

# Introduction, Purpose and Scope

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The State of California is home to over 37.6 million residents and an increasingly diverse population. The State has 58 counties and 482 incorporated cities.

Diversity among its residents, in terms of cultural backgrounds and socioeconomic characteristics make California a highly desirable place to live. To continue nurturing this diversity, it is critical that an environment exists where equal access to housing opportunities is treated as a fundamental right. Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. In recognition of equal housing access as a fundamental right, the federal government and the State of California have both established fair housing choice as a right protected by law.

As a condition of receiving Federal community development block grant funds, communities and states that apply for funds must certify that they are affirmatively furthering fairness and equal opportunity in housing for individuals and groups protected by the federal Fair Housing Act of 1968 and its amendments. Jurisdictions that administer or directly receive federal funds from the U.S. Department of Housing and Community Development (HUD) must meet this obligation by performing an Analysis of Impediments to Fair Housing Choice (AI) as part of their consolidated planning process for housing and community development programs under the Code of Federal Regulations (CFR) 24 Part 91. The AI is used to identify barriers to fair housing, and to develop and implement strategies and actions to overcome these impediments.

The California Department of Housing and Community Development (HCD), as a recipient of federal Home Investment Partnership (HOME) and Community Development Block Grant (CDBG) program funds has been designated as the department responsible for the preparation of California's Analysis of Impediments to Fair Housing and its plan to Affirmatively Further Fair Housing. The State's responsibility to affirmatively furthering fair housing choice is a comprehensive strategy designed to:

- Reduce housing discrimination;
- Promote public awareness of fair housing laws, rights and obligations;
- Ensure a broad range of affordable housing opportunities;
- Ensure programmatic accessibility of housing and programs to all protected classes; and
- Ensure the physical accessibility of housing and programs to persons with disabilities.

In May 2011, HCD contracted the University of California, Los Angeles (UCLA), Luskin School of Public Affairs to assist in the update of the State's AI. The report examines

and assesses major demographic conditions and policy trends that may influence the State's fair housing objectives. The findings in the AI will be used by HCD to develop recommendations relevant to government, the private sector and other interested stakeholders with respect to fair housing.

### Purpose of the Report

HUD recommends that grantees prepare/update an AI about fair housing choice in the public and private sector every five years consistent with the Consolidated Plan cycle (Planning Guide 1996:2-6, 2-7). In Fall 2010, HCD signed a letter of special assurances with HUD agreeing to conduct a complete AI update. HCD is required to complete an AI to satisfy Federal requirements for California to administer the federal formula grants for the CDBG, HOME ESG and HOWPA programs. The AI facilitates efforts by HCD to address Federal requirements for the receipt of approximately \$150 million annually from HUD for these programs. The AI also fulfills requirements of the CFR 24 Part 91 for Consolidated Submissions for Community Planning and Development and Programs.

The AI presents a demographic profile for the State, regions and counties, assessing the extent of housing needs among specific income groups, and evaluating the availability of a range of housing choices for residents. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. As the name of the report suggests the document reviews "impediments" to fair housing. While this report also assesses the nature and extent of housing discrimination, the focus is on identifying impediments that may prevent equal housing access and developing solutions within the HCD's control to mitigate or remove such impediments.

### Legal Framework

HUD is committed to eliminating racial and ethnic segregation, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through fair housing planning. HUD has historically encouraged the adoption and enforcement of state and local fair housing laws and the reduction of separation by race, ethnicity, or disability status in its community planning and development programs in order to affirmatively further fair housing choice. These programs include:

- Community Development Block Grant (CDBG)
- Home Investment Partnerships (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Federal Emergency Shelter Grant (FESG)

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, each grantee must certify that it "actively furthers fair housing choice."

The CDBG program contains a regulatory requirement to affirmatively further fair housing (AFFH) based upon HUD's obligation under Section 808 of the Fair Housing Act. The CDBG regulation also reflects the CDBG statutory requirement that grantees certify that they will affirmatively further fair housing. HUD requires CDBG grantees to document AFFH actions in the Consolidated Plan, Consolidated Annual Performance and Evaluation Report (CAPER), and reports submitted to HUD.

Definitions
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The following definitions are found in HUD's Fair Housing Planning Guide (FHPG). The FHPG serves as HUD's guidance on preparation of an AI for state and local entities receiving federal funds.

Fair Housing: Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of age, race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Affirmatively Furthering Fair Housing (AFFH): HUD's requirement of recipients of federal funds to do the following:

- Conduct an analysis to identify impediments to fair housing choice within its jurisdiction.
- Take appropriate actions to overcome the effects of any impediments identified through the analysis.
- Maintain records reflecting the analysis and actions taken in this regard.

Equal Opportunity: Right guaranteed by both federal and many state laws against any discrimination in employment, education, housing or credit rights due to a person's race, color, sex (or sometimes sexual orientation), religion, national origin, age or handicap.

Impediments to fair housing choice:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- 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, religion, sex, disability, familial status, or nation origin.

Disparate Impact: A theory of liability that prohibits using a facially neutral practice that has an unjustified adverse impact on members of a protected class. A facially neutral practice is one that does not appear to be discriminatory on its face; rather it is one that is discriminatory in its application or effect.

The basic notion is that housing choice should not be restricted because of one's demographic characteristics, a number of which are defined in law. While this notion is simple, the causes creating barriers are complex and complicated, very difficult to

determine conclusively. At one end, it includes overt acts of discrimination by individuals against another. There are also more institutionalized practices that can undermine “fair housing” and “equal housing opportunity.” These practices can occur in both the private housing market and governmental programs. Given the inherent difficulties in precisely measuring potential problems of the lack of “fair housing” and “equal housing opportunity,” this report examines a number of direct and indirect indicators. The overall research design is to use available data and information along with some survey data to triangulate, to determine whether there are restrictive barriers and practices.

## Protected Classes and Discriminatory Practices

Both federal and California fair housing laws establish protected classes and govern their treatment by a variety of housing professionals who provide services and are, therefore, parties to the transaction in regard to nearly every aspect of the purchase and rental of housing. The Fair Housing Act makes it unlawful to “refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person” because of their:<sup>1</sup>

- Race
- Color
- Religion
- National Origin
- Sex
- Familial Status (families with children under 18 or who are expecting or adopting a child)
- Disability (includes physical, mental and developmental disabilities)

In addition to federal statutes, there are a number of California State laws that have added the following protected classes:

- Age
- Ancestry
- Sexual Orientation
- Medical Condition
- Marital Status
- Arbitrary Characteristics
- Source of Income

Federal statutes, State statutes, and case law further define discriminatory practices or acts in housing. The most common practices fall into the following broadly defined categories:

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<sup>1</sup> Title VIII of the Civil Rights Act of 1968, as amended (1988), 42 U.S.C. §§ 3601 – 3619, 3631.

