

City of Concord Draft Housing Element (2023-2031)

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1.1 Introduction

The Housing Element is one of the seven required elements of the General Plan and is the primary document that local jurisdictions in California use to plan for current and future housing needs. State Housing Element law, enacted in 1969, mandates that each local government in California create a Housing Element to adequately plan to meet the existing and projected housing needs of all segments of the population. The Housing Element must be consistent with all other elements of the General Plan and is updated on a regular basis. The law acknowledges that, in order for the private market to adequately address housing needs and demand, local governments must adopt plans and regulatory systems that support housing development. As a result, implementation of local general plans, and in particular, local housing elements, is an important factor in the successful growth of a community.

Each jurisdiction's projected housing need during the Housing Element planning period is determined through the Regional Housing Needs Allocation (RHNA) process, which is based on projected Statewide growth in households as determined by the California Department of Housing and Community Development (HCD). Through the RHNA process, HCD distributes the Statewide projected housing need among the regions in the State, where each regional council of government allocates the projected regional growth to local jurisdictions within the region. The total housing need for each jurisdiction is distributed among income categories, requiring each jurisdiction to plan to meet the need for housing for households at all income levels. The agency responsible for distributing the RHNA in the Bay Area is the Association of Bay Area Governments (ABAG), which works closely with the Metropolitan Transportation Commission (MTC), the regional transportation planning agency for the Bay Area.

Each city and county in California are then required to produce a Housing Element that demonstrates the jurisdiction's ability to accommodate the housing need identified in its RHNA during the Housing Element planning period. This Housing Element covers the 2023-2031 Housing Element planning period, also known as the 6th Cycle.

1.2 Housing Element Organization

This Housing Element identifies goals, policies, and programs to comprehensively address the housing needs of all current and anticipated residents at all income levels over the housing planning period of 2023 through 2031. The Housing Element is divided into chapters, and supporting documentation is included as appendices. The following describes the Housing Element's organizational structure:

- ***Introduction*** provides an overview of the Housing Element, its relationship to State law, the City's RHNA, and the organization of the Housing Element.
- ***General Plan Consistency*** details those goals of the General Plan that guides the policies set forth in the Housing Element to ensure that consistency is maintained throughout the General Plan.
- ***Goals and Policies*** specifies the City's plans for meeting the existing and projected comprehensive housing needs of Concord.
- ***Program Implementation*** identifies the specific actions that will be implemented to ensure that Concord's housing needs are met within the planning period.

Appendices

Appendix A: 5th Cycle Review evaluates the efficacy of the 5th Cycle Housing Element; the progress in implementation; and the appropriateness of the goals, policies, and programs.

Appendix B: Housing Needs Assessment provides detailed information on the City's demographic characteristics and trends that influence supply and demand of various housing types.

Appendix C: Constraints and Zoning Analysis details governmental and non-governmental constraints to the maintenance, improvement, and development of housing for all income levels.

Appendix D: Affirmatively Furthering Fair Housing identifies disproportionate housing needs, including segregated living patterns, concentrated areas of poverty, disparities in access to opportunity, and displacement risk.

Appendix E: Sites Analysis describes the methodology by which the City can accommodate its RHNA targets, and provides an inventory of the sites identified to meet the housing need.

Appendix F: Community Engagement Summary provides the detailed results and materials of the outreach conducted for the update to the Housing Element.

Appendix G: Community Discussions and City Council Actions on Housing Issues addresses housing needs, issues, and the actions to be taken upon the implementation of the Housing Element through conversations between the City and the community.

Appendix H: Public Review public comments received and responses to public comments.

1.3 General Plan Consistency

State law requires that each city have a General Plan that establishes policy guidelines for future development. The City of Concord's most recent comprehensive General Plan update was adopted in 2007, with subsequent updates to various elements. The General Plan consists of an integrated and internally consistent set of policies and implementing programs. The General Plan Land Use Element sets forth land use designations to guide the location, type, and intensity or density of permitted uses of land in Concord. The City of Concord Development Code implements the Land Use Element of the General Plan by providing specific direction and development standards within each of the land use categories. These land use controls can facilitate and limit certain types of development.

The City's 6th Cycle Housing Element includes a list of goals, policies, and programs that are internally consistent with the current General Plan. Of all the General Plan elements, the Housing Element most specifically addresses the policies of the General Plan Land Use Element since it is the Land Use Element that designates the location and extent of residential development throughout Concord. The following goals of the Land Use Element outline the vision for the City of Concord consistent with the goals, policies, and programs identified in the 6th Cycle Housing Element:

- *Create a balanced supply of housing types, densities, and prices to meet the needs of all income groups residing or who wish to reside in Concord.*
- *Preserve and enhance Concord's residential neighborhoods while integrating new developments to improve the quality of life for all residents.*
- *Encourage a complete and diverse community with well-connected neighborhoods, high quality urban design, and enhanced mobility options.*
- *Promote the expansion of housing opportunities for all groups with special housing needs, including older adults, female-headed households, persons with disabilities, first-time homebuyers, large families, and people experiencing homelessness.*
- *Strive for equal housing opportunity and access for all people regardless of race, religion, gender, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.*
- *Protect the environment with sustainable developments and lower the cost of energy through energy conservation policies.*

1.4 Goals and Policies

The Housing Element has five goals to address the housing needs during the 6th Cycle. Each goal has a series of policies to be implemented to facilitate how the City will achieve the prescribed goal. Extensive community input and engagement informed that various goals and policies and reflect the City's commitment to creating inclusive housing for all segments of the community.

Goal 1: A balanced supply of housing types, densities, and prices to meet the needs of all income groups residing or who wish to reside in Concord.

Policy 1.1: Ensure an adequate supply of housing sites to achieve the City's Regional Housing Needs Allocation (RHNA) for the 2023-2031 planning period.

Policy 1.2: Encourage a variety of housing types, including accessory dwelling units, middle density housing, apartment buildings, condominiums, and housing for those experiencing homelessness.

Policy 1.3: Promote the development of housing that provides ownership opportunities that are affordable to extremely low-, very low, low- and moderate-income households.

Policy 1.4: Encourage accessory dwelling units in new and existing residential developments and the development of duplex condominiums, where duplexes are consistent with the General Plan.

Policy 1.5: Promote the development, conservation and rehabilitation of housing that is affordable to extremely low-, very low-, low- and moderate-income households.

Policy 1.6: Promote the development of new condominiums and cooperatives.

Policy 1.7: Promote a diversity of housing types, including efforts to increase rental options and homeownership opportunities for households at all income levels.

Policy 1.8: Remove or reduce constraints to housing production by lowering the cost of development and improving the ease of building in Concord.

Goal 2: Preserved and enhanced neighborhoods that improve quality of life for all residents.

Policy 2.1: Support the conservation and rehabilitation of the existing housing stock (including mobile homes) through a balanced program of code enforcement and property improvements, when and where appropriate.

Policy 2.2: Preserve and enhance the quality of Concord's residential and mixed-use neighborhoods to ensure a comfortable, safe, healthy, and attractive living environment for all residents.

Policy 2.3: Preserve Concord’s historic homes, areas, and buildings.

Policy 2.4: Ensure that any development or redevelopment in Concord does not lead to the displacement of existing residents.

Policy 2.5: Preserve the existing housing stock that is affordable to extremely low-, very low-, low-, and moderate-income households.

Goal 3: A City with housing opportunities for all special housing needs, including households with older adults, persons with disabilities, female-headed households, large families, and people experiencing homelessness.

Policy 3.1: Facilitate the development of affordable housing for extremely low-, very low-, low-, and moderate-income households with older adults.

Policy 3.2: Expand housing opportunities for persons with disabilities in new and existing single-family and multifamily developments.

Policy 3.3: Expand housing opportunities for persons with physical and developmental disabilities in Concord.

Policy 3.4: Encourage the development of childcare facilities to help female-headed households, especially those with extremely low, very low, low, or moderate incomes.

Policy 3.5: Promote the development of housing that is affordable to very low-, low- and moderate-income first-time homebuyers.

Policy 3.6: Encourage the development of affordable housing for large families with extremely low-, very low-, low-, or moderate-incomes, and continue to take actions to prevent discrimination against children in housing.

Policy 3.7: Facilitate the development of emergency shelters, transitional and supportive housing, and long-term affordable housing to reduce the risk of homelessness in the City of Concord.

Goal 4: A City with equal housing opportunity and access for all people regardless of race, religion, gender, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.

Policy 4.1: Ensure equal housing opportunities exist for all by reaffirming the City’s commitment to work towards the elimination of discrimination in housing with regard to race, religion, sex, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability

Policy 4.2: Create greater opportunity for mixed-income housing in all areas of Concord, including moderate- and high-resource areas.

Policy 4.3: Seek opportunities to provide additional resources in lower-resource areas of Concord.

Goal 5: A sustainable City that protects the environment while lowering the cost of energy.

Policy 5.1: Encourage the incorporation of energy and water conservation design features in existing and future residential developments to conserve resources, reduce greenhouse gas emissions, and reduce housing costs.

1.5 Summary of Current City Tenant Protection and Housing Programs and Services

The City of Concord acknowledges the severe housing crisis that is facing California and the Bay Area in particular. This crisis has greatly impacted Concord, and the City has had many community-wide discussions since 2015 on how to address the crisis. Based on these discussions, the City has dedicated substantial resources and adopted major new policies and programs to meet its housing needs. This section provides a brief, high-level overview of the housing policies, programs, services, and funding that the City has provided since 2015.

Housing Development

- The City released a Notice of Funding Availability (NOFA) in Spring 2018 making available \$14 million in City Affordable Housing Funds and allocated a total of \$7.8 million to Resources for Community Development (RCD) for **new construction of a 62-unit affordable housing development** on Galindo Street. The City will release another Housing NOFA by December 2025 to allocate the remaining funds to other projects, including acquisition and rehabilitation of existing affordable housing complexes to ensure long-term affordability.
- The Naval Weapons Station Base Reuse Plan includes approximately 12,000 housing units, of which **25% are to be affordable (approximately 3,000 units) to low and very low income residents**. Of those approximately 3,000 units, 125 units will be dedicated to supportive housing, 195 units for housing those experiencing homelessness, and 20 units for self-help housing.
- City funded affordable housing complexes are monitored to ensure **affordability standards are maintained**.
- The City has established an [affordable housing inclusionary program](#) for its homeownership projects. This program recently resulted in five homeownership opportunities for moderate-income households. In the last five years, the City has also collected approximately \$170,000 in affordable housing in lieu fees, which will support future affordable housing efforts. The City's Housing Trust Fund balance, which includes the in-lieu fees, is currently \$6.2 Million. These funds will support future affordable housing efforts.
- The City's "pipeline" of approved, but not yet constructed, housing projects includes 1,280 housing units (430 of which are affordable). These are primarily multifamily units in or near Downtown and within a short walking distance from BART. Many of these projects

- can be viewed on the City's [Interactive Development Map](#).
- The City maintains a [list and an interactive map](#) on its Housing Assistance webpage of affordable housing complexes in Concord.
- The City offers a centralized virtual and/or in-person, one-stop counter for permit processing to streamline the development process to provide preliminary application reviews to assist applicants with the filing process.
- The City reports to the State annually on its progress toward implementation of the programs identified in the Housing Element and toward its eight-year RHNA housing production targets, and presents this report to the City Council for review and public comment.
- The City offers various incentives for affordable housing projects, including streamlined processing under State law (SB35), and density bonuses and other incentives under State law and the City's own Affordable Housing Incentive Program.
- The City complies with the Surplus Land Act by offering affordable housing developers the opportunity to purchase any City-owned properties before they are offered to other developers. The City also reports annually on any surplus properties disposed of, in accordance with State law.

Housing Preservation & Tenant Protections

- The City developed a Rent Registry program, effective July 1, 2021, requiring all multifamily complexes with four (4) or more units to register through an online portal and provide data that includes rent increases and tenancy changes. This data will provide specific local information to the community and Council and will serve to inform and support additional policy development in the future.
- The City operates a [Multi-Family Inspection Program \(MFIP\)](#), which applies to all multi-family housing complexes of four or more units (except those controlled for affordability), which totals approximately 9,000 units in Concord. This program promotes the safety, habitability and long-term maintenance of Concord's rental housing stock, and it is one of the only of its kind in Contra Costa County. In 2017, the City made the following enhancements to the MFIP to increase preservation of affordable housing:
 - Increased inspections frequency from three to two years,
 - Increased City-inspection rates of self-certification properties from 20% to 25%,
 - Added additional personnel to support these efforts, and
 - Moved the Bed Bug Enforcement Program from Code Enforcement to MFIP.
- On July 28, 2020, the City adopted Ordinance 20-7 and established Municipal Code Chapter 19.40, the Residential Tenant Protection Program (RTPP). The RTPP strengthens protections provided by State legislation by increasing the relocation amount for tenants due to no-fault eviction from a flat amount of \$1,000 to two times the monthly rent or \$5,000, whichever is greater. The program also requires landlords to offer tenants a twelve- or six-month lease. The City adopted a Residential Tenant Anti-Harassment Protection (RTAHP) Ordinance, effective July 28, 2022, to further fair housing practices in the City by prohibiting discrimination, violations of tenants' rights to privacy, and landlord retaliation. The RTAHP

Ordinance aims to deter harassment, as defined in Code of Civil Procedure Section 527.6(b)(2), by residential property owners, to encourage such owners to follow the law and provide habitable rental properties and to give tenants legal recourse when they are subjected to harassment by owners.

- The City's [Homeowner Rehabilitation Loan and Grant Program](#) preserves housing by providing grants up to \$25,000 and loans up to \$75,000 to low-income Concord homeowners to rehabilitate their single family or mobile homes and address emergency, weatherization, security, handicap accessibility, and other health and safety issues. An average of 1 loan and 20 grants are provided each year. The total allocation per year is approximately \$500,000.
- The City has allocated approximately \$1.3 million in Federal CARES Act funding for [Tenant Emergency Rental Assistance](#) to help tenants affected by the COVID-19 pandemic remain in their homes. This program will support approximately 450 tenant households.
- The City has allocated funds to support [Tenant/Landlord Counseling and Legal Services](#) to help tenants maintain their housing and to build an awareness around housing laws, including \$10,000 in Community Development Block Grant funds, \$40,000 in Concord/Pleasant Hill Health Care District funds, \$15,000 in Affordable Housing funds and \$245,000 in CARES Act funds.
- The City contracts with [Eden Council for Hope and Opportunity \(ECHO\) Housing](#) to provide tenants with Fair Housing Services, Tenant/Landlord Counseling and Tenant Legal Services. These services include referrals to legal services for advice and representation, information to tenants and landlords on rental housing issues such as evictions, rent increases, repairs and habitability, harassment, illegal entry, amongst others as well as mediation services to assist in resolving tenant/landlord disputes. ECHO conducts blind testing annually of a selection of Concord properties to determine compliance with Fair Housing law. ECHO then works with any property owner where issues are identified to educate and bring them into compliance.
- **Home Match Contra Costa**- The City partners with the non-profit, Covia, to match low-income tenants seeking housing with homeowners who are 55+ who have an extra room to rent. Since Home Match launched in 2018, 16 successful matches have been conducted in Concord.
- **Mobile Home Rent Stabilization Program**- the City maintains a Rent Stabilization Program for homeowners of mobile homes in order to help moderate mobile home parkspace rents and promote the affordability of this de-facto affordable housing stock. There are 1,759 mobile homes in Concord, comprising 3.7% of the City's housing stock.
- As part of the Contra Costa County Consortium, the City participates in the regional Analysis of Impediments to Fair Housing Choice. The City will continue to collaborate in the Analysis of Impediments to Fair Housing Choice for the Contra Costa County Consortium and continue to work with the Contra Costa CDBG/HOME Consortium to reduce impediments to fair housing choice.

Homeownership

- The City's [Below Market Rate \(BMR\) Homeownership Program](#) provides homeownership opportunities to income eligible, first-time homebuyers purchasing Below Market Rate homes (BMR's) in Concord. There are currently 19 housing units under this program. BAAHA oversees the resale of properties to ensure that they are marketed in compliance with BMR guidelines and sold to qualified applicants. BAAHA monitors existing units annually to ensure that they are in compliance with program requirements.
- The City's [First Time Homebuyer Program \(FTHB\)](#) provides limited down payment assistance for the purchase of a first home, with eligibility based on income and household size. The program is designed to assist low- and moderate-income households. There are currently 21 households utilizing this program. The City typically allocates about \$90,000 per year under this program.

Homelessness

- On July 1, 2021, the City allocated \$304,000 for fiscal year 2021-22 to organizations that provide safety net services to the City's most vulnerable residents. Services include the 211 Call Line, Contra Costa County's Coordinated Outreach Referral Engagement (CORE)³ program, food distribution programs, health clinics, emergency centers and other vital support services.
- On November 2, 2021, the City Council adopted a resolution to add a full-time Community Services Manager position to provide administrative, policy, coordination, and communication functions to develop strategies to address homelessness issues in the community.
- The City Council allocated \$304,000 and amended its Agreement with Contra Costa County to add a fulltime Masters Level Social Worker (MSW) to the CORE team for Fiscal Years 2021-22 and 2022-23.
- At its goal setting session in April 2022, the City Council made the development of a Strategic Plan to address homelessness in the community a Tier I priority and set aside \$2.4 million dollars to develop and implement the Strategic Plan.
- On May 3, 2022, the City was also awarded approximately \$1.25 million dollars over a five-year period in Permanent Local Housing Allocation (PLHA) grant funds from the State of California, which will be used to provide housing navigation, support services, and 6 to 12 months of rental subsidy to rapidly rehouse people experiencing homelessness.
- The City provides case management services to assist in outreach and connect those experiencing homelessness to available resources.

Accessory Dwelling Units

- The City has amended its ordinance establishing standards and regulations for accessory dwelling units (ADU) and junior accessory dwelling units (JADU), consistent with and in certain instances more permissive than State law (Government Code Section 65852.2).
- The City reviews, approves, and tracks the timely review of ADU building permit applications. The Community Development Department collects data annually on building permit issuance

and construction of ADUs for the Housing Element Annual Progress Report.

- The City has dedicated \$310,000 in grant funds and is in the process of establishing a pre-approved Accessory Dwelling Unit building permit ready plan sets, which will be made available to the public free of charge. The program will establish six sets of floor plans of various sizes and shapes with assorted architecture styles to match Concord’s existing housing stock.
- Since 2018, the City is averaging the construction of 38 [Accessory Dwelling Units](#) per year, which is expected to increase further due to the removal of barriers for their development as well as making plans publicly available at no cost to the public.

General

- The City continually monitors pending State housing legislation, policies, and funding, and advocates for changes that will increase affordability and homeownership opportunities and reduce the risk of displacement and homelessness in Concord. As an example of such advocacy, on May 9, 2022, the City Council sent a letter to the Assembly Appropriates Committee supporting AB 2170, a pending bill that would promote homeownership by giving owner-occupants and public entities a “First Look” at purchasing bank-owned properties, and prohibiting “bulk sales” of foreclosed homes.

1.6 Program Implementation

Program 1: *Accessory Dwelling Units*

The City has amended its ordinance establishing standards and regulations for accessory dwelling units (ADU) and junior accessory dwelling units (JADU), consistent with and in certain instances more permissive than State law (Government Code Section 65852.2). The City submitted the updated ordinance to the State Department of Housing and Community Development (HCD) in July 2021 for its review, is still awaiting HCD’s comments, and will incorporate amendments, as required by HCD, upon receipt of comments. Further, the City will develop and adopt a program that incentivizes and promotes the creation of ADUs that can be offered at an affordable rent for extremely low-, very low-, low-, or moderate-income households or households with special housing needs (**Assembly Bill [AB] 671, 2019**).

In addition, the City reviews, approves, and tracks the timely review of ADU building permit applications. The Community Development Department collects data annually on building permit issuance and construction of ADUs for the Housing Element Annual Progress Report. As part of this program, the Community Development Department commits to continued monitoring of ADU development, including approved affordability of each unit.

Further, the City will develop a web-based “ADU Toolkit” which will include Frequently Asked Questions (FAQs), development standards, financial/regulatory incentives (once adopted), an overview of the permit process, required forms, and permit-ready ADU construction-level drawings to allow for “off-the shelf” ADUs. The ADU Toolkit will assist with the promotion and streamlining

of the production of ADUs by providing information in one location along with guidance on navigating the permit process. Permit ready plans will encourage the construction of ADUs by reducing the cost through the availability of a selection of pre-approved ADU building plans that will be available on the City’s website free of charge. The City will conduct robust outreach by promoting to the community in both English and Spanish the availability of the pre-approved ADU plans through social media, the newspaper, the City’s website and e-newsletter with more than 10,000 subscribers, notification to housing groups/advocates, a freeway oriented digital reader board, and meetings with the various business groups (e.g. Chamber of Commerce) and local lumber and hardware stores.

The City will also conduct outreach and education to ADU owners regarding compliance with fair housing and tenant protection laws, including Senate Bill (SB) 329 and SB 222, which prohibit discrimination against tenants using Housing Choice (Section 8) vouchers to pay rent. The City will include resources on these topics in the ADU Toolkit and at the Permit Counter.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 1.1: Coordinate with HCD and update ADU Ordinance within 12 months of receipt of HCD’s findings. • 1.2: Amend ADU Ordinance, if needed, to conform to future amendments to State law and submit to HCD within 60 days of adoption. • 1.3: Monitor the development of ADUs, including affordability, and collect and report data for the Housing Element Annual Progress Report annually. • 1.4: Develop and adopt an affordable ADU incentive program by April 2025. Regulatory and financial incentives will be selected, such as a reduction in development regulations or a waiver of parking requirements. • 1.5: Develop and make publicly available permit-ready ADU plans by October 2022. • 1.6: Develop and release a comprehensive web-based “ADU Toolkit” including permit-ready plans, FAQs, development standards, financial/regulatory incentives (once adopted), an overview of the permit process, required forms and information regarding fair housing and tenant protection laws by March 2023. • 1.7: Conduct English and Spanish outreach and education to ADU owners regarding compliance with fair housing and tenant protection laws, including SB 329 and SB 222, which prohibit discrimination against tenants using Housing Choice (Section 8) vouchers to pay for rents by the end of June 2023. Include resources on these topics in the web-based ADU toolkit, at the Permit Counter, and conduct at least three training sessions during the planning period.
Responsible Agency	Community Development Department

Funding Sources	City General Fund and SB2 Funds
Relevant Policies	1.1, 1.2, 1.3, 1.4, 1.7, 1.8, 3.1
Fair Housing Issue	Disproportionate Housing Needs and/or Integration/Segregation and or/ Disparities in Access to Opportunity
Contributing Factor(s)	The availability of affordable units in a range of sizes; location and type of affordable housing.
Action Type	New Housing Choices and Affordability in Areas of Opportunity.

Program 2: *Addressing Constraints to Development*

Constraints to providing a variety of housing types have been identified in Appendix C. The City will further address constraints to the development of housing, including housing for extremely low-income households and housing for persons with disabilities. This will include amendments and clarifications to the City’s Development Code related to how manufactured housing is permitted, the inclusion of objective criteria to determine when a Neighborhood Meeting is required, and clarifying language related to hillside development permits.

Objective(s)/Timeframe(s)	To permit a variety of housing types consistent with State law, the City will implement the following amendments to its Development Code by December 2025: <ul style="list-style-type: none"> • 2.1: Allowing manufactured housing on a permanent foundation in the same manner as other single family uses in the same zone. • 2.2: Provide objective criteria for determining when a Neighborhood Meeting is required for housing development. • 2.3: Clarify the difference between a minor and major hillside development permit and associated procedures.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.2, 1.8, , 3.7
Fair Housing Issue	Disparities in Access to Opportunities
Contributing Factor(s)	Regulatory barriers to providing housing as required by new State law.
Action Type	New Housing Choices and Affordability in Areas of Opportunity

Program 3: *Affordable Housing Development Toolkit*

The City will actively work with the development community to assist in the development of affordable housing, especially housing for extremely low-income households and households with special housing needs. The City will develop an Affordable Housing Toolkit that will provide details on available resources to assist the development community in affordable housing production. These resources will include guidance on navigating development permit processes, available affordable

housing incentives, a map of available underutilized and vacant sites, and notices of City funding available to provide financial assistance in affordable housing development.

The Affordable Housing Toolkit will be made available on the City website, and will carry out the following:

- Promote the availability of sites and engage developers through resources that support development activity. This will include, at minimum, an online map of vacant and underutilized sites identified in the Sites Inventory, with site area, zoning, and other information including a list of surplus land.
- Maintain information on the City's website that applies to any proposal for a housing development project; including a current schedule of fees, exactions, applicable affordability requirements, all zoning ordinances, development standards, and annual fee reports or other relevant financial reports to ensure consistency with **AB 1483**.
- Maintain a list of notices of City funding available to provide financial assistance in affordable housing development.
- Maintain a link to State and federal low-interest land acquisition/construction funds available for development of housing affordable to extremely low-, very low-, low-, and moderate-income households.

Further, the City will continue to offer a centralized, one-stop counter for permit processing to streamline the development process to provide preliminary application reviews to assist applicants with the filing process.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 3.1: Develop an Affordable Housing Development Toolkit by December 2023 to provide the aforementioned resources, as well as any additional resources that may be useful in assisting developers. • 3.2: Continue to provide a centralized virtual and/or in-person, one-stop counter for permit processing to streamline the development process to provide preliminary application reviews to assist applicants with the filing process.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.5, 1.7, 2.5, 3.1, 3.5, 3.6
Fair Housing Issue	Outreach
Contributing Factor(s)	Lack of a variety of media and the availability of affordable units in a range of sizes.
Action Type	New Housing Choices

Program 4: *Annual Progress Reports*

The City will continue to report annually on the City’s progress toward implementation of the programs identified in the Housing Element and toward its eight-year RHNA housing production targets, including units that have been substantially rehabilitated, preserved or acquired, consistent

with the standards set forth in Government Code section 65583.1, subdivision (c) (**AB 879, 2017**). City staff will present the Housing Element Annual Progress Report (APR) to the City Council for review through an annual housing forum before submitting to the State Housing and Community Development Department, in accordance with the requirements of Government Code Section 65400. Through the annual housing forum, the City will invite local housing advocacy groups, developers, and other interested parties to engage in a discussion on housing needs, resources, and ideas.

Further, the City will identify and prioritize local surplus lands available for housing development affordable to lower-income households and report on these lands annually through the APR. (**AB 1255, 2019; AB 1486, 2019**). The City will conduct annual outreach to local affordable housing developers to establish a notification list, which will ensure interested developers are notified of the availability of surplus lands.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 4.1: Conduct a housing forum annually and report to the City Council and the community on Housing Element progress. • 4.2: Identify and prioritize surplus lands available for lower-income housing development and report on these annually by April 1st through submittal of the APR. • 4.3: Annually conduct outreach to local affordable housing developers through email notifications to establish a notification list for City surplus lands.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 2.1, 2.5
Fair Housing Issue	Fair Housing Enforcement and Outreach Capacity
Contributing Factor(s)	Lack of Fair Housing resources.
Action Type	Mobility Strategies

Program 5: *Affordable Housing Streamlining*

To further assist in the development of housing for extremely low-, very low-, low-, and moderate-income households, the City provides a streamlined approval process in accordance with State requirements for qualifying affordable housing development proposals (SB 35)¹, and will continue to report on such proposals in the Housing Element Annual Progress Report. Further, the City will continue to update its SB 35 application forms and procedures based on any future changes to State law. Although the City is already implementing SB 35, the Development Code has not been updated to be consistent with SB 35; therefore, the City will amend its Development Code to include the State law requirements and will continue to update to remain consistent with State law. The City will

¹ Under Government Code Section 65913.4 (commonly referred to as “SB 35”), multifamily housing developments that satisfy objective planning standards—among other requirements—may be approved through a streamlined, ministerial approval process in certain jurisdictions, including the City of Concord. Developments approved through the streamlined approval process are not subject to a Conditional Use Permit or to the California Environmental Quality Act (CEQA).

continue to implement the provisions of SB 35 throughout the planning period and will process 100% of qualifying projects ministerially.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 5.1: Amend the Development Code to expand development permit streamlining consistent with State law by December 2024. • 5.2: Process all SB 35 applications consistent with State law throughout the planning period. • 5.3 Update the City’s application forms, procedures, and Development Code to reflect any future changes to State law, throughout the planning period.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.3, 1.5, 1.7, 3.1, 3.6
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	The availability of affordable units in a range of sizes.
Action Type:	New Housing Choices and Affordability in Areas of Opportunity

Program 6: *By-Right Development*

The City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on vacant or underutilized sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements in accordance with Government Code Section 65583.2(c) and Housing Element law. Previously identified sites that may qualify for by-right development are identified in Exhibit A, Electronic Sites Inventory Form, of Appendix E.

Further, the City will identify a location, process, and procedure by which residential and mixed-use development can be permitted by-right, especially in areas near amenities and resources such as transit, parks, childcare facilities, and within established commercial and near key areas of employment. This will include evaluation of opportunities to establish a Housing Sustainability District, a Workforce Opportunity Zone, or an affordable housing overlay where eligible projects would qualify for streamlined California Environmental Quality Act review, ministerial permit processing, and additional incentives beyond those allowed under the State density bonus.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 6.1: Amend the Development Code by January 2024 to permit by-right development on sites previously identified in past Housing Elements in which at least 20 percent of the units are affordable to lower income households in accordance with the specifications of Government Code Section 65583.2(c). 6.2: Provide additional pathways by which residential and mixed-use development providing at least 20% affordable units can be permitted by-right by June 2026.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.5, 1.6, 1.7, 1.8, 2.4, 3.1, 3.6, 4.1
Fair Housing Issue	Disparities in Access to Opportunity; RECAPs, and/ or Integration/Segregation; Displacement Risk
Contributing Factor(s)	The availability of affordable units in a range of sizes, including near services or amenities.
Action Type:	New Housing Choices and Affordability in Areas of Opportunity/ Place-based Strategies.

Program 7: Code Enforcement

The City’s Building Division has a robust Multi-Family Rental Housing Inspection and Maintenance Program (MFIP) to address tenant complaints, Building Code and Housing Code violations, and to enhance the quality of life for residents living in multifamily units. This program is implemented by proactively identifying deteriorated housing stock, responding to complaints, and assisting property owners with compliance to promote the rehabilitation of housing in accordance with minimum local and/or state Building, Housing Code and Health and Safety standards.

The MFIP applies to all residential rental buildings with four or more units, including rooming houses with four or more rental spaces (units or rooms), with exceptions for subsidized residential rental buildings where 100 percent of the units are restricted by federal, state or local programs, or for the first five years following construction of a new development. The program operates on a two-year cycle during which all rental dwelling units and common areas on the property are inspected. The inspection determines whether the property complies with Building and Housing Codes and identifies any substandard maintenance conditions that do not meet the minimum standards established by local and state laws. Properties that do not comply, are required to be altered or repaired to obtain the required level of compliance, and a re-inspection of the property is required to verify compliance. If any rental unit is found to be unsafe to occupy, the owner is responsible for the costs and expenses for the relocation of any tenant from that unit.

As part of the MFIP, the City also offers a Self-Certification Program for well-maintained properties that do not have previously identified and uncorrected violations, do not have outstanding payments associated with the MFIP Self-Certification Program; and whose owner has a current business license

for the facility. If the property is found ineligible to participate in the Self-Certification Program, the property is subject to the standard MFIP requirements and inspections. For qualifying properties, owners must submit an application packet certifying that conditions at the property achieve the rental unit and property standards listed on the MFIP’s Self-Certification Checklist. Properties in the Self-Certification Program have 25% of all rental units inspected on a random basis in the first year of their two-year program cycle.

The City also provides an online portal through the Building Division’s MFIP webpage, where residents can submit a complaint for health, safety or maintenance issues that landlords have failed or refused to resolve. Staff members from the MFIP then notify the landlord of any required actions or repairs that must be taken. After repairs are made, the City contacts the tenant to confirm the issues have been resolved. Additionally, the City’s website clearly provides code enforcement resources and technical assistance for residents.

The City will continue to ensure the safety of residential buildings through enforcement of building codes on both complaint-driven and proactive bases, and through administration of the MFIP for rental housing enforcement conditions/ inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 7.1: Continue to administer the MFIP and Self-Certification Program option for qualifying properties throughout the planning period. 7.2: Through the complaint-driven inspections, Building Division staff will make property owners aware of current resources on the City website to assist with the remediation of violations, within 90 days of receipt of a complaint. 7.3: Maintain up-to-date Building Code enforcement and substandard housing resources to ensure they are easily accessible to all residents, including extremely low-, very low-, low- and moderate-income households throughout the planning period.
Responsible Agency	Building Division; Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.5, 2.1, 2.2, 2.5, 4.1
Fair Housing Issue	Racially and Ethnically Concentrated Areas of Poverty and/or Disparities in Access to Opportunity for Persons with Disabilities
Contributing Factor(s)	Deteriorated and abandoned properties; Lack of assistance for housing accessibility modifications
Action Type	Place-Based Strategies to Encourage Community Conservation and Revitalization

Program 8: *Fair Housing*

The City seeks to expand the range of housing opportunities, including for residents with low and moderate incomes, older adults, people with disabilities, large families, female-headed households with children, and people experiencing homelessness. To make adequate provision for the housing needs of all segments of the community, the City must ensure equal and fair housing opportunities are available to all residents. The City will continue to advance fair housing through continued implementation of the following actions:

- **Analysis of Impediments to Fair Housing Choice** – As part of the Contra Costa County Consortium, the City participates in the regional Analysis of Impediments to Fair Housing Choice. The City will continue to collaborate in the Analysis of Impediments to Fair Housing Choice for the Contra Costa County Consortium and continue to work with the Contra Costa CDBG/HOME Consortium to reduce impediments to fair housing choice.
- **Eden Council for Hope and Opportunity (ECHO) Fair Housing** – The City contracts with ECHO Fair Housing (ECHO) for fair housing services. Services provided by ECHO include fair housing testing and counseling. Additionally, ECHO operates a rent review and eviction harassment program for the City. The City will continue to contract with ECHO to provide fair housing, tenant-landlord counseling, mediation, education, and outreach services.

The City makes information available on fair housing services in both English and Spanish, and will continue to distribute resources to residents.

In addition to continuing those fair housing programs that the City already participates in, the City is committed to the following additional actions to affirmatively further fair housing:

- **Housing Trust Fund** – A regional housing trust fund can leverage housing funds to bring state and federal money to the region, increasing funds to support affordable housing activities. In 2019 AB 1487 was signed into law, establishing the Bay Area Housing Finance Authority (BAHFA). BAHFA is the first public entity focused entirely on the region’s housing needs in the Bay Area. This bill allows BAHFA to place new funding measures on the ballot in the nine Bay Area counties, enabling the region to raise up to \$1.5 billion annually for housing. On November 2, 2020 Contra Costa County voters passed Measure X, a countywide half-cent sales tax with collection of the tax beginning on April 1, 2021. Measure X includes funding (\$10 million in year one and an ongoing annual allocation of \$12 million) for the establishment of an affordable housing trust fund with a top priority of building permanent housing for households earning less than 50% of the Area Median Income. Given these new affordable housing revenue streams and the County’s efforts to establish a housing trust fund, Concord will advocate for and participate during the County’s annual needs assessment to ensure the funding of affordable housing remains an identified priority, as needed and seek to collaborate or establish a partnership with the County for funding projects and programs in Concord.
- **Community Land Trust** – Community Land Trusts (CLTs) are community-based non-profit organizations that retain ownership of property to maintain affordability. CLTs provide a mechanism for creating affordable homeownership opportunities and maintaining long-term affordability, increasing opportunities for upward mobility. To support the formation of CLTs in Concord, the City will include the topic of CLTs as an agenda item for discussion with the

Contra Costa County Consortium. Through this effort, the City can raise awareness of CLTs and work at the regional level to develop opportunities for the Contra Costa County Consortium to attract outside experts that can support communities in the formation of a CLT.

- **Increased Opportunity in Higher Resources Areas** – Allowing for the development of multifamily residential uses across the City can increase opportunities for existing and future residents to live where they choose. To increase geographic equity and opportunities for residents, the City will identify and rezone areas appropriate for medium and high residential densities, specifically in areas designated as “Moderate Resource” or “High Resources” on the TCAC Opportunity Maps in Appendix D, with consideration for access to amenities and/or public transit.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 8.1: Continue to participate in the Analysis of Impediments to Fair Housing Choice every 5 years. • 8.2: Continue contract with qualified service provider for fair housing counseling, education, and outreach services throughout the planning period. • 8.3: Continue to fund contract with a qualified service provider throughout the planning period to conduct programs aimed at increasing economic self-sufficiency and upward mobility for low-income Concord residents, with targeted outreach throughout the planning period regarding these programs in the area along Monument Boulevard identified as a Racially and Ethnically Concentrated Area of Poverty (R/ECAP) according to federal (HUD) guidelines. Targeted outreach will include coordinating with community-based organizations (CBOs) that serve the R/ECAP to distribute information in English and Spanish about available programs via e-mail, flyers and other methods recommended by the CBOs at least twice per year, and within 60 days of any new fair housing programs or policies becoming effective. • 8.4: Within three months following the adoption of program guidelines for the award and distribution of Measure X affordable housing trust funds, coordinate with Contra Costa County staff to determine potential funding that will be available for programs and/or projects within Concord. If necessary to meet Concord’s housing needs, continue coordinating with County staff and elected officials within one year of adoption of Measure X guidelines to evaluate and advocate for potential expansion of Measure X affordable housing funds including the evaluation of a partnership between the City and County. • 8.5: By December 2022, coordinate with Bay Area Housing Finance Authority (BAHFA) to determine potential funding that will be available to programs and/or projects within Concord. If necessary to meet Concord’s housing needs,
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	<p>continue coordinating with BAHFA and elected officials within one year to evaluate and advocate for potential expansion of BAHFA funds.</p> <ul style="list-style-type: none"> • 8.6: Rezone sites to increase multifamily residential options outside of areas designated as “Low Resource” on the Tax Credit Allocation Committee’s most recent Opportunity Maps. Begin the rezone process by December 2024 to conduct outreach, analyze opportunities, and complete CEQA analysis to finalize the rezone by December 2026. • 8.7: Bring forward community land trusts as an item on the Contra Costa County Consortium Agenda by July 2024 to initiate a discussion on establishing a community land trust by providing funding for an outside expert, which can acquire existing properties for long-term affordability and a pathway to ownership within the planning period. • 8.8: Throughout the planning period, seek grants that provide additional resources for areas identified as “Low Resource” or “Lower Resource” on the opportunity maps prepared by the Tax Credit Allocation Committee, with special emphasis on the area along Monument Boulevard identified as a Racially and Ethnically Concentrated Area of Poverty (R/ECAP) according to federal (HUD) guidelines. • 8.9: By July 2024, utilize grant funds from the Governor’s Office of Emergency Services to: (1) compile, integrate and analyze language data for the R/ECAP Census Tracts; (2) build a comprehensive picture of the community’s language needs for emergency management purposes; (3) integrate language data to improve communication plans, identify gaps in preparedness, and develop a comprehensive strategy for incorporating language access considerations into all steps of the City’s emergency management plans. • 8.10 Contract with qualified service provider to conduct at least three training sessions during the planning period for property owners on fair housing laws, with targeted outreach to owners of property within the R/ECAP as described in Objective 8.3. Training shall include avoiding discrimination based on income or other protected classes, and requirements for reasonable accommodation under the Americans with Disabilities Act. • 8.11: Continue contract with qualified service provider throughout the planning period to conduct at least five phone calls/inquiries per year to test compliance with fair housing laws, e.g. by having people of color or those with foreign accents attempt to obtain housing, evaluate property owner/manager
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	responses, and report apparent violations to responsible authorities.
Responsible Agency	Community Development Department
Funding Sources	Federal/Local Grant Funds
Relevant Policies	3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 4.1, 4.2, 4.3
Fair Housing Issue	Disproportionate housing needs and disparities in access to opportunity.
Contributing Factor(s)	Location and type of affordable housing and access to financial services.
Action Type	New housing choices and affordability in areas of opportunity,

Program 9: *Middle Density*

To ensure an efficient use of land and more walkable neighborhoods, the City provides standards for small lot and medium density development. Through the implementation of these standards, the City provides a reduction in development standards in exchange for small lot development, facilitating the production of units that can provide homeownership opportunities, while ensuring an efficient use of land.

To further facilitate the production of housing that may provide homeownership options and to increase opportunities for an efficient use of land in single family zones, the City will create a ministerial process by which single-family zoned lots can be subdivided to accommodate additional single-family units and duplexes, consistent with the requirements of SB 9.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 9.1: Continue to provide a reduction in development standards for qualifying small lot, medium density residential development throughout the planning period. 9.2: Adopt an ordinance to implement the provisions of SB 9 to establish ministerial review procedures for proposed lot splits of existing single-family residential lots by July 2024.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 2.2, 2.4, 2.5, 3.1, 4.2, 4.3
Fair Housing Issue	Disproportionate Housing Needs, Including Displacement Risks and/or Disparities in Access to Opportunity
Contributing Factor(s)	Regulatory barriers to providing housing as required by new State law and location and type of affordable housing.
Action Type	New Housing Choices and Affordability in Areas of Opportunity

Program 10: *Homeownership Assistance*

The City will continue to offer and support the following programs to provide assistance for maintaining and achieving homeownership:

First Time Home Buyer (FTHB) Program

Through the FTHB program, the City provides loans of up to \$40,000 to assist qualified lower- and moderate-income FTHB households with down payments and closing costs. Bay Area Affordable Homeownership Alliance (BAAHA), a non-profit organization, assists the City in administering the program, including monitoring compliance of ownership units that are regulated and/or funded by the City.

The City will continue to provide loans to first time home buyers and will continue to work with BAAHA (or another qualified service provider) to monitor compliance of regulated ownership units.

Below Market Rate (BMR) Homeownership Program

Through its Inclusionary Housing Program (see Program 12 below), the City makes possible BMR homeownership units affordable to households earning 120 percent or less of area median income. BMR homes are specific dwellings where eligibility is based on income and household size. The program also assists current BMR homeowners in selling, refinancing or making capital improvements to their home. The program is designed to serve lower- and moderate-income households. BAAHA assists the City in administering the program, including ensuring compliance with affordability requirements and monitoring compliance of ownership units that are regulated and/or funded by the City.

To facilitate the production of BMR affordable homeownership units, the City will establish inclusionary requirements for condominium developments through an amendment to its Inclusionary Housing Program.

Mortgage Credit Certificate (MCC) Program

The MCC program is administered by the Contra Costa County Department of Conservation and Development and is a homebuyer assistance program designed to help lower-income families afford homeownership. The program allows homebuyers to claim a dollar-for-dollar tax credit for a portion of mortgage interest paid per year.

The City will promote the availability of this program to homeowners and families through informational resources found on the City's website.

Tenant/Community Opportunity to Purchase Act

A Tenant Opportunity to Purchase Act (TOPA) is an anti-displacement housing policy that gives tenants increased options to have secure housing when the property they rent goes up for sale, while also preserving affordable housing. A Community Opportunity to Purchase Act (COPA) is a similar policy geared toward non-profit affordable housing providers, community land trusts, and similar entities, who may purchase a property to maintain affordability and prevent displacement of current tenants.

Generally, TOPA and COPA programs implement the first right of refusal for tenants or qualified nonprofits, respectively, prior to listing the property on the open market. The programs do not require a property owner to accept the offer but do allow for tenants or qualified nonprofits the opportunity to match a third-party offer. For COPA programs, they generally require long-term affordability restrictions, which are deed recorded, thereby preserving affordable housing, and reducing the risk of displacement.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 10.1: Facilitate the production of BMR units through an amendment to the Inclusionary Housing Program including removing exemption for rental and condo units by December 2024. • 10.2: Continue to provide pathways to homeownership through the MCC program throughout the planning period through annual notifications to the City’s interested parties list and publication to the City’s website. • 10.3: Continue to provide at least three loans per year to first time home buyers and continue to work with a qualified service provider to monitor compliance of regulated ownership units. • 10.4: Conduct an evaluation of best practices for the development and implementation of a Tenant Opportunity to Purchase Act (TOPA) and/or Community Opportunity to Purchase Act (COPA) program. Bring forward findings to City Council for public comment, consideration, and further direction by December 2026.
Responsible Agency	Community Development Department; Contra Costa County Department of Conservation and Development; Contra Costa County Housing Authority
Funding Sources	City General Fund; City’s Affordable Housing Funds, Community Development Block Grants, Contra Costa County Funds;
Relevant Policies	1.3, 1.5, 1.7, 2.2, 2.4, 3.1, 3.5, 4.1
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Lack of sufficient affordable housing and displacement risk
Action Type	Enhancing housing mobility strategies; Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing; and protecting existing residents from displacement.

Program 11: *Incentives to Assist in Development*

The City will continue to provide financial and regulatory incentives to proactively encourage and facilitate the development of affordable housing for lower-income households, particularly those with

extremely low incomes and special housing needs including large households, older adults, and persons with physical or developmental disabilities. Incentives include streamlined ministerial approval, reduced fees, parking reductions, and direct financial allocations to assist in the development of housing.

This includes the following incentives that are currently offered by the City:

- **Density Bonus** – The City implements the State’s current Density Bonus program, although the City’s implementing ordinance is outdated. The City will amend its density bonus ordinance to ensure consistency with State law, including the provision of a bonus for student affordable housing, senior housing, 100% affordable developments, and units affordable to moderate-income households.
- **Transit Station Overlay District** - The City provides an automatic 25-percent increase in density and floor area ratio through the Transit Station Overlay District to facilitate high density development near transit.
- **Affordable Housing Incentive Program** - The City provides additional incentives, above and beyond the Density Bonus Program, in exchange for the development of affordable units beyond the requirements of the City’s Inclusionary Housing Program. All incentives provided by the Affordable Housing Incentive Program supersede the bonuses and incentives offered by the Transit Station Overlay District. Incentives include but are not limited to reduced open space requirements, increased permitted height, reduced and deferred fees, and reduced parking requirements.

