistent message and inclusive delivery	Refer to HUD Resource Exchange for updated guidance and coordinate content production from County
		c) Promote and coordinate expansion of outreach to the community regarding fair housing rights	CCC Lead	2018	Campaign to highlight the single toll-free telephone number for fair housing services; strategies to jurisdictions and pre-prepared content for trade publications	Involve Home Builders, Realtors, Property Management Association, and small landlords
		d) Diversify form and content of outreach	Fair Housing Services	2019	Alternatives to traditional fair housing outreach that reach different populations or present a fresh way of sharing information; also, develop a LAP	Collect best practices and outcomes to share with grantees. (This will be ongoing and updates will be provided annually in CAPER.)

Goal	Duration	Action Steps	Responsibility	Completion	Deliverable	Comments
Goal # 2: To Improve and Better Utilize Financial Assistance for Housing	Short-term					
		a) Continue to support development of new affordable housing and preservation of existing affordable housing, which include the CDBG Program, HOME Program, and HOPWA Program	CCC Members	2017	Action Plan budget allocations maintained with minimum reduction; project selection criteria that relate to new State resources, e.g. Housing Trust Fund and Rapid Rehousing	Coordinate funding levels from within CCC and CCD Lead report performance in CAPER
		b) Publicize information about housing assistance programs, especially rental assistance with referral feature for available housing	CCC Lead	2017	Annual update/distribution of material; protocol to direct inquiries for affordable rental housing to County website list of subsidized rental housing; creation of "Apartment Finder"	Include information rental assistance programs; create list of realtors, brokers, banks, credit unions etc.
		c) Facilitate tenant/landlord dispute resolution or other dispute resolution services	Fair Housing Services	2017	Reduced evictions and greater lease renewals	Collect and monitor data on tenant rent increases; promote rights of protected classes and equal access
		d) Diversify information on the availability of home financing and rental subsidy programs	CCC Members	2018	Expanded multi-lingual services and outreach to special needs population and the organizations that serve these populations	Ensure website and social media has all materials in Spanish discussions with organizations that serve these populations (will be necessary to establish best modes of outreach and coordination)

Goal	Duration	Action Steps	Responsibility	Completion	Deliverable	Comments
Goal # 3: Review Home Purchase Loan Denial Figures with Local Lenders	Short-term					
		a) Require their respective fair housing consultant(s) to review and monitor HMDA data in regards to loan denial rates among racial/ethnic minorities	CCC Members	2017	Reports of any disparate impacts between racial and ethnic minorities to CCC members and possible enforcement action	Refer cases as appropriate to State and Federal complaint centers
		b) Utilized preapproved lenders and encourage them to examine loan approval policies and procedures	CCC Members	2017	Documentation of review by lenders	Include established networks such as the Home Equity Preservation Alliance; indicate what affirmative steps lenders might take to address this apparent issue
		c) Prefer lenders with Community Reinvestment Act (CRA) rating of "Outstanding" when selecting new participants	CCC Members	2018	Review of CRA rating reports	In addition, review lenders most recent HMDA reporting published by Federal Financial Institutions Examination Council (FFIEC)

Goal	Duration	Action Steps	Responsibility	Completion	Deliverable	Comments
Goal # 4: Increase Access to Special Needs Housing	Short-term					
		a) Adopt formal policies and procedures, in jurisdictions that have none, for persons with disabilities to request reasonable accommodations to local planning and development standards	CCC Members	2017	New appeals process within jurisdictions that presently do not offer such protection	Gather more information to determine extent to which the available supply of supportive housing is limited particularly for individuals with physical and mental disabilities; use County policy as model for other jurisdictions
		b) Promote best practices for alternative types of special needs/elderly housing and considering policy changes	Continuum of Care	2017	Prototypes of housing designs that permit vulnerable populations to gain access, receive services/age in place (this includes development of accessory dwelling units by reducing fees for new units, placement services for seniors, and expanded use of VASH vouchers	Reflect changes in plans, program descriptions and funding requests for CoC, PHA, etc. (Also, follow new State legislation to further encourage accessory dwelling units)
		c) Educate tenants, and owners and agents of rental properties	Fair Housing Service Providers	2018	Targeted outreach to property owners and representatives that have not received past notification	Include landlords and small property owners with scattered site units

Goal	Duration	Action Steps	Responsibility	Completion	Deliverable	Comments
Goal # 5: To Review Municipalities Planning Code and Offer Incentives	Long-term					
		a) Examine the review and approval process to identify opportunities to streamline and simplify action on affordable projects	CCC Lead	2017	Report recommending possible changes in zoning, land use and building permit issuance	Confer with both planners, developers and builders
		b) Publicize the density bonus ordinance and encourage developers to utilize the ordinance in order to create affordable housing	CCC Lead	2018	Media campaign to draw attention to recent successes in the region (e.g. as a 25% parking reduction permitted with the inclusion of very low Income rental housing units); updates of promotional material and outreach strategies	Track progress to determine whether further changes are necessary in other jurisdictions and promote consideration of similar incentives
		c) Develop policy for priority review to affordable housing projects as needed	CCC Members	2019	Model development codes, including one adopted recently in the region which streamlines the review process for many types of development; facilitate information sharing and networking among municipalities	Compile best practices from other states, ask APA and ICMA for best practices