- Different Terms & Conditions
- Refusal to Rent, Sell or Lend
- False Denial of Availability
- Intimidation and Coercion
- Interference With Rights
- Brokers' Services
- Financing
- Advertising or Discriminatory Statements
- New Construction Accessibility for Persons with a Disability
- Reasonable Modification for Persons with a Disability
- Reasonable Accommodation for Persons with a Disability

Modern housing discrimination tends not to be overt. Subtle forms includes differential treatment (e.g., steering to certain neighborhoods, housing developments, financial institutions) and responses (e.g., disproportionate screening out of applicants, differential access to types of mortgages). Because these practices are difficult to detect by individuals, relying on self-reporting, consequently, is very problematic in reviewing discrimination. Even when housing discrimination is suspected, many possible victims may be reluctant to pursue remedies, or do not have the time or resources. While it is important to look at formal complaints of housing discrimination, this is likely to be only the tip of the iceberg. The best way to determine if these discriminatory practices occur is through audit studies (sending in paired applications who only differ by a key demographic characteristics, such as race), and HUD funded audit studies have found widespread housing discrimination, certainly considerably more pervasive than indicated by housing complaints. Unfortunately, these types of studies are expensive and well beyond the scope and resources of the AI study.

The lack of “fair housing” can also be caused by institutionalized practices rather than just individual acts of discrimination. “Fair housing” should also include the notion of equal access to all geographic segments of the housing market. However, the market is fragmented along race and ethnic lines, which means that information (e.g. housing advertisement, language barriers) and access (e.g., through realtors) also is fragmented. Jurisdictions also create barriers through restrictive zoning and rejection of inclusionary practices. Determining the exact nature and magnitude of institutionalized practices is very time consuming and costly, and impossibly prohibitive for an AI study of 165 jurisdictions. What is feasible is some self-reporting by the jurisdictions, both about their own practices and possible barriers created by others sectors of the community.

Given the problems of detecting individual acts of discrimination and institutional barriers, the AI study also examines larger housing patterns and outcomes to determine if they indicate problems with “fair housing” and “equal housing opportunity”. The most widely used measure is related to the degree of housing segregation along demographic lines. If segregation is non-existing or very marginal, then the results would not support an assertion that there are problems with “fair housing” and “equal

access.” If segregation exists and significant, the result indicates that there may be a problem.

Of course, other factors could contribute the observed pattern. For example, if there is a systematic difference in income across racial groups, then a part of the observed segregation could be due to differences in ability to pay for housing in more affluent neighborhoods. It is possible to estimate how much of the segregation is due to income difference, but the findings usually find that there is substantial racial segregation after controlling for income. This is certainly the case for this AI study. But even the income component of segregation may be due to unfair barriers due to land-use and zoning practices that precludes the development of affordable housing in more affluent neighborhoods. The net result would be fewer opportunities for minorities to move into these areas. Racial and ethnic segregation could also be due to self-selection and group preferences. We see this most often in immigrant populations, where culture and language influence their housing choice. Nonetheless, most minorities prefer to live in integrated neighborhoods, and existing levels of housing segregation exceeds what would have been expected based solely on preference.

Practices by local government can also undermine “fair housing” and “equal housing opportunity”. Historically, the placement of subsidized housing projects reinforced housing segregation. Those most dependent on assistance were more often than not housed in most segregated racial locations and most economic disadvantaged neighborhoods. Even with the move to individual housing choice, geographic opportunities are constrained because of limits on vouchers and certificates, and because of the voluntary aspect of landlord participation. While these realities are understandable, they nonetheless tend to reinforce segregation and fail to open up opportunities in historically restrictive areas.

We use a similar process to examine the programs under study in the 165 jurisdictions, focusing on two key questions. The first is whether protected groups have adequately access to the benefits. This requires defining the appropriate housing market (not just the individual jurisdiction but the larger housing market within which the jurisdiction operate) and the eligible population (households that qualify for assistance rather than all households). This can only be approximated because of data limitations. The basic test is whether the demographic distribution of those in the housing programs are roughly proportionate to the demographic distribution of the eligible household in the relevant housing market. There is a problem when a protected group (e.g., racial/ethnic minorities). The second question is where do assisted households reside relative to existing housing patterns. Ideally, the housing program would promote “equal housing opportunity” by opening up options and choices in areas where minorities have been excluded. On the other hand, if they are over represented in highly segregated areas with an existing over concentration of minorities, then the housing programs is reinforcing segregation.

When there are indicators of a lack of “fair housing” and “equal housing opportunity”, other evidence can point to possible causes. One source is comprised of the

jurisdictions. Of course, this type of data is likely to have limitations. The responses are based subjective perceptions and a potential bias to not report the jurisdiction's own actions as being biased. Consequently, this type of information is likely to under-report the extent of the problem and would point to the most serious problems. Despite this limitation, the survey of jurisdictions is a concrete step in identifying potential problems and barriers.

No single piece of information in the AI study is conclusive. Instead, the disparate findings should be taken as a whole to assess whether "fair housing" and "equal housing opportunity" and whether governmental housing programs are operating in ways consistent with these principles. These programs cannot eliminate existing problems, but they should operate to attenuate existing ones.

### Other Factors

Over the past several years, jurisdictions across the United States have become increasingly aware of their obligations under fair housing laws and federal and State housing planning documents to affirmatively further fairness and equal opportunity in housing. This comes after a series of landmark court cases and a report from the U.S. Government Accountability Office (GAO) that call for heightened scrutiny of local governments' efforts to undo residential segregation and for greater enforcement of fair housing laws.

In 2010, the GAO released its report "Housing and Community Grants: HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans." The report analyzed a representative sample of 473 CDBG and HOME grantees from a total of 1,209 Fiscal Year 2009 program participants.<sup>2</sup> The GAO determined that "many grantees' AIs are outdated or otherwise out of conformance with guidance from HUD and thus there is limited assurance they serve as effective fair housing planning tools."<sup>3</sup> GAO suggested HUD have clearer submission deadlines, establish better methods to identify and address impediments, require signatures from top elected officials, and impose AI update requirements for HUD review.<sup>4</sup> In response, HUD restated its commitment to reenergize the Fair Housing Act's requirement to affirmatively further fair housing. Ron Simms, Deputy Secretary of HUD, stated the court's view was ". . . consistent with the president's desire to see a fully integrated society. Until now, we tended to lay dormant [on affirmatively furthering fair housing requirements]. This is historic, because we are going to hold people's feet to the fire."<sup>5</sup>

Fair housing issues in Westchester County, New York and Marin County, California demonstrate a strong need for compliance with federal fair housing laws and were instrumental in the increased attention on fair housing issues at the federal level.

<sup>2</sup> U.S. Government Accountability Office (GAO), "Housing and Community Grants: HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions' Fair Housing Plans," September 2010, page 3.