The City will amend the Affordable Housing Incentive Program to clarify that incentives associated with this program include ministerial review.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 11.1: Amend the local Density Bonus Ordinance to ensure consistency with State Density Bonus law by July 2024. • 11.2: Continue to offer additional density and floor area ratio within the Transit Station Overlay District throughout the planning period. • 11.3: Continue to offer affordable housing incentives beyond what is permitted under the State Density Bonus throughout the planning period. • 11.4: Amend the Affordable Housing Incentive Program to provide clarity on incentives offered, including ministerial review by January 2026.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.5, 1.7, 1.8, 2.2
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Lack of sufficient affordable housing
Action Type	Encouraging development of new affordable housing

Program 12: *Inclusionary Housing*

The City’s Inclusionary Housing Program requires the inclusion of a minimum percentage of affordable housing units in all projects with five units or more. The Inclusionary Housing Program includes a threshold exempting rental and condominium developments from this program until 600 rental units have been constructed. The City will further advance this program through the removal of the 600-unit threshold and by providing an option for moderate-income rental units to satisfy inclusionary requirements.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 12.1: Continue implementing the City’s Inclusionary Housing Program. • 12.2: Adopt an amendment to remove the threshold which excludes application of the inclusionary housing requirements on rental and condominium developments by July 2024. • 12.3: Adopt an amendment to allow moderate-income rental units to satisfy inclusionary requirements by July 2024. • 12.4: Update inclusionary housing fee to maintain project feasibility while maximizing affordable housing funds by July 2024.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.3, 1.5, 1.6, 1.7, 2.4, 3.6
Fair Housing Issue	Disproportionate Housing Needs, Including Displacement Risks
Contributing Factor(s)	The availability of affordable units in a range of sizes.
Action Type	New Housing Choices and Affordability in Areas of Opportunity

Program 13: *Lot Consolidation Incentive*

To facilitate affordable housing development on smaller parcels, the City currently offers technical assistance in the parcel merge process to streamline the process in a timely manner. To further incentivize lot consolidation to facilitate housing production, especially for lower-income households, the City will provide financial or regulatory lot consolidation incentives which may include priority processing, fee deferments and waivers, and the modification of site development standards.

In addition, the City will continue to facilitate lot consolidation and development of smaller parcels through the following actions:

- Publicize the lot consolidation program on the City’s website, outreach to the development community, and through preliminary meetings with prospective project applicants.
- Assist affordable housing developers in identifying opportunities for lot consolidation using the City’s GIS Map Portal and property database.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 13.1: Continue to provide technical assistance and assist affordable housing developers in identifying opportunities for lot consolidation using the City’s GIS system and property database through preliminary meetings throughout the planning period. • 13.2: Amend the Development Code to provide financial or regulatory incentives and a density bonus in exchange for lot consolidation by December 2023. • 13.3: Publicize the adopted program on the City’s website, at the Permit Center, and by notice to affordable housing providers within 3 months of adoption.
Responsible Agency	Community Development and Information Technology Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.5, 1.6, 1.8, 2.2
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Lack of sufficient affordable housing
Action Type	Encouraging development of new affordable housing

Program 14: *No Net Loss*

The City will use its development permit data to monitor development activity, proposed rezones, and identified capacity to ensure adequate remaining capacity is available to meet any remaining unmet share of the RHNA for all income levels throughout the entirety of the planning cycle, consistent with no net loss requirements. The City will develop and implement a monitoring procedure pursuant to Government Code Section 65863, and will make the findings required by that code section to demonstrate whether or not remaining sites identified in the housing element are adequate to accommodate the City’s remaining share of the RHNA if a site is proposed for development with fewer units or at a different income level than shown in the Housing Element.

If, at any time during the planning period, a development project results in fewer units by income category than identified in the Sites Inventory (Appendix E) for that parcel and the City cannot find that the remaining sites in the Housing Element are adequate to accommodate the remaining RHNA by income level, the City will, within 180 days, identify and make available additional adequate sites to accommodate the remaining RHNA. Any site identified to be upzoned to meet “no net loss” requirements will satisfy the adequate site requirements of Section 65583.2 and will be consistent with the City’s obligation to affirmatively further fair housing. **(SB 166, 2017)**

Additionally, the City will continue to implement minimum densities in multifamily zones and zones that permit mixed-use development. This will help the City ensure an efficient use of land that is available for development.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 14.1: Develop a methodology for tracking remaining capacity of sites identified in the Sites Inventory no later than December 2023. This could include a revision of internal permitting procedures to review permit applications against identified sites; creating an interactive map of sites and their corresponding capacity to connect with permit data; or monthly capacity analysis. • 14.2: Review each development approval on sites listed in the Housing Element and make findings required by Government Code Section 65863 if a site is proposed with fewer units or a different income level than shown in the Housing Element throughout the planning period. • 14.3: In the event that adequate capacity is not available, identify additional sites within 180 days.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 4.1, 4.2, 4.3
Fair Housing Issue	Disproportionate Housing Needs
Contributing Factor(s)	Location and type of affordable housing and opportunities for new development
Action Type	New Housing Choices and Affordability in Areas of Opportunity

Program 15: *Objective Design Standards*

The City will increase transparency and certainty in the development process through objective design standards. The City will monitor Development Code amendments to ensure any new design standards applicable to housing developments are objective (*i.e.*, without involvement of personal or subjective judgment by a public official, and uniformly verifiable by reference to the City’s regulations), in accordance with the requirements of the Housing Crisis Act of 2019 (**SB 330, 2019; SB 8, 2021**) and related State housing law.

Further, to remove constraints to development associated with the City’s Design and Site Review process and to facilitate the development of housing on the sites identified to accommodate the RHNA, the City will create and adopt Objective Design Standards to provide ministerial processing of the Design & Site Review permit for projects that meet 100% of the objective criteria of the standards.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 15.1: Monitor Development Code amendments throughout the planning process to ensure any new design standards are objective. • 15.2: Amend the Design and Site Review Process by July 2024. • 15.3: Develop and adopt Objective Design Standards by July 2024.
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Responsible Agency	Community Development Department
Funding Sources	City General Fund; Local Early Action Plan (LEAP) and Regional Early Action Plan (REAP) grants
Relevant Policies	1.1, 1.2, 1.7, 1.8, 2.2, 5.1

Program 16: *Parking Reductions*

Large parking lots associated with religious institutions provide opportunities for partnerships that facilitate the development of housing for vulnerable populations. The City will amend the Development Code in accordance with State law, to identify a process by which parking requirements can be reduced for religious institutions in order to accommodate housing developments. **(AB 1851)**

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 16.1: Amend the Development Code by December 2024 as required by State law (AB 1851) to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 1.2, 1.5, 1.7, 1.8, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6
Fair Housing Issue	Disparities in Access to Opportunity
Contributing Factor(s)	Land use and zoning laws nonconformance with new State law.
Action Type	New Housing Choices and Affordability in Areas of Opportunity

Program 17: *Preservation and Housing Rehabilitation*

The City makes special efforts to help preserve affordable housing and maintain Concord’s older housing stock. Where possible, the City utilizes public funds to provide assistance in the rehabilitation and conservation of deteriorated multifamily developments, single-family homes, and mobile homes.

Through these programs, the City will continue to help preserve and rehabilitate housing for tenants and homeowners in extremely low-, very low-, and low-income households, households with disabilities, and older adults. This will be accomplished through the allocation of affordable housing funds for multifamily developments and provision of housing rehabilitation loans and grants.

Affordable Multifamily Units Preservation

As funding permits, the City partially subsidizes the costs of acquisition and/or rehabilitation for older multifamily rental complexes for property owners interested in extending or introducing an affordable housing component. The City will continue to seek opportunities to allocate public funds to finance the rehabilitation and acquisition of affordable multifamily complexes in the City.

Housing Rehabilitation Loan and Grant Program

In addition, the City’s Housing Rehabilitation Loan and Grant Program provides grants and no-interest/low-interest loans to low-income homeowners. The City employs Habitat for Humanity as a contractor to administer the program to assist low-income homeowners with needed repairs and improvements to single-family and mobile homes, such as to address emergency repairs, weatherization, accessibility for those with disabilities, lead-based paint abatement and security for older adults. Through this program, the City provides improvements for energy efficiency through replacement of existing energy inefficient appliances and weatherization.

Home rehabilitation loans are offered for major repairs up to \$75,000. Loans are provided with 1% simple interest with a 15-year term. Older adults (62+) and households with a disability may opt for a deferred payment plan and their asset threshold to apply is higher than that of other applicants. Older adults are also eligible for weatherization and home security grants up to \$15,000.

Historical Preservation

The City maintains an inventory of historic properties and will continue to maintain the inventory during the 6th Cycle.

Solar Incentive Program

As part of the rehabilitation of housing, the City will continue to promote energy conservation where possible and implement updates to the State’s Green Building Standards. The City Council also establishes itself as the City of Concord Solar Utility, granting rules, regulations, and procedures to encourage and promote the use of solar energy in projects, including rehabilitated housing.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none">• 17.1: Continue to provide funds for the acquisition and/or rehabilitation of multifamily housing in exchange for affordability. The City will release a Notice of Funding Availability by December 2025.• 17.2: Continue to contract with a qualified service provider to administer the Housing Rehabilitation Loan and Grant Program throughout the planning period.• 17.3: Conduct targeted outreach in the R/ECAP regarding the Housing Rehabilitation Loan and Grant Program; see Objective 8.3 for specific outreach methods and frequency.• 17.3: Continue to maintain an inventory of historic properties through the CEQA review process and will annually review and update the City’s maps.• 17.4: Continue to promote energy conservation through the Solar Incentive Program and Green Building Standards throughout the planning period.
Responsible Agency	Community Development Department

Funding Sources	Affordable Housing Funds CDBG Fund and Revolving Loan Funds (<i>rehab loan & grant program</i>) County Funding
Relevant Policies	1.5, 2.1, 2.2, 2.3, 2.4, 2.5, 5.1
Fair Housing Issue	Access to Opportunity and Disproportionate Housing Needs and Integration and Segregation Patterns and Trends
Contributing Factor(s)	Need for increased accessibility for those with disabilities, including developmental disabilities. Need for addressing housing quality to avoid displacement or substandard conditions.
Action Type	Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing

Program 18: *Preservation of At-Risk Affordable Housing Units*

The City will continue to monitor affordable units under a City Regulatory Agreement and affordable units identified as being at-risk of conversion to market-rate housing. This will include collaboration on the identification of financial resources and establishing cooperative partnerships with affordable housing developers and/or property owners willing to maintain units as affordable to lower-income households, including extremely low-income households. For those properties under current City Regulatory Agreements, the City will work directly with property owners to negotiate potential term extensions, as funding allows. Preventing the conversion of at-risk units to market-rate housing will ensure tenants are not displaced and that affordable units are not lost from the City’s housing stock. The extension of existing project-based rental assistance covenants, or utilization of other funding sources, will help preserve and/or extend affordability.

Additionally, the City contracts with Compliance Services, LLC to assist staff with monitoring and managing affordability compliance for multifamily complexes that are utilizing City funds. The City will work toward maintaining the rent restrictions of at-risk developments by monitoring any changes in ownership, management, and status of deed restrictions. Further, the City will work with the owners of these developments to retain the units and, where feasible, provide technical assistance to property owners and/or organizations interested in purchasing and maintaining the properties should the current owners be interested in selling.

Assisted Housing Projects at Risk of Conversion (2021)

<i>Project Name</i>	<i>Address</i>	<i>Affordable Units</i>	<i>Expiration</i>
Clayton Crossings Apartments	2751 Monument Boulevard	296	2030
Hidden Creek Townhomes	1032 Mohr Lane	128	2028
Sunridge Apartments	1265 and 1271 Monument Boulevard	196	2029
Clayton Way Home/Mary McGovern	1859 Clayton Way	6	2026
The Heritage	2222 Pacheco Blvd	121	2029

Plaza Tower	2020 Grant St.	20	2030
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Source:

City of Concord 2021.

California Housing Partnership, At-risk federal and state subsidized and/or assisted affordable developments 2022.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 18.1: Continue to contract and coordinate with a qualified service provider to monitor compliance for City-funded affordable multifamily housing properties. 18.2: When regulated units are found to be at risk of conversion to market rate, coordinate with a qualified service provider and property owners at least 2 years in advance of conversion to market rate to work toward solutions for retaining affordability, and notify owners of such units at least 1 year prior to conversion.
Responsible Agency	Community Development Department; Housing Authority of Contra Costa County
Funding Sources	City General Fund, Affordable Housing Funds
Relevant Policies	1.5, 2.1, 2.3, 2.4, 2.5
Fair Housing Issue	Disproportionate housing needs including displacement risks.
Contributing Factor(s)	Displacement due to economic pressures and the availability of affordable units in a range of sizes.
Action Type	Protecting existing residents from displacement.

Program 19: *Replacement Requirements*

Consistent with the Housing Crisis Act of 2019 (Government Code Section 66300(d)) and related State housing law, the City requires that housing development projects provide at least the same number of dwelling units as any units demolished to build the project, including any units existing on the site within the past five years. Government Code Section 66300(d) and the City further require that for demolished units subject to certain affordability restrictions or occupied by low- or very low-income households, the project meet applicable requirements for affordability, relocation benefits, and right of first refusal for existing occupants. The City will work with tenants of units that could be redeveloped and provide them with linguistically appropriate educational materials regarding tenant rights and resources.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> 19.1: Enforce replacement requirements in accordance with Government Code Sections 66300(d) and 65915(c)(3) throughout the planning period. 19.2: By December 2024, require that applicants of proposed development projects involving demolition or removal of existing dwelling units provide an affidavit signed by the property owner regarding compliance with the provisions of
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	<p>SB330 and SB8 for current or recent tenants and replacement units.</p> <ul style="list-style-type: none"> • 19.3: Provide education and technical assistance to tenants to ensure they are aware of their rights and available resources. Develop educational materials by December 2023 and conduct outreach related to tenant rights and resources as described in Objective 20.3.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 2.1, 2.4, 2.5
Fair Housing Issue	Disproportionate Housing Needs, Including Displacement Risk
Contributing Factor(s)	Needs for preventing displacement and for providing needed affordable housing.
Action Type	Protecting existing residents from displacement. Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing

Program 20: *Residential Tenant Protections*

Rental Tenant Protection Program

In July 2020, the City Council adopted the Residential Tenant Protection Program (RTPP) (Chapter 19.40 of the Municipal Code) which requires, among other things that a tenant be provided a written lease with specified minimum lease terms and relocation assistance for no-fault evictions. In January 2021, the City Council also included a Rent Registry Program within the larger RTPP. The RTPP sunsets on January 1, 2030. The RTPP provides protections to tenants beyond what is required under State law (AB 1482, 2019). The RTPP strengthens the State relocation payment requirement by:

- Increasing the relocation amount for tenants due to no-fault eviction from a flat amount of \$1,000 to two times the monthly rent or \$5,000, whichever is greater.
- Requiring landlords to offer tenants a twelve-month lease.

Tenants may report Residential Tenant/Landlord issues, including rent or eviction issues, to the City’s service provider via phone or email.

As part of the larger RTPP, the Residential Rent Registry Program went into effect in July 2021 and requires all multifamily complexes of four or more units to register with the City on an annual basis. The program is administered by the City and its consultant, and requires property owners to provide information on tenancy and rents. The City will continue to work with its consultant to ensure all landlords are registered and will continue to publish an annual report based on the rent registry results to provide transparency around the available data. This data can be used to identify potential fair housing or rent related issues. The data will further inform decision making on City housing policies and programs related to the impact of rents and/or potential fair housing and rent disparities or issues in the local housing market.

Residential Tenant Anti-Harassment Protection Ordinance

Additionally, the City has recently taken action to further Fair Housing practices in the City by prohibiting discrimination, violations of tenants’ rights to privacy, and landlord retaliation through a Residential Tenant Anti-Harassment Protection (RTAHP) Ordinance. The City Council adopted the RTAHP Ordinance on June 28, 2022. The RTAHP Ordinance aims to deter harassment, as defined in Code of Civil Procedure Section 527.6(b)(2), by residential property owners, to encourage such owners to follow the law and uphold their responsibility to provide habitable rental properties, and to give tenants legal recourse when they are subjected to harassment by owners.

The City is and will continue working with local housing advocacy groups to develop and distribute linguistically appropriate educational materials pertaining to the RTPP and the Residential Tenant Anti-Harassment Protection Ordinance to property owners, apartment managers, and tenants, with more intensive bilingual outreach efforts in the City’s R/ECAP along Monument Boulevard.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 20.1: Continue implementation of Residential Tenant Protection Program throughout the planning period including the following : (1) the Residential Rent Registry Program, whereby the City collects rent and tenancy data with an annual report provided to City Council on the data collected and trends observed, to inform and evaluate additional tenant protections as directed by Council; (2) require that rental property owners offer tenants a minimum lease term of 12 months; (3) require that rental property owners provide relocation assistance of at least two times the monthly rent or \$5,000, whichever is greater, to tenants undergoing no-fault evictions. • 20.2: Provide education and technical assistance to tenants to ensure they are aware of the Residential Tenant Anti-Harassment Protection Ordinance. Develop and distribute educational materials by September 2022. Conduct more intensive, bilingual outreach for households in the R/ECAP along Monument Boulevard as discussed in Objective 20.4. • 20.3: Provide Citywide education and technical assistance to tenants to ensure they are aware of all federal, State, and local tenant protections in place for them and resources for reporting potential issues. Develop and distribute educational materials by January 2024 and conduct at least one educational session every two years during the planning period. • 20.4: Conduct more intensive, bilingual outreach regarding tenant protections in the R/ECAP along Monument Boulevard, including, but not limited to, translating materials from Objective 20.3 into Spanish, partnering with non-profit organizations serving this area to distribute materials and meeting announcements, and conducting at least one in-person training session in Spanish within or near the R/ECAP, by
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	January 2024. Conduct ongoing outreach throughout the planning period as discussed in Objective 8.3.
Responsible Agency	Community Development Department
Funding Sources	City General Fund, CDBG Fund
Relevant Policies	2.4, 4.1, 4.2, 4.3
Fair Housing Issue	Disproportionate Housing Needs and Racially and Ethnically Concentrated Areas of Poverty
Contributing Factor(s)	Needs for preventing displacement.
Action Type	Protecting existing residents from displacement. Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing.

Program 21: *Special Housing Needs*

The City will provide assistance for those with special housing needs including older adults, large families, female-headed households, and persons with disabilities through the following methods:

- Home Match Contra Costa - This program provides matching services for older adults that would like to share their homes for companionship, extra income, or assistance with home maintenance. This service includes applicant screenings, home visits, interviews, on-going mediation, outreach, and written agreements for living arrangements.
- Increased Accessibility - The City will promote increased accessibility by connecting developers and residents to resources on design features that are accessible and safe to all people regardless of age, size, ability, or disability. This can include guidance on home retrofits for increased accessibility and referrals to independent living centers.
- The City will coordinate with the Regional Center of East Bay to implement an outreach program that informs families within the City on housing and services available for persons with disabilities.

Additionally, the City will continue to support large families and female-headed households through development fees on new construction and tenant improvements to provide continued funding for the Concord Child Care Program.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 21.1: Continue to connect older adults through Home Match Contra Costa through annual notifications to the City’s interested parties list. • 21.2: Create a Housing for Persons with Disability webpage that connects residents to accessibility and service resources such as home-retrofit grants and independent living services within the planning period. • 21.3: Update the Resources for Housing Developers webpage to connect developers to accessibility resources, including a link to the City’s Building Division, ADA Compliance webpage within the planning period.
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	<ul style="list-style-type: none"> • 21.4: Promote the web pages through media channels within the planning period. • 21.5: Continue providing funding for the Concord Child Care Program.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.7, 2.5, 3.1, 3.2, 3.3, 3.6, 4.1, 4.2, 4.3
Fair Housing Issue	Disparities in Access to Opportunity, including access to opportunity for people with disabilities.
Contributing Factor(s)	Lack of assistance for housing accessibility modifications and location and type of affordable housing.
Action Type	New housing choices and affordability in areas of opportunity.

Program 22: *Support for People Experiencing Homelessness*

On July 1, 2021, the City allocated \$304,000 for fiscal year 2021-22 to organizations that provide safety net services to the City’s most vulnerable residents. Services include the 211 Call Line², Contra Costa County’s Coordinated Outreach Referral Engagement (CORE)³ program, food distribution programs, health clinics, emergency centers and other vital support services.

On November 2, 2021, the City Council adopted a resolution to add a full-time Community Services Manager position to provide administrative, policy, coordination, and communication functions to develop strategies to address homelessness issues in the community. Further, the City Council also amended its Agreement with Contra Costa County to add a fulltime Masters Level Social Worker (MSW) to the CORE team for Fiscal Years 2021-22 and 2022-23.

At its goal setting session in April 2022, the City Council made the development of a Strategic Plan to address homelessness in the community a Tier I priority and set aside \$2.4 million dollars to develop and implement the Strategic Plan.

On May 3, 2022, the City was also awarded approximately \$1.25 million dollars in Permanent Local Housing Allocation (PLHA)⁴ grant funds from the State of California, which will be used to provide housing navigation, support services, and 6 to 12 months of rental subsidy to rapidly rehouse people experiencing homelessness for the next 5 years.

Additionally, the City will provide processes that facilitate the production of housing to meet the needs of those experiencing homelessness. Through this program the City will:

- Amend the Development Code to allow supportive housing by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting

² 211 is a countywide call center and the County’s main entry point to its system for assisting the unhoused individuals. It is a 24/7 hotline run by the nonprofit Contra Costa Crisis Center.

³ The CORE program works to engage and stabilize individuals and families experiencing homelessness. The outreach team identify individuals experiencing homelessness, assess their housing and service needs, and facilitate connection to shelter and services.

⁴ Overall, it is anticipated that the City will receive \$2.9 million over five years.

multifamily uses, consistent with State requirements. Supportive housing shall be permitted in accordance with California Government Code Section 65651 (AB 2162, 2018).

- Amend the Development Code to ensure that Emergency Shelters are not subject to the Design and Site Review process (AB 139, 2019).
- Amend the Development Code to ensure that Single Room Occupancy (SRO) or Group Housing are not subject to the Design and Site Review process.
- Amend the Development Code to permit the development of Low-Barrier Navigation Centers as a use by-right, without requiring a discretionary action, in mixed-use and non-residential zones that permit residential uses (AB 101, 2019). Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.

Further, the City provides case management services to assist in outreach and connect those experiencing homelessness to available resources. The City will continue to provide this service throughout the planning period.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 22.1: Appropriate \$2.4 million towards the development and implementation of the Strategic Plan to address homelessness. • 22.2: Develop and implement a Strategic Plan to address homelessness by December 2024. • 22.3: Continue to fund position for a Community Services Manager position through the planning period.. • 22.4: Continue to fund the MSW for the CORE program through the planning period as funding is available. • 22.5: Rapidly rehouse people experiencing homelessness through January 2026 or longer if funding is made available. • 22.6: Amend the Development Code, consistent with State requirements, by February 2024. • 22.7: Continue to fund organizations that serve individuals and families experiencing homelessness.
Responsible Agency	Community Development Department; Contra Costa County Health Services
Funding Sources	City General Fund, Affordable Housing Funds, State and Federal Funds
Relevant Policies	1.7, 1.8, 3.1, 3.2, 3.3, 3.6, 3.7, 4.1
Fair Housing Issue	Disparities in Access to Opportunities.
Contributing Factor(s)	Access to financial services.
Action Type	Mobility strategy.

Program 23: *Water and Sewer Priority for Affordable Housing*

Pursuant to Chapter 727, Statutes of 2005 (SB 1087), the City is required to deliver its adopted Housing Element and any amendments thereto to local water and sewer service providers. This legislation allows for coordination between the City and water and sewer providers when considering approval of new residential projects. The Contra Costa Water District (CCWD) is responsible for providing water service to the City, and the City oversees wastewater collection and conveyance. As such, the City will distribute a copy of the adopted 6th Cycle Housing Element to CCWD, the area water provider, and coordinate internally with the Public Works Department for review and consideration when reviewing new residential projects to ensure adequate water and sewer capacity is available to accommodate housing, especially housing for lower-income households.

The current 2020 CCWD Regional Urban Water Management Plan acknowledges the requirements and includes the projected water use for single-family and multifamily housing needed for lower-income households. The Community Development Department will coordinate with the area water provider and with Public Works to prioritize proposed developments with housing affordable to lower-income households, including extremely low- and very-low income by providing copies of subsequent updates or amendments to the Housing Element, if any. The coordination efforts will further support the prioritization of water and sewer services for future residential development, including units affordable to lower-income households, as a public agency or private entity providing water or sewer services must adopt written policies and procedures that grant a priority of service to housing units affordable to lower income households and shall not deny or condition the approval of an application for services without specific written findings in accordance with State law.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 23.1: Distribute adopted Housing Element to CCWD and the City’s Public Works Department by June 2023, or within one month of Housing Element adoption. • 23.2: Increase coordination with CCWD and the City’s Public Works Department to ensure that adopted policies prioritize water and sewer allocation for affordable housing developments through contact at the beginning of the planning period and every 5 years or sooner if the Housing Element is amended. .
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.1, 5.1

Program 24: *Short Term Rentals*

A short-term rental is typically defined as a dwelling unit, or portion thereof, that is offered or provided to a guest by a short-term rental owner or operator for fewer than 30 consecutive nights. Such rentals are also commonly referred to as vacation rentals.⁵ While short-term rentals can provide a positive economic impact to a city with an additional income through tax revenues, they can also

⁵ Law Insider. <https://www.lawinsider.com/dictionary/short-term-rental>

reduce the available housing supply, often impacting residents who depend on affordable housing, contributing to increasing housing and rental prices.

The Concord community has expressed concern over displacement of tenants through conversion of conventional rental dwelling units to short-term rentals (e.g., AirBnB and VRBO units). Through this program, the City will evaluate the development of regulations to address this issue.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 24.1: Conduct an evaluation of best practices for the development of regulations to address displacement of residential tenants due to conversion of conventional dwelling units to short term rentals (e.g. AirBnB and VRBO units). Present evaluation to City Council for public comment, consideration and further direction by December 2026. • 24.2: If regulations are adopted, conduct outreach and education within 6 months of adoption to increase property owner and tenant awareness of the new regulations. Conduct more intensive, bilingual outreach in the City’s R/ECAP along Monument Boulevard, including, but not limited to, translating materials into Spanish, partnering with non-profit organizations serving this area to distribute materials and meeting announcements, and conducting at least one in-person training session in Spanish within or near the R/ECAP. • 24.3: If adopted, include regulations in educational materials on tenant protections (Program 20) within six months of adoption.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.4, 2.4, 2.5
Fair Housing Issue	Disproportionate Housing Needs and Racially and Ethnically Concentrated Areas of Poverty
Contributing Factor(s)	Needs for preventing displacement
Action Type	Protecting existing residents from displacement. Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing.

Program 25: *Advocacy for State Housing Legislation, Policies and Funding*

The City continually monitors pending State housing legislation, policies, and funding, and advocates for changes that will increase affordability, homeownership opportunities, and to reduce the risk of displacement and homelessness in Concord. As an example of such advocacy, on May 9, 2022, the City Council sent a letter to the Assembly Appropriates Committee supporting AB 2170, a pending bill that would promote homeownership by giving owner-occupants and public entities a “First Look” at purchasing bank-owned properties and prohibiting “bulk sales” of foreclosed homes.

Through this program, the City will continue to advocate for changes at the State level that will help address Concord’s housing needs, including changing the methodology for allocation of Low Income Housing Tax Credits (LIHTCs), which makes it difficult for affordable housing projects in Concord to obtain LIHTCs.

Objective(s)/Timeframe(s)	<ul style="list-style-type: none"> • 25.1: Coordinate with the City’s public affairs consultant to receive regular updates (at least quarterly) regarding pending State housing legislation, policies, and funding. • 25.2: Submit letters annually, to the State legislature, Governor, and other State entities supporting pending legislation, policies and funding that will increase affordability, homeownership opportunities, and to reduce the risk of displacement and homelessness in Concord. • 25.3: Request the support of other local jurisdictions for housing legislation, policies and funding that the City supports, through elected officials, professional groups (e.g. Public Management Association and Planning Directors), the League of California Cities, and other similar organizations. • 25.4: During the next public comment period on the methodology for allocation of Low-Income Housing Tax Credits (LIHTCs), submit a letter requesting changes to make projects in Low Resource areas (as classified on the most recent TCAC Opportunity Maps), but with access to transit and other amenities, more competitive for LIHTCs. • 25.5: Submit a letter to the State Assembly supporting AB 2710 (Kalra), if and when that bill is re-introduced. AB 2710 would provide tenants, community land trusts and nonprofit and governmental entities a first right of refusal to purchase rental housing. If AB 2710 is not re-introduced or not adopted, support any similar bills as they are.
Responsible Agency	Community Development Department
Funding Sources	City General Fund
Relevant Policies	1.4, 2.5
Fair Housing Issue	Disproportionate Housing Needs and Racially and Ethnically Concentrated Areas of Poverty
Contributing Factor(s)	Needs for preventing displacement
Action Type	Protecting existing residents from displacement. Improving place-based strategies to encourage community conservation and revitalization, including preservation of existing affordable housing.

Appendix A: Review of 5th Cycle Programs

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Introduction

The City of Concord's (City) 5th Cycle Housing Element was adopted by the City Council in November 2014. For the 5th Cycle Housing Element planning period (2015–2023), the City committed to specific programs to address the comprehensive housing needs of the community and to help achieve the goals identified in the 5th Cycle Housing Element. This section evaluates progress made toward the goals and actions of the 5th Cycle Housing Element, and is used as a foundation to inform the programs of the 6th Cycle Housing Element (2023–2031) tailored to meet this 6th Cycle's housing needs.

California Government Code Section 65588(a) requires each jurisdiction to regularly review its Housing Element and evaluate the following:

- the progress in implementation of the Housing Element;
- the effectiveness of the Housing Element programs in progress toward achieving the housing goals and objectives; and
- the appropriateness of the housing goals, objectives, and policies, and in contributing to the attainment of the State housing goal.

Evaluation of Previous Housing Element Implementation

This evaluation provides information on the extent to which programs have achieved stated objectives and whether these programs continue to be relevant to addressing current and future housing needs in Concord. The success of a program toward achieving the 5th Cycle goals is the basis for the goals, policies, and programs, and the establishment of objectives provided in the 6th Cycle. **Table 1** lists each program from the 2015–2023 5th Cycle Housing Element, and identifies the program's progress, effectiveness, and appropriateness. The goals, policies, and programs of the 6th Cycle Housing Element reflect each program's effectiveness as determined by this evaluation. Because many of the 5th Cycle programs are written as policy without clear objectives, the programs have been repurposed to comply with 6th Cycle Housing Element requirements, including programs with a strong action plan and implementable objectives.

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
<i>Goal H-1: Promote a balanced supply of housing types, densities, and prices to meet the needs of all income groups residing or who wish to reside in Concord.</i>		
<p>Policy H-1.1: Ensure an adequate supply of housing sites to achieve the City’s Regional Housing Needs Allocation (RHNA) goals for the 2007-2014 planning period.</p>	<p>Program H-1.1.1: Continue to identify potential sites for reuse to ensure an adequate supply of land for residential development.</p> <p>To maintain adequate sites throughout the planning period to accommodate the City’s RHNA, on a project basis, pursuant to Government Code Section 65863, the City will monitor available residential capacity and evaluate development applications, particularly in non-residential and/or mixed use zones. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for extremely low-, very low-, low, or moderate-income households, the City will identify and zone sufficient sites to accommodate the shortfall.</p> <p><i>Responsible Agency:</i> Planning Division</p> <p><i>Time Frame:</i> Ongoing to comply with Government Code section 65863</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund</p>	<p>Progress: As part of the annual reporting process, the City of Concord (City) continues to monitor site capacity and the net remaining RHNA. The Sites Inventory is located in the Housing Element document on the City’s website, Planning & Housing page, under “Housing Element 2014-2022.” No net loss of housing capacity occurred during the planning period; therefore, no rezoning of sites stemming from net loss occurred.</p> <p>Effectiveness: This program is effective and necessary, and required by State law.</p> <p>Appropriateness: Continue. Revise as needed to comply with current no-net loss, State law.</p>
	<p>Program H-1.1.2: Continue to implement minimum densities in multi-family zoning districts.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The City continues to implement minimum density in multifamily zoning districts pursuant to Chapter 18.30 of the City’s Development Code.</p> <p>Effectiveness: This program is effective because the Development Code has been codified to include minimum densities for multifamily districts. Therefore, City staff continue to carry out this program through implementation of the existing Development Code.</p> <p>Appropriateness: Continue. This program will be carried over to the 6th Cycle and be revised to include evident objectives.</p>
	<p>Program H-1.1.3: Maintain an inventory of vacant and underutilized sites and make it available to interested home builders.</p> <p><i>Responsible Agency:</i> Planning Division</p>	<p>Progress: The City’s website provides the Sites Inventory. The Sites Inventory is located in the Housing Element document on the City’s website, Planning & Housing page, under “Housing Element 2014-2022,” last updated on January 5, 2015. The inventory of vacant and underutilized sites identified in the Sites Inventory did not experience</p>

**Table 1
Review of 2015–2023 Housing Element Past Accomplishments**

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Time Frame:</i> Update inventory starting with this Housing Element, and thereafter every two years</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund</p>	<p>many changes; therefore, updates every 2 years were not needed. City staff met with interested home builders routinely to discuss housing opportunities and directed home builders to the Sites Inventory document.</p> <p>Effectiveness: This program did not have any quantified objectives to measure its success. However, the intent was to make sites identified in the Sites Inventory available to interested home builders, which was done by City staff. As such, the program was effective.</p> <p>Appropriateness: Continue. This program will be revised with objectives to better promote the availability of sites and engage developers.</p>
	<p>Program H-1.1.4: Continue to allow multifamily residential development projects on parcels identified in the Housing Element land inventory as Downtown Mixed Use (DMX) and Commercial Mixed Use (CMX) zoning districts.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None Required</p>	<p>Progress: The City has permitted several multifamily residential developments on parcels that are zoned as DMX with a Use Permit. The Argent, a 181-unit project; Concord Village, a 230-unit project; Galindo Terrace, a 62-unit project; and The Ashbury, a 313-unit project, are zoned as DMX and were identified in the 5th Cycle Sites Inventory. The Grant, a 228-unit project, was also developed on a parcel zoned as DMX but was not identified in the 5th Cycle Sites Inventory.</p> <p>Effectiveness: The program has been effective. During the 5th Cycle, five developments were approved and permitted in the DMX zone with multifamily housing units, four of which were identified in the 5th Cycle Housing Element Sites Inventory.</p> <p>Appropriateness: Delete. This program will not be carried over to the 6th Cycle. The DMX and CMX zones allow for multifamily development; therefore, allowing multifamily residential development projects in these zones is a routine function of the City’s Development Code. Staff will continue to implement this program through implementation of the existing Development Code.</p>
<p>Policy H-1.2: Encourage a variety of housing types in new subdivisions, including duplexes,</p>	<p>Program H-1.2.1: Promote mixed-use developments and a mix of housing types in Concord, consistent with the General Plan.</p> <p>Financial incentives may be provided on a project-by-project basis if funds are available.</p>	<p>Progress: The City’s Development Code, specifically, Chapters 18.40 and 18.45, continues to promote mixed-use developments within the Office, Commercial Districts, and Downtown Districts, as well as implements general</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
townhomes, small apartment buildings or condominiums.	<p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund; Inclusionary Housing In-Lieu Fee Revenues</p>	<p>development standards for new mixed-use projects and housing types.</p> <p>Effectiveness: The program does not have quantified objectives; however, based on the intent of the program, it has been effective because there has been mixed-use development and a mix of housing types built in Concord. For example, the 2019 and 2020 Annual Progress Report documented a fourplex (1985 North Third Street) permitted in the CMX zone and a 62-unit development (Galindo Terrace) permitted in the DMX zone. A recent project known as The Grant, a 228-unit project (1676 and 1776 Grant Street), is also zoned as DMX and includes residential and ground-floor retail.</p> <p>Appropriateness: Continue. Revise to include evident objectives that incentivize development.</p>
	<p>Program H-1.2.2: Continue to promote mixed-use, transit-oriented development Downtown where housing is located in close proximity to urban services, shopping and/or public transportation through implementation of the Downtown Specific Plan.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund</p>	<p>Progress: The City’s Development Code provides development standards for mixed-use projects, and staff also continues to implement the Downtown Specific Plan (DSP), which was amended on February 25, 2021.</p> <p>Effectiveness: The program was effective. As previously mentioned, various projects permitted during the 5th Cycle planning period were in the DMX zone located in close proximity to urban services. This program is ongoing as the City continues to promote mixed-use, transit-oriented development in the Downtown and through implementation of the DSP.</p> <p>Appropriateness: Delete. This program will not continue in the 6th Cycle. The City adopted the DSP in June 2014 and it was amended on February 25, 2021. As such, City staff implement the program through the DSP.</p>
	<p>Program H-1.2.3: Facilitate the development of housing in the Downtown that is affordable to a households at a range of income levels (extremely low-, very low-, low-, moderate-, and above moderate-incomes).</p> <p>This program provides financial and regulatory incentives where possible to encourage mixed-income housing developments (i.e. developments with units affordable to extremely low-, very low-, low-, moderate-, and above moderate-</p>	<p>Progress: This is an ongoing program. The DSP was adopted and promotes mixed-income housing in the Downtown, with focus on the transit overlay. In 2017, the City Council amended the Development Code by permitting junior accessory dwelling units by creating a streamlined ministerial process and reducing fees. In 2019, the City allocated \$7.8 million to Resources for Community Development for the construction of a 62-unit affordable</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>incomes households) to help meet the need for units affordable to lower income households.</p> <p><i>Responsible Agencies:</i> City Council and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> The Downtown Plan envisions up to 4,020 new units being added over the next 20 to 24 years. Much of Concord’s recent planning has been structured to promote the inclusion of units affordable to extremely low-, very low-, low- moderate-, and above moderate-income households within these anticipated new projects. In keeping with Concord’s current Inclusionary policy and In-Lieu Fee, it is expected that approximately 400 of these units will be targeted to be affordable to extremely low-, very low-, low- moderate-, and above moderate-income households, creating a mixed-income transit-oriented urban neighborhood. Based on the 8-year RHNA cycle, it is anticipated that at least 1,600 new units will be developed during the period in the Downtown.</p> <p><i>Funding:</i> General Fund, Inclusionary Housing In-Lieu Fee Revenues</p>	<p>housing development located in the DSP area (Galindo Terrace). In 2020, a 75-unit project (RMG) and a 313-unit project (The Ashbury) were permitted in the DSP area. The RMG project includes 15 very low-income and 15 low-income units, and 45 above moderate-income units permitted ministerially under the City’s Affordable Housing Incentive Program. The Ashbury, which includes 313 low-income units was permitted under Senate Bill (SB) 35: Streamlined Affordable Housing.</p> <p>Effectiveness: To date, the program has partially met its objective that at least 1,600 new units would be developed during the planning period in the Downtown (400 of which would be affordable). There have been approximately 425 units permitted or developed affordable to very low- and low-income households, and 1,089 units developed or permitted affordable to above moderate-income households built or permitted in Downtown.</p> <p>Appropriateness: Continue. The program will be modified to include evident objectives that incentivize development.</p>
<p>Policy H-1.3: Promote the development of single-family homes that are affordable to very low, low- and moderate-income households in all new single-family developments as well as in existing single-family neighborhoods.</p> <p>For the purposes of this policy, “single-family” includes detached homes, townhomes, and similar housing types. Condominiums are considered separately under Guiding Policy H-1.7.</p>	<p>Program H-1.3.1: Encourage the development of small lot subdivisions and continue to implement standards for small-lot single-family homes.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 40 new single-family homes (detached or attached) affordable to low-, very low-income households and 60 new single-family homes (detached or attached) affordable to moderate income households.</p> <p><i>Funding:</i> General Fund for planning staff</p>	<p>Progress: During the 5th Cycle, the City approved several small lot subdivisions resulting in 6 recorded units affordable to lower- and moderate-income households.</p> <p>Effectiveness: This program was not effective in incentivizing a substantial number of affordable single-family homes. Although small-lot subdivision approvals and development of single-family homes occurred, most of the development is affordable to only above moderate-income households.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.3.2: Provide financial incentives through the City’s First Time Home Buyers Program to make small-lot single family homes affordable for households earning 60 to 100 percent of AMI.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p>	<p>Progress: This program is ongoing. In 2019, the City provided first-time homebuyer funds to five new households earning 60% to 100% of the area median income (AMI). Additionally, the City provides development standards for small-lot single-family homes in the Development Code.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> First-time Homebuyer Program</p>	<p>Effectiveness: The program is effective as the City has provided funding for first-time homebuyers.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
<p>Policy H-1.4: Encourage secondary units in new and existing residential developments and the development of duplex condominiums, where duplexes are consistent with the General Plan.</p>	<p>Program H-1.4.1: Encourage duplex condominiums, where consistent with the General Plan density standards, to increase opportunities for home ownership.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 40 units created through new duplex condominium or second units developments and/or legalization or compliance of existing illegal second units.</p> <p><i>Funding:</i> None required.</p> <hr/> <p>Program H-1.4.2: Allow secondary units in the single-family districts in accordance with State law.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> On going</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: This program is ongoing. City staff encourage duplexes and condominiums when reviewing proposed residential projects through the implementation of the General Plan and development standards in the City’s Development Code. In 2019, the City approved a duplex (1499 Davis Avenue) and in 2020, the City approved 70 townhome units (Clayton Townhomes) and a four-unit townhome project at 1985 North Third Street. In 2021, the City approved a six-unit townhome project at 2150 Fremont Street.</p> <p>Effectiveness: This program is effective. The program objective was to incentivize development of 40 units through new duplex, condominium, or second unit developments. The City reported one duplex, 74 townhomes, and approximately 127 secondary units or accessory dwelling units (ADUs) during its 5th Cycle.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p> <hr/> <p>Progress: This is an ongoing program. The City permitted approximately 127 ADUs during the 5th Cycle planning period.</p> <p>Effectiveness: The program is effective. In 2019, the City was awarded \$310,00 in State SB 2 Planning Grants Program funds to encourage the construction of ADUs in Concord by offering pre-approved architectural plans to the public and a streamlined approval process through the City’s Planning Division. In late 2020, a Request for Proposals was issued to engage a design firm to create the architectural plans for the City in 2021 for launch in 2022. Further, in 2019 and 2020, the City permitted approximately 79 ADUs.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives and to ensure compliance with recent changes to State law.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>Program H-1.4.3: Review the development codes as it related to secondary units and consider amendments to make the development of secondary units more feasible.</p> <p>Potential amendments include eliminating the other owner-occupancy requirement for properties with secondary units in the transit overlay zone and modifications to the requirements based on lot size, lot dimensions, and units size to make these requirements less restrictive.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Review the development code and make revisions in 2015</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund/General Plan and Zoning Ordinance Reimbursement fee</p>	<p>Progress: This is an ongoing program. The City continues to look for opportunities to streamline ADU approvals where possible and appropriate. For example, in 2020 the City created an information handout/FAQ explaining the types of secondary units allowed by ministerial permit. In the summer of 2021, the City adopted an ADU ordinance to codify ADU regulations consistent with and more permissive than State law.</p> <p>Effectiveness: This program is effective because the City ensures that its Development Code is compliant with State law.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.4.4: Help to reduce the costs associated with building a second unit by working with the Contra Costa Water District to examine the fees charged by the District for extending service to a new detached second unit.</p> <p>The District’s upcoming Facility Reserve Charge update process provides an opportunity to engage with the District on this issue. At the municipal level, the City will evaluate its fees for second units and determine if they can be “scaled” so that small units or units created through the conversion of already habitable floor space are charged at a lower commensurate rate than larger second units, units created through a net addition of floor space, or single-family units.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> 2015-2016</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: This program has been completed. Contra Costa Water District reduced costs of ADUs on January 5, 2016, and again in 2018 in response to updates to State law related to ADUs. The City permitted approximately 123 ADUs since costs were reduced in January 2016.</p> <p>Effectiveness: This program was effective because approximately 123 ADUs have been built or permitted since 2016, and both State law and City updates, including reduced costs associated with building a second unit, provided incentives for ADUs.</p> <p>Appropriateness: This program will not be directly carried over to the 6th Cycle. Financial and regulatory incentives to reduce costs associated with building a secondary unit will be included through other programs.</p>
	<p>Program H-1.4.5: Work with property owners with illegal secondary units to bring them into compliance with the building development codes.</p> <p>This will be done on as individual basis, in response to owners’ request for assistance.</p>	<p>Progress: This program is ongoing. The Building Division documents illegal secondary units and works with property owners to bring the development into compliance. Although owners of ADUs have a right to request a delay in</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Responsible Agencies:</i> Planning Division; and Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>enforcement of building standards for 5 years until January 1, 2035, pursuant to Section 17980.12 of the Health and Safety Code, the City has been working with property owners pursuing legalization and has brought approximately five ADUs or secondary units into compliance per year during the 5th Cycle.</p> <p>Effectiveness: This program has been effective as the City has been able to assist approximately 40 property owners to bring their ADUs or secondary units into compliance through the 5th Cycle.</p> <p>Appropriateness: Delete. The City will continue to work with property owners interested in legalizing their existing second units, but this program will not continue into the 6th Cycle. A new ADU program will be created.</p>
<p>Policy H-1.5: Promote the development and conservation of housing that is affordable to extremely low-, very-low-, low- and moderate-income households.</p>	<p>Program H-1.5.1: Facilitate the development of housing that is affordable to extremely low-, very low-, low-, and moderate-income households through medium and high density zoning and mixed-use zoning, density bonuses, land write-downs, priority permit processing, direct subsidies and other financial incentives, if available.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; Planning Division; and Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: This program is completed as the City’s Development Code, provides an Affordable Housing Incentive Program, Transit Overlay, and State Density Bonus Program to create incentives for mixed-income housing. The City’s Affordable Housing Incentive Program was highlighted on the California Department of Housing and Community Development’s (HCD) website as an example ordinance for promoting affordable housing. The City’s DSP also facilitates the development of housing because it allows for higher densities, where appropriate. The Argent, a development project in Downtown, was approved in June 2017 with 20 very low-income units. In 2019, the City’s Resources for Community Development was awarded \$7.8 million in City funds for a 62-unit project that serves extremely low- and low-income households. In 2020, a 313-unit project, with all units affordable to low-income households, was approved through SB 35 (The Ashbury), and a 75-unit project (RMG), of which 30 units are affordable, was permitted ministerially through the City’s Affordable housing incentive program.</p> <p>In late 2020, as a result of the City’s Inclusionary Housing Program, one newly constructed below-market-rate homeownership unit was sold to an income-qualified</p>