<sup>3</sup> Ibid, page 9

<sup>4</sup> Ibid, page 30-32

<sup>5</sup> The New York Times August 10, 2009, NY Region, Sam Roberts

In 2009, Westchester County entered into a \$30 million settlement after the Anti-Discrimination Center (ADC) filed a lawsuit against the County. The lawsuit alleged Westchester County, one of the nation's wealthiest suburbs, failed to accurately report its non-compliance with fair housing mandates while applying for federal CDBG funds. The court ruled that the County misrepresented its efforts to desegregate communities when it applied for federal funds, and that it made little to no effort to deny being in non-compliance.<sup>6</sup>

As part of the settlement, and in addition to monetary reparations, the County is required to allocate housing in areas under-represented by African-Americans and Hispanics.<sup>7</sup> And market these units to non-Hispanic Whites in Westchester County and New York City. In addition, the settlement also required the county to "promote, through the County Executive, legislation currently before the Board of Legislators to ban 'source of income' discrimination in housing and to incorporate that undertaking in the county's AI.

Non-compliance with fair housing, however, remains an issue for the County even after the settlement. On June 25, 2010, the county executive vetoed the county board of legislators' source of income legislation. A year later on July 13, 2011, HUD notified the county that its revised AI did not meet the requirements of the settlement because it did not include corrective actions specified in a May 13 HUD letter regarding "promotion of source of income legislation or plans to overcome exclusionary zoning practices." HUD therefore rejected the county's certification that it would affirmatively further fair housing, as well as the county's FY11 Annual Action Plan.

Consequently, as of May 1, 2011, HUD has withheld formula program funds such as CDBG and HOME. Most recently on May 3, 2012 the U.S. District Court of the Southern District of New York ruled that the county executive of Westchester County breached a settlement with the United States when he vetoed source of income legislation approved by the county board of legislators.<sup>8</sup>

The latest landmark case came in January 2011, when Marin County, CA signed a Voluntary Compliance Agreement (VCA) promising to improve its fair housing practices after the FHEO found that they were in "preliminary non-compliance" with several fair housing issues. Key issues included the County's failure to Affirmatively Further Fair Housing (AFFH) and its failure to conduct a meaningful AI.<sup>9</sup> As part of the VCA, Marin County was required to report annually its actions related to fair housing. Whereas the Westchester County, New York case focuses on residential segregation by race, Marin County also takes into account impediments to fair housing for persons of disabilities. Correspondence between HUD's Office of FHEO and the Marin County Community Development Agency indicates that the County is required to address specific concerns

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<sup>6</sup> Roberts, Sam. 2009. "Westchester Adds Housing to Desegregation Pact." August 10.

<sup>7</sup> United States District Court, Southern District of New York. Anti-discrimination Center of Metro New York, Inc. v. Westchester County, NY.

<sup>8</sup> National Low Income Housing Coalition, Memo to Members. Volume 17, Issue 8, May 4, 2012.

<sup>9</sup> National Low Income Housing Coalition, Memo to Members, Volume 17, January 4, 16 (2).

for persons with disabilities by providing data, a communications policy, and program and site accessibility.

Westchester and Marin County are examples of the continued need for federal oversight and enforcement of fair housing practices at the local level.

## Scope of Analysis and Organization of the Report

The report is divided into four sections:

- State-level analysis of needs and resources to address fair housing issues
- State Program CDBG-Eligible Jurisdictional Analysis
- Model County Analysis
- Identified Impediments and Actions to overcome potential barriers

The State-level analysis of needs and resources to address fair housing issues provides an overview of demographic information analyzed at the State, regional and county levels including population growth, age and gender, racial and ethnic composition, nativity and poverty rates. In addition, household data is provided on number of housing units, household tenure, vacancy rates, and housing burden. Existing conditions, including depletion of resources available for affordable housing, projected loss of subsidized housing and patterns of lending and foreclosures are analyzed for impact on fair housing choice.

The State Program CDBG-Eligible Jurisdictional Analysis provides an evaluation of potential fair housing impediments for protected classes relative to allocation of State Program CDBG and HOME funds. Specifically, analysis identifies, on a jurisdictional basis, the following: 1) a disproportionate need exists based on income, ethnicity and poverty within State-CDBG eligible jurisdictions 2) identifies residential areas of over-representation for these groups and looks at State CDBG and HOME Program funded housing activities taking place in these jurisdictions as reported by grantees 3) analyzes beneficiary characteristics of households served by CDBG, HOME and other housing programs 4) details and analyzes of the results of over 100 CDBG grantee surveys and 5) includes a jurisdictional assessment on the current fair housing practices, including enforcement of fair housing laws, fair housing complaints filed and ultimate resolution to determine if these practices are contributing to over-representation.

The purpose of the Model County Analysis is to suggest additional jurisdictional level analysis which may be useful for more focused analysis of fair housing opportunities within individual jurisdictions. While data included in this Model County analysis may not be readily available in standardized format for all 165 State CDBG-eligible jurisdictions, this approach provides an opportunity to identify – at the local level – potential impediments to fair housing and use indicators identified within the Model County to provide insight on potential fair housing constraints at the local level which can be used in educating the State’s CDBG-eligible entities and provide general recommendations for administration of the Department’s State CDBG and HOME Programs to address potential impediments to fair housing and identify areas for further analysis where

appropriate and resources are available. The Department proposed this approach to address concerns voiced by the Stakeholder group in the Department's outreach efforts during the development of the scope of work and identifies indicators or trends common among HCD's pool of eligible applicants.

Based on the analysis provided in the sections detailed above, the AI identifies potential impediments to fair housing and proposes detailed actions to address identified barriers. HCD will begin implementing proposed actions immediately upon completion and approval of the AI and will report on the progress of implementation of each identified action in its Consolidated Annual Performance and Evaluation Report (CAPER) as submitted to HUD.

### Overview of State CDBG and HOME Programs

There are several ways in which the State CDBG or HOME programs differ from a local city or county CDBG or HOME program. This section describes some of the general differences between State and local CDBG and HOME Programs, and the implications this has on development and implementation of the State's AI. Also discussed are some current and proposed program changes concerning issues related to the AI.

Geographic Considerations: The State CDBG and HOME Programs operate statewide in jurisdictions that do not receive a direct allocation of CDBG or HOME funds from HUD, either as an entitlement jurisdiction (Metropolitan City or Urban County),<sup>10</sup> or as a locality participating in an Urban County program. A jurisdiction is also ineligible for State HOME funds if it is participating in a HUD HOME consortium. Non-entitlement jurisdictions can decide once every three years whether they choose to participate in their local CDBG or HOME program, if there is one, or the State's program. The number of State CDBG and State HOME-eligible jurisdictions can vary from year to year depending on these local decisions; however, the State HOME program typically has around 225 eligible jurisdictions and CDBG typically has around 166 eligible jurisdictions, including cities and the unincorporated areas of counties, which are eligible to compete for programs or projects funded by the State share of federal funds.