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		<p>household, and four additional below-market-rate units received their building permits.</p> <p>Additionally, in October 2019, the City was awarded \$310,000 in State SB 2 Planning Grants Program funds to encourage the construction of ADUs in Concord by offering pre-approved architectural plans to the public and a streamlined approval process through the City’s Planning Division. In late 2020, a request for proposals was issued to solicit design firms to create the architectural plans for the City in 2021.</p> <p>Effectiveness: This program is effective in facilitating development of housing affordable for all income levels, including lower-income levels, through both regulatory and financial incentives.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.5.2: Continue to publish on the City’s website a list of State and federal low-interest land acquisition/construction funds available for development of homes affordable to extremely low-, very low-, low-, and moderate-income households and provide this to interested home builders.</p> <p><i>Responsible Agencies:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The City provides links to Federal and State websites on the Housing Assistance page, including homebuyer and homeowner resources and resources for housing developers. In addition, the City provides a summary of City inclusionary requirements and the City’s Affordable Housing Fund under the Housing Division page, Resources for Housing Developers.</p> <p>Effectiveness: The objective of this program is to connect homebuilders to State and Federal resources. This program was successful because State grants and City financial incentives were used in the development of several housing developments available for lower-income households.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-1.5.3: Promote parcel consolidation to facilitate the assembly of new housing sites.</p> <p>The City has been successful in promoting parcel consolidation for site development, as noted in Table 43, and has incorporated parcel consolidation efforts into the</p>	<p>Progress: The City has approved several parcel consolidation projects, including The Argent project, which consists of 181 units; Galindo Terrace with 62 units; The Grant project with 228 units; and Avesta Assisted Living with 117 units. Following the guidelines of the State Surplus</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>Downtown Concord Specific Plan, adopted in June 2014. The City has also led an effort to consolidate Successor Agency sites that have been included within the City’s Long Range Property Management Plan (LRPMP), which is anticipated to be approved by the State Department of Finance in early 2015. To continue to facilitate development of new housing sites, the City will:</p> <ul style="list-style-type: none"> • Initiate the Request for Proposal (RFP) process, once the LRPMP is adopted, to invite qualified developers to propose housing projects on the Oak Street and the Galindo Street Successor Agency sites. • Work in partnership with private landowners that are receptive to lot consolidation, on a continuing basis, to assist them in facilitating the parcel merge process in a streamlined and timely manner. <p><i>Responsible Agency:</i> Planning and Economic Development & Housing Divisions</p> <p><i>Time Frame:</i> Ongoing activity, with annual report to City Council on progress</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Land Act, which prioritizes affordable housing development proposals in the disposal of public lands, staff is working on declaring Town Center II and the City-owned parcels located between Oak Street and Laguna Street (with potential for lot consolidation) as "surplus" land. Once declared, staff will issue a Notice of Availability (NOA) to affordable housing developers. The timing of this process is dependent on ongoing direction from the Housing and Economic Development Committee and City Council.</p> <p>Effectiveness: This program is effective because there have been several multifamily development projects through parcel consolidation, which has resulted in approximately 588 units.</p> <p>Appropriateness: Revise and continue as a lot consolidation program with evident objectives.</p>
	<p>Program H-1.5.4: Promote new affordable residential development projects near employment centers, personal services, retail clusters, and key transportation corridors and nodes.</p> <p>The City will continue to work with affordable housing developers to identify appropriate sites located near employment centers, personal services, retail clusters, and key transportation nodes and corridors.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: During the 5th Cycle, approximately 425 affordable units and 1,089 market rate units were built or permitted in the Downtown area, which is near employment centers, retail clusters, and key transportation corridors. In 2019, the City approved a new 62-unit (61 of which are income restricted) affordable housing development in the DSP area as part of the Galindo Terrace project. The Argent project also permitted 20 units for very low-income groups. In 2020, the City also permitted two multifamily residential projects with affordable housing located in the DSP area. The RMG project, located at 1335 Galindo Street, was permitted with 75 total units, 30 of which are affordable, and The Ashbury project, located at 1650 Ashbury Drive, was permitted with 313 units, all of which are affordable.</p> <p>Effectiveness: The program does not have any measurable objectives; therefore, the effectiveness cannot be determined.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
		Appropriateness: Continue. The program will be revised with evident objectives.
	<p>Program H-1.5.5: Provide reduction from the standard parking requirements for new residential projects as allowed by the City’s Density Bonus Program, the Affordable Housing Incentive program, and other provisions of the Zoning Ordinance.</p> <p><i>Responsible Agencies:</i> Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> N/A</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City provides reductions from the standard parking requirements for new residential projects that include affordable housing through its Development Code, specifically its Affordable Housing Incentive Program, Transit Station Overlay District, Density Bonus Program, and in-lieu parking fees. In 2017, the City Council amended the Development Code to provide a clear process for requesting payment of a parking in-lieu fee.</p> <p>Effectiveness: The program has been somewhat effective, as the City was able to provide reductions from the standard parking requirements for two residential projects that included affordable units (the 62-unit Galindo Terrace and 75-unit RMG project), as allowed by the City’s Density Bonus Program, the Affordable Housing Incentive Program, and other provisions of the Development Code.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.5.6: Continue to allow group housing, including Single Room Occupancy units (SRO), in accordance with State law.</p> <p><i>Responsible Agencies:</i> Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The City provides development standards for SROs under Group Housing in the City’s Development Code.</p> <p>Effectiveness: This program is complete, as the Development Code allows for SROs.</p> <p>Appropriateness: Delete. This program will not be continued into the 6th Cycle because it was intended to implement State law and will continue to be implemented by staff as a routine function of the City’s Development Code.</p>
	<p>Program H-1.5.7: Promote the development of affordable housing in all areas designated by the General Plan for multifamily residential development through continued implementation of the Affordable Housing Incentive Program.</p> <p>Participation by developers in the Affordable Housing Incentive program is voluntary, with a range of incentives provided to make development of affordable housing feasible. The available incentives include:</p>	<p>Progress: This program is complete as the Development Code includes the adopted Affordable Housing Incentive Program. Therefore, the City promotes the development of affordable housing through implementation of the Development Code. In 2020, City approved a 75-unit housing development (RMG) with affordable housing, which was permitted ministerially through the City’s Affordable Housing Incentive Program.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<ul style="list-style-type: none"> Residential density increase beyond those provided by State Density Bonus Law; Flexible zoning standards, including reduced development and parking standards, coupled with zoning standards and design review requirements and ensure land use compatibility; Priority permit processing, including any applicable CEQA exemptions; Deferral or reductions of City permit fees. <p>City staff will increase promotion of these available incentives, including preparation of a brochure describing all Affordable Housing Incentives.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund, Inclusionary Housing In-Lieu Fee Revenues</p>	<p>Effectiveness: Based on the intent of this program, it has been effective. Although City staff did not prepare a brochure describing affordable housing incentives available in the City, the City was successful in promoting these incentives through a dedicated webpage on the City’s website.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.5.8: In order to generate additional City funds that can be utilized to facilitate affordable housing production, prepare an update to the Nexus Study for the City’s Housing In-Lieu Fee and adopt a new fee rate based on the updated study that is equal to or less than the maximum fee identified through the study, as appropriate.</p> <p><i>Responsible Agencies:</i> City Council, Planning Commission, and Planning Division</p> <p><i>Time Frame:</i> Prepare updated Nexus Study and adopt new fee rate, as appropriate, in 2015</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund</p>	<p>Progress: In late 2017, the City hired a consultant to prepare a Nexus Study for Inclusionary Housing In-Lieu Fees for rental units. In 2018, the ownership and rental in-lieu fees were updated and scheduled to be increased as specified per year from July 1, 2018 through January 2, 2021. In 2019, the ownership in-lieu fee was updated and increased to facilitate the development of affordable housing.</p> <p>Effectiveness: The program was effective, as the City completed its objective to prepare an updated Nexus Study for the City’s housing in-lieu fee and adopt new fees.</p> <p>Appropriateness: Continue. The program will be revised with evident objectives.</p>
	<p>Program H-1.5.9: Advocate for policies and legislation at the State and Federal level that increase the funding available to support the development and preservation of affordable housing.</p> <p><i>Responsible Agencies:</i> City Council, Planning Commission, and Planning Division</p>	<p>Progress: This program is ongoing. The City did not track the number of policies or legislation it advocated for at the State or Federal levels during the 5th Cycle.</p> <p>Effectiveness: The effectiveness of this program cannot be measured because the City did not track this data during the 5th Cycle.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.5.10: Examine opportunities to develop public private partnerships with experienced partners to create affordable housing through the City’s provision of land, incentives, or partial funding.</p> <p><i>Responsible Agencies:</i> City Council, Planning Commission, and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund, Inclusionary Housing In-Lieu Fee Revenues</p>	<p>Progress: The City has partnered with private and public entities to support the development of affordable housing in the City. Through Successor Agency funding, a rehabilitation project known as Virginia Lane was completed with 91 one- and two-bedroom units in 2018. In addition, the City allocated a total of \$7.8 million in 2019 to Resources for Community Development for the construction of 62 new housing units, including 61 affordable to extremely low- and low-income households. The City also initiated discussions with Bay Area Rapid Transit (BART) regarding construction of affordable transit-oriented development on BART-owned property. In 2019 and 2020, the City entered into discussions with Catalyst Housing to provide multifamily affordable housing using State bonds.</p> <p>Effectiveness: This program has been effective as the City has been able to develop partnerships that led to the development of affordable housing.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
<p>Policy H-1.6: Allow permanent modular/pre-fabricated housing in all residential zones, consistent with State law and building code requirements. Also ensure the conservation and improvement of the City’s existing mobile home parks as part of the City’s affordable housing stock.</p>	<p>Program H-1.6.1: Implement the City’s adopted regulations that allow modular housing units (also known as pre-fabricated) in all residential zones.</p> <p>The City’s regulations allow modular housing units as provided for in State law, if placed on a permanent foundation, connected to public utilities and provided with one covered parking space which is required in all residential districts.</p> <p><i>Responsible Agencies:</i> Building Division; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The program is ongoing as City staff reviews applications for manufactured housing units as permitted by the City’s Development Code, Section 18.200.120. The City received approximately 17 applications for modular housing units through the 5th Cycle.</p> <p>Effectiveness: This program does not have quantified objectives to measure its effectiveness. However, based on the intent of the program, this program has been effective, as the City implements the adopted code that allows for modular housing units in residential zones upon receipt of a building application.</p> <p>Appropriateness: The City was successful in permitting manufactured housing, and this program will be continued. Revisions will include objectives to clarify discretionary</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
		requirements associated with Design and Site Review to ensure that manufactured housing on a permanent foundation is permitted in the same manner as other single-family uses of the same type in the same zone.
	<p>Program H-1.6.2: Require compliance with the City’s Mobile Home Conversion Ordinance, as adopted or amended to comply with State law, to address impacts associated with the closure or conversion of existing mobile home parks to other uses.</p> <p><i>Responsible Agencies:</i> Planning Division; and Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The City’s Mobile Home Conversion Ordinance continues to provide procedures for conversions of a mobile home park to other uses.</p> <p>Effectiveness: No applications related to mobile home closure or conversion have been received.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.6.3: Provide low-interest loans or grants to qualifying households to support the rehabilitation of mobile home units in the City.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 8-10 rehabilitated mobile homes per year</p> <p><i>Funding:</i> CDBG Fund</p>	<p>Progress: The City uses homeowner rehabilitation grant funds for repairs to mobile homes. In 2017, the City awarded four grants and in 2018 it awarded five grants to qualifying households to support the rehabilitation of mobile home units. In 2019, the City awarded four grants/loans to qualifying households to support the rehabilitation of mobile home units. In 2020, the City provided funds to repair 10 mobile homes.</p> <p>Effectiveness: This program was effective as the City has been able to support the rehabilitation of 148 single-family and mobile homes during the 5th Cycle.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-1.6.4: Allow the use of the City’s CDBG funds for the setting up of mobile home foundations, the paving of carports, accessibility modifications, and other construction assistance in mobile home park areas.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p>	<p>Progress: The City awards approximately 17 grants a year to qualifying household to support the rehabilitation of mobile home units and single-family homes through the 5th Cycle.</p> <p>Effectiveness: This program is effective, as the City has been able to support the rehabilitation of 148 single-family and mobile homes during the 5th Cycle.</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Quantified Objective:</i> Assist 10 mobile homes per year</p> <p><i>Funding:</i> CDBG</p>	<p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
<p>Policy H-1.7: Promote the development of new condominiums and cooperatives.</p>	<p>Program H-1.7.1: Ensure that condominiums and cooperatives continue to meet high standards of quality while providing for entry level rental and ownership housing by approving density bonuses in accordance with the City ordinance.</p> <p><i>Responsible Agency:</i> Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 100 new condominium units obtained through density bonuses for 2014-2022 period</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: No application for condominiums were received during the 5th Cycle.</p> <p>Effectiveness: This program was not effective, as the quantified objective for this program was not met. If condominium applications with a density bonus component were received, the City would implement its Density Bonus Program per the provisions of its Development Code.</p> <p>Appropriateness: Continue. Amend to consider alternatives to facilitate condo conversions that offer affordable ownership options for entry into homeownership. Consider objectives that reflect steps the City can take, rather than objectives that rely on the private market.</p>
	<p>Program H-1.7.2: Implement the Condominium Conversion Ordinance to limit the number of rental housing stock converted into condominiums each year.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City has prepared a tracking matrix to monitor condominium conversions. However, no condominium conversions occurred during the 5th Cycle.</p> <p>Effectiveness: The Condominium Conversion Ordinance has been codified in the City’s Municipal Code, Title 17 Subdivisions (Section 17.35.120).</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
<p>Policy H-1.8: Promote a diversity of housing types, including efforts to increase rental and ownership opportunities for moderate- and above-moderate income households.</p>	<p>Program H-1.8.1: Encourage the production of ownership and rental housing in Downtown that is attractive and affordable to moderate and above-moderate income households.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 2,210 for 2014-2022 period (part of Downtown Plan goal of 4,020 units by 2035)</p>	<p>Progress: This program was completed with the adoption of the DSP as the City promotes infill development to increase densities in Downtown and provides incentives that will create opportunities for a mix of ownership and rental housing. Through implementation of the program and DSP, several multifamily residential developments were built in the 5th Cycle.</p> <p>Effectiveness: Although the program has encouraged development or approval of approximately 425 affordable units and 1,089 total units during the 5th Cycle, the</p>

Table 1
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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Funding:</i> None required</p>	<p>program was not effective because it did not meet the quantified objective of 2,210 units.</p> <p>Appropriateness: Delete. Through the adoption of the DSP, this program was largely completed. Residential development will be encouraged through other program’s objectives to encourage development through financial and regulatory incentives.</p>
<p>Policy H-1.9: Remove or reduce constraints to housing production by lowering the cost of development and improving the ease of building in Concord.</p>	<p>Program H-1.9.1: Continue the annual review of the City’s development fees, processing fees, and other charges in the “Master Fees and Charges” to ensure they are not a constraint to development.</p> <p><i>Responsible Agencies:</i> Planning Division; Building Division; and Finance Department</p> <p><i>Time Frame:</i> Ongoing annually</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: This is an ongoing program. Annual fees are reviewed and updated annually, effective July 1st of every fiscal year. The master schedule of fees is available on the City’s website, Community Development Department webpage.</p> <p>Effectiveness: This program has been effective as the City has continued to review its development and processing fees to ensure they are not a constraint to development. The City has permitted approximately 527 units during the 5th Cycle; therefore, fees are not considered a constraint to development.</p> <p>Appropriateness: Continue. Revise objectives to identify the City’s role in implementation of this program.</p>
	<p>Program H-1.9.2: Continue to offer a centralized, one-stop counter for permit processing to streamline the development process.</p> <p>This program continues preliminary reviews to assist applicants with the filing process.</p> <p><i>Responsible Agencies:</i> Planning Division; Building Division; and Engineering Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City continues to offer a one-stop counter for permit processing, and in 2019, the Community and Economic Development Department launched “OpenCounter” a web-based portal for zoning and permit information. In 2020, the City created the Virtual Permit Center (VPC) in response to Covid-19. The VPC allows for online submittal of building permits and planning permits for review by the Building, Planning, Engineering, and Transportation Divisions.</p> <p>Effectiveness: The program is effective because the centralized and online submittal portal has reduced permitting timeframes. For example, certain permits, such as Window Retrofit, are now instant permits online. Although other permit types have the same review time schedules as before online permitting, internal processing of the permits has been simplified for staff.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>Program H-1.9.3: Continue to streamline the processing of building permits for residential developments that include a portion of units as below-market rental rate (BMR) units.</p> <p><i>Responsible Agencies:</i> Planning Division; Building Division; and Engineering Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City’s Density Bonus and Affordable Housing Incentive Programs in the Development Code outline provisions for incentives, which also include expedited or accelerated permitting. The City has also successfully processed projects pursuant to and consistent with the Permit Streamlining (SB 35) under Government Code Section 65913.4, for The Ashbury.</p> <p>Effectiveness: There have been projects that have used density bonus incentives, and the City has received and approved one application under SB 35, The Ashbury (313 units).</p> <p>Appropriateness: Continue. Revise as needed to comply with current Affordable Housing Streamlining, State law.</p>
	<p>Program H-1.9.4: Continue to support legislation that requires special districts to reduce their fees for affordable housing projects.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; Planning Division; and Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: This is an ongoing program. The City is not aware of any such legislation that it supported; however, the City did propose that the Contra Costa Water District reduce its fees for ADUs, which it did.</p> <p>Effectiveness: The program is somewhat effective as the City was successful in advocating for and achieving reduced fees for ADU development.</p> <p>Appropriateness: Continue. This program will be revised to include evident objectives.</p>
	<p>Program H-1.9.5: Review the parking requirements specified in the Development Code and reduce parking requirements for residential development if appropriate.</p> <p>Allow some time before beginning a review of the requirements in order to test the regulations currently set forth in the Development Code as the residential market begins to recover.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Evaluate and revise, as appropriate, in 2018</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: This is an ongoing program. The City provides reduced parking standards through its Affordable Housing Incentive Program, Density Bonus Program, and parking in-lieu fee. In 2017, the City Council amended the Development Code by outlining the process for requesting an in-lieu fee, which is subsidized below the actual cost of providing parking on site. Additionally, staff reviews developments on a case-by-case basis with submittal of a parking study for requested reductions. In 2019, the City approved a reduced parking ratio for the 62-unit Galindo Terrace project by 54 vehicle parking spaces.</p> <p>Effectiveness: This program is somewhat effective, as it has been able to reduce parking requirements for certain residential developments; however, the intent of the</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<i>Funding:</i> General Fund for staff	program was also to review parking requirements to test the effectiveness of the regulations in the Development Code, and, if appropriate, reduce standards for all residential development. Appropriateness: Continue. This program will be revised with evident objectives.
<i>Goal H-2: Preserve and enhance Concord’s residential neighborhoods and improve the quality of life for all residents.</i>		
<p>Policy H-2.1: Support the conservation and rehabilitation of the existing housing stock (including mobile homes) through a balanced program of code enforcement and property improvements, when and where appropriate.</p>	<p>Program H-2.1.1: Utilize public funds to provide assistance in the rehabilitation and conservation of deteriorated single-family homes, multifamily developments, and mobile homes.</p> <p>This program provides assistance in the form of low-interest, deferred-payment loans or where appropriate, grants to elderly or disabled home owners.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 70 single and multifamily housing units (without income limits) rehabilitated for Housing Element period; and 100 units conserved as affordable housing for extremely low, very low, and low income households through long-term rent restrictions or resale agreements with property owners (see Program H-2.1.2)</p> <p><i>Funding:</i> CDBG Fund and Inclusionary Housing In-Lieu Fee Revenue</p>	<p>Progress: This program is ongoing. The City provided approximately \$1.8 million to preserve and rehabilitate affordable housing units at Virginia Lanes Apartments, which consisted of 91 units, including 89 affordable units. The City provided an additional \$1.1 million to finance the acquisition and rehabilitation of two apartment complexes that are part of a three-complex site known as Carena Scattered Site Renovation (the third complex is not within City limits). Camara Circle Apartments consists of a 51-unit residential housing development, including 50 affordable units, and Riley Court Apartments, a 48-unit residential development, includes 47 affordable units. Additionally, 148 single-family and mobile homes were rehabilitated for low-income homeowners through the City’s Housing Rehabilitation Loan and Grant Program during the 5th Cycle.</p> <p>Effectiveness: This program has been effective, as 186 multifamily units and 148 single-family units affordable to lower-income households were rehabilitated through City funding during the 5th Cycle.</p> <p>Appropriateness: Continue. This program will be revised to include evident objectives.</p>
	<p>Program H-2.1.2: Continue to establish price and rent restriction agreements through acquisition, financial assistance, or other means with property owners.</p>	<p>Progress: The City has been able to work with developers to establish single-family homes affordable to low- and moderate-income households. The City had ongoing</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>This program facilitates preservation of at-risk units through cooperative partnerships with non-profit housing provider(s), when feasible and appropriate.</p> <p><i>Responsible Agency:</i> City Council and Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>discussions with developers in regard to constructing affordable housing. Through this effort, four new single-family homes and one townhome affordable to moderate-income households, and one single-family home affordable to a low-income household, was permitted in the City in 2020. Additionally, through financial assistance for approximately 332 multifamily and single-family rehabilitated units, the City was able to preserve affordable housing, as a majority of those units are deed restricted.</p> <p>Effectiveness: This program has been effective because it has facilitated preservation of at-risk affordable units.</p> <p>Appropriateness: Continue. This program will continue and be revised to include evident objectives.</p>
	<p>Program H-2.1.3: Ensure the conservation of existing subsidized housing including State, federally, and locally-assisted developments that are at risk of converting to market rates.</p> <p>As part of this program, the City will undertake the following actions:</p> <ul style="list-style-type: none"> • Streamline and enforce the annual reporting required to verify income limits of affordable units; • Monitoring at-risk projects to anticipate potential conversions to market rates; • As funding allows, work with property owners to negotiate potential term extensions, for those properties under current City Regulatory Agreements. • Provide technical assistance to property owners and/or organizations interested in purchasing and maintaining the properties should the owners be interested in selling as necessary and when feasible; and • Provide education and technical assistance to tenants of units being converted to market rate uses. <p>The City will also work with the owners of these developments and periodically contact interested nonprofit groups to explore possible ways to retain the units as part of the City’s affordable housing stock.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p>	<p>Progress: The City continued to monitor at-risk units that may convert to market rate through the 5th Cycle. In 2019, through negotiations, the City was able to extend the expiration of affordability restrictions for Jordan Court II Apartments from May 2019 to November 2019 to allow for tenants to find new housing accommodations.</p> <p>Effectiveness: This program has been effective as the City has been able to assist in the extension of affordable housing units and continues to monitor at-risk units.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund and HOME and CDBG funds</p> <p>Program H-2.1.4: Continue to monitor the conditions of housing stock through ongoing housing inspections and enforce housing codes and standards to ensure that the existing housing stock is not diminished in quantitative or qualitative terms.</p> <p><i>Responsible Agency:</i> Neighborhood Services</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund and CDBG for eligible areas</p>	<p>Progress: Effective in 2017, the City’s multifamily housing inventory is inspected once every 2 years by the Building Division through the Multi Family Rental Housing Inspection Program. The Building Division monitors units for compliance with health and safety codes. The purpose of the Multi Family Rental Housing Inspection Program is to ensure residents who reside in a multifamily community in Concord can feel safe about where they are living. Specific areas addressed through the Multi Family Rental Housing Inspection Program are related to bed bugs, tenant complaints, building code enforcement, and housing code violations.</p> <p>Effectiveness: This program has been effective as the City conducts an average of 1,537 routine inspections per year.</p> <p>Appropriateness: Continue. Revise as a Code Enforcement program with evident.</p>
	<p>Program H-2.1.5: Continue the City’s Multi-Family Rental Housing Inspection Program that provides regular, periodic inspections of apartment buildings with four or more units.</p> <p><i>Responsible Agency:</i> Building Division</p> <p><i>Time Frame:</i> Occurs three times per year</p> <p><i>Quantified Objective:</i> Inspect at least 180 multi-family units annually on a random basis</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City continues to maintain the self-certification program. Effective 2017, all of the City’s housing inventory has been inspected or self-certified during the last 2 years.</p> <p>Effectiveness: This program has been effective as there is a small number of complaints received on a yearly basis. The City receives and conducts an average of 5 to 10 complaint-based inspections per year.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>
	<p>Program H-2.1.6: Continue the Multi-Family Rental Housing Inspection Self Certification Program.</p> <p>The program allows property owners to do a self-inspection prior to the City performing a 20 percent random unit inspection.</p> <p><i>Responsible Agency:</i> Building Division</p>	<p>Progress: The City continues to maintain the Multi Family Rental Housing Inspection Self-Certification Program. Owners of well-maintained multifamily properties can apply to participate if there are no previously identified and uncorrected violations of the Concord Development Code, California State Building Code, or California Housing Code; no outstanding citations; and no inspection or</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>abatement fees. The City will conduct a random inspection of 25% of the units to verify that the apartment complex meets or exceeds the criteria detailed in the Self-Certification Checklist.</p> <p>Effectiveness: The program has been effective as only a small number of complaints (approximately 5 to 10) is received per year. Additionally, the City conducts approximately 1,537 routine inspections per year. The City will conduct follow-up inspections until all violations are corrected.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-2.1.7: Incorporate maintenance standards, tenant screening and management training requirements in regulatory agreements for multifamily developments that receive City assistance, and work to ensure the enforcement of such standards and agreements.</p> <p><i>Responsible Agency:</i> Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund, CDBG, and Inclusionary In-Lieu Fee Revenues</p>	<p>Progress: The City contracts with Compliance Services, LLC to monitor multifamily complexes using City funds. The Bay Area Affordable Homeownership Alliance is responsible for monitoring compliance of ownership units that are regulated and/or funded by the City through the City's below-market-rate rental units or First-Time Homebuyer Programs. During the 5th Cycle, one multifamily project that received City funding was subject to a regulatory agreement for affordable units, ensuring compliance with affordable covenants.</p> <p>Effectiveness The program was effective as the City contracted with Compliance Services, LLC to ensure compliance with regulatory agreements for multifamily developments that receive City assistance, and Bay Area Affordable Homeownership Alliance for ownership units through the City's programs.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-2.1.8: Ensure deteriorated units that are being acquired and rehabilitated with long-term rent or sale price restrictions are being counted as helping to meet the City's 'fair-share' housing need.</p> <p><i>Responsible Agencies:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: This program is ongoing. Through the Annual Progress Reports submitted to HCD, the City identifies and tracks rehabilitated units as progress toward satisfying the fair-share housing need.</p> <p>Effectiveness: The program is effective as the City has reported on rehabilitated units in its Annual Progress Reports, including rehabilitated units with long-term rent or sale price restrictions.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<i>Funding:</i> None required	
Policy H-2.2: Preserve and enhance the quality of Concord’s residential and mixed-use neighborhoods to ensure a comfortable, safe, healthy, and attractive living environment for all residents.	Program H-2.2.1: Continue to implement and update the City’s Neighborhood Services Strategic Plan. <i>Responsible Agency:</i> Neighborhood Services <i>Time Frame:</i> Ongoing <i>Quantified Objective:</i> N/A <i>Funding:</i> General Fund for staff	Progress: The City’s Neighborhood Services Division no longer exists; the City’s Code Enforcement and Building Division do not have record of the Neighborhood Services Strategic Plan. Effectiveness: This program was not effective as the Strategic Plan was not implemented. Appropriateness: Delete.
	Program H-2.2.2: Promote functional, pleasing, and high quality residential development by applying and enforcing the City’s adopted Development Code, Design Guidelines, and Zoning Standards. <i>Responsible Agency:</i> City Council, Planning Commission, and Planning Division <i>Time Frame:</i> Ongoing <i>Quantified Objective:</i> N/A <i>Funding:</i> General Fund for staff	Progress: The City’s Development Code continues to promote high-quality development through the implementation of its Development Standards, Design Guidelines, and Design and Site Review process, as outlined in the City’s Development Code, Sections 18.150 and 18.415, respectively. Effectiveness: The program is effective through the implementation of the Development Code, Design Guidelines and Standards. Appropriateness: Continue. This program will be continued into the 6th Cycle and be revised to ensure that any new design standards developed and imposed by the City be objective and in accordance with State law.
	Program H-2.2.3: Conduct design review for all residential developments of five or more units. (Also see Program H-2.2.3) <i>Responsible Agencies:</i> Planning Commission; Design Review Board; and Planning Division <i>Time Frame:</i> Ongoing <i>Quantified Objective:</i> N/A <i>Funding:</i> General Fund for staff	Progress: The Development Code continues to promote high-quality development. Design and Site Review is conducted for residential projects/major subdivisions for five or more units, as is outlined in the City’s Development Code, Section 18.145. In 2017, the City adopted the North Todos Santos Design Guidelines to provide design directives to developers. However, Appendix C, Constraints and Zoning Analysis, of this Housing Element, reviews the Design and Site Review to ensure it is not a constraint to housing development. Effectiveness: This program is effective as staff implements it through the City’s Development Code and applicable Design Guidelines.

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
		Appropriateness: Delete. This program will not be continued in the 6th Cycle because it is a routine function of the City’s Development Code. Objective design standards in accordance with State law will be implemented through updated Program 2.2.2.
	<p>Program H-2.2.4: Promote a Jobs/Housing Balance by implementing General Plan Land Use and Growth Management policies to achieve a balance between jobs and housing to achieve a higher quality of life for current and future Concord Residents.</p> <p>Achieving a jobs/housing balance will help reduce traffic and its associated environmental impacts while strengthening the community by allowing people to spend less time commuting and more time participating in community activities.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: Progress is made through implementation of the Economic Vitality Element of the General Plan. In November 2017, the City Council provided direction to Housing Division staff to use \$14 million in affordable housing funds to incentivize the construction or rehabilitation of affordable housing units, giving priority to those projects that also provide housing for Concord’s workforce (e.g., teachers).</p> <p>Effectiveness: This program has been somewhat effective, as during the 5th Cycle the City issued one certificate of occupancy and five building permits that resulted in six recorded new single-family homes affordable to moderate-income households, whereby preference was given to households that live or work in Concord.</p> <p>Appropriateness: Continue and revise with evident objectives. This program implements policies of the General Plan and will not be directly carried over. The program’s overall objective will be tied to other programs of the Housing Element that will provide opportunities for infill, homeownership assistance, an affordable housing toolkit, and incentives to assist in development.</p>
Policy H-2.3: Preserve Concord’s historic homes, areas, and buildings.	<p>Program H-2.3.1: Support housing rehabilitation, conservation, and preservation.</p> <p>The City will annually update and maintain an inventory of historic properties on the City website.</p> <p><i>Responsible Agency:</i> Planning Division.</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City has mapped and inventoried historic buildings in the Downtown within the General Plan Parks, Open Space, & Conservation Element and the General Plan Environmental Impact Report. The Planning Division identifies historic buildings through the California Environmental Quality Act review process, and works to add them to the inventory and link historic preservation resources with the property owners. Additionally, the City’s Development Code, Section 18.450, promotes the preservation of historic locations.</p> <p>Effectiveness: This program is effective in supporting housing rehabilitation, conservation, and preservation, as</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
		<p>the City reviews projects involving demolition and redevelopment to confirm they are not historically identified properties.</p> <p>Appropriateness: Delete. This program will not be carried over, but efforts to connect property owners of historic properties with existing incentives will be tied into housing rehabilitation and preservation efforts.</p>
<p>Policy H-2.4: Ensure that new development in Concord does not lead to the displacement of existing residents.</p>	<p>Program H-2.4.1: Establish a mechanism to determine whether there is a risk of displacement of existing Concord residents as new development activity takes place in the City.</p> <p>Displacement might be direct, resulting from the redevelopment of existing residential properties, or indirect, resulting from increases in market rents as an area becomes more desirable due to new development. If this mechanism determines that new development creates a displacement risk, establish programs to mitigate this risk. Potential programs include:</p> <ul style="list-style-type: none"> • Monitor residential rental rates, sales prices and commercial and office lease rates on a quarterly basis to identify trends; • Monitor local and regional displacement studies such as the Institute of Urban and Regional Development TOD Displacement Study through U.C. Berkeley, which is examining ways to measure and predict displacement of existing residents as a result of increasing investment in transit-oriented development (TOD); • Prior to upzoning additional sites outside of the City’s Transit-Oriented Development overlays, consider potential impact on existing residents with respect to displacement risk; • Study and examine current local and regional just-cause eviction controls; • Study and examine local and regional relocation benefits provided by developers to residents displaced by the demolition and redevelopment of existing residential units and first right of return; and • Study potential ratios for housing unit replacement requirements. <p><i>Responsible Agencies:</i> City Council, Planning Commission, Planning Division</p> <p><i>Time Frame:</i> Establish a mechanism to identify displacement risk and policies to put in place if displacement risk is identified by 2015</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: The City identified increased housing prices in other cities and in Concord. In 2019, the City established a Rental Housing Ad Hoc Committee, which met to discuss the local housing market and recommend policies to address issues such as affordability, availability, and tenant evictions. In 2020, the City adopted an eviction moratorium and rolled out State and Federal emergency funds to support renters with their payments during the COVID-19 pandemic. On February 11, 2020, the City Council voted to eliminate the Residential Rent Review Program. On July 7, 2020, the City Council voted to replace the Residential Rent Review Program with the Residential Tenant Protection Program. On July 28, 2020, the City Council adopted the Residential Tenant Protection Program, which allows for, among other things, relocation assistance for no-fault just-cause evictions, requires that a tenant be provided a written lease with the appropriate minimum lease terms, and sunsets on January 1, 2030. Additional tenant protections were also adopted by the City Council, as was the Rent Registry. The Rent Registry program requires all multifamily complexes of four or more units to register with the City on an annual basis.</p> <p>Effectiveness: The purpose of this program was to establish a program to monitor and study the risk of displacement in Concord. Through the establishment of the Rental Housing Ad Hoc Committee and its activities, this purpose has been achieved, and the City has implemented several new policies intended to reduce the risk of displacement. This includes the Rent Registry program, which will provide information on tenancy and rents in Concord.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<i>Funding:</i> General Fund	Appropriateness: Continue. Revise with updated objectives, including analyzing further policy recommendations for potential City Council adoption.
<i>Goal H-3: Encourage the expansion of housing opportunities for all special needs groups, including seniors, female-headed households, persons with disabilities, first-time homebuyers, large families, and homeless individuals and families.</i>		
<p>Policy H-3.1: Actively seek and encourage the development of affordable housing for extremely low-, very low-, low-, and moderate-income seniors.</p>	<p>Program H-3.1.1: Provide financial assistance, regulatory incentives (e.g., density bonuses, reduced parking requirements, etc.), and priority permit processing for senior housing developments that provide 25 percent or more of their units at rents or prices affordable to moderate-, low-, very low-, or extremely low-income seniors.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; Planning Division; and Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> HOME Fund; CDBG Fund; and General Fund and Inclusionary Housing In-Lieu Fee Revenues</p> <p>Program H-3.1.2: Encourage senior housing developments to be located in areas that are convenient to shopping and other services, including public transit services, and/or to provide transit services (e.g., van shuttles) for their residents.</p>	<p>Progress: The City’s Development Code, Chapter 18.185, provides financial and regulatory incentives, such as density bonuses, parking reductions, and expedited processing, to encourage more affordable residential types, such as senior living. Provisions in the State Density Bonus law do not require any units in a senior living development to be affordable to qualify for a density bonus. However, the City’s Affordable Housing Incentive Programs requires at least 40% of units in a rental project to be affordable to lower-income households, but does not specify special provisions for senior housing.</p> <p>Effectiveness: This program has been effective as the City’s Development Code does provide regulatory incentives and provisions for financial assistance for senior housing developments affordable to moderate-, low-, very low-, and extremely low-income older adults. However, the Development Code grants these incentives only for developments that provide 40% or more of their units for affordable housing, which exceeds the threshold noted in this program. No senior housing developments with deed-restricted affordable units were approved or completed during the 5th Cycle.</p> <p>Appropriateness: Continue. Revised to include evident objectives.</p> <p>Progress: The objective of the DSP and Transit Station Overlay is to encourage development of residential uses near public transit, including affordable housing for singles,</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 200 new senior housing units affordable to extremely low-, very low-, low-, and moderate-income seniors</p> <p><i>Funding:</i> General Fund for staff</p>	<p>families, and older adults. Oakmont of Concord is an assisted senior living complex located right outside of the Downtown area that provides 76 units affordable to above moderate-income households, as well as transportation services. In 2019, the City also entitled the Avesta Assisted Living project in the Downtown area with 150 senior living units, 117 of which are for assisted living and 33 are memory care units. The facility is affordable for above moderate-income older adults.</p> <p>Effectiveness: The program has been somewhat effective. Although there have been approximately 193 senior living units and 33 memory care units built near Downtown and in areas convenient for shopping and other services, these units are not affordable to extremely low-, very low-, or moderate-income older adults.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-3.1.3: Require all housing developments designated for seniors to be handicapped accessible, with such features provided at the time of construction as a standard feature rather than as an optional feature available for an additional charge.</p> <p><i>Responsible Agencies:</i> Planning Division; and Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The Building Division reviews all new construction and alterations to ensure accessibility compliance and requirements pursuant to the California Building Code. The City’s website includes information regarding the Americans with Disabilities Act (ADA), as well as State and Federal compliance resources.</p> <p>Effectiveness: This program was not effective as the City follows the California Building Code, which does not require all housing developments designated for older adults to be accessible for people with disabilities.</p> <p>Appropriateness: Delete. This program will not be carried over to the 6th Cycle.</p>
<p>Policy H-3.2: Actively seek to expand housing opportunities for persons with disabilities in new and existing single-family and multi-family developments.</p>	<p>Program H-3.2.1: Facilitate the development of accessible housing by providing financial assistance, regulatory incentives (e.g., density bonuses, reduced parking requirements, etc.), and priority permit processing for housing developments that make at least 15 percent or more of the total units accessible to persons with disabilities through appropriate design and amenities.</p> <p><i>Responsible Agencies:</i> Planning Division; Economic Development Division; and Building Division</p> <p><i>Time Frame:</i> Ongoing</p>	<p>Progress: The City incentivizes development of housing through regulatory incentives in its Development Code, such as the State Density Bonus Program and additional density bonus incentives in the Downtown and Transit Overlay Districts. The City has no record of any developers coming forward with proposals for projects with at least 15% accessible units.</p> <p>Effectiveness: This program has been somewhat effective, as the City’s Development Code provides regulatory</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>incentives. However, the City has no record of implementing these regulatory incentives or internal priority permit processing for developments that make at least 15% of the total units accessible to persons with disabilities.</p> <p>Appropriateness: Delete.</p>
	<p>Program H-3.2.2: Require accessible units in multifamily housing developments in accordance with State law, with accessibility features provided at the time of construction as a standard feature rather than as an optional feature available for an additional charge.</p> <p><i>Responsible Agencies:</i> Planning Division; and Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 40 City-supported new and rehabilitated units accessible to persons with disabilities; with an additional 100 to be produced without any City financial assistance as part of the normal development process</p> <p><i>Funding:</i> General Fund, CDBG</p>	<p>Progress: The City Building Division reviews all building applications for level of accessibility and ensures projects are consistent with State law. There are no recorded multifamily housing developments with specific information about the number of accessible units required. The number of required accessible units in multifamily housing developments varies based on number of ground-floor units and elevators, per State law.</p> <p>Effectiveness: The program is effective as City staff implements accessibility requirements in multifamily housing developments by requiring proposed developments to be consistent with the California Building Code.</p> <p>Appropriateness: Delete. This program will not be carried to the 6th Cycle as it is codified in the City’s Development Code and the City continues to implement up-to-date California Building Standards Codes.</p>
	<p>Program H-3.2.3: Require accessible units in large housing developments in accordance with State law.</p> <p>Meet or exceed the requirements to provide accessible units in large housing developments as a condition of approval.</p> <p><i>Responsible Agency:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> None required</p>	<p>Progress: The requirements for accessible units in large housing developments are enforced through the planning and building permit process. The Building Division ensures proposed developments are in compliance with the California Building Code, specifically as it relates to ADA compliance.</p> <p>Effectiveness: This program is effective as it is implemented by City staff through Title 15, Building and Building Regulations, of the City’s Municipal Code.</p> <p>Appropriateness: Delete. This program will not be carried to the 6th Cycle as it is codified in the City’s Building and Building Regulations, and the City continues to implement up-to-date California Building Standards Codes.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>Program H-3.2.4: Enforce State handicapped, accessibility, and adaptability standards and remove constraints to housing accessible to persons with disabilities, consistent with SB 520.</p> <p><i>Responsible Agency:</i> Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: State handicapped, accessibility, and adaptability standards are enforced through implementation of the City’s Building Code and California Building Standards Code. The City complies with SB 520. As part of the Housing Element update, the City reviews governmental constraints, which includes analyzing potential and actual constraints to the development and maintenance of housing for persons with disabilities.</p> <p>Effectiveness: This program is effective as the City implements California Building Standards Code.</p> <p>Appropriateness: Delete. This program will not be carried to the 6th Cycle as it is codified in the City’s Building and Building Regulations and the City continues to implement up-to-date California Building Standards Codes.</p>
	<p>Program H-3.2.5: Provide information and related resources to the public, including persons with disabilities, to raise awareness regarding accessibility issues (including the requirements of the Americans with Disabilities Act), encourage accessibility in all new and rehabilitated developments, and provide referrals to independent living centers and other resources.</p> <p>The City will provide public information on accessibility issues and resources at the City’s Permit Center and on the City’s website. Also, the City will provide referrals to independent living centers and other resources as appropriate.</p> <p><i>Responsible Agency:</i> Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: In addition to providing accessibility requirements through the City’s Permit Center, the City’s Building Division webpage includes resources and links to the ADA, disability access requirements and resources, California Building Code Accessibility, Unreasonable Hardship forms, and a video for upgrade requirements for existing buildings and facilities to assist developers and contractors. Additional resources are also provided for financial tools for small business working to become ADA compliant.</p> <p>Effectiveness: This program is effective because the information is made available online and at the Permit Center.</p> <p>Appropriateness: Continue. Revise and combine with similar programs with evident objectives.</p>
<p>Policy H-3.3: Actively seek to expand housing opportunities for persons with developmental disabilities in Concord.</p>	<p>Program H-3.3.1: Work with the Regional Center of the East Bay to implement an outreach program that informs families within the City on housing and services available for persons with developmental disabilities.</p> <p>The program could include the development of an informational brochure, updating the City’s housing assistance resource web page to provide additional information on</p>	<p>Progress: The City provides a link on its Fair Housing webpage to the Regional Center of the East Bay.</p> <p>Effectiveness: This program is effective as the intent was to provide resources for housing assistance, which is available on the City’s website.</p> <p>Appropriateness: Continue. Revise to combine with similar programs with evident objectives.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>services, and providing housing-related training for individuals/families through workshops.</p> <p><i>Responsible Agencies:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> 2014 – 2015</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	
<p>Policy H-3.4: Actively seek and encourage the development of childcare facilities to help female-headed households, especially those with extremely low, very low, low, or moderate incomes.</p>	<p>Program H-3.4.1: Continue to assess a fee on new construction and tenant improvements to help fund the City of Concord Child Care Program.</p> <p><i>Responsible Agencies:</i> Planning Division; and Parks and Recreation Department</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City collects a childcare fee through the Building Division prior to issuance of a Certificate of Occupancy for non-residential projects, based on 0.5% of the project’s valuation. Approximately \$32,485 in funds were collected in 2015 and 2016; \$131,238 in 2017; \$101,211 in 2018; and \$54,628 in 2019.</p> <p>Effectiveness: The program has been effective as the City has been able to fund the Concord Child Care Program. The Concord Child Care Program benefits low-income residents in Concord through micro-enterprise assistance for those who want to maintain or start stable small businesses as licensed home-based family childcare providers. In 2019, the program provided services to 10 daycare providers, including the Mt. Diablo CARES After School Program, which is a comprehensive on-site after-school program for elementary and middle school students. Through this program, services have been made available to approximately 2,300 children, which included 1,212 in 2018 and 1,087 in 2019.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-3.4.2: Support the Section 8 Housing Choice Voucher Program administered by the Contra Costa County Housing Authority by providing referral services through Housing Rights Inc, and making information available at the permit counter and City website.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p>	<p>Progress: The rental referral listing for the Housing Authority is linked to the City’s Housing Assistance page on its website. Referrals frequently provided by staff to the Housing Authority are for those inquiring about the voucher program.</p> <p>Effectiveness: This program is effective as the City provides this information on its website.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	
<p>Policy H-3.5: Actively seek and encourage the development of housing that is affordable to very-low, low- and moderate-income first-time homebuyers.</p>	<p>Program H-3.5.1: Utilize funds as available to provide zero interest second mortgages to qualified low- and moderate-income homebuyers to assist them with down payment and/or closing costs.</p> <p><i>Responsible Agency:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> Provide assistance to 20 homebuyers during Housing Element period</p> <p><i>Funding:</i> Inclusionary Housing In-Lieu Fee</p>	<p>Progress: Because redevelopment funding was eliminated during the 4th Cycle planning period, the City’s funding has been limited to provide funding for one to two loans annually. The City does not have a first or second mortgage program in place, but offers low-interest, down payment assistance through the City’s First-Time Homebuyer Program.</p> <p>Effectiveness: This program has not been effective as there is no record of providing zero-interest second mortgages using the specific funding source. It should be noted that the City has a low-interest, down-payment assistance program through the City’s First-Time Homebuyer Program. Appropriateness: Delete.</p>
	<p>Program H-3.5.2: Support and participate in the Mortgage Credit Certificate (MCC) Tax Credit Program administered by the Contra Costa County Department of Conservation and Development and make information available at the permit counter and City website.</p> <p><i>Responsible Agency:</i> Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City provides information about the Contra Costa County Department of Conservation and Development on its website under the Housing Division webpage, Housing Programs section, and at the City’s Permit Center.</p> <p>Effectiveness: The program has been effective. The intent of the program was to support and participate in the Mortgage Credit Certificate Tax Credit program by making information available, which the City has completed.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-3.5.3: Work with local nonprofit housing developers to facilitate sweat-equity homeownership opportunities for Concord residents.</p> <p><i>Responsible Agency:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: City staff has met with the non-profit affordable housing provider Habitat for Humanity to discuss opportunities for new sweat-equity home ownership projects and potential joint future projects. On September 16, 2017, City staff partnered with Habitat for Humanity on a housing project within the region to facilitate future collaboration.</p> <p>Effectiveness: The program has been somewhat effective. Although the City has collaborated with non-profit housing</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Funding:</i> General Fund for staff</p>	<p>developers to facilitate sweat-equity homeownership opportunities, the homeownership opportunities were not in Concord. However, the City has now developed a relationship for future opportunities with Habitat for Humanity.</p> <p>Appropriateness: Delete.</p>
<p>Policy H-3.6: Actively seek and encourage the development of affordable housing for large families with extremely low-, very low-, low-, or moderate-incomes, and continue to take actions to prevent discrimination against children in housing.</p>	<p>Program H-3.6.1: Expand the current inventory of large units in the City by providing financial and/or regulatory incentives to encourage the inclusion of units with four or more bedrooms in new developments, especially in rental housing developments.</p> <p><i>Responsible Agency:</i> Economic Development/Redevelopment Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> 40 new or rehabilitated housing units in Concord with four or more bedrooms.</p> <p><i>Funding:</i> CDBG</p>	<p>Progress: The City approved several multifamily projects during the 5th Cycle, and one multifamily development included one 4-bedroom unit.</p> <p>Effectiveness: This program has not been effective because a substantial number of units with four bedrooms or more have not been built. Although the current Inclusionary Housing, Density Bonus, and Affordable Housing Incentive Programs offer increased density, lot coverage, and floor-area ratio as incentives, none include incentives for housing with four or more bedrooms. However, it should be noted that State law identifies housing for large families as a unit with three or more bedrooms.</p> <p>Appropriateness: Continue. This program will be carried over to the 6th Cycle and be revised with evident objectives.</p>
	<p>Program H-3.6.2: Facilitate the rehabilitation of large units by giving priority to developments with large units that are deteriorated or at risk of being lost from the City’s housing stock.</p> <p><i>Responsible Agency:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> Inclusionary Housing In-Lieu Fee Revenues and CDBG</p>	<p>Progress: The City currently works with affordable housing developers to identify opportunities for acquisition and rehabilitation projects. The City assisted in the rehabilitation of Riley Court Apartments, Virginia Lane, and Camera Circle; however, these multifamily developments are composed of only one- to two-bedroom units.</p> <p>Effectiveness: This program was somewhat effective, as the City was not able to facilitate the rehabilitation of large units. However, if staff were to receive requests for rehabilitating developments with large units, priority would be given to those with large units.</p> <p>Appropriateness: Delete. This program will not be directly carried over into the 6th Cycle as there are not evident objectives. Rehabilitation and acquisition efforts, including funding, will continue through other programs.</p>
	<p>Program H-3.7.1: Continue to actively participate in the Contra Costa HOME Consortium and the Contra Costa Interagency Council on Homelessness</p>	<p>Progress: Housing and Community Services Program staff regularly participate in the Contra Costa Consortium</p>