The actual 165 jurisdictions that are subject to this AI are jurisdictions that were eligible to receive State CDBG funds in 2010 when data collection for the AI began. The AI does not include all State HOME-eligible jurisdictions because some State HOME eligible jurisdictions receive their own direct allocation of CDBG funds as entitlement jurisdictions, as discussed above, and as such these jurisdictions must prepare their own AI. Table 1-1 below lists the 165 State CDBG-eligible jurisdictions by county.

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<sup>10</sup> Metropolitan cities are generally cities designated by HUD with populations of 50,000 or more. Urban Counties are generally counties designated by HUD with populations of 200,000 or more (excluding populations of entitlement cities).

**Table 1-1  
State CDBG-Eligible Jurisdictions by County**

Alpine	Unincorporated Alpine County
Amador	Unincorporated Amador County
	Amador
	Ione
	Jackson
	Plymouth
	Sutter Creek
Butte	Unincorporated Butte County
	Biggs
	Gridley
	Oroville
Calaveras	Unincorporated Calaveras County
	Angels
Colusa	Unincorporated Colusa County
	Colusa
	Williams
Del Norte	Unincorporated Del Norte County
	Crescent City
El Dorado	Unincorporated El Dorado County
	Placerville
	South Lake Tahoe
Fresno	Firebaugh
	Huron
	Orange Cove
	Parlier
	San Joaquin
Glenn	Unincorporated Glenn County
	Orland
	Willows
Humboldt	Unincorporated Humboldt County
	Arcata
	Blue Lake
	Eureka
	Ferndale
	Fortuna
	Rio Dell
	Trinidad
Imperial	Unincorporated Imperial County
	Brawley
	Calexico
	Calipatria
	Holtville
	Imperial
	Westmorland
Inyo	Unincorporated Inyo County
	Bishop

Kern	Maricopa
	McFarland
	Taft
	Wasco
Kings	Unincorporated Kings County
	Avenal
	Corcoran
	Lemoore
Lake	Unincorporated Lake County
	Clearlake
	Lakeport
Lassen	Unincorporated Lassen County
	Susanville
Los Angeles	Artesia
	Avalon
	Hidden Hills
	Industry
	Palos Verdes Estates
Madera	Unincorporated Madera County
	Chowchilla
Mariposa	Unincorporated Lake County
Mendocino	Unincorporated Mendocino County
	Fort Bragg
	Point Arena
	Ukiah
	Willits
Merced	Unincorporated Merced County
	Atwater
	Dos Palos
	Gustine
	Livingston
	Los Banos
Modoc	Unincorporated Modoc County
	Alturas
Mono	Unincorporated Mono County
	Mammoth Lakes
Monterey	Unincorporated Monterey County
	Carmel-by-the-Sea
	Del Ray Oaks
	Gonzales
	Greenfield
	King
	Marina
	Pacific Grove
	Sand City
	Soledad

Napa	Unincorporated Napa County
	American Canyon
	Calistoga
	St. Helena
	Yountville
Nevada	Unincorporated Nevada County
	Grass Valley
	Nevada City
	Truckee
Orange	San Juan Capistrano
Placer	Unincorporated Orange County
	Auburn
	Colfax
	Lincoln
	Loomis
Plumas	Unincorporated Plumas County
	Portola
Riverside	Calimesa
	Coachella
	Indian Wells
	Rancho Mirage
San Benito	Unincorporated San Benito County
	Hollister
	San Juan Bautista
San Luis Obispo	Morro Bay
	Pismo Beach
Santa Barbara	Guadalupe
Santa Cruz	Unincorporated Santa Cruz County
	Anderson
	Shasta Lake
Sierra	Unincorporated Sierra County
	Loyalton
Siskiyou	Unincorporated Siskiyou County
	Dorris
	Dunsmuir
	Etna
	Fort Jones
	Montague
	Mount Shasta
	Tulelake
	Weed
	Yreka
Solano	Unincorporated Solano County
	Benicia
	Dixon
	Rio Vista
	Suisun

Stanislaus	Hughson
	Riverbank
Sutter	Unincorporated Sutter County
	Live Oak
Tehama	Unincorporated Tehama County
	Corning
	Red Bluff
	Tehama
Trinity	Unincorporated Trinity County
Tulare	Unincorporated Tulare County
	Dinuba
	Exeter
	Farmersville
	Lindsay
	Woodlake
Tuolumne	Unincorporated Tuolumne County
	Sonora
Yolo	Unincorporated Yolo County
	West Sacramento
	Winters
Yuba	Unincorporated Yuba County
	Marysville
	Wheatland

Some jurisdictions choose to participate in the State CDBG and HOME Programs because they can compete for a larger share of dollars than they could receive by participating in an Urban County program or HOME Consortia; nonetheless, once they become eligible to compete for and receive State CDBG or HOME funds, a jurisdiction's decision to apply for funds in any given year is completely voluntary. Typically, most jurisdictions choose not to apply every year<sup>11</sup>; therefore, the Department monitors the HOME and CDBG-funded activities of a jurisdiction at a particular point in time and does not have an ongoing relationship with every eligible jurisdiction covering the spectrum of housing activities that a jurisdiction could choose to undertake.

In addition, by virtue of their non-entitlement status, all State CDBG-eligible cities and unincorporated county areas are small communities located in rural or suburban areas.<sup>12</sup> Many State CDBG-eligible cities that are part of this AI have populations of less than 20,000 people, and several counties have populations of less than 150,000 people. Lack of resources to these areas makes it more difficult to implement CDBG and HOME activities. There are also data limitations for these smaller jurisdictions relative to that of larger jurisdictions. For example, U.S. Census and American Community Survey data

<sup>11</sup> See "Access to State CDBG and HOME Funding", Appendix XI for the Applied and Funded information for HOME funds for the 165 State CDBG-eligible jurisdictions that are the subject of this AI.

<sup>12</sup> Non-entitlement areas are generally cities with populations of less than 50,000 and counties with populations of less than 200,000.

limitations for smaller jurisdictions make it difficult to do a full analysis of minority concentration by race for these communities.<sup>13</sup>

**Relevant State Authorities:** In addition to federal statute and regulations for CDBG and HOME which entitlement jurisdictions are subject to, the State CDBG Program is also governed by State statute (California Health and Safety Code 50825-50834) and State regulation (Title 25, Division 1, Chapter 7, Subchapter 2, Sections 7050-7126). The State HOME Program is governed by State regulations (Title 25, Division 1, Chapter 7, Subchapter 17, Sections 8200-8220); hence making changes to the State programs may require changes to State statute or regulation which can take up to a year or more to put into place.

**Eligible Activities:** In order to be responsive to the different needs and priorities of jurisdictions statewide, the State HOME and CDBG Programs do not significantly limit the type of activities eligible under the programs, enabling individual jurisdictions to decide what activities best address local needs among the array of activities eligible under the federal rules. This is unlike many entitlement jurisdictions that chose to focus their HOME and CDBG dollars on a few specific activities. The State programs are composites of the locally determined needs of their eligible jurisdictions. Offering funds for multiple activities makes administering HOME and CDBG funds more complex than if the programs were to concentrate funding on one or two eligible activities in a subset of eligible cities, counties, or regions.

State HOME Program eligible activities and minimum percentage allocations by activity are as follows:

- Rental new construction or rehabilitation projects (55%)
- Homeowner new construction or rehabilitation projects (5%)
- First-time homebuyer acquisition with or without rehabilitation programs, first-time homebuyer infill new construction programs, owner-occupied rehabilitation programs, and tenant-based rental assistance programs (40%).

State CDBG Program eligible housing activities are as follows. A minimum of 51% of the available funding allocation is used for these activities<sup>14</sup>; individual activity percentages are based on application demand:<sup>15</sup>

#### Housing: Single Family and Multi-Family

- Acquisition
- Rehabilitation
- Combination: Acquisition and Rehabilitation
- Homeownership Assistance
- New Construction (replacement housing of last resort only)

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<sup>13</sup> For example, small sample sizes of Blacks and Asians in some Census Tracts make it difficult to determine over or underrepresentation of those races compared to the county as a whole due to data suppression by the Census.

<sup>14</sup> After subtracting funds for State administration.

<sup>15</sup> CDBG eligible activities include housing, public facilities, public improvements, public services, and economic development activities. For purposes of this AI, the CDBG data collection and analysis focuses on housing activities and infrastructure in support of housing. For more information on all CDBG-eligible activities, see the CDBG NOFA at <http://www.hcd.ca.gov/fa/cdbg/funds/CurrentNOFAs.html>

## Public Infrastructure In Support of New Housing Construction

- Acquisition
- Rehabilitation
- Installation

Note also that 1.25% of the CDBG allocation can be used for housing or infrastructure benefiting non-federally recognized Native American tribes, and 5% of the allocation can be used in Colonias, which are federally designated communities within 150 miles of the California-Mexico border. Funds are set-aside for these purposes and allocated based on demand. Funds that are not awarded under these set-asides roll into the allocation to be used for housing and other community development (non-economic development) activities.

For both CDBG and HOME, projects are activities where the site for the activity has been identified prior to applying for funds. Program-activities are activities without an identified site at the time of application, where funds are awarded to operate a particular type of activity on several different sites throughout the jurisdiction. For housing activities, these sites are found by the assisted households themselves once individual income-qualified households are identified over the expenditure period of the HOME or CDBG contract.<sup>16</sup> Offering funds for activities where the sites are previously identified by local jurisdictions or developers, as well as those where multiple sites are identified after the award of funds by the assisted households themselves, such as with a homeowner mortgage assistance or rehabilitation program, makes decreasing the minority concentration of assisted housing more challenging.

Alleviating minority concentration is also complicated by federal requirements for CDBG which mandate that 70% of all CDBG funds must be spent in areas where at least 51% of the population is low income (80% of the Area Median Income or below). In addition, as noted above, 5% of CDBG funds must be made available to Colonias,<sup>17</sup> and 1.5% must be made available to Native American Tribes.<sup>18</sup> It is also important to note that State CDBG funds for community development activities are used almost exclusively to benefit existing housing stock such as homeowner rehabilitation programs, or existing public infrastructure improvements, and not on activities which involve site selection for new construction. Long-term effectiveness in reducing minority concentration will be contingent on developing policies which accomplish the Department's or HUD's fair housing policy goals, and which are achievable by the vast majority of eligible cities and counties statewide and do not result in permanent exclusion of any community from accessing State HOME or CDBG funding because the population of the community is predominately minority.

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<sup>16</sup> A typical program-activity expenditure period in a HOME or CDBG contract is currently 36 months.

<sup>17</sup> Colonias are assumed to be areas of minority concentration by virtue of their location within 150 miles of the U.S Mexico border and their age of establishment (pre-1991).

<sup>18</sup> Pursuant to federal CDBG requirements, tribes served with CDBG funds must be non-federally recognized. These tribes may be concentrated in various local areas.

## Competitive Application Process

The State CDBG program has historically been oversubscribed. In the 2012 CDBG funding round, the applications received for housing and infrastructure funding are as follows:

Table 1-2  
CDBG Funds Requested by Activity, 2012

Activity	Amount Requested	Amount Available to Award
Housing Assistance	\$9.4 million/24 applications	\$4.3 million
Housing Rehab: Single Family	\$15.6 million/ 34 applications	\$6.9 million
Housing Rehab: Multi-Family	\$4.9 million/7 applications	\$2.2 million
Public Infrastructure (PI) and PI in Support of Housing New Construction	\$37.7 million/ 36 applications	\$16.6 million
Total	\$67.6 million/101 applications <sup>19</sup>	\$30 million

The 2012 CDBG NOFA represents a restructuring of the State CDBG Program's method of distribution. As in the past, housing and infrastructure activities are being evaluated on community need, program/project readiness, and applicant capability rating factors. However, new scoring criteria have been implemented to level the competitive field in applying for awards, including scoring like-activities against like-activities, and making the evaluation of Need activity-specific. All applications must meet eligibility threshold criteria, including having a locally adopted housing element.

For additional detail on all CDBG application rating factors and the allocation of points, see the current CDBG NOFA and the application for the specific CDBG activity. These documents can be found at: <http://www.hcd.ca.gov/fa/cdbg/funds/CurrentNOFAs.html>. Like CDBG, the State HOME program has historically had far larger demand than it has funds available. In 2011, oversubscription was as follows:

Table 1-3  
HOME Funds Requested by Activity, 2012

Activity	Amount Requested	Amount Funded
Rental Projects	\$156 million/41 applications	\$18.6 million/5 applications
Programs	\$28 million/47 applications	\$16 million/26 applications
FTHB Projects	\$4 million /3 applications	\$2.1 million/1 application
Total	\$188 million/91 applications <sup>20</sup>	\$36.7 million/32 applications

Given the size of the program and the demand for funds, it is necessary for HOME to act with caution before making major changes to its application rating criteria or other program requirements, as these changes impact multiple cities and counties and may affect whether projects, for which planning has been underway for several years, rank

<sup>19</sup> from 98 of 167 State CDBG-eligible jurisdictions for 2012

<sup>20</sup> Includes both State CDBG-eligible jurisdictions and CDBG entitlement jurisdictions that are eligible for State HOME funds because they do not receive HOME funds through a local allocation.