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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
<p>Policy H-3.7: Actively seek and encourage emergency, transitional, and long-term affordable housing to reduce the problem of homelessness in the City of Concord.</p>	<p>(CCICH) to identify and respond to the needs of homeless individuals and families in Concord and surrounding communities, giving priority to the implementation of the strategies and actions identified in the Consortium’s Consolidated Plan.</p> <p><i>Responsible Agency:</i> Economic Development Division and Community Grants Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> Grants, HOME, and CDBG funds</p>	<p>(Consortium), Contra Costa Health Services, and Continuum of Care: Council on Homelessness (previously Contra Costa Interagency Council on Homelessness). The Consortium, along with four of the largest cities, which includes Concord, develops a 5-year consolidated plan for the use of Community Development Block Grants (CDBG), HOME Investment Partnerships Act (HOME), and Emergency Solutions Grant funds within a 5-year timeframe. These funds are used to build affordable housing, improve or construct public facilities, and provide services to persons experiencing homelessness. Through the development of the Consolidated Plan, cities, including the City, identify housing needs, including a Homeless Needs Assessment, for each of the participating cities.</p> <p>Effectiveness: The program has no objectives to assess its effectiveness. However, based on the intent of the program, which is to participate and implement the strategies and actions identified in the Consortium’s Consolidated Plan, the program is effective.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-3.7.2: Continue to permit the development of emergency homeless shelters without discretionary review, in the Industrial Mixed Use (IMU), Industrial Business Park Zone (IBP), and Office Business Park (OBP) zones in accordance with State law.</p> <p>Emergency shelters will be subject to the same development and management standards that apply to other allowed uses within each zone. The City will ensure that applications for these facilities receive priority review and streamlined processing.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City’s Development Code permits the development of emergency and homeless shelters in the Industrial Mixed Use (IMU), Industrial Business Park (IBP), and Office Business Park (OBP) zones with a Zoning Clearance pursuant to the requirements outlined in Section 18.200.070.</p> <p>Effectiveness: This program is somewhat effective as it is implemented by City staff through Chapter 18.50 of the Development Code. However, no emergency shelters were built in the City during the 5th Cycle.</p> <p>Appropriateness: Continue. This program will be carried to the 6th Cycle; the City will continue to make updates to its Development Code to implement up-to-date State law.</p>
	<p>Program H-3.7.3: Revise the City’s Development Code to explicitly identify transitional and supportive housing as residential uses subject to only those</p>	<p>Progress: On April 25, 2017, the City revised its Development Code to identify transitional and supportive</p>

**Table 1
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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>restrictions that apply to other residential dwellings of the same type in the same zone, and adopt definitions of transitional housing and supportive housing pursuant to SB 745.</p> <p><i>Responsible Agencies:</i> City Council; Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> 2015-2016</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>housing as residential uses subject to only those restrictions that apply to other residential dwellings of the same type in the same zone, and to adopt definitions of transitional housing and supportive housing pursuant to SB 745.</p> <p>Effectiveness: The program is effective as the Development Code has been updated to include Transitional and Supportive Housing types with their own standards and definitions.</p> <p>Appropriateness: Delete.</p>
	<p>Program H-3.7.4: Coordinate with the County and local non-profits to identify and address the housing and social needs of the local homeless population.</p> <p>The City will provide financial support where feasible and appropriate to non-profit agencies or groups that provide emergency, supportive, and/or transitional housing for people who are homeless at risk of homelessness. State or County housing oversight and accountability is a prerequisite for City and City pass-through funding. Additionally, City staff will meet with non-profit groups at least once every year to discuss the needs of the local homeless population.</p> <p><i>Responsible Agency:</i> Parks & Recreation Department/Community Grants Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> CDBG Fund</p>	<p>Progress: City staff refers clients to local resources, such as Contra Costa 211, which serves as a crisis center and manages a comprehensive database of useful resources and information for Contra Costa County residents, including social and health services. The City contracts with Contra Costa Health Services, the County of Contra Costa’s (County) Health Services Department, for outreach to City residents experiencing homelessness through the County’s Coordinated Outreach Referral, Engagement (C.O.R.E.) program, which was established in 2017. C.O.R.E. teams serve as an entry point into the County’s coordinated entry system for unsheltered persons, and work to locate, engage, stabilize, and house chronically homeless individuals and families. The outreach teams identify individuals living on the streets, assess their housing and service needs, and facilitate connection to shelter and services. The City funds a dedicated C.O.R.E. outreach team to provide homeless outreach in Concord, and recently added a full-time Social Worker (MSW) to provide case management. The City also stays engaged and partners with the County through the Executive Committee for the Contra Costa Council on Homelessness, as the Housing & Community Services Manager serves on the committee. The City also provides grant funds to local day and overnight emergency shelters.</p> <p>Effectiveness: The program is effective as the City continues to coordinate with the County to identify and address the housing and social needs of the local population</p>

Table 1
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<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
		of persons experiencing homelessness through engagement in the Executive Committee and C.O.R.E. program. Appropriateness: Continue. Revise with evident objectives.
<i>Goal H-4: Strive for equal housing opportunity and access for all people regardless of race, religion, sex, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.</i>		
<p>Policy H-4.1: Ensure equal housing opportunities for all by reaffirming the City’s commitment to work towards the elimination of discrimination in housing with regard to race, religion, sex, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.</p>	<p>Program H-4.1.1: Continue the City’s existing contract with ECHO Housing to provide fair housing counseling, education, and outreach services.</p> <p>The City provides information regarding the City’s Fair Housing Services available in both English and Spanish, and advertises the availability of these services through the local media (including Spanish language newspapers and radio), through the local schools and libraries, and through the City’s network of Neighborhood Partnership organizations.</p> <p><i>Responsible Agencies:</i> City Council and Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> CDBG</p> <hr/> <p>Program H-4.1.2: Continue the City’s existing contract with Bay Area Legal to provide tenant-landlord counseling and resolve problems and conflicts that occur in tenant/landlord relationships.</p> <p>The City makes information regarding Tenant-Landlord Counseling available in both English and Spanish, and advertises the availability of the service through the local media (including Spanish language newspapers and radio), through the local schools and libraries, and through the City’s network of Neighborhood Partnership organizations.</p> <p><i>Responsible Agency:</i> Economic Development/Redevelopment Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: The City’s Housing Program administers a contract with Eden Council for Hope and Opportunity (ECHO) to provide fair housing counseling, education, and outreach services. ECHO specifically provides counseling, investigation, mediation, enforcement, and education through its Fair Housing Program. Counselors conduct investigations and enforcement in response to reports of housing discrimination complaints. The City provides information through its website in the Housing Division, Housing Programs webpage, as well as on social media and through regular email blasts to registered parties.</p> <p>Effectiveness: This program is effective. The intent of the program is continuing the contract with ECHO, which was maintained during the 5th Cycle.</p> <p>Appropriateness: Continue. The program will be revised with evident objectives.</p> <hr/> <p>Progress: The City contracted with Bay Area Legal Aid to provide tenant/landlord counseling services to resolve problems and conflicts. However, within the 5th Cycle, the City began contracting with ECHO Housing to provide tenant/landlord counseling and resolve problems and conflicts that occur in tenant/landlord relationships, and the City also refers to a contracted housing attorney for legal services. In the 2020/2021 fiscal year, ECHO provided services to 154 households in the City.</p> <p>Effectiveness: This program is effective. The intent of the program is to continue providing fair housing services, which has been continuously provided during the 5th Cycle.</p> <p>Appropriateness: Continue. Revise program to update the City’s fair housing provider and identify the City’s continued commitment to provide fair housing resources and services.</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p><i>Funding:</i> CDBG</p> <p>Program H-4.1.3: Continue to monitor rental rates in Concord on an annual basis to provide up to date, reliable information on average and median rents in the City by unit size and type.</p> <p>Use the collected data to inform decision making on City housing policies and programs and help reduce the potential impact of rapidly escalating rents and/or disparities in the local housing market (e.g., the monitoring program may call attention to a shortage of a particular housing type).</p> <p><i>Responsible Agency:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The City contracts with Compliance Services, LLC to monitor compliance of affordable multifamily complexes using City funds. In 2017, the City also began performing bi-annual in-house market-rate rent surveys to monitor rental rates and inventory in the City. In 2021, the City Council adopted a Rent Registry Program as part of the City’s larger Residential Tenant Protection Program, which requires property owners to provide information on tenancy and rents. The program kicked off on July 31, 2021, and as of December 2021, 63% of rental owners had completed their registration. The Rent Registry Program is managed by HdL Companies on behalf of the City. HdL provides data analysis and reporting for public agencies. The larger Residential Tenant Protection Program requires minimum lease terms and relocation assistance beyond what is offered by the State.</p> <p>Effectiveness: This program has been effective, as the initial data collected informed and led the City to establish an Ad Hoc Committee on Rental Housing in 2019. The Ad Hoc Committee on Rental Housing met to discuss the local housing market and recommend policy to address issues such as affordability, availability, and tenant evictions. Resulting from the Ad Hoc Committee on Rental Housing’s recommendations, the City adopted the Residential Rent Registry Program as part of the City’s larger Residential Tenant Protection Program in 2021.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-4.1.4: Work with the Contra Costa HOME Consortium to reduce impediments to fair housing choice identified in the Consortium’s Analysis of Impediments to Fair Housing Choice.</p> <p><i>Responsible Agency:</i> Community Grants Division and Economic Development & Housing Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p>	<p>Progress: The City continues to work with Contra Costa Consortium to reduce impediments to fair housing choice identified in the Consortium’s Comprehensive Analysis of Impediments.</p> <p>Effectiveness: This program is effective. The Contra Costa Consortium also develops a Consolidated Plan that assesses the needs of Consortium member communities, including the City, to guide the use of funds administered by the Federal Department of Housing and Urban Development. The Consolidated Plan also develops an Action Plan that</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<i>Funding:</i> CDBG Fund and General Fund	cities can use to address the goals developed in the Analysis of Impediments to address fair housing. The City provides updates to the progress of the City’s annual Action Plan, prepared in coordination with the Consortium. Appropriateness: Continue. The program will be continued to the 6th Cycle, with revised objectives to identify the City’s continued commitment to provide fair housing resources and to reduce impediments to fair housing.
<i>Goal H-5: Protect the environment and lower the cost of energy through energy conservation policies.</i>		
<p>Policy H-5.1: Encourage the incorporation of energy and water conservation design features in existing and future residential developments to conserve resources, reduce greenhouse gas emissions, and reduce housing costs.</p>	<p>Program H-5.1.1: Continue to allow new residential developments to provide, to the extent feasible, for passive energy conservation, solar access, and water conservation features.</p> <p>The City’s Subdivision Ordinance promotes the use of passive or natural heating or cooling opportunities. The Ordinance also empowers the City to adopt solar access standards and require easements for solar access.</p> <p><i>Responsible Agencies:</i> Planning Commission; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p> <hr/> <p>Program H-5.1.2: Continue to enforce State Energy Conservation Standards (Title 24) for new residential construction or additions to existing structures.</p> <p><i>Responsible Agency:</i> Building Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: City staff encourages design strategies for new buildings through Design and Site Review of projects. The City has streamlined the permit process for rooftop solar photovoltaic panel applications through the Solar FasTrac website. The Engineering and Planning Divisions perform plan checks for landscaping and ensure landscape plans are reviewed for compliance when required by the State Model Water Efficient Landscape Ordinance and/or the Development Code as outline in Chapter 18.170. The Development Code also provides provisions with regard to solar panels and access.</p> <p>Effectiveness: The program is effective as staff implements the Development Code for new residential developments, which includes provisions for energy conservation.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives and will capture objectives from comparable programs.</p> <hr/> <p>Progress: The City Building Division’s review and inspection procedures are based on California Building Efficiency Standards (Title 24), which includes State Energy Conservation Standards.</p> <p>Effectiveness: All new residential projects must comply with Title 24 and, therefore, the program is effective as it is enforced by the City’s Building Division.</p> <p>Appropriateness: Continue. This program will be revised with evident objectives.</p>

Table 1
Review of 2015–2023 Housing Element Past Accomplishments

<i>Policy (if applicable)</i>	<i>Program</i>	<i>Progress in Implementation</i>
	<p>Program H-5.1.3: Continue to offer rehabilitation loans to extremely low-, very low-, and low-income homeowners and seniors to improve the energy efficiency of their residence and/or replace existing energy inefficient appliances through various Home Repair Loans and the Weatherization for Seniors Program.</p> <p><i>Responsible Agencies:</i> Economic Development Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> CDBG Fund</p>	<p>Progress: The City continues to offer emergency repair loans and weatherization and Home Security Grants for older adults, as CDBG funds allow. The City also approved Property Assessed Clean Energy Programs to allow property owners to pay for energy efficiency upgrades through their property tax bill, rather than securing an alternative form of financing. In the 2020/2021 fiscal year, 20 grants were provided for rehabilitation of housing. This program is ongoing and continues to be funded.</p> <p>Effectiveness: This program is effective as there have been more 20 grants provided for rehabilitation of housing during the 5th Cycle.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>
	<p>Program H-5.1.4: Continue to implement the Green Building Standards adopted in 2011 in accordance with State law to implement General Plan policies and promote solar energy and other environmentally sound, energy efficient methods for heating and cooling homes, consistent with adopted building, mechanical and plumbing codes.</p> <p><i>Responsible Agencies:</i> Building Division; and Planning Division</p> <p><i>Time Frame:</i> Ongoing</p> <p><i>Quantified Objective:</i> N/A</p> <p><i>Funding:</i> General Fund for staff</p>	<p>Progress: The 2019 CALGreen Building Code has been adopted by the City’s Building Division. The program is ongoing and continually enforced by the Building Division.</p> <p>Effectiveness: All building projects must comply with the CALGreen Building Code, and it is therefore effective as it is enforced by the City’s Building Division.</p> <p>Appropriateness: Continue. Revise with evident objectives.</p>

Review of Programs Addressing the Housing Needs for the Population with Special Needs

The City's 5th Cycle Housing Element included several programs to address housing for those with special needs, both directly and indirectly. The programs specifically address the needs of older adults, people with disabilities, large families, female-headed households, and people experiencing homelessness.

Older Adults

Programs H-2.1.1 and H-5.1.3 both aim to provide financial assistance in the rehabilitation and conservation of homes in Concord. Program H-5.1.3 is geared toward assisting extremely low-, very low-, and low-income homeowners and older adults to improve their home's energy efficiency and facilitate the replacement of existing energy-inefficient appliances through home repair loans and through the weatherization assistance program, which prioritized special needs groups, including older adults. In the 2020/2021 fiscal year, 20 grants were provided for rehabilitation of housing. Although there is no data on the number of older adults who have benefited from these programs, the programs are indirectly effective as they help older adults to age in place. Program H-3.1.1 provides regulatory incentives and financial assistance for senior housing developments affordable to moderate-, low-, very low-, or extremely low-income older adults. However, the program has not been effective, as senior living facilities developed during the 5th Cycle were all market rate units.

Program H-3.1.3 requires all housing developments designated for older adults to be accessible for people with disabilities at the time of construction, with the intent to standardize accessibility features rather than as an optional feature available for an additional charge. This requirement may be considered a constraint to affordable senior housing developments; however, City staff review developments to ensure accessibility requirements are compliant with the California Building Code without any local amendment.

Program H-3.1.2 encourages senior housing development to be located in areas that are convenient to shopping and other services, including public transit services, and/or to provide transit services, such as van shuttles, for their residents. This program has been effective, as there were two senior living facilities developed and/or permitted during the 5th Cycle (Oakmont of Concord and Avesta Assisted Living) in the Downtown area near shopping and other services, and that provide transportation services for their residents.

Persons with Disabilities

Programs H-3.2.1 and H-3.2.2 are both intended to provide housing for people with disabilities by incentivizing accessible housing to persons with disabilities by providing financial assistance and regulatory incentives, as well as enforcing State law regarding required accessible units in multifamily housing developments. Currently, there is no data to track the effectiveness of incentivizing housing for people with disabilities through financial and regulatory programs. However, through the implementation of State law, multifamily housing developments provide accessible features in accordance with State law. Another program that enforces State law is Program H-3.2.4; it specifically enforces State accessibility and adaptability standards, and removes constraints to housing accessible to persons with disabilities, consistent with Senate Bill 520.

During the 5th Cycle, the City committed to providing resources related to persons with disabilities. For example, Program H-3.2.5 raised awareness regarding accessibility issues, encouraged accessibility in all new and rehabilitated housing developments, and provided referrals to independent living centers through resources on the City's website and at the City's Permit Center. Through Program H-3.3.1, the City committed

to working with the Regional Center of the East Bay to implement an outreach program that informs families within Concord on housing and services available for persons with developmental disabilities.

Large Families and Female-Headed Households

Programs aimed to support large families include Program H-3.6.1 and Program H-3.6.2, which strive to maintain and expand the current inventory of large units with four or more bedrooms. However, housing units for large families is identified as units with three- or more bedrooms per State and Federal classification. Through Program H-3.6.1, the City provided financial and regulatory incentives, such as density bonus and parking reductions; however, only one housing development during the 5th Cycle included one unit with four or more bedrooms. As such, the program was not effective. Through Program H-3.6.2, the City intended to prioritize rehabilitation of large units at risk of being lost from the City's housing stock; however, the City did not fund any rehabilitation projects during the 5th Cycle that had units with four or more bedrooms. During the 6th Cycle needs assessment review (Appendix B, Housing Needs Assessment), the City will identify if there is a need for units with three or more bedrooms, as well as identify existing housing stock of three or more bedrooms at risk of being lost from the City's housing stock during the 6th Cycle planning period.

Program H-3.4.1 indirectly supported female-headed households through the Child Care Program, which was funded by a new construction fee. The funds gathered through this program helped provide services, such as an after-school program, to an average of 1,149 children per year.

People Experiencing Homelessness

Through Program H-3.7.2, the City continued to permit development of emergency homeless shelters as a permitted use in the Industrial Business Park and Office Business Park zones. However, upon further review, any building development is subject to a Design and Site Review, which is not compliant with State law. Further, no emergency shelters were developed during the 5th Cycle. The City supports the population of persons experiencing homelessness in Concord by actively participating in the Contra Costa Consortium and the C.O.R.E. program, which identify the needs of, and provide resources to, persons experiencing homelessness through Program H-3.7.1. During the fiscal years 2017/2018 through 2020/2021, C.O.R.E. reported 3,447 contacts in Concord. Through Program H-3.7.4, the City committed to coordinate with the County of Contra Costa and local non-profits to identify and address the housing and social needs of the local population of persons experiencing homelessness. Both Programs H-3.7.1 and H-3.7.4 support the local population of persons experiencing homelessness through resources and outreach services. During the COVID-19 pandemic, the City assisted in housing 15 families, approximately 37 individuals, in motels, and eventually relocated the families to appropriate housing.

The City's 5th Cycle Housing Element also included several programs to allow for a variety of housing types that can provide housing opportunities for those with special needs, such as Program H-1.5.1 that facilitated the development of housing affordable to extremely low-, very low-, low-, and moderate-income households through medium- and high-density zoning and mixed-use zoning, density bonuses, land write-downs, priority permit processing, direct subsidies, and other financial incentives. In addition, Program H-1.2.1 promotes mixed-use developments and a mix of housing types in Concord. Although there have been approximately 1,089 units affordable to above moderate-income households built or permitted in Downtown and 425 units affordable to very low- and low-income households, the City was not effective in incentivizing

and meeting its larger Regional Housing Needs Allocation objective. Nonetheless, programs that aimed to indirectly support housing for special needs groups include the following:

- Program H-1.4.2: Allow secondary units in the single-family districts in accordance with State law.
- Program H-1.5.5: Provide reduction from the standard parking requirements for new residential projects as allowed by the City’s Density Bonus Program, the Affordable Housing Incentive Program, and other provisions of the Zoning Ordinance.
- Program H-1.5.6: Continue to allow group housing, including Single Room Occupancy (SRO) units, in accordance with State law.
- Program H-1.6.1: Implement the City’s adopted regulations that allow modular housing units (also known as pre-fabricated) in all residential zones.
- Program H-2.1.3: Ensure the conservation of existing subsidized housing—including State, federally, and locally assisted developments—that are at risk of converting to market rates.
- Program H-3.4.2: Support the Section 8 Housing Choice Voucher Program administered by the Contra Costa County Housing Authority by providing referral services through Housing Rights Inc., and making information available at the permit counter and on the City’s website.
- Program H-3.5.3: Work with local non-profit housing developers to facilitate sweat-equity homeownership opportunities for Concord residents.
- Program H-4.1.1: Continue the City’s existing contract with ECHO Housing to provide fair housing counseling, education, and outreach services.
- Program H-4.1.2: Continue the City’s existing contract with Bay Area Legal to provide tenant/landlord counseling and resolve problems and conflicts that occur in tenant/landlord relationships.

Additionally, in 2019, the City established an Ad Hoc Committee on Rental Housing to address the local housing market and recommend policies to address issues related to affordability, availability, and tenant evictions.

Many of the 5th Cycle programs are written as policy without clear objectives. Therefore, through new programs in the 6th Cycle Housing Element, the City will continue striving to specifically address housing needs and concerns of residents with special needs by revising programs with a strong action plan and implementable objectives, and adding new programs to comply with updates to State law.

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Appendix B: Housing Needs Assessment

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This Housing Needs Assessment provides detailed information on demographic characteristics and trends that influence supply and demand for various housing types in Concord. Information includes population, housing, employment, and homelessness counts and trends. This information helped inform the goals, objectives, policies, programs, and activities proposed in this Housing Element.

Population Characteristic Trends

Population Count

Concord’s population is projected to increase by approximately 34.1% from 2020 to 2035. The population growth of Contra Costa County is set to be slower than that of Concord over the same time period, with a projected population increase of approximately 17.8%. As shown in **Table 1**, by 2035, it is expected that Concord’s share of the population will increase, making up approximately 13.6% of the Contra Costa County population. Table 1 provides population sizes and trends for both Concord and Contra Costa County from 2010 to 2035.

Table 1
Population Size and Trends by City and County (2010 to 2035)

Location	2010	2020	2035	2010 to 2035 Change		2020 to 2035 Change	
				Number	Percent	Number	Percent
City of Concord	122,155	134,605	180,555	+58,400	+47.8%	+45,950	+34.1%
Contra Costa County	1,051,830	1,128,660	1,329,330	+277,500	+26.4%	+200,670	+17.8%

Source: Projections 2040 by Jurisdiction (Curated); Excel; <http://projections.planbayarea.org/> (accessed November 2021).

Age

Age is an important demographic factor for analyzing future housing needs and crafting policies to help meet the specific demands of different age groups. **Table 2** provides population sizes by age group in 2010 and 2019. In 2019, the family-forming adults age group (ages 25–44) made up the largest share of the population (29.3%) in Concord, followed by the middle age group (27%). The largest change in population age is in the older adults age group (those age 65 and over), shifting from approximately 11.3% of the population in 2010 to approximately 15% of the population in 2019—about a 42.1% increase. Race and ethnicity can add an additional layer of understanding, as families and older adults of color are more likely to experience challenges in finding affordable housing. Persons of color make up 26.2% of older adults ages 65 and older, and 44.3% of youth under age 18 in Concord. In general, there is a higher proportion of younger residents that identify as persons of color and a higher proportion of older residents that identify as White in Concord. The City of Concord (City) will need to implement policies that address the specific needs of this rising population of older adults, especially given that approximately 36% of those age 65 and older in Concord had a disability in 2019.

Table 2
Age Groups in Concord (2010, 2019)

Age Group	2010		2019		Percent Change 2010 to 2019
	Number	Percent	Number	Percent	
Children and Youth (Under Age 18)	27,807	22.9%	26,659	20.6%	-4.1%
College Age (Ages 18–24)	11,310	9.3%	10,438	8.1%	-7.7%
Family-Forming Adults (Ages 25–44)	36,385	30%	37,861	29.3%	+4.1%
Middle Age Adults (Ages 45–64)	32,172	26.5%	34,823	27%	+8.2%
Older Adults (Ages 65 and Older)	13,652	11.3%	19,402	15%	+42.1%

Table 2
Age Groups in Concord (2010, 2019)

Age Group	2010		2019		Percent Change 2010 to 2019
	Number	Percent	Number	Percent	
Total	121,326	100%	129,183	100%	—
Median Age	36.9		38.9		—

Sources (accessed November 2021):

<https://data.census.gov/cedsci/table?q=dp05&g=1600000US0616000&tid=ACSDP5Y2010.DP05>.

<https://data.census.gov/cedsci/table?q=dp05&g=1600000US0616000&tid=ACSDP5Y2019.DP05>.

Race and Ethnicity

Concord is becoming increasingly diverse. **Table 3** provides the population by race and ethnicity in Concord for 2010 and 2019. From 2010 to 2019, Concord saw its largest percent increase in the “Two or More Races” population (a nearly 76% increase), although this population made up approximately 7.2% of Concord’s total population in 2019. The Native Hawaiian and Other Pacific Islander population grew by more than 20%, and both the Asian and Black or African American populations each grew by approximately 18%. In the same time period, Concord saw its only decrease in the White population (an approximately 1% decrease), although this population still made up nearly two-thirds of Concord’s total population in 2019 (approximately 62.5%). The population of Hispanic or Latinx origin is the second largest in Concord and has increased approximately 8% since 2000. Despite an increase in diversity of persons of color in Concord, when compared to the Bay Area, persons of color comprise a lower proportion of the overall population. In creating policies and allocating resources at the City and regional levels, considerations must be made for housing needs of the growing population of persons of color.

Table 3
Race and Ethnicity Trends in Concord (2010, 2019)

Race and Ethnicity	2010		2019		Percent Change 2010 to 2019
	Number	Percent	Number	Percent	
White	81,844	67.5%	80,796	62.5%	-1.3%
Black or African American	3,699	3%	4,359	3.4%	+17.8%
American Indian and Alaska Native	528	0.4%	587	0.5%	+11.2%
Asian	13,754	11.3%	16,269	12.6%	+18.3%
Native Hawaiian and Other Pacific Islander	609	0.5%	732	0.6%	+20.2%
Other (Alone)	15,577	12.8%	17,110	13.2%	+9.8%
Two or More Races	5,315	4.4%	9,330	7.2%	+75.5%
Total	121,326	99.9%	129,183	100%	—
Hispanic Origin ¹	34,576	28.5%	38,663	29.9%	+11.8%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=dp05&g=1600000US0616000&tid=ACSDP5Y2010.DP05>.

<https://data.census.gov/cedsci/table?q=dp05&g=1600000US0616000&tid=ACSDP5Y2019.DP05>.

¹ Persons of Hispanic origin may be of any race or multiple races.

Economic Characteristics

Employment has an important impact on housing needs and the demand for various types of housing. **Table 4** provides the employment trends by city, county, and the region from 2020 to 2035. Concord is projected to add 29,760 jobs from 2020 to 2035 (approximately a 46.1% increase). The City will need to accommodate a range of housing types at prices affordable to the range of household incomes. The

projected job growth in Concord is set to outpace the projected job growth in both Contra Costa County and the greater Bay Area¹ within the same time frame.

Employment Status

As shown in **Table 5**, there were 67,039 employed civilians in Concord in 2019, and Table 4 shows there were a projected 64,550 jobs in Concord in 2020. Using these numbers, the ratio of jobs to resident workers is 0.96. Concord is a net exporter of workers.² Growth accommodated under Concord's 2030 General Plan Economic Vitality Element will consist of an employment mix that continues growth in the Central Area, the Monument and Clayton Road corridors, North Concord, and the Concord Reuse Project Area.³ This growth is expected to accommodate regional businesses and local-serving jobs (in retail, services, and other economic sectors) in existing and planned shopping areas, offices, industrial parks, and mixed-use areas.⁴

According to the 2019 American Community Survey, 70,668 Concord residents 16 years and older were in the labor force, and among these residents, 67,039 were employed. Table 5 provides information on employment status in Concord in 2010 and 2019. From 2010 to 2019, unemployment decreased by approximately 38%. Additionally, there was an approximately 20% increase in Concord residents who are not in the labor force; the growing population of older adults may be a primary driving factor, indicating that there is a growing number of residents who are entering into retirement.

¹ Association of Bay Area Governments (ABAG) region

² ABAG/MTS Staff and Baird + Driskell Community Planning. 2021. Housing Needs Data Report: Concord. April 4, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794788860330>.

³ <https://www.cityofconcord.org/DocumentCenter/View/1077/Chapter-2-Economic-Vitality-PDF> (accessed November 2021).

⁴ <https://www.cityofconcord.org/DocumentCenter/View/1077/Chapter-2-Economic-Vitality-PDF> (accessed November 2021).

Table 4
Employment Trends by City, County, and Region (2020 to 2035)

	<i>City of Concord</i>			<i>Contra Costa County</i>			<i>ABAG Region</i>		
	<i>2020</i>	<i>2035</i>	<i>Percent Change</i>	<i>2020</i>	<i>2035</i>	<i>Percent Change</i>	<i>2020</i>	<i>2035</i>	<i>Percent Change</i>
Number of Jobs	64,550	94,310	+46.1%	414,290	483,810	+16.8%	7,920,230	9,142,745	+15.4%

Sources: Projections 2040 by Jurisdiction (Curated); Excel; <http://projections.planbayarea.org/> (accessed November 2021).
Regional Projections; <http://projections.planbayarea.org/> (accessed November 2021).
ABAG = Association of Bay Area Governments

Table 5
Employment Status for Population Age 16 Years and Older in Concord (2010, 2019)

<i>Labor Force</i>	<i>2010</i>		<i>2019</i>		<i>Percent Change 2010 to 2019</i>
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	
In Armed Forces	101	0.1%	112	0.1%	+10.9%
Civilian – Employed	62,173	64.2%	67,039	63.9%	+7.8%
Civilian – Unemployed	5,631	5.8%	3,517	3.4%	-37.5%
Not in Labor Force	28,885	29.8%	34,292	32.7%	+19.7%
Total	96,790	99.9%	104,960	100.1%	—

Sources (accessed October 2021):
<https://data.census.gov/cedsci/table?q=DP03%20concord&g=1600000US0616000&tid=ACSDP5Y2010.DP03>.
<https://data.census.gov/cedsci/table?q=DP03%20concord&g=1600000US0616000&tid=ACSDP5Y2019.DP03>.

Employment by Industry

In 2019, Concord’s top industries were Educational Services, and Health Care and Social Assistance (approximately 19.6%); Professional, Scientific, and Management, and Administrative and Waste Management Services (approximately 15.9%); and Retail Trade (approximately 11.6%) (see **Table 6**). From 2010 to 2019, the Agriculture, Forestry, Fishing and Hunting, and Mining industry experienced the largest increase (by approximately 77.5%), while the Wholesale Trade industry experienced the largest decrease (by approximately 29.1%). It should be noted, however, that the Agriculture, Forestry, Fishing and Hunting, and Mining industry remains the smallest overall (at less than 1%), and the Wholesale Trade industry was the third-smallest overall in 2010 (at approximately 2.6%) and the second-smallest overall in 2019 (at approximately 1.7%).

Table 6
Civilian Employed Population 16 Years and Over by Industry in Concord (2010, 2019)

Industry	2010		2019		Percent Change 2010 to 2019
	Number	Percent	Number	Percent	
Agriculture, Forestry, Fishing and Hunting, and Mining	258	0.4%	458	0.7%	+77.5%
Construction	5,365	8.6%	4,779	7.1%	-10.9%
Manufacturing	3,912	6.3%	4,079	6.1%	+4.3%
Wholesale Trade	1,630	2.6%	1,156	1.7%	-29.1%
Retail Trade	8,030	12.9%	7,782	11.6%	-3.1%
Transportation and Warehousing, and Utilities	2,798	4.5%	2,851	4.3%	+1.9%
Information	1,521	2.4%	1,231	1.8%	-19.1%
Finance and Insurance, and Real Estate and Rental and Leasing	6,665	10.7%	5,894	8.8%	-11.6%
Professional, Scientific, and Management, and Administrative and Waste Management Services	8,408	13.5%	10,676	15.9%	+27.0%
Educational Services, and Health Care and Social Assistance	10,928	17.6%	13,153	19.6%	+20.4%
Arts, Entertainment, and Recreation, and Accommodation and Food Services	6,800	10.9%	7,378	11.0%	+8.5%
Other Services, except Public Administration	3,751	6.0%	4,781	7.1%	+27.5%
Public Administration	2,107	3.4%	2,821	4.2%	+33.9%
Total Civilian Employed Population 16 Years and Over	62,173	99.8%	67,039	99.9%	+7.8%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20unemployment&tid=ACSDP5Y2010.DP03&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20unemployment&tid=ACSDP5Y2019.DP03&hidePreview=false>.

Unemployment Rate

Concord’s unemployment rate decreased from 2010 to 2019, as shown in **Table 7**. According to 2019 American Community Survey employment status statistics, Black or African American persons experienced the highest percent of unemployment rate at 12.2%, followed by persons with two or more races at 9.9%.⁵ The population of White, American Indian and Alaskan native, Asian, Native Hawaiian and other Pacific Islander, Hispanic or Latinx origin (of any race), and some other race experienced

⁵ <https://data.census.gov/cedsci/table?q=employment%20status%20by%20race&g=1600000US0616000&tid=ACSST5Y2019.S2301>.

unemployment rates below 5%. The unemployment rate for Black or African American persons and persons of two or more races is significant because they only make up 3.4% and 7.2% of Concord’s population, respectively. Based on these statistics, the population of Black persons and persons of two or more races are the most vulnerable to experiencing unemployment.

Table 7
Unemployment Rate for Population Age 16 Years and Older in Civilian Labor Force in Concord (2010, 2019)

	<i>2010</i>	<i>2019</i>
Unemployment Rate	5.8%	3.4%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=DP03%20concord&g=1600000US0616000&tid=ACSDP5Y2010.DP03>.

<https://data.census.gov/cedsci/table?q=DP03%20concord&g=1600000US0616000&tid=ACSDP5Y2019.DP03>.

Occupation, Employment Count, and Wages

Table 8 provides information on occupations and earnings of the labor force in Concord. The majority of Concord’s employed population in 2019 (approximately 39.0%) was employed in the Management, Business, Science, and Arts sector, which remains the occupation with the highest median earnings (at about \$76,101 in 2019). The second most prevalent occupation in 2019 was in the Sales and Office sector, which had approximately 22.4% of the employed population that year, but with just over half the median earnings of that in the Management, Business, Science and Arts sector (\$38,626 in 2019). The third most prevalent occupation is in the Service sector (approximately 21.6%), which is the lowest-earning occupation in Concord (\$22,828 in 2019). The Service sector includes occupations related to healthcare support, protective services (such as firefighting and prevention, as well as law enforcement), food preparation and serving, building and grounds cleaning and maintenance, and personal care and service. In 2019, the Area Median Income (AMI) for Contra Costa County was \$111,700, which means that the three most prevalent occupation sectors in Concord earned less than the AMI for Contra Costa County; therefore, many employees in these sectors may need access to affordable housing options with costs that are restricted to below market-rate prices. From 2010 to 2019, the Management, Business, Science, and Arts sector experienced the largest percent increase in employed residents (an increase of approximately 27.3%), and the Natural Resources, Construction, and Maintenance sector experienced the largest percent increase in median earnings (an increase of approximately 26.9%).

Household Characteristics

Household Size

Table 9 provides information on household types in Concord in 2010 and 2019. From 2010 to 2019, total households in Concord grew approximately 3.4%. Family Households made up the largest share of household types in 2019, at 68.2% of all households. Nonfamily Households experienced an approximate 0.2% increase (to approximately 31.8% in 2019), which includes an increase in households with roommates and shared living situations. The largest increase in household type is shown at approximately 12.8% where the householder is not living alone. This suggests that more householders are opting to share their households with other people, perhaps in an effort to make the monthly payment more affordable. The largest decrease in household type is shown at approximately 7.2%, where the householder is female and there is no spouse present.

Table 8
Civilian Employed Population 16 Years and Older by Occupation in Concord (2010, 2019)

<i>Occupation</i>	<i>2010</i>			<i>2019</i>			<i>Percent Change</i>	
	<i>Number</i>	<i>Percent</i>	<i>Median Earnings</i>	<i>Number</i>	<i>Percent</i>	<i>Median Earnings</i>	<i>Number</i>	<i>Median Earnings</i>
Management, Business, Science, and Arts	20,559	33.1%	\$63,717	26,173	39.0%	\$76,101	+27.3%	+19.4%
Service	13,009	20.9%	\$18,290	14,477	21.6%	\$22,828	+11.3%	+24.8%
Sales and Office	17,282	27.8%	\$36,050	14,988	22.4%	\$38,626	-13.3%	+7.1%
Natural Resources, Construction, and Maintenance	5,990	9.6%	\$39,690	5,400	8.1%	\$50,374	-9.8%	+26.9%
Production, Transportation, and Material Moving	5,333	8.6%	\$31,264	6,001	9.0%	\$36,648	+12.5%	+17.2%
Total	62,173	100.0%	\$39,134	67,039	100.0%	\$46,277	+7.8%	+18.3%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20occupation&tid=ACSST5Y2010.S2401&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20city,%20earnings%20by%20occupation&tid=ACSST5Y2019.S2401&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20city,%20earnings%20by%20occupation&tid=ACSST5Y2010.B24011&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20city,%20earnings%20by%20occupation&tid=ACSST5Y2019.B24011&hidePreview=false>.

Table 9
Household Types in Concord (2010, 2019)

<i>Household Type</i>	<i>2010</i>		<i>2019</i>		<i>Change</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Family Households ¹	30,186	67.2%	31,691	68.2%	+1,505	+5.0%
Married	22,055	49.1%	23,929	51.5%	+1,874	+8.5%
Male Householder, No Spouse Present	2,381	5.3%	2,465	5.3%	+84	+3.5%
Female Householder, No Spouse Present	5,705	12.7%	5,297	11.4%	-408	-7.2%
Nonfamily Households ²	14,733	32.8%	14,764	31.8%	+31	+0.2%
Householder Living Alone	11,499	25.6%	11,117	23.9%	-382	-3.3%
Householder Not Living Alone	3,234	7.2%	3,647	7.9%	+413	+12.8%
Total Households	44,919	100%	46,455	100%	+1,536	+3.4%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2010.S2501&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2019.S2501&hidePreview=false>.

Notes:

- ¹ A family household is defined by the U.S. Census Bureau as a household maintained by a household who is in a family (a group of two or more people related by birth, marriage, or adoption residing together), and includes unrelated people (unrelated subfamily members and/or secondary individuals) who may be residing there.
- ² A nonfamily household is defined by the U.S. Census Bureau as a household living alone (a one-person household) or where the household shares the home exclusively with people to whom they are not related.

The average household size in Concord increased from 2010 to 2019, as shown in **Table 10**.

Table 10
Average Household Size in Concord (2010, 2019)

	<i>2010</i>	<i>2019</i>	<i>Change</i>
Average Household Size	2.67	2.75	+3%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20S1101&tid=ACSST5Y2010.S1101&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S1101&tid=ACSST5Y2019.S1101&hidePreview=false>.

Tables 11 and 12 provide household sizes for owner-occupied and renter-occupied units, respectively, in 2010 and 2019. In 2019, owner-occupied two-person households made up the largest proportion of households in Concord overall (approximately 20.5%).

Among owner-occupied households, two-person households made up the largest proportion in 2019 (approximately 34.2%). Two-person households also made up the largest proportion of renter-occupied households in the same year (approximately 28.2%).

From 2010 to 2019, owner-occupied households only experienced an increase in three-person households (increase of approximately 31.3%), while all other owner-occupied household size categories experienced a decrease (ranging between approximately 1.7% and 14.9%). The increase in three-person households could be indicative of a number of factors, including an increase of families with children, an increase in older adults residing with family members, or an increase in younger adults staying for longer durations with family members.

In the same time frame, renter-occupied households experienced an increase in all household size categories (ranging between approximately 6.7% and 16.2%), the largest of which being one-person households (an increase of approximately 16.2%) (as shown in Table 12).

Table 11
Household Size for Owner-Occupied Units in Concord (2010, 2019)

<i>Household Size</i>	<i>2010</i>		<i>2019</i>		<i>Change</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
One-Person Household	7,143	25.3%	6,078	21.9%	-1,065	-14.9%
Two-Person Household	10,079	35.7%	9,518	34.2%	-561	-5.6%
Three-Person Household	4,207	14.9%	5,523	19.9%	+1,316	+31.3%
Four-or-More-Person Household	6,804	24.1%	6,686	24.0%	-118	-1.7%
Total	28,233	100%	27,805	100%	-428	-1.5%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2010.S2501&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2019.S2501&hidePreview=false>.

Table 12
Household Size for Renter-Occupied Units in Concord (2010, 2019)

Household Size	2010		2019		Change	
	Number	Percent	Number	Percent	Number	Percent
One-Person Household	4,338	26.0%	5,039	27.0%	+701	+16.2%
Two-Person Household	4,789	28.7%	5,266	28.2%	+477	+10.0%
Three-Person Household	2,953	17.7%	3,413	18.3%	+460	+15.6%
Four-or-More-Person Household	4,622	27.7%	4,932	26.4%	+310	+6.7%
Total	16,686	100.1%	18,650	99.9%	+1,964	+11.8%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSS5Y2010.S2501&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSS5Y2019.S2501&hidePreview=false>.

Housing Types and Growth Trends

Household size is one factor that influences the demand for multifamily and single-family homes, as well as the size of the units. **Table 13** identifies the number of homes within each housing type. From 2010 to 2019, the one-unit detached housing type experienced the largest increase (by approximately 3.9%). In the same time frame, the two- to four-unit housing type experienced the largest decrease (by approximately 18.9%). The most prevalent types of housing unit in both 2010 and 2019 were one-unit detached (approximately 58% and approximately 60.2%, respectively) and five or more units (approximately 24.3% and approximately 24.6%, respectively). From 2010 to 2019, Concord experienced growth in one-unit detached units (approximately a 3.9% increase) and five or more units (approximately a 1.3% increase). This could be an indicator that there is market demand for both single-family and higher-density multifamily uses.