receive HOME funds. Rental and homebuyer projects are evaluated based on Applicant Capability, Community Need, Financial Feasibility and Project Readiness application rating factors. HOME funds for program-activity applications (activities without sites at the time of application) are evaluated based on Applicant Capability, Community Need, and Financial Feasibility rating factors. All HOME applications receive rating points for having a Department-approved housing element and for meeting specified Program State Objectives. In addition, entitlement jurisdictions that authorize their HOME formula allocation to go to the State HOME Program receive additional points on all of their HOME applications.<sup>21</sup>

In recent years, HOME has been developing and testing new State Objective rating factors designed to promote greater geographic diversity in the award of funds.<sup>22</sup> In 2012, with the advent of the AI minority concentration analysis, HOME is developing a mechanism for awarding points to projects located in census tracts that are not minority concentrated compared to the county as a whole. In addition, HOME is proposing changes to its State regulations which would increase the total number of points available for meeting State Objective rating factors, and decrease the total number of points available for Community Need. Increasing points for State Objectives will enable HOME to make points available for new factors such as the minority concentration rating factor, without diminishing points available for meeting other State Objectives. Decreasing the number of points available for Community Need should foster a greater geographic distribution of HOME funds.<sup>23</sup> Additional points may also be offered to applicants that did not rank high enough in the previous two funding rounds. This is another means for promoting geographic diversity.

For additional detail on all HOME application rating factors and the allocation of points, see the current HOME NOFA and the application for the specific HOME activity. These documents can be found at <http://www.hcd.ca.gov/fa/home/2010NOFA.html>.

**Affirmative Marketing:** Currently, pursuant to federal HOME requirements, projects of five or more units must prepare and update affirmative fair housing marketing plans<sup>24</sup>. The plans are prepared using HUD form 935.2A. The purpose of the affirmative marketing plan is to analyze which racial and other protected groups are least likely to apply based on the demographics of the county compared to the project's census tract (for new projects), or the project's current residents and applicant waiting list (for existing projects). The affirmative marketing plans should also detail the mechanisms

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<sup>21</sup> As of the 2011 HOME NOFA, there are currently three HOME entitlement jurisdictions that qualify for these points; the cities of Gardena, Torrance and Lancaster.

<sup>22</sup> In 2009 and 2010, points were awarded to the highest ranked rental and first-time homebuyer project in every county in an attempt to ensure that as many project applications in different parts of the State received funding. In 2011 points were awarded based on the number of affordable rental housing projects for the same population-type located in the Census Tract (for projects in the unincorporated county), or located within the city limits (for projects located within cities). The goal of this State Objective was to award more points for applicants where there were fewer affordable housing projects.

<sup>23</sup> Most Community Need factors are Census data driven. Due to the number of points currently allocated for Community Need, and the fact that this data is fairly constant and does not change, Community Need tends to dictate who ranks high enough to be funded, and contributes to a geographic concentration of HOME funds.

<sup>24</sup> See 24 C.F.R. 92.351.

used to outreach to these underserved populations, and discuss a project sponsor's fair housing training plans.

Currently, affirmative marketing requirements do not apply to projects of less than five units; however proposed changes to the federal HOME regulations would require that a jurisdiction's affirmative marketing analysis be done for multi-site activities, such as tenant-based rental assistance, and homebuyer mortgage assistance programs.<sup>25</sup> The State CDBG program may also implement similar procedures to assist local jurisdictions in understanding what protected groups are applying for and utilizing their funds, and what groups are being underserved.

Because HOME and CDBG operate in predominately rural communities, the market area from which to attract underserved populations is smaller; consequently, the standard normally applied by HUD to determine whether a particular group is over or under-represented in a census tract(s), or by an existing project or program-activity, may have to be adjusted.<sup>26</sup>

For more information on actions to be taken to overcome identified impediments to fair housing. See the AI Recommendations chapter, available following the conclusion of the AI public comment period.

Description of Geographic Regions used in Analysis
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For the purposes of the AI, specifically the socio-economic context provided in the detailed demographic information of the State and its regions in Chapter 2 of this report, data analyzed for 8 regions – the Greater Los Angeles, San Francisco Bay area, Sacramento, San Joaquin Valley (also referred to as the Central Valley), San Diego County, Central Coast, Northern California and Central Southern California. The counties located within each region are detailed in the map below.

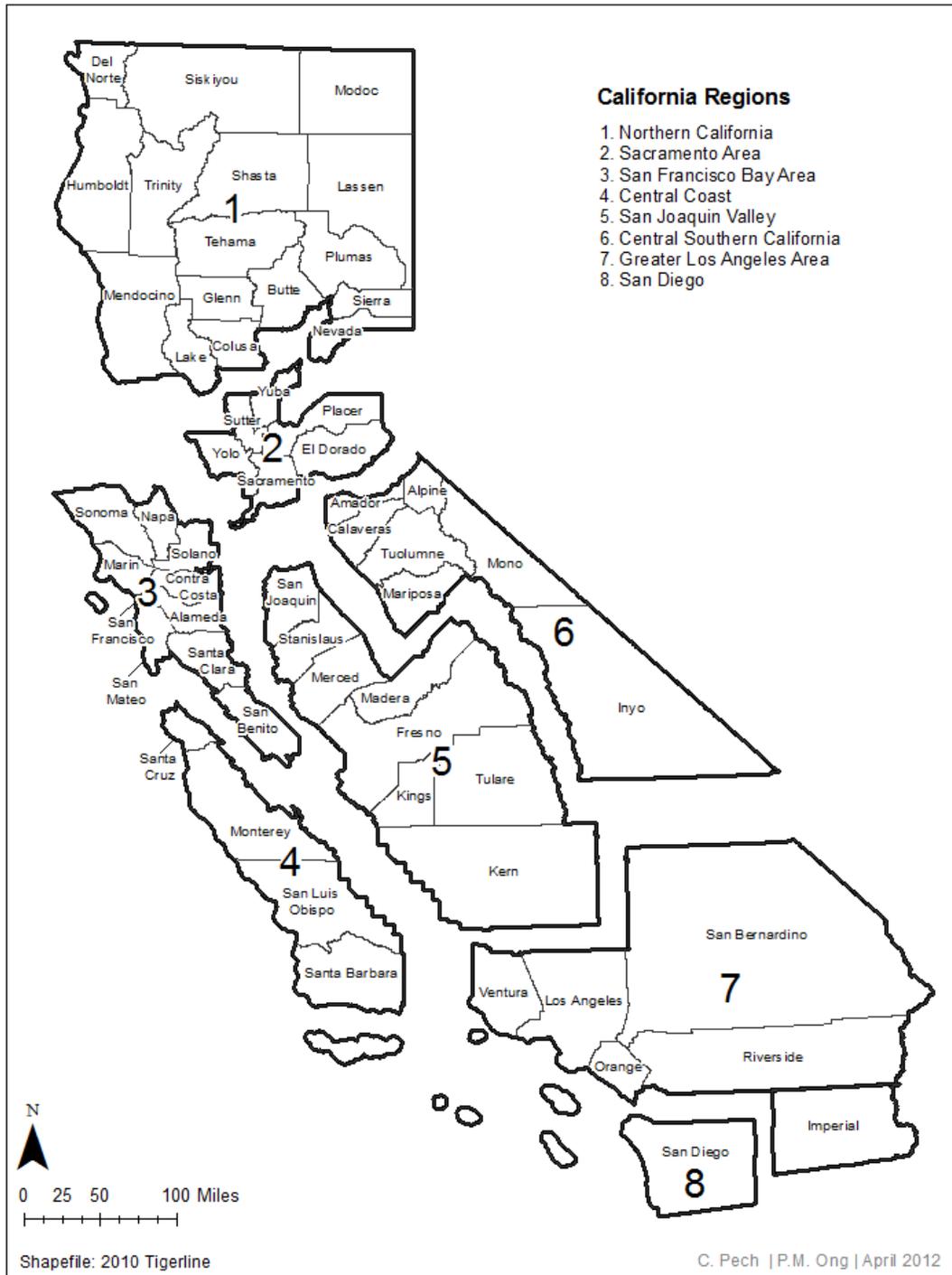
The Table below provides information on State CDBG-Eligible Jurisdictions - 166 of the State's 540 jurisdictions. Most of these jurisdictions are located in rural parts of California, primarily in the Sacramento, San Joaquin Valley, Northern California and Central Southern California regions. Table 1-1 provides information, by region, of the number of State CDBG-Eligible jurisdictions within each county and the number of eligible jurisdictions within the region compared to the total number.

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<sup>25</sup> Currently, jurisdictions that receive these funds must market the availability of this assistance community wide, with no analysis of underserved groups required prior to development of the activity marketing plan.

<sup>26</sup> Currently the State HOME Program is using a 10% standard to determine over-or under-representation, but some groups are less than 10% of the overall county population, meaning that a smaller percentage basis of comparison will need to be utilized in these instances.

Figure 1-4



**Table 1-5**  
**Number of State CDBG-Eligible Jurisdictions by Region**  
 (\* indicates unincorporated county is an eligible entity)

Region	Counties in Region	# of State CDBG-Eligible Jurisdictions	Total # State CDBG-Eligible Jurisdictions (Total in Region)	Percentage of State-CDBG Eligible Jurisdictions within Region
Greater Los Angeles Area	Imperial	7*	18 (195)	9%
	Los Angeles	6		
	Orange	1		
	Riverside	4		
	San Bernardino	0		
	Ventura	0		
San Francisco Bay Area	Alameda	0	13 (112)	12%
	Contra Costa	0		
	Marin	0		
	Napa	5*		
	Santa Clara	0		
	San Benito	3*		
	San Francisco	0		
	San Mateo	0		
	Solano	5*		
	Sonoma	0		
	Sacramento	El Dorado		
Placer		5*		
Sacramento		0		
Sutter		2*		
Yolo		3*		
Yuba		3*		
San Joaquin Valley	Fresno	5	29 (70)	41%
	Kern	4		
	Kings	4*		
	Madera	2*		
	Merced	6*		
	Stanislaus	2		
	San Joaquin	0		
	Tulare	6*		
San Diego County	San Diego	0	0 (19)	0
Central Coast	Monterey	10*	16 (35)	46%
	San Luis Obispo	2		
	Santa Barbara	1		
	Santa Cruz	3*		

Region	Counties in Region	# of State CDBG-Eligible Jurisdictions	Total # State CDBG-Eligible Jurisdictions (Total in Region)	Percentage of State-CDBG Eligible Jurisdictions within Region
Northern California	Butte	4*	58 (63)	92%
	Colusa	3*		
	Del Norte	2*		
	Glenn	3*		
	Humboldt	8*		
	Lake	3*		
	Lassen	2*		
	Mendocino	5*		
	Modoc	2*		
	Nevada	4*		
	Plumas	2*		
	Shasta	3*		
	Sierra	2*		
	Siskiyou	10*		
	Tehama	4*		
Trinity	1*			
Central Southern California	Alpine	1*	16 (16)	100%
	Amador	6*		
	Calaveras	2*		
	Inyo	2*		
	Mariposa	1*		
	Mono	2*		
	Tuolumne	2*		
California Total			166 (540)	31%

Data and Methodology

The following data sources were used to complete this AI. Sources of specific information are identified in the text, tables and figures.

- California Department of Fair Employment & Housing
- California Department of Department of Finance
- California Housing Partnership Corporation
- Home Mortgage Disclosure Act data
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Census Bureau, 2000 and 2010 Census data
- U.S. Census Bureau, 2005-2009 American Community Survey data

The data used throughout the AI represents the most current information available at the time the report was prepared.

The update of the AI incorporates development and testing of new methodologies for completion of the analysis of disproportionate need and analysis of minority and lower-income concentration of completed CDBG and HOME funded projects within State CDBG-eligible jurisdictions (chapters 8-11). There are numerous limitations to such analysis for the universe of predominantly rural or smaller suburban jurisdictions that are eligible entities for these State programs, compared to what may be relevant or possible for entitlement jurisdictions. In particular, there is not a body of literature establishing the incidence or characteristics of racial residential segregation for rural areas, they are characterized by typical data limitation and issue of “small area data” issues, including but not limited to the absence of Census income by race. This directly affected the process of developing appropriate methodologies and determining over/under representation in the affected Census tracts by race and lower-income level. This lack of data required researchers at UCLA and HCD to develop alternative estimates using a combination of datasets, where available, including federal poverty level data, HUD income limit data and decennial Census or ACS race and ethnicity data. It should also be noted that many of the counties have minority majorities (see page 2-15).

#### Limitations of Analysis

HUD's FHPG requires “states ensure that State-funded jurisdictions comply with their certifications to affirmatively further fair housing.”<sup>27</sup> To do this, States should:

- Require state funded jurisdictions to take actions that promote fair housing choice at the local level and that have measurable results
- Provide guidance and technical assistance to State-funded jurisdictions including fair housing training and education for citizens as well as ensuring that fair housing complaints are quickly addressed.<sup>28</sup>

The Department is committed to identifying meaningful local actions to address identified impediments through the AI, upon which the Department can report progress through the Consolidated Annual Performance Evaluation Report (CAPER). Development of the scope of work for the State’s AI update focused on what methods the Department may employ, given its limited statutory authority to review, evaluate, and impose specific land-use requirements on localities.<sup>29</sup> Although expressly required for entitlement jurisdictions, in non-entitlement State administered programs, participation is voluntary and the State lacks the authority to in affect impose specific

<sup>27</sup> HUD, Fair Housing Planning Guide, Page 3-4.