Table 13
Housing Types by Units in Structure in Concord (2010, 2019)

Housing Type	2010		2019		Change	
	Number	Percent	Number	Percent	Number	Percent
One-Unit, Detached	27,862	58.0%	28,935	60.2%	1,073	+3.9%
One-Unit, Attached	3,248	6.8%	2,839	5.9%	-409	-12.6%
Two to Four Units	3,494	7.2%	2,834	5.9%	-660	-18.9%
Five or more Units	11,673	24.3%	11,830	24.6%	157	+1.3%
Mobile Home, Boat, RV, Van, etc.	1,794	3.8%	1,658	3.4%	-136	-7.6%
Total Housing Units	48,071	100.1%	48,096	100%	25	+0.1%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

Tenure and Vacancy Rates

Housing tenure and vacancy rates are important indicators of the supply and cost of housing, as well as income. Housing tenure refers to whether a housing unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types. Vacancy rates are indicative of whether or not there is a sufficient supply of available housing at a given point in time. A healthy vacancy rate is considered to be at around 5%, demonstrating that there are desirable housing options available when in the market for a home.

The ratio of owner-occupied units versus renter-occupied units is an indicator of financial stability. **Table 14** identifies the occupied housing units by tenure in Concord in 2010 and 2019. In 2019, approximately 59.9% of Concord’s occupied housing stock was owner-occupied and approximately 40.1% was renter-occupied. Of the owner-occupied units, approximately 76% of those households had a mortgage in 2019, while approximately 24% of those households did not have a mortgage.⁶ Additionally, homeownership rates vary considerably across race and ethnicity. These disparities not only reflect a difference in wealth and income, they can also stem from past Federal, State, and local policies that limited access to homeownership for persons of color. As such, the impact of historical redlining is still evident across the Bay Area. The 2019 American Community Survey U.S. Census data found that more than 50% of White, Asian/Asian/Pacific Islander, and American Indian or Alaska Native residents live in owner-occupied units, whereas more than 50% of Black or African American, Hispanic or Latinx, and other races of residents live in renter-occupied units. The low home ownership rates among many groups of color can be explained further in the section “Household Income and Extremely Low-Income Households,” below.

Table 14
Occupied Housing Units by Tenure in Concord (2010, 2019)

<i>Housing Unit Type</i>	<i>2010</i>		<i>2019</i>		<i>Change</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Owner-Occupied Housing Units	28,233	62.9%	27,805	59.9%	-428	-1.5%
Renter-Occupied Housing Units	16,686	37.1%	18,650	40.1%	+1,964	+11.8%
Total Occupied Housing Units	44,919	100%	46,455	100%	+1,536	+3.4%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2010.S2501&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S2501&tid=ACSST5Y2019.S2501&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S1101&tid=ACSST5Y2010.S1101&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20S1101&tid=ACSST5Y2019.S1101&hidePreview=false>.

Tables 15 and 16 provide the number of vacant units and vacancy rates, respectively, in Concord in 2010 and 2019. A healthy vacancy is considered to be approximately 5%, but both homeowner and rental vacancy rates were below this 5% threshold in 2019 at 3.4%, decreasing from 6.6% in 2010. Considering that total housing units increased by approximately 0.1% since 2010, a decreasing vacancy rate indicates that there are not enough vacant units or enough new units being developed to support mobility within Concord. This also indicates that the regional job market is likely providing more opportunities than the housing market can keep up with, resulting in not enough housing to meet demand.

Table 15
Vacant Housing Units in Concord (2010, 2019)

<i>Housing Unit Type</i>	<i>2010</i>		<i>2019</i>		<i>Change</i>	
	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>	<i>Number</i>	<i>Percent</i>
Total Vacant Housing Units	3,152	6.6%	1,641	3.4%	-1,511	-47.9%
Total Occupied Housing Units	44,919	93.4%	46,455	96.6%	+1,536	+3.4%
Total Housing Units	48,071	100%	48,096	100%	+25	+0.1%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

⁶ <https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false> (accessed December 2021).

Table 16
Vacancy Rate by Homeowners and Rentals in Concord (2010, 2019)

	<i>2010</i>	<i>2019</i>
Homeowner Vacancy Rate	2.2%	0.4%
Rental Vacancy Rate	5.7%	1.7%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

Housing Age and Condition

Housing age is commonly used by State and Federal programs to estimate rehabilitation needs. Typically, most homes begin to require major repairs or rehabilitation at 30 or 40 years of age. Factors commonly used to determine housing conditions are age of housing, overcrowding, homeowner income, and lack of plumbing facilities.

To understand the rehabilitation needs for Concord, the age of housing, overcrowding of housing, and homeowner income were considered. As provided in **Table 17**, approximately 76.4% of the housing stock is over 40 years old (built in or before 1979). More than 94% of Concord’s housing stock was built prior to 2000. Further, approximately 8% of households are considered overcrowded or severely overcrowded. Approximately 29% of owner-occupied households in 2019 spent more than 30% of their income on housing. Based on the percentage of the housing stock over 40 years old and cost-burdened homeowners, there is likely a need for housing rehabilitation assistance.

A high estimate of the number of units in need of rehabilitation, based solely on the age of the housing stock provided in Table 17, is approximately 36,725 units. However, regular maintenance and remediation of many units suggests that much of this needed rehabilitation may be minimal and isolated to small upgrades and repairs. The number of units in need of substantial rehabilitation is likely much lower. The City’s Building Division monitors compliance with health and safety codes to ensure residents who reside in a multifamily community can feel safe about where they are living through the Multi Family Rental Housing Inspection Program. The program addresses bed bugs, tenant complaints, and building and housing code enforcement. The City’s multifamily housing inventory is inspected once every 2 years to identify deteriorated housing stock and ensure the rehabilitation of housing that does not meet minimum local and/or state building, housing code, and health and safety standards. The Building Division responds to complaints and assists property owners in bringing their properties into compliance. On average, the City performs routine inspections on approximately 1,500 units per year, and receives and conducts an average of 5 to 10 complaint-based inspections per year.

In addition, special effort has been made by the City to help preserve affordable housing and maintain Concord’s older housing stock. Concord’s older homes are often owned by older adults who purchased their homes many years ago. These residents are typically on fixed incomes and may not have the means to perform regular maintenance and repairs, or to qualify for traditional home repair loans. Through the Housing Rehabilitation Loan and Grant Program, the City provides weatherization and home security grants of up to \$15,000 for older adults and low-interest loans up to \$75,000 for repairs and improvements to income-qualified homeowners, including older adults, residents with disabilities, and low- to extremely low-income households. The City also supports the acquisition and rehabilitation of affordable multifamily developments in the City through allocation of the City’s Inclusionary Housing In-Lieu Fee revenue. The City will continue to support the preservation of affordable housing in the City through the implementation of **Program 17, Housing Preservation and Rehabilitation**, of the Housing Element. Further, the City works with lower-income homeowners to address safety and health code

violations of dwelling units. These units are those that are in substantial need of rehabilitation. Given that the City assisted with the rehabilitation of 148 housing units in the 5th Cycle Housing Element, it can be estimated that a similar number of units will require substantial rehabilitation for the 6th Cycle. Therefore, based on local data provided by City databases, the City estimates that the number of units in need of substantial rehabilitation and/or replacement during the 6th Cycle planning period is approximately 150 units. This number also closely correlates to those units lacking kitchen or plumbing facilities, as provided below in the section “Lack of Plumbing Facilities.”

Table 17
Age of Housing Stock in Concord

<i>Year Built</i>	<i>Number</i>	<i>Percent</i>
2014 or Later	199	0.4%
2010 to 2013	204	0.4%
2000 to 2009	2,352	4.9%
1980 to 1999	8,616	17.9%
1960 to 1979	24,138	50.2%
1940 to 1959	11,699	24.3%
1939 or Earlier	888	1.8%
Total Housing Units	48,096	99.9%

Source: <https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false> (accessed October 2021).

The City’s Homeowner Rehabilitation Loan and Grant Program provides funds for grants and low- or no-interest deferred rehabilitation loans for low-income homeowners (eligibility is based on income and household size, and the home must be owner-occupied).⁷ Qualifying repairs include accessibility improvements and other interior and exterior repairs, foundation work, heating/air conditioning repair/replacement, plumbing and electrical repairs, and roof repair/replacement.⁸

During the 5th Cycle Housing Element, Concord had 15 to 21 rehabilitated housing units per year, as shown in **Table 18**. Therefore, a low estimate of the number of units in need of rehabilitation during the 6th Cycle planning period, based solely on the number of units rehabilitated from 2014 to 2021, is approximately 148 units. In the 2020–2021 fiscal year, 20 units were rehabilitated through this program, and a similar number is projected for the 2021–2022 fiscal year.

Table 18
Rehabilitated Units by Fiscal Year in Concord

<i>Fiscal Year</i>	<i>Number of Units Rehabilitated</i>
2014–2015	15
2015–2016	18
2016–2017	21
2017–2018	18
2018–2019	19
2019–2020	17
2020–2021	20
2021–2022 (projected)	20

Source: City of Concord 2022.

⁷ <https://www.cityofconcord.org/343/Homeowner-Rehabilitation-Loan-Grant-Prog> (accessed November 2021).

⁸ <https://www.cityofconcord.org/343/Homeowner-Rehabilitation-Loan-Grant-Prog> (accessed November 2021).

Lack of Plumbing Facilities

Table 19 provides the number of occupied housing units lacking complete kitchen or plumbing facilities in 2010 and 2019. About 1% of all housing units in 2019 lacked a complete kitchen facility (a deterioration since 2010) and about 0.5% lacked complete plumbing facilities (a deterioration since 2010). It is likely that there is overlap between these two factors, indicating that many units that lack complete kitchen facilities may also lack complete plumbing facilities.

Table 19
Occupied Housing Units Lacking Complete Kitchen or Plumbing Facilities (2010, 2019)

Facility Type	2010		2019		Percent Change
	Number	Percent	Number	Percent	
Lacking Complete Kitchen Facilities	257	0.6%	468	1.0%	+82.1%
Lacking Complete Plumbing Facilities	178	0.4%	212	0.5%	+19.1%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

Household Income and Extremely Low-Income Households

High housing costs compared to household income creates housing challenges for households with incomes that fall below the AMI and can lead to overcrowding. AMI is calculated based on gross annual income, adjusted by family size. A four-person household is used as the standard for the base calculation for median income, and income categories are based on a percentage of the AMI, adjusted by the number of people in a household per their income category. **Tables 20 and 21** provide the AMI categories and income limits for 2019 and 2021, respectively.

Table 20
Area Median Income Categories

Category	Description
Extremely Low-Income	Gross household income equal to 30% or less of AMI.
Very Low-Income	Gross household income equal to 50% or less of AMI.
Low-Income	Gross household income equal to 80% or less of AMI.
Moderate-Income	Gross household income equal to 120% or less of AMI.
Above Moderate Income	Gross household income equal to 121% or more of AMI.

AMI = area median income

Table 21
Contra Costa County Income Limits for a Four-Person Household (2019, 2021)

Income Limit	2019	2021
Extremely Low Income (30% AMI)	\$37,150	\$41,100
Very Low Income (50% AMI)	\$61,950	\$68,500
Low Income (80% AMI)	\$98,550	\$109,600
Median Income	\$111,700	\$125,600
Moderate Income (120% AMI)	\$134,050	\$150,700

Sources: <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2021.pdf> (accessed October 2021).

<https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2019.pdf> (accessed December 2021).

AMI = area median income.

Table 22 provides the household income in the past 12 months for total occupied housing units in 2010 and 2019. From 2010 to 2019, the overall median household income for occupied housing units increased by approximately 37.5%. By comparison, owner-occupied household median income increased by approximately 29.4% (as shown in **Table 23**), and renter-occupied household median income increased by approximately 36.6% (as shown in **Table 24**) in the same time period.

As shown in Table 22, among total occupied housing units, household incomes of \$150,000 or more experienced the largest increase (by approximately 88.6%) from 2010 to 2019, and household incomes between \$15,000 to \$19,999 experienced the largest decrease (by approximately 34.0%) in the same time period.

As shown in Table 22, the 2019 estimated number of existing extremely low-income households (i.e., households with incomes less than \$37,150; see Table 21) is approximately 8,595 (i.e., the number of households with incomes less than or equal to \$34,999). This is significant because it highlights a large wealth gap in Concord as more than 10,419 households have a household income greater than \$150,000, which is well over the 2019 AMI of \$111,700, as identified on Table 22.

Table 22
Household Income in the Past 12 Months (in 2010 and 2019 Inflation-Adjusted Dollars) for Total Occupied Housing Units in Concord (2010, 2019)

Household Income	2010		2019		Change	
	Number	Percent	Number	Percent	Number	Percent
Less than \$5,000	629	1.4%	1,040	2.2%	+411	+65.3%
\$5,000 to \$9,999	943	2.1%	711	1.5%	-232	-24.6%
\$10,000 to \$14,999	1,797	4.0%	1,420	3.1%	-377	-21.0%
\$15,000 to \$19,999	1,527	3.4%	1,008	2.2%	-519	-34.0%
\$20,000 to \$24,999	1,887	4.2%	1,353	2.9%	-534	-28.3%
\$25,000 to \$34,999	3,953	8.8%	3,063	6.6%	-890	-22.5%
\$35,000 to \$49,999	6,109	13.6%	4,132	8.9%	-1,977	-32.4%
\$50,000 to \$74,999	8,759	19.5%	6,862	14.8%	-1,897	-21.7%
\$75,000 to \$99,999	6,154	13.7%	6,533	14.1%	+379	+6.2%
\$100,000 to \$149,000	7,591	16.9%	9,914	21.3%	+2,323	+30.6%
\$150,000 or more	5,525	12.3%	10,419	22.4%	+4,894	+88.6%
Total	44,919	99.9%	46,455	100%	+1,536	+3.4%
Median	\$65,123		\$89,564		+\$24,441	

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2010.S2503&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2019.S2503&hidePreview=false>.

Table 23 provides the household income in the past 12 months for owner-occupied housing units in 2010 and 2019. In 2019, out of total owner-occupied housing units, approximately 54.9% had a median household income of more than \$100,000. Among owner-occupied households, all household income categories below the median for owner-occupied units (i.e., the median is \$109,035, so household income categories \$99,999 and below) decreased from 2010, with the exception of a slight increase of households earning \$15,000 to \$19,999 per year. In juxtaposition to the change among lower-income earners, those earning \$100,000 to \$149,000 saw an increase in number of households between 2010 and 2019 at an approximate 5.9% increase, and households making \$150,000 or more also increased by approximately 68.1% in the same time period.

Table 23

Household Income in the Past 12 Months (in 2010 and 2019 Inflation-Adjusted Dollars) for Owner-Occupied Housing Units in Concord (2010, 2019)

Household Income	2010		2019		Change	
	Number	Percent	Number	Percent	Number	Percent
Less than \$5,000	339	1.2%	303	1.1%	-36	-10.6%
\$5,000 to \$9,999	367	1.3%	214	0.8%	-153	-41.7%
\$10,000 to \$14,999	621	2.2%	234	0.8%	-387	-62.3%
\$15,000 to \$19,999	536	1.9%	543	2.0%	+7	+1.3%
\$20,000 to \$24,999	791	2.8%	502	1.8%	-289	-36.5%
\$25,000 to \$34,999	1,807	6.4%	1,424	5.1%	-383	-21.2%
\$35,000 to \$49,999	2,852	10.1%	1,833	6.6%	-1,019	-35.7%
\$50,000 to \$74,999	5,223	18.5%	3,345	12.0%	-1,878	-36.0%
\$75,000 to \$99,999	4,235	15.0%	4,141	14.9%	-94	-2.2%
\$100,000 to \$149,000	6,352	22.5%	6,725	24.2%	+373	+5.9%
\$150,000 or more	5,082	18.0%	8,541	30.7%	+3,459	+68.1%
Total	28,233	99.9%	27,805	100%	-428	-1.5%
Median	\$84,249		\$109,035		+\$24,786	

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2010.S2503&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2019.S2503&hidePreview=false>.

Table 24 provides the household income in the past 12 months for renter-occupied housing units in 2010 and 2019. Approximately 27% of rental-occupied households made \$100,000 or more. Among renter-occupied housing units, households with incomes of \$150,000 or more experienced the largest increase (by approximately 317.7%) from 2010 to 2019, and household incomes of less than \$5,000 experienced the second-largest increase (by approximately 179.4%) in the same time period. This suggests that the income gap is widening in Concord. Renter-occupied housing units with household incomes of \$15,000 to \$19,999 experienced the largest decrease (by approximately 54.2%) from 2010 to 2019.

Table 24

Household Income in the Past 12 Months (in 2010 and 2019 Inflation-Adjusted Dollars) for Renter-Occupied Housing Units in Concord (2010, 2019)

Household Income	2010		2019		Change	
	Number	Percent	Number	Percent	Number	Percent
Less than \$5,000	267	1.6%	746	4.0%	+479	+179.4%
\$5,000 to \$9,999	584	3.5%	504	2.7%	-80	-13.7%
\$10,000 to \$14,999	1,185	7.1%	1,194	6.4%	+9	+0.8%
\$15,000 to \$19,999	1,018	6.1%	466	2.5%	-552	-54.2%
\$20,000 to \$24,999	1,118	6.7%	858	4.6%	-260	-23.3%
\$25,000 to \$34,999	2,119	12.7%	1,641	8.8%	-478	-22.6%
\$35,000 to \$49,999	3,254	19.5%	2,294	12.3%	-960	-29.5%
\$50,000 to \$74,999	3,521	21.1%	3,525	18.9%	+4	+0.1%
\$75,000 to \$99,999	1,919	11.5%	2,387	12.8%	+468	+24.4%
\$100,000 to \$149,000	1,251	7.5%	3,189	17.1%	+1,938	+154.9%
\$150,000 or more	451	2.7%	1,884	10.1%	+1,433	+317.7%
Total	16,686	100%	18,650	100.2%	+1,964	+11.8%
Median	\$44,093		\$60,243		+\$16,150	

Sources (accessed November 2021):

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2010.S2503&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2019.S2503&hidePreview=false>.

Table 25 provides the owner-occupied median household income and median home price in Concord in 2010 and 2019. From 2010 to 2019, the percent increase in median household income for owner-occupied units far outpaced the increase in median home price. In contrast to owner-occupied households, the increase in annual median rent outpaced the increase in median household income for renter-occupied units, as shown in **Table 26**. Further, renter incomes increased at a higher rate than those of homeowners. Renters are more vulnerable to changes in rent, and the cost of rent is increasing at a much faster rate than the median home price.

Table 25

Owner-Occupied Median Household Income and Median Home Price in Concord (2010, 2019)

	<i>2010</i>	<i>2019</i>	<i>Number Change</i>	<i>Percent Change</i>
Median Household Income	\$84,249	\$109,035	+\$24,786	+29.4%
Median Home Price	\$470,200	\$551,300	+\$81,100	+17.2%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2010.S2503&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2019.S2503&hidePreview=false>.

Table 26

Renter-Occupied Median Household Income and Median Rent in Concord (2010, 2019)

	<i>2010</i>	<i>2019</i>	<i>Number Change</i>	<i>Percent Change</i>
Median Household Income	\$44,093	\$60,243	+\$16,150	+36.6%
Median Rent (annual)	\$14,256	\$20,592	+\$6,336	+44.4%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2010.S2503&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord,%20ca%20income&tid=ACSST5Y2019.S2503&hidePreview=false>.

Households Burdened by Housing Cost

Table 27 provides the total households burdened by housing costs in Concord in 2019, broken down by tenure. Approximately 54% of renter-occupied households in Concord spent more than 30% of their income on housing, and approximately 29% of owner-occupied households spent more than 30% of their income on housing. Approximately 40% of all households are renter occupied. As rents continue to rise, outpacing median income, more rental households will continue to be burdened by housing costs, leaving homeownership further out of reach for many.

Table 27

Cost Burden by Tenure in Concord (2019)

<i>Tenure</i>	<i>0%–30% of Income Used for Housing</i>	<i>30%–50% of Income Used for Housing</i>	<i>50%+ of Income Used for Housing</i>	<i>Not Computed</i>	<i>Totals</i>
Owner Occupied	19,581	5,217	2,886	121	27,805
Renter Occupied	7,898	4,960	5,107	685	18,650
Totals	27,479	10,177	7,993	806	46,455

Source: ABAG/MTC Housing Element Data Package – Tab: OVER-06. Last updated April 2, 2021.

<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

In 2017, the AMI for Contra Costa County was \$97,400.⁹ **Table 28** shows the number of occupied housing units burdened by housing cost in Concord in 2017. There were approximately 13,180 occupied housing units that were both in the income group of 80% or less of AMI and spent over 30% of income on housing. Across all income groups, approximately 38.9% of occupied housing units spent more than 30% of income on housing and are therefore considered to be burdened by housing cost. More specifically, of the 6,615 occupied housing units in the 0%–30% of AMI group, approximately 87.2% spent more than 30% of income on housing and are therefore considered to be burdened by housing cost. Of the 5,650 occupied housing units in the 31%–50% of AMI group, approximately 71.8% spent more than 30% of income on housing and are therefore considered to be burdened by housing cost. Of the 6,385 occupied housing units in the 51%–80% of AMI group, approximately 52.5% spent more than 30% of income on housing and are therefore considered to be burdened by housing cost.

Additionally, people of color are more likely to be cost burdened and have a greater risk of housing insecurity as a result of Federal and local housing policies that have historically excluded them from the same opportunities extended to White residents. Hispanic or Latinx residents are cost burdened, with 28% of households spending 30% to 50% of their income on housing, and Black or African American, Non-Hispanic residents are the most severely cost burdened, with 33.8% of households spending more than 50% of their income on housing. Therefore, these groups are likely to have low home ownership rates because the cost to own a home can be too burdensome. This points out a significant disparity in wealth and population, as one of the most cost-burdened groups, the Hispanic or Latinx population, contributes to one of the largest populations in Concord, and the most severely cost burdened group, Black or African American, Non-Hispanic population, is one of the smallest populations in the City, as described above in the section “Population Characteristic Trends.”

Table 28
Cost Burden by Income Level in Concord (2017)

<i>Income Group</i>	<i>0%–30% of Income Used for Housing</i>	<i>30%–50% of Income Used for Housing</i>	<i>50%+ of Income Used for Housing</i>
0%–30% of AMI	845	1,065	4,705
31%–50% of AMI	1,595	2,110	1,945
51%–80% of AMI	3,030	2,460	895
81%–100% of AMI	3,275	1,695	260
Greater than 100% of AMI	19,095	2,520	90
Totals	27,840	9,850	7,895

Source: ABAG/MTC Housing Element Data Package – Tab: OVER-05. Last updated April 2, 2021.

<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

AMI = area median income.

Overcrowded Households

Overcrowding is defined by the U.S. Census Bureau as a housing unit occupied by more than one person per room. This is more likely to occur in in extremely low- and low-income households, as discussed in the section “Housing Costs and Affordability,” below. A severely overcrowded household is defined as one with more than 1.5 persons per room. From 2010 to 2019, the total proportion of households considered to be overcrowded in Concord increased by about 41.3%, and the total proportion of households considered to be severely overcrowded increased by about 138.7%, as shown in **Table 29**.

⁹ <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/inc2k17.pdf> (accessed December 2021).

Table 29
Overcrowding in Concord (2010, 2019)

Type of Overcrowding	2010		2019		Percent Change
	Number	Percent	Number	Percent	
Overcrowded (>1 and ≤1.5 occupants/room)	1,779	4.0%	2,514	5.4%	+41.3%
Severely Overcrowded (>1.5 occupants/room)	509	1.1%	1,215	2.6%	+138.7%

Sources (accessed October 2021):

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2010.DP04&hidePreview=false>.

<https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false>.

People of color are more likely to experience overcrowding similar to how they are more likely to experience poverty and housing instability, as described in previous sections. The racial group with the highest overcrowding rate in Concord is “Other Race or Multiple Races” (Hispanic and Non-Hispanic), accounting for 20.1% of all households experiencing overcrowding. Residents of Hispanic or Latinx background experience the second highest overcrowding rate and account for 19% of all households that experience overcrowding. This is important, as residents of Hispanic or Latinx background are the second largest racial/ethnic group in Concord, accounting for 30% of the total population of any race, as discussed above in the section “Population Characteristic Trends.”

Table 30 provides information on overcrowding by tenure in Concord in 2019. The vast majority of owner- and renter-occupied units had one or fewer occupants per room. While owner-occupied units had a relatively low level of units considered crowded (approximately 2%), renter-occupied units experienced higher levels of units considered crowded (approximately 10.5%). Although only approximately 0.7% of owner-occupied units experienced severe overcrowding, renter-occupied units experienced approximately 5.5% severe overcrowding. Overall, renter-occupied units experienced disproportionately higher rates of overcrowding and severe overcrowding than owner-occupied units in 2019.

Table 30
Overcrowding by Tenure in Concord (2019)

Number of Occupants Per Room	Owner-Occupied Units		Renter-Occupied Units	
	Number	Percent	Number	Percent
1.00 or Fewer	27,059	97.3%	15,667	84.0%
1.01 to 1.50	559	2.0%	1,955	10.5%
1.51 or More	187	0.7%	1,028	5.5%
Total Occupied Housing Units	27,805	100%	18,650	100%

Source: <https://data.census.gov/cedsci/table?q=concord%20city,%20household%20size&tid=ACSST5Y2019.S2501&hidePreview=false> (accessed October 2021).

Large Households

Large families are defined by the U.S. Department of Housing and Urban Development (HUD) as families with five or more members. Many large households have special housing needs because they tend to have lower household income and have few options or access to adequately sized, affordable housing. In 2019, there were 4,888 large-family households (accounting for approximately 10.5% of all households in Concord) and 40 large non-family households (accounting for approximately 0.09% of all households in Concord), as shown in **Table 31**. According to the Association of Bay Area Governments/Metropolitan Transportation Commission (ABAG/MTC) housing need data report for the City, in 2017, 28.8% of large households were very low-income, earning less than 50% of the AMI.

Table 31
Household Type by Household Size in Concord (2019)

<i>Household Size</i>	<i>Number</i>	<i>Percent</i>
<i>Family Households</i>	31,691	68.2%
Two- to Four-Person Household	26,803	57.7%
Five-Person Household	2,919	6.3%
Six-Person Household	1,363	2.9%
Seven-or-More-Person Household	606	1.3%
<i>Nonfamily Households</i>	14,764	31.8%
One- to Four-Person Household	14,724	31.7%
Five-Person Household	27	0.1%
Six-Person Household	4	0%
Seven-or-More-Person Household	9	0%
Total Households	46,455	100%

Source: <https://data.census.gov/cedsci/table?q=concord%20b11016&tid=ACSDT5Y2019.B11016&hidePreview=false> (accessed October 2021).

Single-Parent Households

Table 32 provides the number of single-parent households in Concord. In 2019, single-parent households made up approximately 5.7% of all households in Concord, and women were the head of about 75.9% of all single-parent households. As previously shown in Table 9, there was a decrease of approximately 7.2% of household types where the householder is female and there is no spouse present from 2010 to 2019.

Table 32
Single-Parent Households in Concord (2019)

<i>Households</i>	<i>Number</i>	<i>Percent*</i>
Total Households with Children Under the Age of 18	14,932	32.1%
Single-Parent Households	2,630	5.7%
Single-Parent Households Headed By Women	1,995	4.3%

Source: <https://data.census.gov/cedsci/table?q=concord%20city,%20California%20single%20parent&tid=ACSDP5Y2019.DP02&hidePreview=false> (accessed October 2021).

* Of all households (46,455).

Housing Costs and Affordability

Housing affordability is dependent on income and housing costs. The Federal standard of rental affordability is that a household should spend no more than 30% of its gross income on monthly housing costs and utilities. In 2019, the AMI for Contra Costa County was \$111,700 (see Table 21), indicating that the healthy maximum housing cost for the median income household should not exceed \$33,510 a year or \$2,792.50 per month. The maximum affordability of housing costs per household is further detailed below and provided in **Table 33**.

Table 33
Maximum Affordable Price and Rent in Contra Costa County (2019)

<i>Household Income Category</i>	<i>Annual Income</i>	<i>Maximum Affordable Monthly Payment for Housing and Utilities</i>
<i>Two-Person</i>		
Extremely Low	\$29,750	\$744
Very Low	\$49,600	\$1,240
Low	\$78,850	\$1,971
Median	\$89,350	\$2,234

Table 33
Maximum Affordable Price and Rent in Contra Costa County (2019)

<i>Household Income Category</i>	<i>Annual Income</i>	<i>Maximum Affordable Monthly Payment for Housing and Utilities</i>
Moderate	\$107,250	\$2,681
<i>Four-Person</i>		
Extremely Low	\$37,150	\$929
Very Low	\$61,950	\$1,549
Low	\$98,550	\$2,464
Median	\$111,700	\$2,793
Moderate	\$134,050	\$3,351

Source: <https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/income-limits-2019.pdf> (accessed December 2021).

Median Home Value and Median Rent

Table 34 provides the median value and median rent in Concord, and **Table 35** provides the gross median rent by bedroom count in 2019. In Concord, the median home value in 2019 for owner-occupied units was \$551,300, and median monthly rent was \$1,716. For perspective, a 30-year fixed mortgage at a 4% interest rate can cost approximately \$2,865 a month, and that price will vary depending on the amount of the down payment provided. Down payments at 20% or more will help buyers obtain lower interest rates, which tend to fluctuate from day-to-day, leaving homeownership out of reach for lower and even moderate-income households. Monthly rents are out of reach for extremely low-income households and even some very low-income households. According to 2019 American Community Survey Census data, Black or African American residents experience the highest rate of poverty and account for 18.9% of racial/ethnic groups that experience poverty in Concord. When all other household costs are considered, such as student loan payments, payments for childcare, the costs of transportation, utilities, and other standard payments, housing attainability leaves many households at varying income levels constrained, and significantly impacts Black or African American, Hispanic or Latinx, and other residents of color experience because they experience a high rate of poverty and overcrowding, and have low home ownership rates.

Table 34
Median Value and Median Rent in Concord (2019)

<i>Value/Rent</i>	<i>Cost (2019)</i>
Median Value for Owner-Occupied Units	\$551,300
Median Monthly Rent for Occupied Units Paying Rent	\$1,716

Source: <https://data.census.gov/cedsci/table?q=concord%20DP04&tid=ACSDP5Y2019.DP04&hidePreview=false> (accessed October 2021).

Table 35
Median Gross Rent by Bedroom Count in Concord (2019)

<i>Number of Bedrooms</i>	<i>Median Gross Rent</i>
No Bedroom	\$1,545
One Bedroom	\$1,432
Two Bedrooms	\$1,704
Three Bedrooms	\$2,158
Four Bedrooms	\$2,678
Five or More Bedrooms	\$1,779

Groups with Special Housing Needs

Groups with special housing needs can face increased challenges in finding housing to meet their needs. Individuals experiencing homelessness and in need of emergency shelter, older adults, persons with disabilities, large families, farmworkers, and families with a female head of household often have difficulty finding housing to meet their specific needs. This section provides an analysis of special needs groups in Concord. Policies and programs to address these needs are incorporated throughout the Housing Element.

Older Adults

Older adults refer to those who are age 65 and older. Like in many cities across California, the population of older adults is increasing in Concord (see Table 2), and housing that meets the changing needs of this demographic is becoming increasingly important. Older adults share four common characteristics:

- **Income:** People over 65 are usually retired and living on a fixed income.
- **Healthcare:** Accounts for an increasing proportion of older adults' expenses.
- **Transportation:** Many older adults require assistance with transportation.
- **Housing:** Many live alone and their homes require modifications to meet changing levels of ability.

These characteristics indicate a need for smaller, lower-cost housing with easy access to transit, healthcare facilities, and other services. In 2019, more than 28% of the total households in Concord had a resident aged 65 years or older—an increase of approximately 75% since 2010, as shown in **Table 36**. In the same time period, there was an approximately 22% decrease in householders 65 years and older living alone. Tenure is also a factor in determining household challenges for older adults. According to ABAG/MTC data, the largest proportion of older adult households who rent make 0%–30% of AMI, and the largest proportion of older adult households who are homeowners fall in the income group greater than 100% of AMI.

Table 36
Households with Older Adults in Concord (2010, 2019)

	2010		2019		Change	
	Number	Percent*	Number	Percent**	Number	Percent
Households with One or More Person 65 Years and Older	9,608	21.4%	13,220	28.5%	+3,612	+75.2%
Householder Living Alone (65 Years and Older)	3,568	7.9%	3,174	6.8%	-394	-22.1%

Source: <https://data.census.gov/cedsci/table?q=concord%20city,%20California%20single%20parent&tid=ACSDP5Y2019.DP02&hidePreview=false> (accessed October 2021).

* Out of total households (44,919)

** Out of total households (46,455)

Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. As shown in Table 9, in Concord in 2019, the largest proportion of households was married-couple family households at 51.5% of total, while female-headed households with no spouse present made up 11.4% of all households. According to ABAG/MTC data, 31% of female-headed households with children fell below the Federal poverty line, while 8.4% of female-headed households without children live in poverty.

Farmworkers

Across California, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs, and they may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market. The following are needs identified for farmworkers:

- **Income:** Farmworkers, often falling within extremely low-income groups, are generally subject to unstable income due to the nature of seasonal work. They are also typically paid California’s minimum wage.
- **Housing:** Farmworkers with very low incomes have limited housing choices and often live in overcrowded conditions to offset the burden of high rent costs. Additionally, the housing available to many farmworkers are substandard, including informal shacks, illegal garage units, and other structures generally unsuitable for occupancy.

As shown in Table 37, in Concord, there were no reported children of migrant workers going to school in the 2019–2020 school year. From the 2016–2017 to the 2019–2020 school year, the number of children of migrant worker going to school decreased by approximately 14.1% in the Bay Area, and from the 2018–2019 to the 2019–2020 school year, there was a decrease in the number of migrant worker students by 2.4%.

Table 37
Migrant Worker Student Population (2016–2020)

Academic Year	Concord	Contra Costa County	Bay Area
2016–2017	0	0	4,630
2017–2018	0	0	4,607
2018–2019	0	0	4,075
2019–2020	0	0	3,976

Source: ABAG/MTS Staff and Baird + Driskell Community Planning. 2021. Housing Needs Data Report: Concord. April 4, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794788860330>.

According to the U.S. Department of Agriculture Census of Farmworkers, and as shown in **Table 38**, the number of permanent farm workers in Contra Costa County has decreased since 2002, totaling 450 in 2017, and the number of seasonal farm workers has also decreased, totaling 860 in 2017. Data on permanent and seasonal farmworkers in Concord is unavailable. Although, there are no agricultural uses in Concord, farmworkers may reside in Concord as a result of agricultural uses located primarily in eastern Contra Costa Country and Solano County near the Sacramento–San Joaquin River Delta, which is approximately 25 miles away in distance or 35 to 45 minutes by vehicle.

Table 38
Farm Operations and Farm Labor in Contra Costa County (2002–2017)

<i>Type of Worker</i>	<i>2002</i>	<i>2007</i>	<i>2012</i>	<i>2017</i>
Permanent	730	578	509	450
Seasonal	1,874	1,295	1,540	860
Total	2,604	1,873	2,049	1,310

Source: ABAG/MTC Housing Element Data Package – Tab: FARM-02. Last updated April 2, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

In Concord in 2002, there were 48 jobs in the Agriculture and Natural Resources group, and by 2018, there were 38 jobs in the same group—a decrease of approximately 20.8%.¹⁰ In 2018, Agriculture and Natural Resources jobs made up approximately 0.06% of total jobs in Concord.¹¹

Table 39 shows the number of residents who worked in the Agriculture and Natural Resources industry, regardless of the location where those residents are employed. According to Table 39, there were 458 Concord residents employed in the Agriculture and Natural Resources industry in 2019, making up approximately 0.7% of employed civilians in Concord. It should be noted that those who work in the Agriculture and Natural Resources industry are not limited to farmworkers, and the numbers may include occupations pertaining to mining, quarrying, and oil extraction. Further, there are no farms in Concord, so it is less common that those residing in Concord working in the Agriculture and Natural Resources Industry would qualify as farmworkers. Most of Contra Costa County’s farms are located in Brentwood, with the nearest farms located in neighboring Clayton. These farms typically produce vegetables, fruits, or tree nuts.

Table 39
Resident Employment in the Agriculture and Natural Resources Industry (2019)

<i>Geography</i>	<i>Number of Residents</i>
Concord	458
Contra Costa County	3,720
Bay Area	30,159

Source: ABAG/MTC Housing Element Data Package – Tab: POPEMP-06. Last updated April 2, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

¹⁰ ABAG/MTC Housing Element Data Package – Tab: POPEMP-11. Last updated April 2, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

¹¹ ABAG/MTC Housing Element Data Package – Tab: POPEMP-11. Last updated April 2, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

Persons with Disabilities

Several Federal and State statutes affect the provision of housing for persons with disabilities. The Fair Housing Act (1968) prohibits discrimination on the basis of disability in all types of housing transactions, and defines “persons with a disability” as those individuals with mental or physical impairments that substantially limit one or more major life activities. The Fair Housing Amendments Act (1988) requires local jurisdictions to “make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.”

The 2010 Census defines six types of disabilities: sensory, physical, mental, self-care, go-outside-home, and employment. The Census defines sensory and physical disabilities as “long-lasting conditions.” Mental, self-care, go-outside-home, and employment disabilities are defined as conditions lasting 6 months or more that make it difficult to perform certain activities. A more detailed description of each disability is provided below:

- **Sensory:** Blindness, deafness, or severe vision or hearing impairment.
- **Physical:** A condition that substantially limits one or more basic physical activities, such as walking, climbing stairs, reaching, lifting, or carrying.
- **Mental:** A mental condition lasting more than 6 months that impairs learning, remembering, or concentrating.
- **Self-Care:** A condition that restricts the ability to dress, bathe, or get around inside the home.
- **Go-Outside-Home:** A condition that restricts the ability to go outside the home alone to shop or visit a doctor’s office.
- **Employment:** A condition that restricts the ability to work at a job or business.

According to 2019 ACS data, the race group with the highest percent of persons with a disability is American Indian and Alaska Native, with 26.6%; followed by Black or African American persons, with 14.6% of the population; and White persons, with 13.4% of the population. This is significant because the Black or African American population experiences the highest rates of poverty, at 18.9%, and the American Indian or Alaska Native population experiences the third-highest rate of poverty in Concord, at 16.1% of the population. Therefore, families living with or persons with a disability are more likely to experience major financial challenges for special housing and care.

Disability by Type

Table 40 provides the population with a disability in Concord in 2019. In 2019, approximately 12% (15,454) of Concord’s population had a disability, and approximately 36% of those age 65 and older had a disability (**Table 41**). Because older adults make up the largest subgroup of those with a disability, as older adults continue to age, the need for housing to meet varying levels of ability will become increasingly vital. Through the Housing Rehabilitation Loan and Grant Program, the City provides weatherization and home security grants of up to \$15,000 for older adults and low-interest loans up to \$75,000 for repairs and improvements to income-qualified homeowners, including older adults, residents with disabilities, and low- to extremely low-income households.

Table 40
Civilian Noninstitutionalized Population with a Disability in Concord (2019)

<i>Disability Type</i>	<i>Number</i>	<i>Percent of Population</i>
Hearing Difficulty	4,026	3.1%
Vision Difficulty	2,393	1.9%
Cognitive Difficulty	6,652	5.5%

Ambulatory Difficulty	8,015	6.7%
Self-Care Difficulty	3,428	2.9%
Independent Living Difficulty	6,343	6.2%
Total*	15,454	12.0%

Source: <https://data.census.gov/cedsci/table?q=concord%20city,%20disability%20type&tid=ACSST5Y2019.S1810&hidePreview=false> (accessed in October 2021).

* It is likely that there are individuals with multiple types of disabilities, in which case the total does not reflect the disability types when added up.

Disability by Age

Table 41 provides the disability type by age in Concord in 2019. Among those younger than 65 years, the largest proportion of disabilities is cognitive. Among those age 65 years and older, the largest proportion of disabilities is ambulatory.

Table 41
Disability Type by Age in Concord (2019)

<i>Disability Type</i>	<i>Number</i>	<i>Percent of Total Population</i>
Total population	128,468	—
Total population with a disability	15,454	12%
Population under 18 years old	26,645	—
<i>Population with a disability under 18 years old*</i>	<i>1,140</i>	<i>4.3%</i>
• Hearing difficulty	69	0.3%
• Vision difficulty	77	0.3%
• Cognitive difficulty	1,006	5.5%
• Ambulatory difficulty	114	0.6%
• Self-care difficulty	292	1.6%
• Independent living difficulty	—	—
Population 18 to 64 years old	82,820	—
<i>Population with a disability 18 to 64 years old*</i>	<i>7,480</i>	<i>9%</i>
• Hearing difficulty	1,415	1.7%
• Vision difficulty	1,286	1.6%
• Cognitive difficulty	3,482	4.2%
• Ambulatory difficulty	3,296	4.0%
• Self-care difficulty	1,339	1.6%
• Independent living difficulty	2,873	3.5%
Population 65 years and over	19,003	—
<i>Population with a disability 65 years and older*</i>	<i>6,834</i>	<i>36%</i>
• Hearing difficulty	2,542	13.4%
• Vision difficulty	1,030	5.4%
• Cognitive difficulty	2,164	11.4%
• Ambulatory difficulty	4,605	24.2%
• Self-care difficulty	1,797	9.5%
• Independent living difficulty	3,470	18.3%

Source: <https://data.census.gov/cedsci/table?q=concord%20city,%20disability%20type&tid=ACSST5Y2019.S1810&hidePreview=false> (accessed in October 2021).

* Out of total population for that given age group.

Disability by Employment Status

Table 42 provides the employment status by disability in Concord in 2019. Among the civilian noninstitutionalized population age 18 to 64 years in 2019, the unemployment rate for those with a disability was approximately 13.3%, while the unemployment rate for those without a disability was approximately 4.6%. As shown in Table 7, in 2019, the overall unemployment rate for the population 16 years and older in the civilian labor force was approximately 3.4%. This indicates that persons with disabilities may have more difficulty finding work than the overall population.

**Table 42
Employment Status by Disability for Civilian Noninstitutionalized Population Ages 18 to 64
Years in Concord (2019)**

<i>Employment Status</i>	<i>With a Disability</i>			<i>No Disability</i>		
	<i>Number</i>	<i>Percent of Total</i>	<i>Percent of Total in Labor Force</i>	<i>Number</i>	<i>Percent of Total</i>	<i>Percent of Total in Labor Force</i>
Employed	3,061	40.9%	86.7%	60,204	79.9%	95.4%
Unemployed	470	6.3%	13.3%	2,874	3.8%	4.6%
Not in Labor Force	3,949	52.8%	—	12,262	16.3%	—
Total	7,480	100%	—	75,340	100%	—
Total in Labor Force	3,531	47.2%	100%	63,078	83.7%	100%

Source: <https://data.census.gov/cedsci/table?q=concord%20disability%20by%20employment&tid=ACSDT5Y2019.C18120&hidePreview=false> (accessed October 2021).

Persons with Developmental Disabilities

According to Section 4512 of the California Welfare and Institutions Code, a “developmental disability” is a disability that originates before an individual reaches 18 years of age; continues, or can be expected to continue, indefinitely; and constitutes a substantial disability for that individual, which includes intellectual disability, cerebral palsy, epilepsy, and autism. The U.S. Census describes a “cognitive disability” as an intellectual impairment that causes one to have difficulty concentrating, remembering, or making decisions. Cognitive disabilities include mental and emotional conditions, such as an intellectual disability, autism, an emotional condition, or another developmental disability, that often results in difficulty getting along with other children, doing schoolwork, or making decisions. Many persons with developmental disabilities can live and work independently within a conventional housing environment. However, the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for those with developmental disabilities is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

The State Department of Developmental Services currently provides services and support to individuals with developmental disabilities. Services are provided through State-operated developmental centers and community facilities, and contracts with 21 non-profit regional centers. The Regional Center of the East Bay serves Alameda and Contra Costa Counties.¹² The Regional Center of the East Bay served about 21,590 consumers in 2020, of which approximately 45% had a diagnosis of autism, approximately 30% had a diagnosis of mild/moderate intellectual disability, approximately 14% had a diagnosis of

¹² DDS (California Department of Developmental Services). 2021. “Regional Center Listings.” Accessed October 2021. <https://www.dds.ca.gov/rc/listings>.

severe/profound intellectual disability, approximately 13% had a diagnosis of cerebral palsy, and approximately 12% had a diagnosis of epilepsy.¹³

Homelessness

A Continuum of Care (CoC) is an integrated system of care that guides and tracks individuals and families experiencing homelessness through a comprehensive array of housing and services designed to prevent and end homelessness. HUD defines a CoC as a community plan to organize and deliver housing and services to meet the specific needs of people experiencing homelessness as they move to stable housing and maximize self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness. The CoC has four necessary parts: outreach, intake, and assessment; emergency shelter; transitional housing with supportive services; and permanent and permanent supportive housing with services if needed. CoC programs for people experiencing homelessness consist of a network of emergency and transitional shelters, as defined in **Table 43**. In addition, permanent supportive housing programs for persons previously experiencing homelessness are major components of the region’s network of care. **Table 44** lists the interim housing facilities for those experiencing homelessness in Concord. The 2020 Point in Time Count included 16 emergency shelters, including the two located in Concord, and eight transitional housing facilities; these 24 interim housing facilities serve the regional needs of those experiencing homelessness.¹⁴

Table 43
Housing Option Definitions

<i>Term</i>	<i>Definition</i>
Emergency Shelters	Provides low-barrier, safe, and supportive 24-hour shelter, food, and comfort to those experiencing homelessness. Winter Emergency Shelters are seasonal Emergency Shelters that operate from December 1 through March 31.
Transitional Housing	Provides longer-term shelter solutions through temporary housing options that can last up to 24 months and includes supportive services, such as case management.
Supportive Housing	Provides long-term housing with wraparound services that are meant to support the stability and health of individuals experiencing homelessness.
Crisis Housing	Provides a safe, low-barrier, housing-first, housing-focused, and supportive 24-hour residence to persons/households experiencing homelessness while they are being quickly assessed and connected to a broad range of housing resources.
Bridge Housing	Provides a safe, low-barrier, housing-first, housing-focused, and supportive 24-hour residence to persons experiencing homelessness while they are working on locating, applying to, and obtaining their permanent housing. Bridge Housing prioritizes individuals experiencing homelessness based on the vulnerability level of the individual person, with the most vulnerable prioritized. Prioritization factors include mental health conditions, physical disability, and length of homelessness.
Homelessness Prevention and Rapid Re-Housing	Rapid re-housing reconnects families and individuals to a housing option as quickly as possible using housing vouchers and rental assistance. It is a more stable and cost-effective way to house people, but due to an overall shortage of housing, these options are often limited.

¹³ https://secureservercdn.net/166.62.108.196/v6q.90e.myftpupload.com/wp-content/uploads/2021/08/RCEB-2020-PC-Year-End-Rpt-Spring-2021DRAFT.4.12.20214-final.Final_.pdf (accessed October 2021).

¹⁴ City of Concord 2021.

Table 44
Interim Housing Facilities for those Experiencing Homelessness in Concord

<i>Provider</i>	<i>Type</i>	<i>Population Served</i>	<i>Bed or Room Count</i>
Concord Adult Interim Housing (Contra Costa Health Services Homeless Program)	Emergency	Men and women	64 Beds
Philip Dorn Respite Center (Contra Costa Health Services Homeless Program)	Emergency	Adults experiencing homelessness who are discharged from local hospitals and require medical stabilization services	28 Beds

Sources: City of Concord 2021.

<https://cchealth.org/h3/emergency-shelter.php> (accessed November 2021).

<https://cchealth.org/h3/respice-center.php> (accessed November 2021).

According to Contra Costa Health Services (CCHS),¹⁵ the Health, Housing, and Homeless Services Division (H3) integrates housing and homeless services across the health system, and coordinates housing and homeless services across the County of Contra Costa government and in the community. As the administrative entity for the CoC for those experiencing homelessness, H3 works with key partners, such as the Employment and Human Services Department, the Housing Authority, school districts, housing providers, law enforcement, and cities, to develop innovative and community-specific policies and strategies to address the needs of persons experiencing homelessness and/or housing insecurity as a key determinant of health.

H3 is committed to making homelessness short-lived and non-recurring by ensuring an integrated system of housing and support services for persons experiencing homelessness in Contra Costa County, according to the CCHS. H3 operates a service delivery system that includes street outreach; respite and emergency shelters; independent living programs for transition-age youth; and permanent supportive housing for adults, youth, and families.

CCHS describes that, as the Federally designated administrative entity for the local homeless CoC, H3 provides technical assistance, strategic guidance, and funding to a network of community-based agencies organized to respond to homelessness in the community. The CoC provides a full system of care that includes crisis response services and long-term permanent solutions to homelessness for adults, youth, and families.

Additionally, according to CCHS, H3 manages the community-wide homeless management information system, and submits the annual application for Federal HUD homelessness assistance funding. H3 administration provides guidance and staff to the Contra Costa Council on Homelessness, the Federally mandated governing body for all HUD Homelessness Assistance–funded services in Contra Costa County.

According to the Contra Costa County: Annual Point in Time Count Report for 2020,¹⁶ in fiscal year 2018–2019, the CoC received approximately \$15,185,985 in Federal funding in support of services for the homeless population.

The Contra Costa County: Annual Point in Time Count Report for 2020 describes that every January, Contra Costa County’s homeless CoC, along with hundreds of communities across the nation, conducts a comprehensive Point in Time count of families and individuals experiencing homelessness across Contra Costa County. As shown in **Table 45**, the 2020 Point in Time count identified 2,277 individuals

¹⁵ <https://cchealth.org/h3/about-us.php> (accessed November 2021).

¹⁶ <https://cchealth.org/h3/coc/pdf/PIT-report-2020.pdf> (accessed November 2021).

sleeping in shelters, outside, or in uninhabitable locations on January 20, 2020. Just under one-third were sheltered (n=707) and more than two-thirds were unsheltered (n=1,570).

According to the Contra Costa County: Annual Point in Time Count Report for 2020, Contra Costa County is commonly divided into West County, Central County, and East County regions, and Concord is within the Central County region. As shown in Table 45, there were 514 unsheltered individuals in the Central County region in 2020, 160 of whom were in Concord; therefore, the unsheltered population in Concord made up approximately 31% of the Central County region’s unsheltered population and approximately 10% of Contra Costa County’s unsheltered population.

Table 45
People Experiencing Homelessness (2020)

<i>Residents</i>	<i>City of Concord</i>	<i>Central County Region</i>	<i>Contra Costa County Total</i>
Sheltered	92*	—	707
Unsheltered	160	514	1,570
Total	252*	—	2,277

Source: <https://cchealth.org/h3/coc/pdf/PIT-report-2020.pdf> (accessed November 2021).

* This assumes 100% bed capacity for the two interim housing facilities for those experiencing homelessness in Concord listed in Table 44.

As shown in **Table 46**, in Contra Costa County in 2019, the most common type of household experiencing homelessness was those without children in their care. Among households experiencing homelessness that do not have children, 75.9% were unsheltered in Contra Costa County. Of homeless households with children, most were sheltered in emergency shelters.

Table 46
Homelessness by Household Type and Shelter Status in Contra Costa County (2019)

	<i>People in Households Composed Solely of Children Under 18</i>	<i>People in Households with Adults and Children</i>	<i>People in Households without Children Under 18</i>
Sheltered – Emergency Shelter	0	159	359
Sheltered – Transitional Housing	0	32	118
Unsheltered	0	128	1,499

Source: ABAG/MTC Housing Element Data Package – Tab: HOMELS-01. Last updated April 2, 2021.

<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

People of color are more likely to experience poverty and financial instability as a result of past Federal and local housing policies that have historically excluded them from the same opportunities extended to White residents. According to 2019 American Community Survey Census data, Black or African American residents experience the highest rate of poverty and account for 18.9% of racial/ethnic groups that experience poverty in Concord. Consequently, people of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. Considering that the Black or African American population is one of the smallest, as discussed above in the section “Population Characteristic Trends,” being the largest racial/ethnic group experiencing homelessness poses a significant disparity compared to any other group. In Contra Costa County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 45.0% of the homeless population, while making up 55.8% of the overall population (see **Table 47**). This data does not exist at the City level.

Table 47
Racial Group Share of General Population and Population of People Experiencing Homelessness in Contra Costa County (2019)

<i>Racial/Ethnic Group</i>	<i>Share of Homeless Population</i>	<i>Share of Overall Population</i>
American Indian or Alaska Native (Hispanic and Non-Hispanic)	14.5%	0.5%
Asian/Pacific Islander (Hispanic and Non-Hispanic)	3.1%	17.2%
Black or African American (Hispanic and Non-Hispanic)	33.8%	8.7%
White (Hispanic and Non-Hispanic)	45.0%	55.8%
Other Race or Multiple Races (Hispanic and Non-Hispanic)	3.7%	17.7%
Totals	100.0%	100.0%

Source: ABAG/MTC Housing Element Data Package – Tab: HOMELS-02. Last updated April 2, 2021.
<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

In Contra Costa County, Hispanic or Latinx residents represent 16.6% of the population experiencing homelessness, while Hispanic or Latinx residents comprise 25.4% of the general population (see **Table 48**). This data does not exist at the City level.

Table 48
Latinx Share of General Population and Population of People Experiencing Homelessness in Contra Costa County (2019)

<i>Latinx Status</i>	<i>Share of Homeless Population</i>	<i>Share of Overall Population</i>
Hispanic/Latinx	16.6%	25.4%
Non-Hispanic/Latinx	83.4%	74.6%
Totals	100.0%	100.0%

Source: ABAG/MTC Housing Element Data Package – Tab: HOMELS-03. Last updated April 2, 2021.
<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

Many of those experiencing homelessness are dealing with severe issues, including mental illness, substance abuse, and domestic violence, that are potentially life threatening and require additional assistance. In Contra Costa County, individuals experiencing homelessness are commonly challenged by severe mental illness, with 519 reporting this condition (see **Table 49**). Of those, some 70.1% are unsheltered, further adding to the challenge of handling the issue. This data does not exist at the City level.

Table 49
Characteristics for the Population Experiencing Homelessness in Contra Costa County (2019)

<i>Variable</i>	<i>Chronic Substance Abuse</i>	<i>HIV/AIDS</i>	<i>Severely Mentally Ill</i>	<i>Veterans</i>	<i>Victims of Domestic Violence</i>
Sheltered – Emergency Shelter	86	4	128	25	28
Sheltered – Transitional Housing	31	1	27	14	6
Unsheltered	377	4	364	75	80

Source: ABAG/MTC Housing Element Data Package – Tab: HOMELS-04. Last updated April 2, 2021.
<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

As shown in **Table 50**, in Concord, the student population experiencing homelessness totaled 371 during the 2019–2020 school year and increased by 14.9% since the 2016–2017 school year. By comparison, Contra Costa County has seen a 4.4% increase in the population of students experiencing homelessness since the 2016–2017 school year, and the Bay Area population of students experiencing homelessness decreased by 8.5%. During the 2019–2020 school year, there were still some 13,718 students experiencing

homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer-term negative effects. The number of students in Concord experiencing homelessness in 2019 represents 16.8% of the Contra Costa County total and 2.7% of the Bay Area total.

Table 50
Students in Local Public Schools Experiencing Homelessness (2016–2020)

<i>Geography</i>	<i>2016–2017</i>	<i>2017–2018</i>	<i>2018–2019</i>	<i>2019–2020</i>
Concord	323	343	404	371
Contra Costa County	2,116	2,081	2,574	2,209
Bay Area	14,990	15,142	15,427	13,718

Source: ABAG/MTC Housing Element Data Package – Tab: HOMELS-05. Last updated April 2, 2021.
<https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794790237486>.

Whereas Concord’s population only made up approximately 11.9% of Contra Costa County in 2020 according to the population projections provided in Table 1, Concord’s proportion of Contra Costa County’s share of those experiencing homelessness was approximately 11.1% in 2020.

Available Resources

In addition to the resources detailed above to assist those experiencing homelessness, many resources are available to assist extremely low-income households and those with special needs. **Table 51** details the public and affordable housing developments in Concord, including those restricted for Section 8 housing vouchers or restricted as affordable through other subsidies.

Table 51
Concord Housing Units with Income Restrictions

<i>Site</i>	<i>Total Units Affordable (not including number of vacancies)</i>	<i>Population Served</i>	<i>Funding Source</i>	<i>Affordability Expires</i>
1750 Diane Court, Concord, CA 94520	8	Family	City of Concord (City) Rehab Loan	City Expired March 2021
Caldera Place Apartments – 2401 Bonifacio Street, Concord, CA 94520	12	Disabled	City Rehab Loan; HOME	July 2056
California Apartments – 1621 Detroit Avenue, Concord, CA 94520	9	Family	Still Affordable; Expiration Unknown	City Expired Oct 2012
Carlton Senior Living – 1700 Broadway Street, Concord, CA 94520	31	Older Adults	City; State Bonds	May 2041
Camara Circle Apartments – 2501–2566 Camara Circle, Concord, CA 94520	51	Family/ Disabled	City; Low-Income Housing Tax Credit (LIHTC)	November 2074
Clayton Crossings Apartments – 2751 Monument Blvd, Concord, CA 94520	296	Family	LIHTC Exp. 2030	City Expired March 2015
Clayton Villa Senior Apartments – 4450 Melody Drive, Concord, CA 94521	79	Older Adults 62+	LIHTC Exp. 2033	City Expired December 2014
Concord Residential Club – 2141 California Street, Concord, CA 94520	19	Disabled	—	Does not Expire

**Table 51
Concord Housing Units with Income Restrictions**

<i>Site</i>	<i>Total Units Affordable (not including number of vacancies)</i>	<i>Population Served</i>	<i>Funding Source</i>	<i>Affordability Expires</i>
El Sol Apartments – 1890 Farm Bureau Road, Concord, CA 94519	10	Family	City and Section 8	City Expired October 2019
Hidden Creek Townhomes – 1032 Mohr Lane, Concord, CA 94518	128	Family	LIHTC Exp. 2028	City Expired April 2017
Lakeside Apartments – 1897 Oakmead Drive, Concord, CA 94520	124	Family/HIV/ AIDS/SHP/ Shelter & Care/PBS8	City; LIHTC	July 2060
Las Casitas Apartments – 1181 Detroit Avenue, Concord, CA 94520	4	Family	City	April 2059
La Vista Apartments – 3838 Clayton Road, Concord, CA 94521	74	Family	LIHTC	December 2062
Phoenix Apartments – 3720 Clayton Road, Concord, CA 94520	11	Older Adults	Section 202 Housing from U.S. Department of Housing and Urban Development	City Expired 2015
Plaza Tower Apartments – 2020 Grant Street, Concord, CA 94520	96	Older Adults 55+	City	June 2070
Riley Court Apartments – 2061 Riley Court, Concord, CA 94520	48	Family/HIV/ AIDS	City; LIHTC	November 2074
Robin Lane Apartments – 1149 Meadow Lane and 1890 Robin Lane, Concord, CA	16	Family	Expires 2067; owned by Satellite Affordable Housing Associates – Contra Costa County Neighborhood Stabilization Program, California Housing Finance Agency, Mental Health Service Act, Bank of the West Affordable Housing Program	City Expired September 2010
Sunridge Apartments – 1265 and 1271 Monument Blvd, Concord, CA 94520	196	Family	LIHTC Exp. 2029	City Expired May 2014
The Heritage Apartments – 2222 Pacheco Street, Concord, CA 94520	196	Older Adults 62+	Still affordable; expiration unknown	City Expired December 2014
Victoria Apartments – 1650, 1670, and 1680 Detroit Avenue, Concord, CA 94520	12	Family/HIV/ AIDS	City	July 2035
Vintage Brook Senior Apartments – 4672 Melody Drive, Concord, CA 94521	148	Older Adults 62+	City	November 2056

**Table 51
Concord Housing Units with Income Restrictions**

<i>Site</i>	<i>Total Units Affordable (not including number of vacancies)</i>	<i>Population Served</i>	<i>Funding Source</i>	<i>Affordability Expires</i>
Virginia Lane Apartments – 1140 Virginia Lane, Concord, CA 94520	91	Family	City; LIHTC	July 2071
Windsor Park Apartments – 1531 and 1611 Adelaide Street, Concord, CA 94520	137	Family	City; LIHTC Exp. 2037	City Expired October 2016

Source: City of Concord 2021.

Additionally, during 2015–2018, the City allocated \$2.9 million for the substantial rehabilitation of 186 extremely low- to low-income units across three multifamily properties—Camara Circle, Riley Court, and Virginia Lane—ensuring their affordability for at least an additional 55 years. In 2018, the City released a notice of funding availability for \$14 million in affordable housing funds to partially finance an acquisition/rehabilitation or a new affordable housing development. In 2019, the City allocated \$7.8 million to Resources for Community Development for the construction of the Galindo Terrace project. The project will provide 62 new housing units, including 61 units affordable to extremely low- to low-income households. The project will serve families, people with disabilities, and veterans for a duration of at least 57 years.

The following are other resources to assist extremely low-income households and those with special needs:

- **Food Bank Contra Costa/Solano** – Food bank partnered with other non-profits to provide perishable and non-perishable foods to residents seeking food security.
- **Habitat for Humanity East Bay/Silicon Valley** – Provides home repairs valued up to \$10,000 for eligible low-income mobile homeowners to address health and safety deficiencies.
- **Housing Consortium of the East Bay** – Provides affordable housing assistance for lower-income individuals with developmental disabilities or other special housing needs.
- **Monument Crisis Center** – Local organization that provides food, education, assistance, and referrals to families and individuals in crisis situations, and promotes community awareness of needs and available resources to at-risk and low-income individuals.
- **SHELTER, Inc.** – Prevents and ends homelessness for low-income, homeless, and disadvantaged families by providing housing, services, support, and resources.

Programs of the Housing Element that are designed to assist those with special needs include the following:

- Through **Program 1, Accessory Dwelling Units**, the City will incentivize and facilitate the creation of accessory dwelling units that will be affordable to lower-income households and to households with special housing needs. Accessory dwelling units provide the benefit of independence and low cost while maintaining proximity to caretakers and family members. As detailed in this program, resources and information for ADUs will be provided through outreach (i.e. social media, newspapers, website), a web-based “ADU Toolkit”, and at the Permit Counter. Resources and information will include items such as permit-ready ADU plans, FAQs, required application forms, and fair housing and tenant protection laws.
- Through **Program 3, Affordable Housing Development Assistance**, the City will actively work with the development community to assist in the development of affordable housing for extremely low-, very low-, low-, and moderate-income households and households with special housing needs by providing resources, guidance, and financial assistance. The Affordable

Housing Development Assistance program, will make this information and these resources available on the City website.

- Through **Program 11, Incentives to Assist in Development**, the City will proactively encourage the development of affordable housing for lower-income households and households with special housing needs through incentives such as density bonuses, flexible standards, and parking reductions. These incentives benefit mixed-used, multifamily developments where lower-income households and persons with special housing needs benefit from resources and opportunities typically associated with these developments.
- Through **Program 17, Preservation and Housing Rehabilitation**, the City will preserve and rehabilitate its existing housing stock, which is predominantly owned by older adults. This will be accomplished through the preservation of affordable multifamily units, rehabilitation possible through loan and grant programs, preservation of historic properties, and promoting energy conservation through a Solar Incentive Program.
- Through **Program 21, Special Housing Needs**, the City will provide assistance to households with special housing needs, including older adult households, large families, and female-headed households, through its continued cooperation with Home Match Contra Costa, a matchmaking service for older adults seeking to share their home for companionship or extra income; increased accessibility, by connecting developers and residents to resources on design features that are accessible and safe to all people regardless of age, size, ability, or disability; and coordination with the Regional Center of East Bay to implement an outreach program that informs families on housing services available for persons with developmental disabilities.
- Through **Program 22, Support for People Experiencing Homelessness**, the City will facilitate housing for people experiencing homelessness by amending the Development Code to allow supportive housing, transitional housing, and emergency shelters by-right or to not be subject to the Design and Site Review process. Additional support will be detailed through a strategic plan along with the funding of organizations and programs that serve individuals and families experiencing homelessness.

Preservation of At-Risk Housing

Although there is an immense need to produce new affordable housing units, ensuring that the existing affordable housing stock remains affordable is equally important. Additionally, it is typically faster and less expensive to preserve currently affordable units that are at risk of converting to market-rate than it is to build new affordable housing. The Housing Element must identify and analyze units that are at risk of converting from affordable to market-rate during the next 10 years, meaning those assisted housing developments with existing affordability covenants or deed-restrictions that will expire in the next 10 years.¹⁷ Through **Program 18, Preservation of At-Risk Affordable Housing Units**, the City will continue to monitor which affordable units are at risk of conversion to market-rate housing. Upon finding units at-risk of conversion, the City will coordinate with property owners to work towards solutions for retaining affordability. Further, **Program 19, Replacement Requirements**, ensures that replacement requirements consistent with State law are mandated in the City for proposed housing developments on sites that currently have residential uses, or within the past 5 years have had residential uses that have been vacated or demolished that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low- or very low-income, subject to any other form of rent or price control, or occupied by low- or very low-income households.

¹⁷ Building Blocks: Housing Needs – Assisted Housing Developments at Risk of Conversion (ca.gov). Accessed December 2021. <https://hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml>.

The data in **Table 52** comes from the 2020 California Housing Partnership’s Preservation Database, the State’s most comprehensive source of information on subsidized affordable housing at risk of losing its affordable status and converting to market-rate housing. However, this database does not include all deed-restricted affordable units in the State, so there may be at-risk assisted units in a jurisdiction that are not captured in this data. As shown in Table 52, there are 1,580 assisted units in Concord in the Preservation Database. Of these units, 0% are at High Risk or Very High Risk of conversion.¹⁸

Table 52
Assisted Units at Risk of Conversion (2020)

<i>Income</i>	<i>Concord</i>	<i>Contra Costa County</i>	<i>Bay Area</i>
Low	1,439	13,403	110,177
Moderate	141	211	3,375
High	0	270	1,854
Very High	0	0	1,053
Total Assisted Units in Database	1,580	13,884	116,459

Source: ABAG/MTS Staff and Baird + Driskell Community Planning. 2021. Housing Needs Data Report: Concord. April 4, 2021. <https://mtcdrive.app.box.com/s/nei8x775oi5m47mqhu8ctpyyqrioa2v3/file/794788860330>.

Review of the City’s current data and at-risk data of Federal and State subsidized and/or assisted affordable developments from the California Housing Partnership indicate that there are six developments at risk of expiring affordability in the next 10 years in Concord. **Table 53** lists the project name and the type and number of affordable units that will expire within the planning period. Anka Behavioral Health is the qualified entity in Concord.

Table 53
Assisted Housing Projects at Risk of Conversion (2021)

<i>Project Name</i>	<i>Address</i>	<i>Type</i>	<i>Affordable Units</i>	<i>Funding Source</i>	<i>Expiration</i>
Clayton Crossings Apartments	2751 Monument Boulevard	Family	296	Low Income Housing Tax Credits	2030
Hidden Creek Townhomes	1032 Mohr Lane	Family	128	Low Income Housing Tax Credits	2028
Sunridge Apartments	1265 and 1271 Monument Boulevard	Family	196	Low Income Housing Tax Credits	2029
Clayton Way Home/Mary McGovern	1859 Clayton Way	SRO	6	HCD	2026
The Heritage	2222 Pacheco Boulevard	Family	121	HUD	2029
Plaza Tower	2020 Grant Street	Family	20	CalHFA	2030

Source: City of Concord 2021. California Housing Partnership, At-Risk Federal and State Subsidized and/or Assisted Affordable Developments. SRO = single-room occupancy; HCD = California Department of Housing and Community Development; HUD = U.S. Department of Housing and Urban Development; CalHFA = California Housing Finance Agency.

¹⁸ California Housing Partnership uses the following categories for assisted housing developments in its database:
Very-High Risk: Affordable homes that are at risk of converting to market rate within the next year that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.
High Risk: Affordable homes that are at risk of converting to market rate in the next 1–5 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.
Moderate Risk: Affordable homes that are at risk of converting to market rate in the next 5–10 years that do not have a known overlapping subsidy that would extend affordability and are not owned by a large/stable non-profit, mission-driven developer.
Low Risk: Affordable homes that are at risk of converting to market rate in 10+ years and/or are owned by a large/stable non-profit, mission-driven developer.

As shown in Table 53, Clayton Crossing Apartments provides 296 affordable units for families. This development was originally built in 1973 and was acquired and rehabilitated to be made available for lower-income households. The property began operating under an affordability contract in 2000. The affordability for this property expired in 2015 and was successfully extended. The development successfully received funding to maintain affordability through 2030. Affordability is financed using 4% Low Income Housing Tax Credits. Clayton Crossings is the recipient of annual funding in the amount of \$706,612. Therefore, it is estimated that the cost to preserve the affordability of Clayton Crossings would cost \$706,612 annually. Based on 2019 Building Valuation Data, it is further estimated that the cost to replace the Clayton Crossings development would amount to approximately \$35 million. It should be noted that this estimate does not calculate the increase in the cost of materials or the timing associated with the shortage of available materials that have resulted due to the COVID-19 pandemic.

Hidden Creek Townhomes provides 128 affordable units for families. This development was originally built in 1968 and has been maintained as affordable since. Affordability expired in 2017 and was renewed through 4% Low Income Housing Tax Credits, ensuring ongoing affordability through 2028. Hidden Creek Townhomes is the recipient of annual Federal funding in the amount of \$375,007. It is estimated that the cost to preserve the affordability of Hidden Creek Townhomes would be \$375,007 annually. Based on 2019 Building Valuation Data, it is further estimated that the cost to replace the Hidden Creek Townhomes development would amount to approximately \$20 million. It should be noted that this estimate does not calculate the increase in the cost of materials or the timing associated with the shortage of available materials that have resulted due to the COVID-19 pandemic.

Sunridge Apartments provides 196 affordable units for families. This development was originally built in 1965 and was acquired and began operating under an affordability contract in 2001. The affordability of this property expired in 2014, but the affordability was successfully extended through 4% Low Income Housing Tax Credits to maintain affordability through 2029. Sunridge Apartments is the recipient of annual funding in the amount of \$1,780,437. It is estimated that the cost to preserve the affordability of Sunridge Apartments would be \$1,780,437 annually. Based on 2019 Building Valuation Data, it is further estimated that the cost to replace the Sunridge Apartments development would amount to approximately \$25 million. It should be noted that this estimate does not calculate the increase in the cost of materials or the timing associated with the shortage of available materials that have resulted due to the COVID-19 pandemic.

Clayton Way Home/Mary McGovern provides six single-room occupancy units for those who are at risk of or were formerly experiencing homelessness. This property is owned and operated by Shelter Inc. a 501(c)(3) non-profit since 1986 created by the Board of Supervisors' Contra Costa County Task Force on Homelessness. Shelter Inc. serves as the primary service agency for those experiencing homelessness in Contra Costa County. As of June 30, 2020, Shelter Inc. had replacement reserves of \$12,457 for replacements and repair of property and equipment. Funds for the property were provided through the Department of Housing and Community Development, in the original amount of \$200,000, and bears interest at 3% and matures in June 2026. It is estimated that the cost to preserve the affordability of Clayton Way Home/Mary McGovern would be \$200,000. Based on 2019 Building Valuation Data, it is further estimated that the cost to replace this development would amount to approximately \$400,000. It should be noted that this estimate does not calculate the increase in the cost of materials or the timing associated with the shortage of available materials that have resulted due to the COVID-19 pandemic.

The Heritage and Plaza Tower are two parts of the same development. Heritage Tower has a project-based Section 8 contract with HUD, providing 196 affordable senior housing units. Of the 196 units, 121 are identified as at risk of converting to market rate due to the 2029 expiration of HUD project-based

vouchers. Plaza Tower is the recipient of a California Housing Finance Agency loan, and 20 of the units are identified as at risk of conversion to market rate. Given that the median rent in Concord is \$1,716 per month, it is estimated that the cost of preservation of these units would be approximately \$240,000 per year. Based on 2019 Building Valuation Data, it is further estimated that the cost to replace this development would amount to approximately \$23 million. It should be noted that this estimate does not calculate the increase in the cost of materials or the timing associated with the shortage of available materials that have resulted due to the COVID-19 pandemic.

Appendix C: Constraints and Zoning Analysis

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Introduction

There are many factors that may affect the type, timing, and cost of housing development, maintenance, and improvement. Both governmental and non-governmental factors can act as barriers to the development of housing. The City of Concord (City) can exercise some control to alleviate some of these barriers through regulatory changes and process improvements. The constraints detailed below include those governmental constraints related to local land use and zoning regulations, code enforcement, required on-site and off-site improvements, development permit processes, fees and exactions, and other local regulations. Further, this document provides an analysis of non-governmental constraints that details the availability of financing, land costs, and construction costs, as well as a detailed overview of the existing infrastructural and environmental constraints to development. An analysis of local efforts to remove constraints to the development of housing is also included. Ongoing and new programs aimed to facilitate development and further remove constraints are detailed in the policy and program portion of the Housing Element.

Governmental Constraints

Land Use and Zoning

State law requires that each city have a General Plan that establishes policy guidelines for future development. The City of Concord's most recent comprehensive General Plan update was adopted in 2007, with subsequent updates to the elements. The General Plan consists of an integrated and internally consistent set of policies and implementing programs. The General Plan Land Use Element sets forth land use designations to guide the location, type, and intensity or density of permitted uses of land in Concord. The City of Concord Development Code implements the Land Use Element of the General Plan by providing specific direction and development standards within each of the land use categories. These land use controls can facilitate and limit certain types of development.

The City's 6th Cycle Housing Element (6th Cycle) includes a list of goals, policies, and programs that are internally consistent with the current General Plan. Of all the General Plan elements, the Housing Element most specifically addresses the policies of the General Plan Land Use Element because it is the Land Use Element that designates the location and extent of residential development throughout Concord. The following goals of the Land Use Element outline the vision for the City, consistent with the goals, policies, and programs identified in the 6th Cycle Housing Element:

1. Create a balanced supply of housing types, densities, and prices to meet the needs of all income groups residing or who wish to reside in Concord.
2. Preserve and enhance Concord's residential neighborhoods while integrating new developments to improve the quality of life for all residents.
3. Encourage a complete and diverse community with well-connected neighborhoods, high quality urban design, and enhanced mobility options.
4. Promote the expansion of housing opportunities for all groups with special housing needs, including older adults, female-headed households, persons with disabilities, first-time homebuyers, large families, and people experiencing homelessness.
5. Strive for equal housing opportunity and access for all people regardless of race, religion, gender, marital status, age, ancestry, national origin, color, sexual orientation, familial status, source of income, or disability.
6. Protect the environment with sustainable developments and lower the cost of energy through energy conservation policies.

As shown in **Table 1**, the Land Use Element describes 12 land uses that permit residential uses.

Table 1
General Plan Land Use Designations that Allow Residential Use

<i>Land Use Designation</i>	<i>Acres</i>	<i>Description</i>
<i>Residential</i>		
Rural Residential	355	This designation is intended for very low-density residential development, at densities fewer than 2.5 units per net acre. Clustered development is preferred to maximize open space.
Low Density Residential	4,368	This designation is intended for residential development at densities from 2.5 to 10 units per net acre. This density range is typical of a single-family residential neighborhood, such as Sun Terrace or Turtle Creek.
Medium Density Residential	3,886	This designation is intended for residential development at densities ranging from a minimum of 11 units per net acre to a maximum of 32 units per net acre. This density range accommodates a variety of housing types, from small-lot single-family homes to townhomes and other forms of multifamily development.
High Density Residential	108	This designation is intended for residential development at densities ranging from a minimum of 33 units per net acre to a maximum of 100 units per net acre. This density range would accommodate attached homes, two- to four-plexes, and apartment buildings. This designation is intended for areas in and adjacent to central Concord and near Bay Area Rapid Transit (BART) stations, where higher densities may be appropriate. Residential design standards will ensure land use compatibility.
North Todos Santos	28	This designation is applied to the North Todos Santos neighborhood, an area characterized by pre-World War II development, including historic buildings. The designation allows a mix of offices, single-family homes, and multifamily residences. Residential densities range from 2.5 to 32 units per net acre, and the maximum floor-to-area ratio is 0.5.
CRP Neighborhood and Village Districts	1,000	This designation applies within the Concord Reuse Project (CRP) area only. It is primarily intended for residential development at densities ranging from 6 to 50 units per net acre. Residential areas are focused around village centers containing a mix of residential, commercial, public, and open space uses.
<i>Commercial and Mixed Use</i>		
Neighborhood Commercial	140	This designation is intended for neighborhood commercial centers that provide convenience and comparison goods and services to the local community. Residential uses are allowed above the ground level at densities from a minimum of 11 units per net acre to a maximum of 24 units per net acre.
Commercial Mixed Use	128	This designation allows for a mix of commercial uses, offices, multifamily uses, and mixed-use development. Densities range from a minimum of 11 units per net acre to a maximum of 40 units per net acre.
Downtown Pedestrian District	22	This designation is intended for low- to high-rise commercial and residential development around Todos Santos Plaza, with restrictions in height around the Plaza to preserve sunlight access. Residential densities range from a minimum of 33 units per acre to a maximum of 100 units per net acre.
Downtown Mixed Use	190	This designation is intended for a high density and intensity mix of residential, commercial, and office development in Central Concord. It allows for a mix of uses

**Table 1
General Plan Land Use Designations that Allow Residential Use**

<i>Land Use Designation</i>	<i>Acres</i>	<i>Description</i>
		that balances jobs and housing opportunities, including offices, commercial development, hotels, public/quasi-public, and residential uses. Residential densities range from a minimum of 33 units per acre to a maximum of 100 units per net acre.
Concord Reuse Project Transit Oriented Development Districts	145	This designation applies to those parts of the Concord Reuse Project (CRP) planned for high-density residential and commercial development in a transit-oriented setting. The CRP-TOD [Transit-Oriented Development] area is envisioned as a major employment center, shopping district, and urban residential area.
<i>Business Park / Industrial</i>		
Industrial Mixed Use	268	This land use designation is intended for a mix of light industrial, secondary office, service uses (excluding auto-oriented retail services) and live/work facilities. Typical uses include warehouse, research and development, wholesale, bulk retail, office space with limited customer access, and artist studios.
Total	10,638	—

Residential Uses by Zone

The City’s zoning regulations accommodate a diversity of housing types to meet the varying needs of residents at all economic segments. This includes housing to meet the special needs of older adults, persons with disabilities, farmworkers, and those experiencing homelessness. **Table 2** details the residential housing types permitted under each applicable zoning designation.

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**Table 2
Zoning for a Variety of Housing Types**

Permit Required by District

<i>Zone Districts</i>	<i>Rural Residential</i>	<i>Single-Family Residential</i>	<i>Residential Low Density</i>	<i>Residential Medium Density</i>	<i>Residential High Density</i>	<i>North Todos Santos Dist.</i>	<i>Community Office</i>	<i>Commercial Mixed-Use</i>	<i>Neighborhood Commercial</i>	<i>Service Commercial</i>	<i>Industrial Business Park</i>	<i>Industrial Mixed-Use</i>	<i>Downtown Pedestrian</i>	<i>Downtown Mixed-Use</i>	<i>Public/ Quasi-Public Dist.</i>	<i>Rural Lands Conservation</i>	
<i>Residential Uses</i>	<i>Residential Zones</i>						<i>Commercial Zones</i>				<i>Industrial</i>		<i>Downtown District</i>		<i>Public Dist.</i>	<i>Community Land Dist.</i>	
Single-Family, Detached	ZC	ZC	ZC	—	—	ZC	ZC	—	—	—	—	—	—	—	—	—	ZC
Single-Family, Detached – Small Lot Subdivision	—	UP	UP	UP	—	UP	UP	UP	—	—	—	—	—	—	—	—	—
Single-Family, Attached	—	UP	ZC	ZC	ZC	ZC	ZC	ZC	—	—	—	—	—	—	—	—	—
Duplex	—	—	AP	ZC	—	ZC, MP	ZC	ZC	—	—	—	—	—	—	—	—	—
Multifamily	—	—	—	ZC	ZC	MP, UP	UP	UP	UP ⁽¹⁾	—	—	—	UP	UP	—	—	—
Family Day Care Home, Small	ZC	ZC	ZC	ZC	ZC	ZC	ZC ⁽²⁾	ZC ⁽²⁾	—	—	—	ZC ⁽²⁾	—	—	—	—	ZC
Family Day Care Home, Large	AP	MP	AP	AP	AP	MP	MP ⁽²⁾	MP	—	—	—	MP ⁽²⁾	—	—	AP	MP	—
Group Housing	—	—	—	UP	UP	UP	UP	UP	—	—	ZC	ZC	—	UP	AP	—	—
Live/Work Unit	—	—	UP	UP	UP	AP	—	ZC ⁽²⁾	—	—	—	MP	UP ⁽¹⁾	UP	—	—	—
Mixed-Use Project	—	—	—	—	—	MP	UP	AP	UP	—	—	UP	UP	UP	—	—	—
Mobile Home Park	—	—	—	UP	UP	—	—	—	—	—	—	—	—	—	—	—	—
Residential Care Facility, Small	ZC	ZC	ZC	ZC	ZC	ZC	ZC ⁽²⁾	ZC ⁽²⁾	—	—	—	—	—	—	ZC	AP	ZC
Residential Care Facility, Large	AP	UP	AP	MP	MP	MP	—	MP	—	—	—	—	—	UP	AP	MP	—
Residential Facility for Seniors, Assisted Living	—	UP	UP	MP	MP	UP	—	UP	UP	—	—	—	UP ⁽²⁾	UP	AP	—	—
Supportive Housing, Multifamily	—	—	—	ZC	ZC	MP, UP	UP	UP	UP ⁽¹⁾	—	—	—	UP	UP	—	—	—
Supportive Housing, Single-Family	ZC	ZC	ZC	ZC	ZC	ZC	ZC	ZC	—	—	—	—	—	—	—	—	ZC
Transitional Housing, Multifamily	—	—	—	ZC	ZC	MP, UP	UP	UP	UP ⁽¹⁾	—	—	—	UP	UP	—	—	—
Transitional Housing, Single-Family	ZC	ZC	ZC	ZC	ZC	ZC	ZC	ZC	—	—	—	—	—	—	—	—	ZC
Work/Live Unit	—	—	—	—	—	AP	—	—	—	AP	—	MP	UP ⁽¹⁾	UP	—	—	—

Notes:

While some uses are permitted in a given zoning district, construction may be subject to Design and Site Review.

1. Not allowed on ground floor.
2. Allowed with residential use only

Permit Allowance

ZC = Permitted Use, Zoning Clearance
 AP = Administrative Permit Required
 UP = Use Permit Required
 MP = Minor Use Permit Required
 — = Use Not Allowed

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Manufactured Housing

Manufactured or factory-built housing on permanent foundations is permitted in zones where single-family homes are permitted (see Table 2). Much like traditional single-family homes, manufactured homes are permanent structures and must be built on a foundation system. The process for approval of a manufactured home differs from that of a traditional single-family built home in that the applications are subject to a review by the Design Review Board pursuant to Chapter 18.415 of the Development Code of the Concord Municipal Code (CMC). Additional discretionary review of manufactured housing on permanent foundation is a constraint to providing such housing; refer to the section “Permitting Processes and Fees,” below, for information on the Design and Site Review process. Through **Program 2, Addressing Constraints to Development**, the City will ensure that manufactured housing on a permanent foundation is treated the same as other single-family uses in the same zones.

Mobile Home Parks

There are 11 mobile home parks operating within Concord. According to 2018 Homeland Infrastructure Foundation-Level Data, the parks total 1,412 spaces for residential use. No new mobile home parks have been built in Concord in more than 25 years. The City considers mobile homes as affordable alternatives to single-family residential. Mobile homes in Concord tend to be occupied by older adults and/or lower-income residents. The parks have little to no vacancy, suggesting a high demand for this alternative form of affordable housing. The City recognized a major threat to this stock of affordable housing when it received applications for redevelopment of certain mobile home parks. The mobile home units are predominantly owner-occupied and set on permanent foundations with utility connections, making the relocation of mobile homes more challenging. Furthermore, it is likely that the homeowners would not be able to afford the costs of relocating, much less find an available space in Concord. To preserve the parks and protect the residents from relocation, the City Council adopted the Mobile Home Conversion Ordinance (CMC Chapter 15.105).

The Mobile Home Conversion Ordinance lays out specific, robust procedures for an owner of a mobile home park to apply for a use change. These procedures make conversion of an existing mobile home park costly for any potential developer. The Ordinance also requires an outreach and notification procedure, paid for by the applicant, so that residents of the mobile home park and the general public are aware of, and can voice their opinion of, the request for conversion or closure. The Ordinance was amended to provide financial protection to the mobile park owners and to encourage investment in mobile home park communities. Park owners have a process to levy money from tenants for park investments and expenses.

Although the City has shown commitment to the preservation and quality of mobile home parks, its land use laws may pose a constraint to building new mobile home parks. The CMC sets a minimum lot size for new parks, which severely limits available land and development opportunity for this highly in-demand affordable housing type. Mobile home parks are permitted in residential medium- and residential high-density zones with a use permit.

Accessory Dwelling Units

The State of California has incorporated many updates to legislation related to the provision of accessory dwelling unit (ADU) and junior accessory dwelling unit (JADU) law since 2017, the latest of which went into effect on January 1, 2021. As per Section 65852.2 of the California Government Code, all local governments are required to permit ADUs and JADUs subject to certain limitations in single-family and multifamily residential zones. On June 2, 2021, the City Council unanimously moved to amend the

Development Code and adopt an ADU Ordinance that is in compliance with and more permissive than the updated State ADU law. Therefore, the City minimizes constraints entailed by the ADU development permitting process by going beyond what the State requires to facilitate ADU production as an alternative solution for providing needed housing units. The City has submitted the updated ordinance to the California Department of Housing and Community Development (HCD) for its review, and upon receipt of comments from the HCD, will incorporate any needed edits as detailed in **Program 1, Accessory Dwelling Units**.

Regulations

ADUs and JADUs are currently permitted in the following zoning districts, per CMC Title 18.200.180:

- R (Residential)
- NTS (North Todos Santos)
- CO (Community Office)
- CMX (Commercial Mixed-Use)
- NC (Neighborhood Commercial)
- DP (Downtown Pedestrian)
- OMX (Downtown Mixed-Use)

ADU and JADU building applications must be reviewed ministerially within 60 days of the application date and are not subject to California Environmental Quality Act (CEQA) review. The minimum ADU size is 150 square feet. Consistent with State law, the current code allows ADUs to have a maximum size of 1,200 square feet, where parking is not required except in limited circumstances, and also ADUs up to 800 square feet in size (see **Table 3**). Additionally, the conversion of space in an existing structure to an ADU is permitted, as are newly constructed ADUs that are attached to the primary dwelling. Although these uses are permitted ministerially, construction of ADUs may be subject to Design and Site Review in cases where they do not meet specified design and development standards. Refer to the section “Permitting Processes and Fees,” below, for more information on the Design and Site Review process. **Program 1** of the Housing Element will monitor ADU development, provide an incentive in exchange for affordable ADUs, develop permit-ready ADU plans, and develop a comprehensive web-based ADU Toolkit with an overview of the permit process, required application forms, and Frequently Asked Questions.

**Table 3
City of Concord Accessory Dwelling Unit Size Allowance**

<i>Lot Area (square feet)</i>	<i>Maximum Accessory Dwelling Unit Square Footage</i>	<i>Allowed Area for Carports and Garages (square feet)</i>
Greater than 12,000	1,200	460
Less than 12,000	1,000	230

Facilities for Those Experiencing Homelessness

Transitional Housing

State law defines transitional housing facilities as rental housing developments that are operated under program standards that require the termination of assistance and the recirculation of the assisted unit to another eligible program recipient at a predetermined time at least 6 months from the beginning of the assistance. Transitional housing facilities offer temporary residential accommodations for those

experiencing homelessness or families transitioning to permanent housing. Transitional housing often includes a supportive services component, such as job skills training or rehabilitation counseling, to allow individuals to gain the necessary life skills to support independent living. In accordance with State law (Assembly Bill 139, 2019), transitional housing must be considered a residential use of a property subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Transitional housing is permitted as shown in Table 2.

Consistent with State requirements, in Concord, transitional housing is only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. Multifamily transitional housing is permitted in the same fashion as regular multifamily uses in all zones. The following zones allow for multifamily housing with discretionary approval: North Todos Santos District (NTS), Community Office (CO), Commercial Mixed-Use (CMX), Neighborhood Commercial (NC), Downtown Pedestrian (DP), and Downtown Mixed-Use (DMX). The same permits in the same zones also apply to multifamily residential development.

The City's regulations are more permissive for single-family transitional housing than regular single-family uses, and therefore does not pose a constraint to development. Single-family transitional housing is permitted in the following zones where regular single-family is not: Residential Medium Density (RM), Residential High Density (RH), and Commercial Mixed-Use (CMX). Additionally, single-family transitional housing is permitted in the Rural Residential (RR), Single-Family Residential (SFR), Residential Low Density (RLD), North Todos Santos District (NTS), Community Office (CO), and Rural Lands Conservation (RLC) zones, consistent with the provisions of single-family residential uses.

The City's regulations permit transitional housing in the same manner as other housing of the same type in the same zone; however, multifamily housing and certain single-family developments, and thus transitional housing, are subject to a Design and Site Review, which is a constraint to transitional housing. Through **Program 22, Support for People Experiencing Homelessness**, the City will ensure that transitional housing will not be constrained by the Design and Site Review process.

Supportive Housing

Supportive housing is defined as housing with no limit on length of stay that is occupied by the target population and is linked to on-site or off-site services that assist occupants in retaining housing; improving their health status; and maximizing their ability to live and, when possible, work in the community. The target population for supportive housing is persons with disabilities and families that are experiencing homelessness. Permanent supportive housing may provide mental health support and counseling, as well as other services needed to support families and individuals with independent living.

In accordance with California Government Code Section 65651, supportive housing is a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses. Table 2 shows where supportive housing is permitted.

The CMC allows supportive housing uses in the same zones where regular multifamily housing is permitted. Multifamily supportive housing is a permitted use in the Residential Medium (RM) and Residential High (RH) density zones. Multifamily supportive housing is allowed with discretionary approval through a Use Permit or a Minor Use Permit in the following zones: North Todos Santos (NTS), Community Office (CO), Commercial Mixed-Use (CMX), Neighborhood Commercial (NC), Downtown Pedestrian (DP), and Downtown Mixed-Use (DMX). Additionally, multifamily projects are subject to the Design and Site Review process. Discretionary approvals, including the Design and Site Review for the development of supportive housing, may pose a constraint to development. Further,

supportive housing that meets the requirements detailed in Government Code Section 65650 must be a permitted use by-right in all zones where multifamily and mixed uses are permitted. Through **Program 22, Support for People Experiencing Homelessness**, the City will amend the CMC consistent with the State requirements of Assembly Bill 2162 (2018) to ensure consistency with regulatory requirements and allow supportive housing, meeting specified requirements, by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.

Single-family supportive housing is more permissible than regular single-family uses as it is additionally permitted in some zones where regular single-family is not, such as Residential Medium Density (RM), Residential High Density (RH), and Commercial Mixed-Use (CMX). Although single-family supportive housing is permitted as identified in Table 2, certain single-family projects may be subject to the Design and Site Review process, which is a constrain to development. Refer to the section “Permitting Processes and Fees,” below, for more information. Through **Program 22**, the City will ensure that supportive housing will not be constrained by the Design and Site Review process.