<sup>28</sup> HUD, Fair Housing Planning Guide, Page 3-5

<sup>29</sup> See Generally United States Department of Housing and Urban Development "Fair Housing Planning Guide" (1996) at pgs. iii, 3-3, 3-5, 3-6 through 3-7, and 3-22 (discussing, among other things (1) the distinctly broad "State-Level" scope of State AI's, (2) the express discretion of states to not require local [non-entitlement] State-funded jurisdictions to submit an AI where not [legally or politically appropriate], and (3) distinguishing the roles and applications of FHL at the State level versus [local land-use] Jurisdictional level {also including contrasting roles when compared to entitlement jurisdictions}).

actions or requirements in individual jurisdictions except as a pre-requisite or condition of funding.<sup>30</sup>

Actions are not required, pursuant to the FHPG, to be specific to individual jurisdictions. Therefore, identification of impediments and actions to address them will be the result of indicators and trends identified through the analysis of data collected at the local level for the 166 State CDBG-eligible jurisdictions.

The AI was written for the State of California for the purpose outlined in this introduction. This AI therefore identifies impediments and makes recommendations based on information gathered from data research from a variety of sources and survey responses with representatives of local jurisdictions and fair housing advocacy organizations. This is not, however, a comprehensive planning document, nor does it offer legal advice. Some of the impediments identified will require further consideration the staff at the Department in order to provide appropriate recommendations. The writers assume that information supplied by other individuals or sources as contained in this AI is accurate.

#### Summary of the AI Development Process

In the process of preparing the AI, UCLA researchers and HCD staff consulted with several governmental agencies and community organizations to gain insight into the nature and extent of housing and housing-related discrimination in the State. Input and data were actively solicited from State and Federal Governmental agencies, local government housing and planning department staff, affordable housing developers and housing advocates.

In addition, HCD worked with a group of stakeholders from the outset of the AI development process. Several meetings were held with HCD staff and members of the Advocate Stakeholder group (listing of participants in the Stakeholder group are detailed below in Acknowledgements). These meetings focused on the development of the scope of analysis and discussions related to the development of definitions and data standards for analysis, available resources and the use and effectiveness of the end product.

HCD is grateful to the members of the Stakeholder group for the collaboration and expertise in fair housing issues and is committed to on-going coordination with the stakeholder group during both the public comment period on the draft document and in the implementation of actions to address identified impediments.

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<sup>30</sup> U.S. ex rel. Anti-Discrimination Center of Metro New York, Inc. v. Westchester County, N.Y. (S.D.N.Y. 2009) 668 F.Supp.2d 548, 550 (discussing a local-level "Entitlement" jurisdictions' AI requirements and its false certifications related thereto -- explaining the statutorily distinct local-level jurisdiction AI and AFFH requirements -- and the Defendant's related failure to show any evidence of complying therewith, despite Defendant's readily apparent (legal and actual) ability to engage in the local level studies and efforts -- with the court also noting how the Defendant had "jurisdiction" to engage in said efforts and/or could obligate its [mandated] recipients [i.e., which is not true of non-entitlement jurisdictions where participation is voluntary])

**Public Review and Comment**

The draft AI was available for public comment from all stakeholders and interested parties for a 60-day period, June 15 through August 15, 2012. Three in-person public hearings were held at various locations throughout the State as noted below to allow the public to respond, comment or ask questions in a public forum. Notification of the public comment period and public hearing dates and locations were posted on the Department’s website and emailed to State-CDBG and HOME eligible program contacts and interested parties. Notices were also be published in newspapers of record to notify the public of the document development process, timelines, and participation options. A copy of the public notices as well as the public hearing agenda are included in the Appendices.

Location	Date/Time	Address
Visalia (Tulare County)	Tuesday July 10, 2012	Self-Help Enterprises 8445 West Elowin Court Visalia, CA 93291
Holtville (Imperial County)	Thursday July 19, 2012	City of Holtville Civic Center 121 West 5th Street Holtville, CA 92250
Sacramento (Sacramento County)	Thursday August 2, 2012	Department of Housing and Community Development Division of Financial Assistance 1800 3rd Street, Room 183 Sacramento, CA

The Department received comments from the following organizations:

<b>Listing of Commenting Organizations</b>
Law Foundation of Silicon Valley*
California Coalition for Rural Housing
Housing Rights Center
Many Mansions
Self-Help Enterprises
Riverside County, Planning Department
County of Tuolumne, Community Resources Agency
City of Gardena
City of Orland
County of Imperial
City of Avenal
Adams-Ashby Consulting
Sacramento Mutual Housing Association

*\* Co-signers include: Public Interest Law Firm, Fair Housing Law Project, Western Center on Law and Poverty, California Rural Legal Assistance, Legal Aid Foundation of Los Angeles County, Public Counsel, Public Interest Law Project/California Affordable Housing Law Project, Housing Equity Law Project, Bet Tzedek*

The Department considered all comments and views of the public, advocates and local governments received in writing, by fax and email. A summary of all comments received and the Department's responses are included in the Appendices.

## Acknowledgements

HCD entered into Interagency Agreement No. 10-3-001 with the University of California, Los Angeles, Lewis Center to conduct analyses and prepare this report. The contents, claims, and findings of this report are the sole responsibility of the authors, and do not necessarily represent the opinions of UCLA or its administration. The authors are not liable for misinterpretations of the provided information or policy failures based on analyses provided in this report.

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Marie Emery, Bob Anderson, Stephen Nnodim, United States Rural Development

Mónica M. Ramírez, U.S. Department of Justice, Civil Rights Division

Paul Collins and Mark Bartson, California Department of Public Health, Sacramento

Matt Schwartz and Marilyn Wacks, California Housing Partnership Corporation, Sacramento

HCD and Advocate AI Stakeholder Group (the individuals listed below participated in at least one of the Stakeholder Group meetings):

- Michael Allen, Relman, Dane and Colfax, PLLC
- Denise McGranahan, Legal Aid Foundation of Los Angeles
- Nanveet Grewel, National Housing Law Project
- Stephanie Haffner, Neighborhood Legal Services LA County
- Shashi Hanuman, Public Counsel
- Ilene Jabobs, California Rural Legal Assistance
- Michelle Kezirian, Bet Tzedek
- Andrea Luquetta, Western Center on Law & Poverty
- Lynn Martinez, Legal Services of Northern California
- Eileen McCarthy, California Rural Legal Assistance
- Christine Minnehan, Western Center on Law & Poverty
- Melissa Morris, Law Foundation of Silicon Valley
- Mary Prem, Housing Equity Law Project
- Mike Rawson, Public Interest Law Project
- Mona Tawatao from Legal Services of northern California
- Shirley Sanematsu, Neighborhood Legal Services LA County