Low-Barrier Navigation Centers

In accordance with Section 65662 of the California Government Code, a Low-Barrier Navigation Center is a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. “Low barrier” means the facility incorporates best practices to reduce barriers to entry. Emergency shelters can qualify as Low-Barrier Navigation Centers. The development of these uses must be permitted by-right in areas zoned for mixed-use, and nonresidential zones permitting multifamily residential uses so long as it offers services to connect people to permanent housing through a services plan that identifies services staffing; is linked to a coordinated entry system; complies with Chapter 6.5 of Division 8 of the Welfare and Institutions Code; and has a system for entering information regarding client stays, demographics, income, and exit destination through the local Homeless Management Information System.

The focus of Low-Barrier Navigation Centers is to move people into permanent housing. A constraint exists to this type of development because the City’s Development Code does not define Low-Barrier Navigation Centers as a use. Therefore, **Program 22, Support for People Experiencing Homelessness**, will amend the City’s Zoning Code to permit the development of Low-Barrier Navigation Centers by-right in mixed-use and nonresidential zones that permit residential uses, in accordance with State law (Assembly Bill 101, 2019). Additionally, although the use currently is not defined, the construction of any building requires a Design and Site Review, which is a constraint to the development of Low-Barriers Navigation Centers; refer to the section “Permitting Processes and Fees,” below, for more information. Therefore, **Program 22** of the Housing Element will ensure that Low-Barrier Navigation Centers will not be subject to the Design and Site Review process.

Single-Room Occupancies

In accordance with Government Code 65583, the City facilitates the development of single-room-occupancy (SRO) units. SROs provide residential facilities where individual, secure rooms are rented to a one- or two-person household. Rooms are generally 150 to 375 square feet and include a sink, closet, and toilet, with shower and kitchen facilities typically shared. SROs are typically developed from older hotel buildings as a way to provide affordable housing for low-income residents, older adults, and people experiencing homelessness.

The City categorizes SROs under the zoning residential use classification of “Group Housing,” and SROs are defined by the CMC as a facility that provides shared living quarters with shared kitchen and bathroom facilities. Group housing includes rooming and boarding houses, dormitories, fraternities, sororities, private residential clubs, residential hotels intended for long-term occupancy (30 days or more), SROs, and transitional housing offering shared living quarters or on-site services.

Group housing facilities are a permitted use in the following zones: Industrial Business Park (IBP) and Industrial Mixed-Use (IMX). They are also permitted with administrative review in the Public/Quasi Public District (PQP) and with a Use Permit in the Residential Medium Density (RM), Residential High Density (RH), North Todos Santos District (NTS), Community Office (CO), Commercial Mixed-Use (CMX), and Downtown Mixed-Use (DMX) zones. The City’s regulations do not unduly constrain SROs because the additional review required in specified zones is necessary to ensure the development can appropriately meet resident needs associated with the provision of proper sanitary facilities, as well as space and security needs. Further, SROs are a permitted use in the Industrial Business Park (IBP) and Industrial Mixed-Use (IMX) zones.

However, development of group housing facilities is subject to a Design and Site Review, which is a constraint to development; refer to the section “Permitting Processes and Fees,” below, for more information on the Design and Site Review process. **Program 22** of the Housing Element will ensure that group housing will not be constrained by the Design and Site Review process.

Emergency Shelters

Consistent with Government Code Section 65583, emergency shelters are a permitted use in the Office Business Park (OBP), Industrial Business Park (IBP), and Industrial Mixed-Use (IMX) zones. Emergency shelters are a permitted use in the three zones listed above and are subject to certain standards, as detailed below. They are also allowed with a Use Permit in the Public/Quasi-Public (PQP) zone.

A Use Permit is required for an emergency or homeless shelter that does not comply with the standards below (Ord. 12-4. DC 2012 Section 122-620):

- No emergency shelter shall be located:
 - Within 300 feet of any residential district;
 - Within 300 feet of another emergency or homeless shelter; and
 - Within 1,000 feet of an elementary school, middle school, high school, public library, or public park.
- The distance between an emergency or homeless shelter and the uses and districts described above shall be measured in a straight line, without regard to intervening structures or objects, from the closest exterior wall of the building or structure, or a portion of the building or structure in which the emergency or homeless shelter is located to the boundary of the use or district described above.
- Transit Accessibility. Emergency or homeless shelter facilities shall either be located within one-half mile of an existing bus route or BART station; or if not, an alternate means of transportation shall be provided by the facility such as a shuttle bus.
- Facility Requirements. Each emergency or homeless shelter shall include, at a minimum, the following:
 - A courtyard or other on-site area for outdoor client congregation, so that clients waiting for services are not required to use the public sidewalk for queuing;
 - Telephones for use by clients;

- On-site personnel during hours of operation when clients are present. The manager’s area shall be located near the entry to the facility;
- Adequate interior and exterior lighting;
- Secure areas for personal property; and
- Other facilities, consistent with the State’s provisions for emergency housing, as recommended by the police department prior to zoning clearance approval.
- Maximum Number of Beds. No more than 75 beds shall be provided in any single emergency or homeless shelter, except:
 - In response to a disaster; or
 - As authorized by a Use Permit approved by the planning commission.
- Hours of Operation. Facilities shall establish and maintain set hours for client intake/discharge. These hours shall be posted at the site. There shall be no gathering or loitering at the facility or in the surrounding area when the facility is closed. It is the responsibility of the facility to enforce this requirement.

Although a Use Permit may be required for the development when it does not comply with the standards listed above, a Use Permit is not a constraint to emergency shelters meeting the specified standards in three zones. Although emergency shelters are permitted subject to the permit type identified in Table 2, the construction of any building requires a Design and Site Review, which is a constraint to the development of emergency shelters. **Program 22** of the Housing Element will ensure that emergency shelters are not constrained by the Design and Site Review process; refer to the section “Permitting Processes and Fees,” below, for details on the Design and Site Review process.

The Industrial Business Park (IBP) and Industrial Districts host a variety of campus-like office buildings, ancillary restaurants and retail, light industrial operations, warehouses, artist studios, and various service activities. Most of these uses are found in North Concord, along with some of the services and non-profits serving people experiencing homelessness. According to Shelterlist.com, many of the behavior health services are located in downtown Concord and along major commercial corridors. The County of Contra Costa (County) operates two shelters, one of them located within Concord.

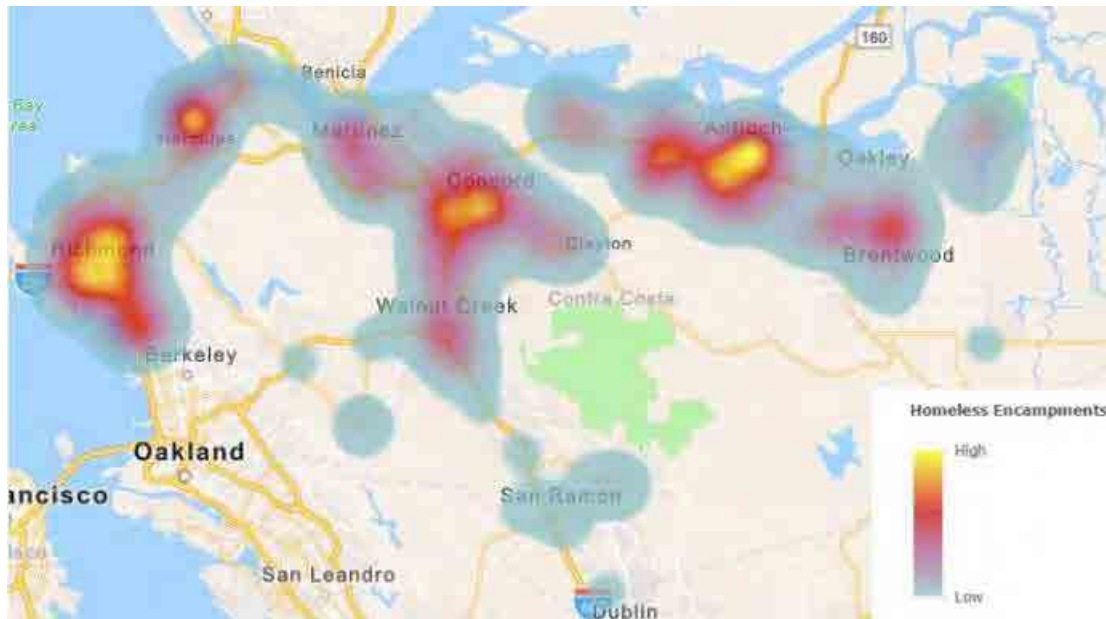
Concord is home to approximately 160 unsheltered people according to the 2020 Contra Costa County Homelessness Services Annual Point in Time Count Report (see **Figure 1, Contra Costa Homelessness Annual Point in Time Count**). This equates to just over 10% of Contra Costa County’s total unsheltered population. Concord has sufficient capacity for the development of emergency shelters to accommodate this population. The Office Business Park (OBP), Industrial Business Park (IBP), and Industrial Mixed-Use (IMX) zones make up approximately 604 acres. Approximately 104 acres consist of underutilized sites, such as buildings that are more than 50 years old, the land to improvement value ratio is less than 1, and the floor area ratio (FAR) is less than what is permitted. A capacity of 20,592 emergency beds can be accommodated on the 104 acres of underutilized sites in zones that allow emergency shelters. This considers the requirements of a maximum of 75 beds per shelter and the minimum lot areas of 40,000 square feet for Office Business Park (OBP) zones, 20,000 square feet for Industrial Business Park (IBP) zones, and 10,000 square feet for Industrial Mixed-Use (IMX) zones. This is well over the number needed for the 160 unsheltered individuals.

Many of the zones permitting emergency shelters are located to the west at the intersections of major highways such as Interstate 680, State Route 4, and State Route 242. Local corridors that provide transport for these zones include Concord Boulevard, Olivera Road, Port Chicago Highway, Solano Way, and Willow Pass Road. Transit service is provided by the Central Contra Costa Transit Authority,

locally known as the County Connection. Access to nearby amenities and shopping centers through these options include Solano Plaza, Sun Valley Shopping Center, Willows Shopping Center, The Veranda, the Food Bank of Contra Costa, and John Muir Hospital.

Figure 1 represents the density of homeless encampments throughout Contra Costa County during the point-in-time count. Compared to other communities in the central region of Contra Costa County, Concord is host to one of the highest intensities of people experiencing homelessness, paralleled by Richmond in the west and Antioch in the east. For further analysis on those experiencing homelessness in Concord, see **Appendix B**.

Figure 1: Contra Costa Homelessness Annual Point-in-Time Count



Source: 2020 Contra Costa County Homelessness Services Annual Point in Time Count Report

Definition of “Family”

Local governments may restrict access to housing for households failing to qualify as a “family” by the definition specified in zoning ordinances. Specifically, a restrictive definition of “family” that limits the number of and differentiates between related and unrelated individuals living together may illegally limit the development and siting of group homes for persons with disabilities, but not for housing families that are similarly sized or situated.

The CMC defines “Family” as follows (Section 18.20.030, Definitions):

One person living alone, or two or more persons living together as a single housekeeping unit in a dwelling unit. A housekeeping unit shall be a group which bears the generic character of a family unit as a relatively permanent household, regardless of biological relationship, and which is characterized by the following:

- A. Shared use of a single common kitchen;
- B. Shared household expenses;
- C. Use by all persons of a shared common entry to the dwelling unit;
- D. Shared use of all or virtually all areas of the dwelling unit at all times;

- E. Shared responsibility for household work;
- F. Shared food;
- G. Sharing of some or all meals;
- H. Occupation of the unit under a single lease if the unit is not occupied in part by the owner;
- I. Shared social, economic and psychological commitments.

“Family” also does not include a group occupying a boardinghouse, dormitory, fraternity or sorority house, convent, rectory or private residential club.

The definition of “family” provided in the CMC is not a constraint to development because it does not distinguish between related and unrelated persons and does not impose limitations on the number of people that may constitute a family.

Reasonable Accommodation

The City is required by the Federal Fair Housing Act and the California Fair Employment and Housing Act to provide a process of reasonable accommodation requests. The CMC establishes a process for persons with a disability to request reasonable accommodation in the application of the City’s zoning laws where necessary to afford the individual an equal opportunity to use and enjoy a dwelling within Concord.

To request a reasonable accommodation, the applicant must submit a completed Reasonable Accommodation Application Form (“Checklist”), as well as follow the usual development application process and pay associated fees for requests. Reasonable accommodations are minor exceptions and may be approved, with or without conditions, by the Planning Division if the following findings can be made (CMC Section 18.425.070; Ord. 12-4. DC 2012 Section 122-956):

- A. The request is necessary to make specific housing available to the applicant due to the applicant’s disability;
- B. There are no other feasible alternatives that would provide an equivalent level of benefit; and
- C. The request will not impose an undue financial or administrative burden on the city.

A notice of a minor exception decision is made public. No hearing will be scheduled unless requested, in which case a notice will be released at least 10 days prior to the meeting (CMC Section 18.500.020).

The findings required under the reasonable accommodation procedure are not overly burdensome and do not pose a constraint.

Residential Care Facilities

Residential care facilities are defined in the CMC as single-family dwelling facilities licensed or supervised by a Federal or State agency that provide 24-hour nonmedical care, assistance, guidance, counseling, and supervision of unrelated adults or others with special needs. The CMC further delineates and defines residential care facilities by size:

- A. Small Residential Care Facility: An establishment that provides care for six or fewer persons, excluding the licensee or members of the licensee’s family or persons employed as facility staff.

- B. Large Residential Care Facility: An establishment that provides care for seven or more persons, excluding the licensee or members of the licensee’s family or persons employed as facility staff.

Small residential care facilities are a permitted use in all residential zones, as well as the North Todos Santos District (NTS), Community Office, Commercial Mixed-Use (CMX), Downtown Mixed-Use, and Rural Lands Conservation (RLC) zones. Further, small facilities are allowed with an Administrative Permit in the Public/Quasi Public zone.

Large residential care facilities are permitted with an Administrative Permit in the Rural Residential (RR), Residential Low Density, and Public/Quasi Public zones. With a Minor Use Permit, large facilities may be permitted in the Residential Medium Density (RM), Residential High Density (RH), North Todos Santos District (NTS), Commercial Mixed-Use (CMX), and Rural Lands Conservation (RLC) zones. Large facilities are also permitted in Single-Family Residential and Downtown Mixed-Use zones with a Use Permit.

Small residential care facilities are more permissible than the regular single-family detached use and allowed in a greater variety of zones, and thus are not considered a constraint because they ensure an administrative, non-discretionary approval process related to the use. Additionally, while Minor Use Permit requirements for large residential care facilities in specified zones may pose a constraint, the Administrative Permit requirements for large residential care facilities are not burdensome because they do not require a public hearing and therefore not considered a constraint.

Because residential care facilities are defined as single-family dwellings, they are exempt from Design and Site Review. However, large residential care facilities are subject to discretionary review and are subject to a Design and Site Review, which may pose as a constraint to its development. However, through **Program 15**, the City will ensure any new design standards developed and imposed by the City on housing projects will be objective without involvement of personal or subjective judgement by a public official, and will be uniformly verifiable by reference to the City’s regulations.

Specific Plans

Downtown Specific Plan

The purpose of the Downtown Specific Plan is to create a Downtown Concord that is “centered around transit and alternative modes of transportation, provides a diversity of housing opportunities, and preserves the desirable qualities of the City that make it an ideal place to live, work and play. The policies, diagrams, and maps outlined in the Specific Plan are based on the need to revitalize the Downtown, accommodate growth in a future population and employment base combined with a real transportation and urban design vision for the future.” The Downtown Specific Plan provides regulatory controls and incentives for the incremental intensification of parcels in a 0.5-mile radius of Bay Area Rapid Transit (BART) stations. Although the Downtown Specific Plan imposes additional and unique requirements and guidelines, this is not a constraint to development because it aims to plan for the following:

- A potential for 4,020 new housing units, consisting of 3,500 apartments, 220 townhomes, and 300 live/work lofts
- 1.6 million square feet of office space
- 743,200 square feet of retail space

As developments within the Downtown Specific Plan meet the standards of the City’s Development Code, the general intent of the Specific Plan is to provide development design guidelines to property

owners, developers, and City staff for determining the architectural character and building development for proposed projects. Guidelines outlined in the Specific Plan include the following:

- Setbacks, including a minimum of 2 feet and maximum of 5 feet to provide outdoor seating by way of wider sidewalks.
- Commercial ground floor, including entries at a minimum of every 50 feet.
- Residential ground floor, including a direct access to primary streets.
- Vehicular access in the form of consolidated parking entries to minimize curb cuts, and garage access located in alleys or side streets.
- Green roofs as a sustainable way to harvest water and minimize stormwater runoff.

The Downtown Specific Plan is subject to less restrictive parking requirements within the Transit Station Overlay District for non-residential developments (as further detailed in the section “Overlay Standards,” below). Although the Downtown Specific Plan is subject to specific criteria, these criteria provide design guidance that aims to facilitate a pedestrian-friendly environment. The Downtown Specific Plan is not considered a constraint because it does not impose additional review or permit requirements that are not applicable in the base zone. More details on the downtown zones that permit residential uses can be found below in the section “Downtown District Zones for Residential Uses.” The Specific Plan facilitates the production of housing where it is needed most to implement smart growth strategies through connections between land use and transportation.

Figure 2, Downtown Specific Plan Boundary Map, provides the boundary for the Specific Plan area.

Figure 2: Downtown Specific Plan Boundary Map



Source: City of Concord

Concord Reuse Project Area Plan

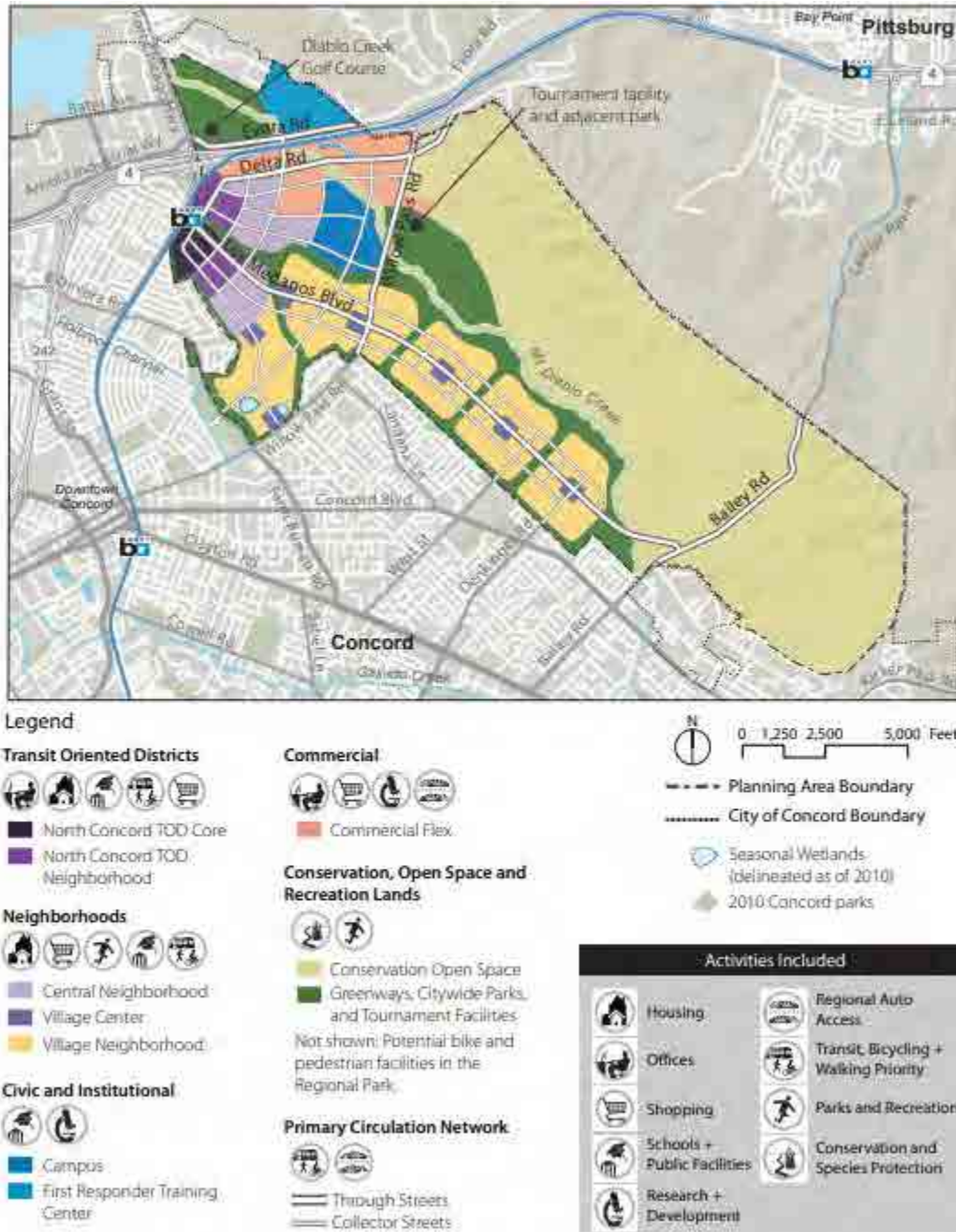
As further discussed in Appendix E, the Concord Reuse Project (CRP) Area Plan allows up to 12,200 housing units and 6.1 million square feet of commercial space on the former Concord Naval Weapons Station, which the United States Navy vacated in 1999 and declared as surplus land in 2007. The CRP Area Plan calls for a variety of housing types to meet the needs of people of varied socioeconomic backgrounds, ages, and physical abilities. The CRP Area Plan also provides for the transfer of approximately 2,600 acres to the East Bay Regional Park District for permanent open space and recreational opportunities.

The CRP is not a constraint to development because it creates significant housing opportunities on a site that was not previously available for the development of housing, and will provide new recreational opportunities for existing and planned residents.

Districts and Densities

The CRP Area Plan includes a land use diagram that depicts different land use districts, representing different development intensities, community characters, and a mix of land uses. All uses have a minimum and maximum number of permitted dwelling units per net residential acre (see Table 4). The land use map is provided as Figure 3, City of Concord CRP Area Plan Land Use Map.

Figure 3: City of Concord CRP Area Plan Land Use Map



Source: City of Concord

The land use map shows a general layout that will guide the Master Developer in development of its Specific Plan proposal. The layout encourages high-access neighborhoods through a cluster of neighborhood nodes that prioritize denser unit typology closest to jobs, transit, and amenities. Assuming the denser units will be smaller and more affordable than a detached single-family home, the lower-income populations living in this neighborhood will have greater access to opportunity. The CRP Area Plan uses two definitions of density to create a clearer depiction of potential build-out. One definition is the allowed gross district density, which is the number of units permitted across the entire geographic extent of each district per gross acre (calculated excluding neighborhood parks but including pocket parks and plazas). The other density definition is net residential density, which measures the permitted number of units allowed on each parcel per net acre within the designated district. The CRP Area Plan further describes the relationship between the two densities as follows: “In some districts, permitted dwelling units across a district (per gross acre) is significantly lower than dwelling units on each parcel. This is because residential dwellings may comprise a small proportion of a district’s overall development. The actual density/intensity will fall somewhere within this range, but not necessarily at the top end.” Ultimately, the proposed Specific Plan will offer more detailed and exact densities within these ranges for the City Council to consider.

**Table 4
Concord Reuse Project District Densities**

<i>District</i>	<i>Allowed Density Gross District Acre (Minimum–Maximum)</i>	<i>Allowed Density Net Residential Acre (Minimum–Maximum)</i>	<i>Approximate Units (per Specific Plan’s Estimation)</i>
North Concord TOD Core	0–20 du per gross district acre	60–150 du per net residential acre	700 units
North Concord TOD Neighborhoods	20–30 du per gross district acre	18–100 du per net residential acre	2,200 units
Central Neighborhoods	15–20 du per gross district acre	14–50 du per net residential acre	2,600 units
Village Centers	5–20 du per gross district acre	18–50 du per net residential acre	500 units
Village Neighborhoods	8–12 du per gross district acre	6–45 du per net residential acre	6,200 units
Total Expected Number of Units			12,200 units

TOD = transit-oriented development; du = dwelling units

The only residential district without a minimum density is the North Concord Transit-Oriented Development Core, which allows for mixed-use typologies without requiring residential. Other districts have a range of minimum densities, from 6 to 60 dwelling units per net residential acre. The density range is far greater if calculated as dwelling units per net residential acre, which is a calculation of residential density based on the developable portion of a site, after streets, easements, and unbuildable areas have been factored out. Specifics of the planned development will be designed by the Master Developer in the Specific Plan and will have to be considered and approved by the City Council.

Total Potential Units at Buildout

The CRP Area Plan identifies 12,200 new units; however, based on the ranges in the CRP Area Plan, the Specific Plan units within each designation could be lower or higher, but should remain consistent with the cap of 12,200 units, which was studied under CEQA. It is difficult to determine a potential range due to most residential zones being composed of mixed uses with various building standards and a wide range for allowed residential density.

The CRP Area Plan accounts for low-income housing by calling for at least 25% of units (approximately 3,020 units per estimated total) to be affordable to lower-income households. Of these affordable units, 30% must be prioritized for lower-income older adults, veterans, and teachers. Furthermore, 260 of these units must accommodate permanent supportive housing for individuals, youth, and families, as well as for individuals experiencing homelessness enrolled in job training and placement programs. Half of the 260 units must be created on site through an obligation by future purchasers, while the other half may be developed off site through contributions to a local Homeless Assistance Fund.

Building Standards

Development Standards

Each zone that permits residential uses provides standards that regulate the allowed uses and permits required, lot and building dimensions, density, and parking requirements. While regulations such as setbacks, lot size, and lot coverage can contribute to the number of dwelling units that can be developed on a lot, residential densities are primarily limited by established maximum densities. The tables below describe all zones where residential uses are permitted in Concord and their respective development standards.

Single-Family Zones

Single-family zones range from a density of 0 to 10 dwelling units per net acre. The lot area minimums range from 1,920 square feet to 40,000 square feet, where smaller lots facilitate more dense development. Lot dimension and setback minimums remain relatively similar between the different residential zones. Standards for single-family zones do not make single-family development at identified densities infeasible, and therefore do not pose a constraint to single-family development. See **Table 5** for specific building standards for single-family zones.

Table 5
Development Standards for Single-Family Zones

Zone	Density	Lot Area	Lot Width	Lot Depth	Setback					Height	Lot Coverage
					Front	Interior Side	Aggregate	Corner Side	Rear		
RR-15	0-2.5 du/ac	15,000 sq ft	100 ft	85 ft	20 ft	10 ft	25 ft	15 ft	30 ft	30 ft	25%
RR-20	0-2.5 du/ac	20,000 sq ft	100 ft	100 ft	25 ft	10 ft	25 ft	15 ft	30 ft	30 ft	25%
RR-40	0-2.5 du/ac	40,000 sq ft	150 ft	100 ft	30 ft	10 ft	50 ft	25 ft	50 ft	30 ft	20%
RS-6	0-10 du/ac	6,000 sq ft	60 ft	85 ft	20 ft	5 ft, 10 ft	15 ft	10 ft	15 ft	30 ft	35%
RS-7	0-10 du/ac	7,000 sq ft	70 ft	85 ft	20 ft	5 ft, 10 ft	15 ft	10 ft	20 ft	30 ft	35%
RS-7.5	0-10 du/ac	7,500 sq ft	75 ft	85 ft	20 ft	5 ft, 10 ft	15 ft	10 ft	20 ft	30 ft	35%
RS-8	0-10 du/ac	8,000 sq ft	80 ft	85 ft	20 ft	5 ft, 10 ft	15 ft	10 ft	20 ft	30 ft	35%
RS-10	0-10 du/ac	10,000 sq ft	100 ft	85 ft	20 ft	5 ft, 10 ft	15 ft	15 ft	25 ft	30 ft	30%

**Table 5
Development Standards for Single-Family Zones**

Zone	Density	Lot Area	Lot Width	Lot Depth	Setback					Height	Lot Coverage
					Front	Interior Side	Aggregate	Corner Side	Rear		
RS-12	0–10 du/ac	12,000 sq ft	100 ft	85 ft	20 ft	10 ft	20 ft	15 ft	25 ft	30 ft	25%
RL	2.5–10 du/ac	1,920 sq ft	24 ft	80 ft	5 ft	—	25 ft	10 ft	5 ft	30 ft*	50%

* Additional height may be approved with a use permit
 du/ac = dwelling units per acre; sq ft = square feet; ft = feet

Multifamily Zones

Multifamily zones range from a density of 11 to 100 dwelling units per net acre. Residential Medium (RM) density allows for 11–32 dwelling units per net acre, and Residential High (RH) density allows for 33–100 dwelling units per net acre. The lot area minimum for RM is 1,440 square feet and for RH is 5,000 square feet. Lot minimums for RM vary depending on if the units are attached or detached; attached units have lower lot minimums than detached units. The RH zone maintains the same lot minimums for all unit typologies and is higher than the lot minimums permitted in the RM zone. Setback minimums remain relatively similar between the different residential zones. In addition to site standards, multifamily residential applications must include private and/or common open space of 200 square feet per unit; this can be a combination of private and common open space. Allowed densities for multifamily housing is highly permissive in Concord, especially in areas that achieve additional density through the Transit Station Overlay District. Further, minimum density requirements ensure that available land is efficiently used. The standards for the RH zone provide requirements that are most suitable for developments achieving the lower densities within the permitted range; however, when developments are achieving higher densities, smaller minimum setbacks could increase flexibility for development. Standards related to setbacks and height could be more permissive, especially when developments are achieving higher FARs and higher densities. See **Table 6** for specific building standards for multifamily zones. More information on open space requirements can be found under the section “Open Space and Recreational Facilities for Residential Development,” below. In addition to those densities provided below, sites that permit residential uses that fall within the Transit Station Overlay District are permitted at densities of 25% higher.

Table 6
Development Standards for Multifamily Zones

<i>Zone</i>	<i>Density</i>	<i>Lot Area</i>	<i>Lot Width</i>	<i>Lot Depth</i>	<i>Setback¹</i>					<i>Building Height</i>	<i>Lot Coverage</i>	<i>Open Space²</i>	
					<i>Front</i>	<i>Interior Side</i>	<i>Aggregate</i>	<i>Corner Side</i>	<i>Rear</i>				<i>Garage Access</i>
RM	11-32 du/ac	1,400 sq ft	18 ft (a) 24 ft (d)	60 ft (a) 80 ft (d)	25 ft	10 ft	25 ft	15 ft	30 ft	20 ft (street access) 4 ft (alley access)	40 ft*	80% (a) 60% (d)	200 sq ft
RH	33-100 du/ac	5,000 sq ft	50 ft	100 ft	30 ft	10 ft	50 ft	25 ft	50 ft	4 ft (alley access)	60 ft*	75%	200 sq ft

du/ac = dwelling units per acre; sq ft = square feet; ft = feet

“(a)” = attached; “(d)” = detached.

¹ The area between the street improvements and street setback line will be landscaped in compliance with Concord Development Code Chapter 18.165. Additional setback standards may apply in small-lot subdivisions pursuant to Development Code Chapter 18.155.

² See Development Code, Section 18.150.100 for residential development, and Chapter 18.155 of the Development Code for small lot subdivisions.

* Additional height may be approved with a Use Permit.

Small Lot Medium Density Residential Standards

The Small Lot and Medium Density Development standards provide standards that recognize small-lot and medium-density development as a more efficient form of land use than lower-density development. A small lot for residential development is under 6,000 square feet (CMC Section 18.155.010). Small-lot residential developments are given a specific set of development standards to encourage infill development and residential uses on land constrained by the regular detached and attached residential standards. Compared to lower-density single-family uses, small-lot standards provide increased allowable height and reduced setbacks, facilitating medium-density development in a more walkable and compact setting. **Table 7** show the lot size minimums and **Table 8** show the applicable development standards. Further, the review authority for small lot projects can approve more permissive alternate standards than those below.

**Table 7
Lot Size Minimums for Small-Lot Residential Developments**

<i>Standards</i>	<i>Zoning District</i>		
	<i>RL and RS</i>	<i>RM</i>	<i>CMX and CO</i>
Minimum Lot Size (square feet)	1,920	1,440	1,440
Minimum Lot Width	24 feet	24 feet (detached) 18 feet (attached)	24 feet (detached) 18 feet (attached)

**Table 8
Development Standards for Small Lot Residential Developments**

<i>Standards</i>	<i>Lot Area (Square Feet)</i>				
	<i>1,440 – 1,920</i>	<i>1,920 – 2,999</i>	<i>3,000 – 3,999</i>	<i>4,000 – 4,999</i>	<i>5,000 – 5,999</i>
Lot Width (minimum)	24 feet (detached) 18 feet (attached)	24 feet	30 feet	40 feet	50 feet
Lot Depth (minimum)	80 feet (detached) 60 feet (attached)	80 feet (detached) 60 feet (attached)	80 feet	100 feet	100 feet
Lot Coverage (maximum)	60% (detached) 80% (attached)	55%	50%	45% (2+story) 50% (1 story)	45% (2+story) 50% (1 story)
Height (maximum)	40 feet	35 feet	30 feet	30 feet	30 feet
Front Setback (minimum)	—	—	10 feet	15 feet	20 feet
Interior Side Setback (minimum)	—	—	3 feet	4 feet	5 feet
Street Side Setback (minimum)	—	5 feet	6 feet	8 feet	10 feet

Table 8
Development Standards for Small Lot Residential Developments

<i>Standards</i>	<i>Lot Area (Square Feet)</i>				
	<i>1,440 – 1,920</i>	<i>1,920 – 2,999</i>	<i>3,000 – 3,999</i>	<i>4,000 – 4,999</i>	<i>5,000 – 5,999</i>
Rear Setback (minimum)	—	—	10 feet	15 feet	15 feet

North Todos Santos Residential Zones

Located north of Todos Santos Plaza and consisting primarily of residential structures, the North Todos Santos (NTS) District provides for flexible reuse and building expansions in an area with special architectural and historical significance. The regulations of the NTS District ensure that developments blend with the scale of the existing neighborhood buildings to encourage retention and preservation of buildings. New developments within this district should protect and preserve the scale and character of the historic neighborhood. The NTS zone permits residential uses at a density of 2.5 to 32 dwelling units per net acre. Lot dimension minimums are comparable to Residential High (RH) standards. FARs permitted in the NTS District are dependent on parcel size; the larger the parcel, the greater allowed FAR. See **Table 9** for specific building standards and **Table 10** for FAR allowances. The conversion of an existing single-family dwelling into duets, duplexes, or three or more dwellings is allowed with an Administrative Permit and Design Review (see the section “Permitting Processes and Fees,” below). Other permits required in the NTC District are provided in Table 2, Zoning for a Variety of Housing Types.

Table 9
Development Standards for North Todos Santos District

<i>Standards</i>	
Lot Area (square feet) Minimum	5,000
Lot Width (feet) Minimum	50
Lot Depth (feet) Minimum	80
Density (dwelling units per net acre)	2.5 (minimum) – 32 (maximum)
Lot Coverage (percent maximum)	50%
Building Height (feet) Maximum	30 feet or three stories, whichever is less
<i>Setback (feet) Minimums</i>	
Front	15
Interior Side	5
Corner Side	15
Rear	15
Porches	10

**Table 9
Development Standards for North Todos Santos District**

Garages	20
Second Story	20
Third Story and Above	25
Open Space/Unit (square feet) minimum	See CMC Section 18.150.100, Open Space and Recreational Facilities, for residential developments

**Table 10
Development Standards North Todos Santos District for Residential Uses**

<i>Maximum Floor Area Ratio</i>	<i>Parcel Size (square feet)</i>
0.30	< or = 5,000
0.32	5,001 – 6,000
0.34	6,001 – 7,000
0.36	7,001 – 8,000
0.38	8,001 – 9,000
0.40	9,001 – 10,000
0.41	10,001 – 11,000
0.42	11,001 – 12,000
0.43	12,001 – 13,000
0.44	13,001 – 14,000
0.45	14,001 – 15,000
0.46	15,001 – 16,000
0.47	16,001 – 17,000
0.48	17,001 – 18,000
0.49	18,001 – 19,000
0.50	19,001 – 20,000

Office and Commercial Zones that Permit Residential Uses

Specific residential uses are permitted in the Office and Commercial Districts, although the primary allowed uses are office and commercial. The allowed total density for Commercial Office (CO) and Commercial Mixed-Use (CMX) zones is between 11 and 40 dwelling units per net acre. Neighborhood Commercial (NC) allows for a density maximum of 24 dwelling units per net acre and does not permit

residential on the ground floor. The CO and CMX zones share the same FARs and minimum lot dimensions. NC has a lower FAR and higher maximum building height. The CO zone shares similar setbacks as single-family residential, and the CMX and NC zones have smaller front setbacks and do not require interior setbacks unless adjacent to residential uses. The CO, CMX, and NC zones do not provide a constraint to residential development because residential development is not the primary use for these zones, and none of the sites identified to accommodate the City’s Regional Housing Needs Allocation are identified in these zones (see **Appendix E, Sites Analysis**). See **Table 11** for specific building standards.

**Table 11
Development Standards Office and Commercial Zones for Residential Uses**

<i>Standards</i>	<i>CO</i>	<i>CMX</i>	<i>NC</i>	<i>Additional Standards</i>
Density (dwelling units per net acre) Minimum/Maximum	11–40	11–40	24 max*	* Residential uses not allowed on ground floor.
Floor Area Ratio (FAR) (maximum)	1.0	1.0	0.35	—
Lot Area (square feet) Minimum	10,000	10,000	10,000	Smaller lots may be approved with a Use Permit.
Lot Width (feet) Minimum	100	100	100	Reduced dimensions may be allowed subject to Use Permit approval.
Lot Depth (feet) Minimum	100	100	100	
Building Height (feet) Maximum	30	30	40	Additional height may be allowed with a Use Permit.
<i>Setbacks (feet) Minimum</i>				
Front	10	5	5	Reduced setbacks may be allowed subject to Use Permit approval.
Corner Side	10	10	10	
Interior Side, Rear	5	None required unless adjacent to an R district or residential use in CMX. See CMC Section 18.150.180, Transitional Requirements, for buildings up to 30 feet in height.		
Open Space/Unit (square feet) minimum	See CMC Section 18.150.100, Open Space and Recreational Facilities, for residential developments, and CMC Chapter 18.155, Standards for Small Lot and Medium Density Development.			

CO = Commercial Office; CMX = Commercial Mixed-Use; NC = Neighborhood Commercial

Downtown District Zones that Permit Residential Uses

Residential uses are permitted in the Downtown districts. The allowed total density for Downtown Pedestrian (DP) and Downtown Mixed-Use (DMX) is 33 to 100 dwelling units per net acre. The FARs for the DMX zone are greater than those for the DP zone. Lot minimums and dimensions are significantly higher in the DMX zone compared to the DP zone. Only lot depth is the same for both, at 100 feet minimum. Building height is the same for the ground floor, at 15 feet, and for the overall minimum, which is 30 feet. The DMX zone allows for building heights up to 200 feet, with increased height allowed with a Use Permit. The DP zone maximum height allowance is 70 feet. Compared to residential zones, the setbacks are far smaller. Standards for development in the DP and DMX zones are very permissive and do not pose a

constraint to development. Further, much of Downtown falls within the Transit Station Overlay, which provides for an increased density and FAR above what is permitted by the base zone. See **Table 12** for specific building standards, and see the section “Transit Station Overlay District,” below, for information on increased density and FAR provided by the Transition Station Overlay District.

Table 12
Development Standards in Downtown Districts for Residential Uses

<i>Standards</i>	<i>DP</i>	<i>DMX</i>	<i>Additional Standards</i>
Density (du/net acre) minimum/maximum	33–100 du/ net acre	33–100 du/ net acre	
Floor Area Ratio (FAR) Minimum	0.75	1.00	
FAR Maximum	4.0	6.0	
Lot Area (square feet) Minimum	5,000	10,000	Development on sites with less than the minimum lot size requires a Use Permit.
<i>Lot Width (feet) Minimum</i>			
Interior Lot	50	100	
Corner Lot	60	110	
Lot Depth (feet) Minimum	100	100	
<i>Building Height (feet)</i>			
Minimum	30	30	
Maximum	70	200	In DMX, increased height may be allowed with a Use Permit.
Building Height – First Floor Minimum (feet, floor to floor height)	15	15	
<i>Setbacks (feet) Required Minimum</i>			
Front	0	10	
Interior Side	0	0	CMC Section 18.150.180, Transitional Requirements.
Corner Side	0	10	
Rear	0	0	
Front and Street Side Yard Required Maximum	10	—	
Open Space/Unit (square feet) Minimum	200	175	Open Space and Recreational Facilities, for residential developments.

PD = Downtown Pedestrian; DMX = Downtown Mixed-Use; du/ = dwelling units per

Business Park and Industrial Zones that Permit Residential Uses

Specific residential uses are permitted in the Business Park and Industrial Districts, such as group housing and live/work units. These uses are expected to supplement the primary uses that serve business and industry operations. FAR, lot dimensions, and setbacks are intended for business and industrial-scale buildings. Residential uses, if permitted, have to meet the same standards or otherwise seek out the discretionary approval process for variances. The district at large incorporates a district boundary, or buffer, surrounding all of the business and industrial zones as a setback from other zones. This buffer seeks to keep pollution and other environmental burdens out of sensitive operations and populations in zones, such as residential and commercial/retail. If the business or industrial zone is adjacent to residential uses, the setback is 40 feet. If the business or industrial zone is sharing a boundary with a commercial zone, the setback is 15 feet. There is no open space requirement for these zones except as a condition of approval for discretionary permits. See **Table 13** for specific building standards.

Table 13
Development Standards in Business Park and Industrial Districts for Residential Uses

<i>Standards</i>	<i>IBP</i>	<i>IMX</i>	<i>Additional Standards</i>
Floor Area Ratio (FAR) Maximum	0.80	1.00	
Lot Area (square feet) Minimum	20,000	10,000	
<i>Lot Width (feet) Minimum</i>			
Interior Lot	100	100	
Corner Lot	100	110	
Lot Depth (feet) Minimum	100	100	
Building Height (feet) Maximum	35	50	
<i>Setbacks (feet) Minimum</i>			
Front	20	20	
Interior Side	10	10	When abutting residential districts: <ul style="list-style-type: none"> ▪ Buildings 30 feet or less in height shall have interior side and rear setbacks equal to the side and rear setbacks required in the abutting residential district. ▪ Buildings exceeding 30 feet in height shall have a minimum setback of 20 feet, plus one additional foot of setback for every 1 foot of building height over 30 feet, up to a maximum setback of 40 feet. Portions of the building above 30 feet may be staggered to comply with the additional setbacks.
Corner Side	20	20	
Rear	10	10	When abutting residential districts:

Table 13
Development Standards in Business Park and Industrial Districts for Residential Uses

<i>Standards</i>	<i>IBP</i>	<i>IMX</i>	<i>Additional Standards</i>
			<ul style="list-style-type: none"> ▪ Buildings 30 feet or less in height shall have interior side and rear setbacks equal to the side and rear setbacks required in the abutting residential district. ▪ Buildings exceeding 30 feet in height shall have a minimum setback of 20 feet, plus one additional foot of setback for every 1 foot of building height over 30 feet, up to a maximum setback of 40 feet. Portions of the building above 30 feet may be staggered to comply with the additional setbacks.
Residential District Boundary (feet) Maximum	40	20	
Commercial District Boundary (feet) Minimum	15	15	

IBP = Industrial Business Park; IMX = Industrial Mixed-Use

Overlay Standards

In addition to the zones detailed in the tables above, the City has two overlay zones that have an impact on potential residential development. The relevant overlays are the Airport Overlay and the Transit Station Overlay, as further detailed below.

Airport Overlay District

The Airport Overlay District (A) was created to provide protection to people and property on the ground and to protect Buchanan Field Airport from the encroachment of noncompatible land uses that may interfere with its safe operation. The Airport Overlay determines which proposed projects must seek review from the Contra Costa County Airport Land Use Commission (ALUC). Certain residential projects are required to submit designs to the ALUC for determination on whether it is compliant with the CMC and the Contra Costa County Airport Land Use Compatibility Plan. The Airport Overlay District extends 14,000 feet from the primary runway surfaces. Further restrictions also exist in the ALUC designated Safety Zones (CMC Section 18.100.020) (see **Figure 4, Airport Safety Zone Map**). Potential compatibility conflicts include light pollution, noise pollution, building height, electrical/radio emissions, bird habitat, blocking of viewsheds, and any general interference with regular airport operations. Regulations provided by the Airport Overlay may pose a constraint to development, but are necessary to protect public health and safety.

Figure 4: Airport Safety Zone Map



Source: Airport Land Use Compatibility Plan

Although the ultimate approval is discretionary and dependent on where the proposed site is located, certain developments will trigger ALUC review. For instance, a proposed residential project or subdivision equal or greater than 20 acres in area with 5 or more lots in the Airport Overlay District will trigger review by the ALUC (CMC Section 18.100.030). The CMC also triggers ALUC review when new utilities designed to serve urban uses are proposed, and provides stringent restrictions on structure heights and densities. The ALUC has fees for an initial review (\$500 deposit plus additional fees for time and materials) and ultimate review (\$2,500 deposit plus additional fees for time and materials). The ALUC review process adds time and cost, in addition to the development standard constraints, to the applicant, which may make it more difficult to build a housing development within the Airport Overlay District. However, these restrictions exist for the safety and quality of life of residents and continued operation of the Buchanan Field Airport in Contra Costa County. Therefore, it does not pose an unreasonable constraint to development.

Transit Station Overlay District

The purpose of the Transit Station (TS) Overlay District is to support transit-oriented development by encouraging greater density near BART stations. The CMC further describes the purpose of the TS Overlay as follows: “The development standards in the TS district are intended to support transit use by ensuring access, creating a safe and pleasant pedestrian environment through the development of active uses such as shops and activities, developing pedestrian-oriented amenities, such as benches, kiosks, and outdoor cafes, and limiting conflicts between transit, vehicles, bicycles, and pedestrians” (CMC Section 18.105.010). The TS Overlay is applied to a 0.5-mile radius from the perimeter of BART stations in Concord, excluding the Reuse Area (study district) adjacent to the North Concord BART Station. The TS Overlay does not apply to projects that use State density bonuses.

Residential parcels within the TS Overlay District are allowed up to a 25% increase of the maximum density and maximum FAR from the base zone. No residential uses are prohibited. For project approval, the following findings must be made:

- The development provides a balanced mixture of residential and commercial uses in a manner that promotes and enhances the use of transit and walkability.
- The development is designed to provide an active, safe, and pleasant pedestrian environment.

All projects that wish to take advantage of the TS Overlay District density and/or FAR bonuses must apply for a Minor Use Permit. The findings to approve the Minor Use Permit are as follows (CMC Section 18.105.040):

A Minor Use Permit shall only be granted if the project includes a minimum of at least three of the following elements:

- Continuity of building facades along the street with no interruptions in the progression of building and uses except for pedestrian access.
- Structured or underground parking with ground floor commercial uses that incorporate pedestrian friendly building design and amenities along the street frontages.
- Pedestrian friendly street level building design amenities such as highly articulated facades with a variety of high-quality materials and architectural detailing, visibility into buildings, awnings, paseos, or arcades, and signage oriented and scaled to the pedestrian, located directly behind the sidewalk.
- Pedestrian amenities, including wide sidewalks, weather protection through building design, landscaping, fountains, public seating or other street furniture, public art, additional lighting, or other pedestrian amenities.

- Residential uses over ground floor commercial uses that incorporate pedestrian friendly building design and amenities along the street frontages.
- Contribution to transit-supportive facilities, such as a combination of shelters; benches; or direct connections to transit station or safe and secure bicycle storage and facilities that exceed the requirements of CMC Section 18.160.120, Bicycle Parking.

Although additional discretionary processes are needed to implement the Transit Station Overlay District, it is not a constraint because it provides additional development capacity in key areas of Concord. As such, it provides access to resources, such as public transportation, and other urban amenities, such as shopping, employment, education, and recreation.

Building Codes and Enforcement

The City implements the 2019 edition of the California Building Code and other model construction codes and amendments adopted by the California Building Standards Commission. The codes used by the City are adopted in the CMC. The City adopted the 2019 California Building Standards Code, which includes the 2019 Building Code, 2019 Electrical Code, 2019 Plumbing Code, 2019 Mechanical Code, 2019 Residential Code, 2019 Green Building Standards Code, and 2019 Existing Building Code. The 2019 California Building Standards Code establishes standards and requires inspections at various stages of construction to ensure code compliance.

The City adopted Appendix A of the California Existing Building Code to include the following:

- Chapter A1, Seismic Strengthening Provisions for Unreinforced Masonry Bearing Wall Buildings
- Chapter A3, Prescriptive Provisions for Seismic Strengthening of Cripple Walls and Sill Plate Anchorage of Light, Wood-Frame Residential Buildings

The City amended the Building Code by deleting the following:

- Section 104.10.1, Flood Hazard Areas
- Section 105.3.2, Time Limitation of Application
- Section 105.5, Expiration
- Section 112, Board of Appeals

The California Building Standards Code also requires new residential construction to comply with the Federal Americans with Disabilities Act (ADA). Although these standards and the time required for inspections increase housing production costs and may impact the viability of rehabilitation of older properties (which are required to be brought up to current code standards), the intent of the codes is to provide structurally sound, safe, and energy-efficient housing. The City's Community Development Department continues to provide information on rehabilitation assistance to potentially eligible households. The codes serve to protect residents from hazards and risks, and are necessary constraints to housing production.

On-Site and Off-Site Improvements

On-site and off-site improvements are necessary for developers to serve residential projects that require discretionary entitlement. Such improvement requirements may include open space, parking, roads, sidewalks, sewer lines, and underground utilities. Requirements for on- and off-site improvements vary depending on the presence of existing improvements and the size and nature of the proposed development. In general, most residential areas in Concord are served with infrastructure.

Subdivision Requirements

For any new subdivision, the CMC requires a number of improvements, such as the following:

- Communications, cable, and fiber optics, including conduits and related equipment necessary for service to each parcel.
- Underground public utilities, including gas and electric.
- Trails and related improvements in accordance with the Trails Master Plan; the General Plan; and other applicable City plans, policies, and ordinances.
- Water infrastructure, including water lines and easements when required to comply with requirements of the Contra Costa Water District, and storm drains.

Other improvements may include bicycle facilities, fire hydrants, frontage improvements, sanitary sewers, sidewalks and pedestrian facilities, and transit facilities. Further subdivision design standards can be found in CMC Section 17.20.030. The City uses the standards and codes adopted by the Contra Costa County Fire Protection District and the Contra Costa Water District. The City's sewer standards and regulations are located in CMC Chapter 13.05. Developers may be required to conduct off-site improvements.

Further, the off-site street program was implemented by CMC Chapter 19.25 as a City-wide program, excluding the CRP area, to ensure continued safe and efficient operation of the City's transportation system. The program is administered by Policy & Procedure No. 144, Traffic Impact Analysis and Mitigation Requirements. Fees associated with the program are set forth in the Resolution Establishing Fees and Charges for Various Municipal Services.

The City already has infrastructure in place, and the subdivision requirements are similar to jurisdictions across California. Further, all identified sites in the inventory of Appendix E, Sites Analysis, are within or near urbanized developments with existing sufficient infrastructure access or areas with planned infrastructure. Therefore, it is not a unique or actual constraint to the development, improvement, or maintenance of housing.

Parking Standards

Parking is often cited as a costly component of development, and when minimum parking requirements are applied citywide, they leave little room for flexibility in development. The City's parking standards require a minimum number of parking spaces, covered and uncovered, for most residential uses (CMC Chapter 18.160). The requirement to provide covered parking for multifamily units is costly and is an added constraint for developers. Parking strategies that allow a market-driven approach can reduce the cost of development, increase development flexibility, and reduce costs for consumers while still providing developers with the freedom to provide parking as supported by the market.

Group housing and emergency shelters are supportive housing that can provide much-needed refuge to particularly vulnerable populations. Unnecessary parking requirements may pose a constraint to the potential capacity to help these populations on any given parcel. Group housing is treated the same as other residential uses, where one space is required per bed, bedroom, or unit (whichever is greatest), plus one guest space per every three beds, bedrooms, or units (whichever is greatest). Consistent with parking requirements under State law, emergency shelter parking requirements only require what is needed to accommodate staff. The requirement is one space per every employee at the maximum shift unless an alternate means of transportation is provided, in which case the parking requirement may be reduced.

Parking standards by residential use are detailed in **Table 14**.

**Table 14
City Parking Standards by Residential Use**

<i>Land Use Type</i>	<i>Parking Spaces Required</i>
Single-Family	<p>Existing homes:</p> <p>2 spaces, at least 1 covered, none within required front yard setback, except where an existing garage or carport is proposed to be converted to dwelling space (as provided in CMC Section 18.160.050(F))</p> <p>Additions to existing homes:</p> <p>5–6 bedrooms – 1 additional space (2 covered), 3 total</p> <p>>6 bedrooms – 2 additional spaces (3 covered), 4 total</p> <p>New homes:</p> <p>4 bedrooms or less, at least 2 enclosed garage spaces (may be tandem)</p> <p>5–6 bedrooms, 3 spaces, at least 2 enclosed garage spaces</p> <p>>6 bedrooms, 4 spaces, at least 3 enclosed garage spaces</p>
Accessory Dwelling Unit	No greater than 1 space per unit or bedroom, whichever is less; these spaces may be provided as tandem parking on a driveway
Duplex	<p>1.5 spaces/studio or 1-bedroom unit</p> <p>2 spaces/2–4 bedroom unit; additional 0.5 space/bedroom for 4–5 or more bedrooms</p> <p>Every unit shall have 1 dedicated covered space</p>
Multifamily	<p>1 space/studio unit</p> <p>1.5 spaces/1-bedroom unit</p> <p>2 spaces/2–3 bedroom unit; additional 0.5 space/bedroom for 4 or more bedrooms</p> <p>1 guest space/each 3 units</p> <p>Every unit shall have at least 1 dedicated covered space</p>
Emergency or Homeless Shelter	1 space/employee at maximum shift unless an alternate means of transportation is approved
Family Day Care Home, Small	Only as required for the dwelling
Family Day Care Home, Large	<p>1 space/nonresident employee in addition to parking required for dwelling; and</p> <p>1 loading space</p>
Group Housing	<p>1 space/bed, bedroom, or dwelling unit, whichever is greater; and</p> <p>1 guest space/3 beds, bedrooms, or dwelling units</p>
Mobile Home Park	<p>2 spaces/unit</p> <p>1 space/unit covered</p>
Residential Care Facility, Small	None, other than parking required for the dwelling

**Table 14
City Parking Standards by Residential Use**

<i>Land Use Type</i>	<i>Parking Spaces Required</i>
Residential Care Facility, Large	1 space/nonresident employee, and 1 loading space in addition to parking required for dwelling
Residential Facility for Older Adults	As determined through the Use Permit
Live/Work Unit	2 spaces/unit, and 1 space/3 units

Parking Management Program

The Downtown Specific Plan considers a parking management plan as a strategy to decrease auto dependency and demand for parking in transit-accessible locations. Nonresidential projects within the Transit Station Overlay District have a reduction in required minimum number of parking spaces up to 25%. Furthermore, in an effort to create a better pedestrian environment, facilitate active forms of transportation, and activate commercial first-floor uses within the Transit Station Overlay District, off-street parking is not permitted between the building frontage and the sidewalk. While placing parking underground or building a parking structure may be more costly than surface parking lots to the applicant, the potential reduction of required spaces may offset this cost or eliminate the need to build auxiliary parking facilities. The parking management program mitigates parking as a constraint with alternative strategies that include the following:

1. Encouraging private parking entities to allow parking after typical business hours and shared parking within each development and between adjacent developments.
2. Developing a “park once” strategy with wayfinding component and real-time availability information.
3. Encouraging car sharing in Downtown zones.
4. Providing flexible parking standards and minimum parking requirements.
5. Incentivized unbundled parking.
6. Offering shuttles with 15-minute headways linked among BART stations, Todos Santos Plaza, John Muir Medical Center, and Diablo Valley College.

Open Space and Recreational Facilities for Residential Development

The City’s regulations establish requirements for private and common open space for residential development providing three or more new dwelling units. The regulations are as follows:

- A minimum of 200 square feet of private and/or common open space is required per dwelling unit. Private open space includes balconies, decks, porches, patios, and enclosed yards.
 - The required open space can include a combination of private and common open space, so long as a minimum of 60 square feet of private open space is provided.

- In addition, projects providing 25 or more units must provide at least one recreational facility, such as:
 - Exercise room
 - Game court
 - Play lot
 - Swimming pool
 - Other similar facilities
- Projects providing 100 or more dwelling units must provide a multipurpose or recreation room, where up to 50% of the square footage may be credited towards the required common space.

Open space requirements for residential development ensure that there is adequate opportunity for residents to enjoy recreation and refuge. The requirements provided by the CMC are not a constraint to development because these are common features and are scaled appropriately for the size of development. Additionally, the City’s processes allow for developments to propose a variance to the adopted regulations when needed, which is further detailed under the section “Permitting Processes and Fees,” below.

Energy Conservation

The City promotes energy conservation through enforcement of the State’s Green Building Standards. Energy conservation is promoted through contact with residents, including public outreach through the City newsletter, its website, and social media, and personal contact during permit applications and City events. Public outreach efforts include advising residents and developers on adopting energy-efficient designs and features, choosing appliances that save energy, installing solar panels, and recycling batteries and other e-waste. Additionally, the City allows solar collectors and solar energy systems to exceed height limits and setback requirements for all residential uses as mandated by the regulations to the minimum extent necessary for their safe and efficient operation in accordance with the California Building Code and other applicable provisions of State law (CMC Sections 18.150.070 and 18.150.140). Solar collectors and solar energy systems require written approval by the Director of Community Development or the designee of that individual to ensure compliance with the regulations. The City Council established itself as the City of Concord Solar Utility, which grants its authority to establish rules, regulations, and procedures to encourage and promote the use of solar energy (CMC Section 13.20.020). The CMC also provides an expedited and streamlined permitting process to minimize the constraints for solar installations and electric-vehicle charging stations (CMC Section 15.120.010). Enforcement of the State’s Green Building Standards is not a constraint to residential development. Further through **Program 17, Preservation and Housing Rehabilitation**, the City will continue to promote energy conservation and implement any updates to the State’s Green Building Standards.

Permitting Processes and Fees

Permit processing fees, development impact fees, and construction taxes can increase the cost of housing development. While City fees and taxes offset the cost of development, they could serve to constrain housing production, especially production of affordable units.

Local processing and permit procedures can also constrain the development of housing through unnecessary discretionary permit requirements, lengthy permit processing timelines, and subjective requirements that leave uncertainties in the overall development design and density. Discretionary actions can be required for Use Permits, zone or plan amendments, and subdivisions. Ministerial, or by-right, permits involve application of objective design standards and criteria.

Further, in accordance with Section 65913.4 of the California Government Code, also known as Senate Bill (SB) 35, qualifying applications for development are subject to a streamlined, ministerial approval process and are not required to obtain a Use Permit if the development meets the locality's objective design standards as outlined in the Government Code and as summarized as follows:

- Multifamily housing developments on infill sites zoned for residential or residential mixed-use.
- A minimum of 10% of the units are dedicated as affordable to households earning 80% or less of the area median income.
- For developments with 10 or more units, a prevailing wage requirement is included in all contracts for the performance of work.

The City reports annually on any applications received pursuant to SB 35. Additionally, in an effort to increase transparency of the development permitting process, the California Legislature adopted Assembly Bill 1483 in 2019 to require jurisdictions to post detailed information regarding development project requirements. A jurisdiction must make all of the following available on its website, as applicable, and update any changes to the information within 30 days of the change:

- A current schedule of fees, exactions, and affordability requirements imposed by the City, applicable to a proposed housing development project, which shall be presented in a manner that clearly identifies the fees, exactions, and affordability requirements that apply to each parcel.
- All zoning ordinances and development standards, which shall specify the zoning, design, and development standards that apply to each parcel.
- A list of information that will be required from any applicant for a development project.
- The current and five previous annual fee reports or the current and five previous annual financial reports.
- An archive of impact fee nexus studies, cost of service studies, or equivalent, conducted by the City on or after January 1, 2018.

Permit Processes and Timelines

The following sections detail the permit processes and timelines, as well as any required findings that are applicable to residential development in Concord. For detail on the specific permits required of varying residential uses in specific zones, see Table 2, Zoning for a Variety of Housing Types.

Neighborhood Meeting

Neighborhood meetings are required to be conducted by applicants seeking discretionary approvals associated with the following types of development:

- All infill residential projects
- Projects located within 300 feet of a residential district
- Complex projects with multiple applications
- Potentially controversial projects
- Uses that have the potential to affect surrounding properties

The Planning Division may waive the neighborhood meeting requirement for those discretionary projects that do not present controversial issues that warrant a neighborhood meeting.

Zoning Clearance

A Zoning Clearance is used by the City to verify that a new or expanded proposed structure or use complies with the permitted list of activities allowed in the applicable zoning district and the development standards are applicable to the use. The planning division may grant a Zoning Clearance if

the request complies with all Development Code provisions applicable to the proposed use or structure. Uses are allowed within the zoning district with the approval of a Zoning Clearance, and it is therefore considered to have the least constraint on the development of housing. Further, the determination of Zoning Clearance applies to the following:

- As a prerequisite to establishing a new land use.
- Before any structure may be altered, constructed, erected, moved, or repaired, or before any vacant land may be used or changed in use.
- Before a building permit or any other required city approval may be issued or granted.

Administrative Permits

An Administrative Permit (AP) or administrative review is used to ensure that each new or expanded use or structure complies with the applicable requirements of the development code. If the Development Code requires an AP, approval will be required before a building permit, grading permit, or other permit or authorization is issued. Since an AP is not generally required for the typical development of residential uses, constraints to the development of housing is minimal. Additionally, any previously approved projects that required a subsequent AP as a condition of approval (CMC Section 18.420.020) and any other use as determined by the Planning Division to require further review and/or documentation in the form of an approval letter, beyond a Zoning Clearance, to determine compliance with the Development Code, will require an AP. A project requiring an AP will typically take up to 3 weeks to review and process, and approval is subject to a 10-day appeal period (CMC Chapter 18.510). The Planning Division may approve an AP, with conditions deemed necessary to:

- ensure that the proposal conforms to the General Plan and other applicable plans or policies adopted by the City Council; and
- ensure that the proposal meets the requirements of the district where the proposal is located, as well as other provisions of the Development Code; and
- comply with the design criteria (CMC Section 18.415.080); and
- the approval shall be in the form of a letter to the applicant.

Design Criteria (CMC 18.415.080)

Design review recommendations shall be based on the following criteria and any other applicable design guidelines:

- The building design and landscaping supports public safety and security by allowing for surveillance of the street by people inside buildings and elsewhere on the site.
- The design is compatible with the historical or visual character of any area recognized by the City as having such character.
- The project design preserves major view and vistas along major streets and open spaces and trails and enhances them by providing project amenities.
- The proposed lighting and fixtures are designed to complement on-site buildings, are of an appropriate scale for the development, and provide adequate light for safety and security while minimizing glare.
- All mechanical, electrical, and utility equipment is located, screened, or incorporated into the design of the buildings so as not to be visible from off site, and screening devices are consistent with the exterior colors and materials of the buildings.

- The overall design of the project, including its scale, massing, site plan, exterior design, and landscaping, enhances the appearance and features of the project site and surrounding natural and built environment.
- The project design is appropriate to the function of the project and will provide an attractive and comfortable environment for occupants, visitors, and the general community.
- The architectural details, colors, materials, and landscaping are internally consistent, fully integrated with one another, and used in a manner that is visually consistent with the proposed architectural design.
- The project is compatible with neighboring development in the same zoning district by avoiding large differences in building scale and character and provides a harmonious transition between the proposed project and surrounding development.
- The project creates an attractive and visually interesting built environment with a variety of building styles and designs, well-articulated structures that present varied building facades, rooflines, and building heights within a unifying context.
- The landscaping is compatible with and enhances the architectural character of the buildings and site features, and blends with the surrounding landscape. Landscape elements complement the buildings and rooflines through color, texture, density, and form. Landscaping is in scale with on-site and off-site buildings, and plantings have been selected and located to avoid conflicts with views, lighting, infrastructure, utilities, and signage.
- Stormwater treatment areas have been integrated into the landscape design.
- New construction does not need to match existing surrounding development or buildings; however, the design shall complement or enhance existing development.

Although some of the design criteria for projects subject to an AP is subjective, they are not considered a constraint to residential development since they are recommendations, and an AP is not generally required for the typical development of residential uses. However, through **Program 15, Objective Design Standards**, the City will ensure any new design standards developed and imposed by the City will be objective without involvement of personal or subjective judgement by a public official and will be uniformly verifiable by reference to the City's regulations.

Use Permits

The City uses the Use Permit process to control the location and operation of certain types of land uses to ensure public health, safety, or general welfare, or to mitigate/avoid material detriment to the property of other persons in the vicinity. Because of this, the constraints imposed by the review process is necessary. The CMC sets forth specific conditions that the Planning Commission may consider. A Use Permit requires a public hearing and an application fee. Typically, a project requiring a Use Permit takes about 6 to 12 months in processing time. In comparison, a project requiring only a Design and Site Review takes about 12 weeks. The Use Permit process potentially extends the timeframe by 3 to 9 months, depending on whether there are other concurrent applications being processed, such as a Tentative Tract Map, and if the project is not exempt from CEQA. The Planning Commission may approve a Use Permit, with or without conditions, only if it makes the following findings:

1. The proposed use is allowed within the applicable zoning district and complies with all other applicable provisions of the Development Code and the CMC.
2. The proposed use is consistent with the General Plan and any applicable Specific Plan.

3. The design, location, size, and operating characteristics of the proposed activity are compatible with the existing and future land uses in the vicinity.
4. The site is physically suitable for the type, density, and intensity of the proposed use, including access, utilities, and the absence of physical constraints.
5. Granting the permit would not be detrimental to the public health, safety, or welfare of the persons residing or working in the subject neighborhood, or materially detrimental or injurious to property or improvements in the vicinity and zoning district where the property is located.
6. If the review authority determines that it is not possible to make all of the required findings for approval of the project as submitted or as modified with conditions, the application shall be denied. The specific basis for denial shall be established for the record.

Minor Use Permits

A Minor Use Permit is necessary for proposed uses that are deemed minor, non-impacting, and noncontroversial. Unlike a Use Permit, a full public hearing may not be required for a Minor Use Permit and may instead provide notice stating that the Planning Division will decide whether to approve or disapprove the application on a date specified in the notice and that a public hearing will only be held by the zoning administrator if requested in writing by an interested person prior to the specified date for the decision. The zoning administrator may refer any minor use application to the Planning Commission for public hearing and decisions. When a public hearing is not requested, the Planning Division may approve the application without holding a public hearing (CMC Section 18.500.040). A Minor Use Permit provides less constraints to development when issued, compared to a standard Use Permit.

Design and Site Review

Design and Site Review is established to recognize the interrelationship among the appearance of open spaces, buildings, and structures to ensure the orderly development of Concord; the stability of land values; and the construction of structures, additions, or alterations with proper attention to the harmony, compatibility, and aesthetic quality of site design, architecture, landscape architecture, signs, and engineering. Design and Site Review may be required to determine whether a proposed development will properly comply with the provisions and development standards. The initial review is done by the Planning Division, which may refer applications to the Design Review Board, Zoning Administrator, or Planning Commission for approval when discretionary determination is necessary. The nature of Design and Site Review poses a constraint due to the multiple authorities and discretionary permits involved. Further, the lack of clarity as to when the Design and Site Review applies may pose a constraint to development, as uncertainty in the development process can create greater risk for developers. Design and Site Review is required for all of the following:

- Prior to construction, use or alteration of any building, structure, or sign
- Prior to substantial alteration of any landscaping or site topography
- Prior to any new tenant improvement subject to the provisions of CMC Chapter 18.535, Nonconforming Physical Improvements/Property Upgrades
- Prior to construction or alteration of any new parking lot improvements or alteration to existing parking lots including circulation, layout, or dimensions
- Prior to the approval of a sign plan or master sign programs pursuant to CMC Chapter 18.180, Signs
- Prior to any improvement on property adjacent to or including a creek as defined in CMC Section 18.305.020

- Prior to the use of a lot for any storage or staging purposes
- Prior to the installation of pavement on any portion of a lot
- Prior to any other site improvement that requires further review to determine compliance with the Development Code or other City ordinances, except for one single-family dwelling or accessory dwelling unit on a single lot or parcel

Additionally, Design and Site Review generally does not impose a constraint to single-family residential developments, unless deemed necessary. These instances are detailed below (CMC Section 18.415.020):

- New single-family dwellings within a proposed minor or major subdivision.
- Any addition resulting in a single-family dwelling with an FAR greater than 30%.
- Second-story additions where the area of the second floor portion is 40% or more than the area of the original structure located on the second floor, or second stories that are set back less than 10 feet from a side property line.
- New single-family dwellings and additions to existing single-family dwellings on sloped lots, subject to the requirements in CMC Chapter 18.300, Hillside Protection.

Process

The Design and Site Review process involves various authorities for the approval of projects and improvements. While the Design and Site Review process can be considered a constraint, the necessary structure of this process aims to maximize efficiency. The applications are approved as follows (CMC Section 18.415.040):

- The Planning Division is the initial review authority for Design and Site Review and may refer the application to the Design Review Board, Zoning Administrator, or Planning Commission for review and approval.
- Zoning Clearance may be granted by staff and does not require a separate Design and Site Review application if improvements being made to existing properties include painting with a similar color scheme, window replacement, or minor storefront changes.
- Administrative Design and Site Review is determined, with or without review by the Design Review Board, for minor projects or improvements that do not otherwise require a discretionary permit approval where the Planning Division determines that such project will not substantially affect the property rights of owners or adjacent parcels. Examples of minor projects or improvements include:
 - Minor additions to existing multifamily residential buildings;
 - New occupancies in existing nonbuildings when the property is in conformance with development standards applicable to the property;
 - New occupancies in existing nonresidential buildings when the property is not in conformance with the development standards applicable to the property where the project includes plans to substantially upgrade the exterior of the building and/or make significant upgrades to landscaping, parking areas, and other site improvements;
 - Minor additions and alterations to nonresidential buildings that are not in the ore downtown area or on prominent streets or gateways throughout the city; and
 - Master signage programs that meet the City’s sign ordinance requirements for maximum size, height, and number of attached and freestanding signs.
- Other Discretionary Approval shall consider Design and Site Review applications and act upon concurrently with any associated planning permits, such as an Administrative Permit, minor or

major use permit, variance, minor or major subdivision, planned development use permit, or hillside development permit.

- A referral can be made by the Planning Division for any application for Design and Site Review to the Design Review Board if there are significant concerns with the proposed design.
- Recommendations of approval of a project to the appropriate review authority can be made by the Design Review Board, with or without conditions of approval.
- When the Design Review Board makes a recommendation for denial of a project or recommends a condition of approval that is not acceptable to the applicant, the decision shall be referred to the appropriate review authority. For administrative design and site review or projects typically reviewed by the zoning administrator, the Planning Division may refer the project directly to the Planning Commission for a public hearing and decision, in accordance with CMC Chapter 18.500.

City staff has the authority to determine when to require a hearing by the Design Review Board, which may be considered a constraint to development. Alternative procedures, including the consideration and approval of projects in a single meeting or multiple study sessions, or appointing a two-person subcommittee to work with the project design team outside of regularly scheduled Design Review Board meetings, require final actions by the Design Review Board at a regular board meeting. The process for the Design Review Board follows (CMC Section 18.415.060):

- A Conceptual Design and Site Review is part of the preliminary application review process. When required, this process provides general comments and direction to applicants prior to submitting a formal application. Plans are not expected to be complete or fully detailed. The board provides comments on the design concept, massing, bulk, site plan layout and function, building orientation, preliminary elevations and architectural style, adequacy of landscaped areas and site amenities, and the integration of stormwater requirements into the site design.
- A Preliminary Design and Site Review is scheduled after a formal application has been submitted with detailed project plans that are either complete or nearly complete, as follows:
 - staff reviews projects that have been through conceptual Design and Site Review for conformance with the board's initial comments;
 - staff reviews new projects for compliance with the Development Code and any applicable design guidelines and provides a recommendation to the board;
 - if the board's recommendations require a significant alteration to the plans or a significant project redesign, a subsequent preliminary design and site review meeting will be required;
 - when the board is generally satisfied with the project design but needs additional plans or details to verify the project design, the board recommends resubmittal of plans for final Design and Site Review approval; and
 - when a project scheduled for preliminary design and site review has incorporated the board's comments from conceptual Design and Site Review, and complete plans have been submitted, the board may approve the project without an additional meeting for final Design and Site Review.
- A Preliminary/Final Design and Site Review may be approved without a subsequent final design review if:
 - all of the project details required in the application checklist for final Design and Site Review have been submitted; and
 - the board has only minor comments which will not affect the overall design of the project nor require further review.

- A Final Design Site and Review is conducted with a review of plans submitted in response to comments made by the Design Review Board at Preliminary Design and Site Review and typically includes additional project details. The board will recommend approval, with or without conditions of approval, if the board is satisfied that the project plans will meet the Design and Site Review criteria.

The Planning Commission, or City Council on appeal, may approve a Design and Site Review, with or without conditions, only if it makes the following findings (CMC Section 18.415.100):

- the project is consistent with the General Plan;
- the project meets the relevant design criteria as detailed below (Design criteria); and
- the project overall reflects design principles and/or incorporates design features that are consistent with applicable design guidelines adopted by the City Council that are in effect at the time of approval.

If necessary, the Planning Commission or City Council may impose conditions of approval to make the following (CMC Section 18.415.110):

- ensure the proposal conforms to the General Plan and other applicable plans or policies adopted by the City Council; and
- ensure the proposal meets the requirements of the applicable zoning district, applicable provisions in the CMC, and other standards in the Development Code.

Scope and Design Criteria

The scope of design review shall include the following (CMC Section 18.415.070):

- Building proportions, massing, and architectural details.
- Exterior colors and materials as they relate to the overall appearance, one another, and surrounding development.
- Site design, orientation, and location of buildings, relative to existing structures on adjacent property, location of the site, topography, and other features of the natural and built environment.
- The size, location, and arrangement of on-site parking and paved areas.
- Grading of property.
- Height, materials, colors, and variety of fences, walls, and screen plantings.
- Location, type, and design of landscaping, including selection and size of plant materials, hardscape, street furniture, and irrigation.
- The size, location, design, color, number, lighting, and materials of all signs.
- Location and screening of above-ground utility structures and equipment.
- Any other features identified in applicable city-approved design guidelines.

The design review recommendations are based on the following criteria (CMC Section 18.415.080):

- The building design and landscaping supports public safety and security by allowing for surveillance of the street by people inside buildings and elsewhere on the site.
- The design is compatible with the historical or visual character of any area recognized by the City as having such character.
- The project design preserves major view and vistas along major streets and open spaces and trails and enhances them by providing project amenities.

- The proposed lighting and fixtures are designed to complement on-site buildings, are of an appropriate scale for the development, and provide adequate light for safety and security while minimizing glare.
- All mechanical, electrical, and utility equipment is located, screened, or incorporated into the design of the buildings so as not to be visible from off site, and screening devices are consistent with the exterior colors and materials of the buildings.
- The overall design of the project, including its scale, massing, site plan, exterior design, and landscaping, enhances the appearance and features of the project site and surrounding natural and built environment.
- The project design is appropriate to the function of the project and will provide an attractive and comfortable environment for occupants, visitors, and the general community.
- The architectural details, colors, materials, and landscaping are internally consistent; fully integrated with one another; and used in a manner that is visually consistent with the proposed architectural design.
- The project is compatible with neighboring development in the same zoning district by avoiding large differences in building scale and character, and provides a harmonious transition between the proposed project and surrounding development.
- The project creates an attractive and visually interesting built environment with a variety of building styles and designs, and well-articulated structures that present varied building facades, rooflines, and building heights within a unifying context.
- The landscaping is compatible with and enhances the architectural character of the buildings and site features, and blends with the surrounding landscape. Landscape elements complement the buildings and rooflines through color, texture, density, and form. Landscaping is in scale with on-site and off-site buildings, and plantings have been selected and located to avoid conflicts with views, lighting, infrastructure, utilities, and signage.
- Stormwater treatment areas have been integrated into the landscape design.
- New construction does not need to match existing surrounding development or buildings; however, the design shall complement or enhance existing development.

The design criteria for projects subject to a Design and Site Review is subjective, which is considered a constraint to housing development because it creates uncertainty in the development process. However, through **Program 15**, the City will ensure any new design standards developed and imposed by the City on housing projects will be objective without involvement of personal or subjective judgement by a public official, and will be uniformly verifiable by reference to the City's regulations.

Exemptions

Exemptions to Design and Site Review requirements for residential uses include the following (CMC Section 18.415.030):

- Minor additions to existing multifamily residential.
- The continuation of a previously approved or permitted use and structure.
- Additions and alterations to individual existing residential dwellings and structures that do not increase the floor area of the building or total building footprint by more than 50% over a 3-year period, which are not subject to the requirements in CMC Chapter 18.300, Hillside Protection.

Through **Program 22, Support for People Experiencing Homelessness**, the City will amend the Development Code to ensure that emergency shelters are exempt from the Design and Site Review process.

Costs

For staff-level review, a \$2,500 deposit is required for Planning staff plus \$814 for Engineering and Building staff. The rate for Planning staff time is \$235 per hour.

The Board review process requires a \$4,000 deposit for Planning and Building staff, plus a \$606 deposit for Engineering and Building staff. The rate is \$215 per hour for Planning staff and \$198 per hour for Building staff.

Variances

Variances permit alterations of development standards as they apply to particular uses when practical difficulties develop from the strict interpretation and enforcement of zoning codes. A request that exceeds the limitations of a Minor Exception (CMC Section 18.425) shall require a variance. Zone variances may be granted, or variances may be required in particular cases for building setbacks, height, bulk, density, parking, landscaping, walls, fencing, and business operation. In the event that there is a request to build at densities lower than the minimum provided by the zone, the applicant has to request a variance. However, the City has not had any requests to build at lower densities.

A variance can take approximately 2 months to process. Due to the additional time required, variances can pose a constraint to development, but variance requests are rare and are sometimes necessary when developers cannot meet the City's adopted regulations due to unusual circumstances, hardships, and other factors beyond their control. The Planning Division may approve a variance if a public hearing is not requested, otherwise the Zoning Administrator will hold a public hearing. The Zoning Administrator may also refer any variance application to the Planning Commission for a decision. The Planning Division, Zoning Administrator, Planning Commission, or City Council, on appeal, may grant a variance from the required development standards, with or without conditions, only if it makes the following findings (CMC Section 18.430.060):

- The strict application of the Development Code denies the property owner privileges enjoyed by other property owners in the vicinity and within the same zoning district due to special circumstances applicable to the property, including location, shape, size, surroundings, topography, or other conditions.
- Such special circumstances were not created by the owner or applicant.
- The variance will not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and the zoning district where the property is located.
- The variance does not authorize a use or activity that is not otherwise expressly authorized in the zoning district where the property is located (see Division II of this title, Zoning Districts – Uses and Standards).

Zone Change

In some cases, the City Council may decide to change the zoning on a particular property by amending the Zoning Map. Zone changes are allowed only when the change will not be materially detrimental to the property of other persons located in the vicinity. The zone change is applicable to the subject property only. A Specific Plan, Zoning Ordinance, or Zoning Map Amendment may be approved only if the City Council first finds that the proposed amendment is consistent with the General Plan. These applications are first processed by Planning staff then presented to the Planning Commission. The Planning Commission adopts a recommendation to be presented to the City Council, which holds

approval authority. The City Council must make the following findings, with or without conditions, to approve an amendment to the Development Code or the Zoning Map.

- The proposed amendment is consistent with the General Plan.
- The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or welfare of the city.
- Zoning map amendments shall also find that the affected site is physically suitable, including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities, for the requested zoning designation and proposed or anticipated uses and/or development.

Planned Development Use Permit

A Planned Development Use Permit (PDUP) provides opportunities for high-quality development where development standards in the residential and mixed-use zoning districts are not met. The constraints typical of infill development are minimized, especially those located on irregularly shaped parcels, which face difficulty in meeting the conventional development code by granting flexibility for enhanced environmental and architectural excellence with a PDUP. Flexibility includes a modification of applicable development standards and ensures that a PDUP achieves the minimum net density or intensity (FAR) for the applicable zoning district regardless of parcel shape or slope. Through a discretionary process, a PDUP is allowed in all residential and mixed-use zoning districts. The initial review is done by the Design Review Board, which reviews the design criteria stated below (CMC Section 18.440.060):

1. **Site Design and Orientation.** Block size; lot layout, widths, and front setbacks; streets, pedestrian and bicycle areas, street connectivity; roundabouts, neck downs, curb bulbs, or similar techniques; shared or clustered driveways; alley parking; visual focal points; building orientation; open space provisions; retention of significant natural features; and grading techniques.
2. **Private, Common, and Recreational Open Space.** Type, quantity, and location of open space; trail systems, recreational amenities; and retention of adjacent open space areas.
3. **Landscaping.** Streetscapes; street trees; open spaces; quality and design of landscaping; use of roof gardens; creative hardscape improvements; preservation of existing landforms; integration of stormwater treatment areas into the landscape design; and preservation of protected trees.
4. **Design Features.** Architectural styles, four-sided design treatment, colors, a mixture of high-quality materials; building size and type; roof forms; variety and interest; high-quality roofing materials, garage and porch placement; accent paving; street furniture and lighting; high-quality walls and fencing; and utility placement and screening.
5. **Other Features.** Site amenities and other features the planning commission deems appropriate.

The application is then forwarded to the Planning Commission for consideration. The Planning Commission may grant approval when the following findings are made:

1. The development is in conformance with the General Plan and any applicable Specific Plan.
2. The development is in conformance with applicable provisions of the development code and the CMC, relating to both on- and off-site improvements necessary to accommodate flexibility in site planning and property development and to carry out the purpose and intent of the zoning district.

3. The development is a comprehensive development that provides a more enhanced environment and architectural excellence (e.g., varied structure placement and orientation, mix of building sizes and types of dwellings, high-quality architectural design and materials, increased landscaping and open space, improved solutions to the design and placement of parking facilities, etc.) than would normally be possible under conventional zoning requirements.
4. The development is compatible and well-integrated with existing, adjacent neighborhoods.
5. The various elements of the development, including buildings, infrastructure, and landscaping, private and common open space, work together to form a comprehensive plan of sufficient unity to justify exceptions to the development standards identified in the applicable zoning district.
6. The design, location, shape, size, operating characteristics, and the provision of public and emergency vehicle access and public services and utilities (e.g., drainage, fire protection, sewers, water) will ensure that the development would not endanger, jeopardize, or otherwise constitute a hazard to the public health, safety, or general welfare, or be injurious to property or improvements in the vicinity.
7. The site is physically suitable for the type of density/intensity of the development, adequate in shape and size to accommodate the developments, and served by streets of adequate capacity for the traffic generated by the development.
8. The public need for, and the positive benefits to be derived from, the project clearly outweigh any potential negative effects it may cause.

Additionally, the Planning Commission may impose conditions deemed reasonable and necessary to do the following:

1. Ensure that the approval complies with the previously stated findings.
2. Ensure compliance with other requirements of the development code to provide compatibility with surrounding properties.
3. Accommodate flexibility in site planning and project design.
4. Provide appropriate transitional treatment.
5. Mitigate potential environmental impacts in accordance with CEQA requirements.
6. Protect the public health, safety, and general welfare.

The PDUP procedures do not pose a constraint to development, as it provides an optional process for developers to deviate from the City’s adopted regulations when they face site-specific challenges. The PDUP process typically allows developments to achieve a higher density than would otherwise be possible under the standards of the base zoning district.

Hillside Development Use Permit

An applicant wishing to build on a slope of 15% or greater must apply for a Hillside Development Use Permit (HDP). Except for ADUs, this requirement applies to any new subdivision, use, structure (including accessory structures), addition to an existing structure that exceeds 50% of the size of the existing structure, and other development on any parcel classified as a “Hillside Parcel” (CMC Section 18.300.020). The purpose of the additional approval process is to protect the visual integrity of the community and quality of life for the residents, and to minimize safety concerns such as liquefaction, landslide, rockfall, and debris flow. The permit process includes associated fees, as detailed in **Table 15**.

An HDP is either qualified as a minor or major permit. Any development on a slope can pose a constraint due to complicated terrain, in-depth planning decisions, and costly permitting fees, and is generally out of reach for lower-income housing. Despite this, it is a necessary procedure to determine that a slope is safe and adequate for development, especially if it is for housing.

The Design Review Board evaluates all minor and major HDP applications based on the design criteria prior to action by either the Zoning Administrator (for minor HDPs) or the Planning Commission (for major HDPs). However, the Planning Division may approve additions to existing single-family homes when the addition does not exceed more than 50% of the existing structure and the Planning Division has determined that the proposal will not impact adjacent properties. The review authority will approve, with or without conditions, a proposed HDP after concluding the following findings:

1. The design, scale, massing, height, and siting of the project is compatible with the site and consistent with the character and scale of the surrounding developed neighborhood.
2. The design and site layout of the project respects and protects the natural environment to the maximum extent feasible.
3. The site grading is sensitive to the hillside site, minimizes tree removal, and provides safe site access.
4. The project is consistent with the General Plan, and meets the development standards of the applicable zoning district and the hillside development and design standards.
5. The project screens development to the extent feasible through clustering and/or avoidance of highly visible hillsides, ridgelines, and knolls.
6. The project incorporates adequate access, public services, and utilities.

Minor and Major Hillside Development Use Permit

An HDP may be considered minor or major depending on the type of project. A minor HDP encompasses smaller projects that may include a new single-family residence on an existing parcel, a major expansion (over 50% of existing floor area) to an existing single-family home, a minor subdivision, or an amendment to a previously approved HDP for a single-family residence on a hillside parcel. A major HDP includes residential subdivisions, multifamily dwellings, or nonresidential structures on a hillside parcel.

The review authority and process are different for minor and major HDPs. The Planning Division may refer an HDP application to the Zoning Administrator or Planning Commission for a public hearing and decision. A minor HDP application is reviewed for approval by the Zoning Administrator at a public hearing. The Zoning Administrator may also refer any minor HDP application to the Planning Commission for a public hearing and decision. A major HDP application is reviewed and approved only by the Planning Commission at a public hearing.

Through **Program 2, Addressing Constraints to Development**, the City will amend the Development Code to clarify the difference between a minor and major HDP and associated procedures.

Subdivisions

In accordance with the Subdivision Map Act, any subdivision of land into four lots or units or fewer requires a Parcel Map, and any subdivision of five lots or units or more requires a Tract Map. Tentative Maps are first submitted to the Planning Division with an application form and required fees. The Planning Division will route plans through the DAC process for review and comment. The applicant must submit plans to the Contra Costa Fire Protection District for review. The project planner will assist in this

process. Comments and corrections required by the Contra Costa Fire Protection District, City departments, outside agencies, or other consultants will be provided. The Tentative Map is then scheduled for consideration by the Planning Commission at a public hearing. The Planning Commission reviews the Tentative Map for consistency with the applicable zoning and General Plan land use designations.

Final maps are to be completed within the timeframe allowed and are considered by the City Council.

Subdivision projects typically take 6 to 12 months to process from the initial application to building permit issuance. The lengthy processing time is a constraint to development, but is necessary for the creation of adequate housing.

Fees and Exactions

The schedule of planning and permitting fees for the City is provided in **Table 15**. The City Council approved changes to the fee schedule on May 3, 2022, which will go into effect on July 1, 2022. Table 15 also includes the typical estimated costs of development per unit for single family and multifamily developments in California. Based on a 2019 development cost analysis for single family and multifamily developments in California, the average cost to develop a new single-family unit is \$538,436 and \$496,950 per multifamily unit. Based on this average development cost, the combined costs of permits and fees are approximately 8.73 percent of the cost of development for a single-family development and 3.22 percent for a multifamily unit.

Table 15
Summary of the City of Concord Fee Schedule

<i>Fee Category</i>	<i>Fee Amount</i>	
<i>Planning & Application Fees</i>	<i>Single-Family</i>	<i>Downtown Multifamily</i>
Total estimated fees per unit	\$47,000	\$16,000
Typical estimated cost of development per unit ¹	\$538,436	\$496,950
Estimated proportion of fee cost to overall development cost per unit	8.73%	3.22%

¹ Assumptions are based on an outside study based on 2019 market conditions.

In addition to permit fees, the City charges development impact fees to offset the impact that new development has on public facilities. For new construction outside of the existing utility service areas, there may be additional hook-up fees. For example, a one-time sewage hook-up fee is approximately \$5,000 per residential unit. The current fee structure requires payment of impact fees for an accessory dwelling unit that is 750 sq. ft. or greater and over 40 percent of the primary dwelling size, albeit at lower rates. For example, an accessory dwelling unit is subject to an \$8,345 park impact fee, a \$2,522 sewer connection fee, and a \$1,626 off-street improvement fee. For accessory dwelling units that are 750 sq. ft. or greater, but less than 40 percent of the primary dwelling size, the unit is subject to a \$5,508 park impact fee, a \$1,664 sewer connection fee, and a \$1,073 off-street improvement fee. These fees can increase the cost of housing and may influence the economic feasibility of affordable housing projects.

When all development and impact fees (not including fees charged by other agencies) are considered for recent developments in Concord, the average total development fee is approximately \$47,000 for a detached single-family unit (\$57,000 including subdivision and grading fees) and \$16,000 for a multifamily unit in the Downtown. The average per unit fees for multifamily housing in Concord are about 60% to 70% less than a detached single-family home. Given that multifamily developments are a

more efficient use of land and resources, impact fees should be significantly lower than those fees for single-family housing. The 2019 National Impact Fees Survey surveyed 37 jurisdictions in California. The study reported median impact fees of \$27,256 per single-family unit, and \$18,234 per multifamily unit. The City's development impact fees are approximately \$26,000 per detached single-family unit and \$13,000 per multi-family unit, well below the Statewide average. City impact fees for a single-family attached home¹ (e.g., townhome) are about \$19,000. If a project provides on-site parkland rather than paying the parkland in-lieu fee, this reduces the fees by approximately \$11,500 per unit.

Although fees are typically a constraint to housing development, the City's planning fees and development fees are low relative to the State average. Like all jurisdictions in the State, the City charges building permit fees. While fees can be a burden on the overall cost of development, they are considered necessary to accommodate the demands additional residents place on community resources and infrastructure.

Locally Adopted Ordinances

The City is committed to encouraging affordable housing development and provides incentives to zoning regulations to promote and encourage the provision of a variety of affordable housing types. In addition to the density bonus and parking requirement reduction within the Transit Station Overlay District, the City provides density bonuses for qualifying development projects that include affordable housing units (CMC Section 18.185.010). The City defines affordable housing units broadly as "units which are specifically designated for very low, low income, or moderate-income households. They may be developed in all districts that allow residential uses. Affordable housing developments may consist of owner-occupied units or rental units" (CMC Section 18.185.020). The City administers three programs that encourage affordable housing development, as further described below.

Inclusionary Housing Program

The Inclusionary Housing Program (CMC Section 18.185.040) requires the inclusion of a minimum percentage of affordable housing units in all projects with five units or more, as detailed in **Program 12**. Its intent is to integrate affordable housing throughout areas of Concord where housing is permitted. An option for payment of in-lieu fees is provided in the event that development of inclusionary units as part of the project is not feasible, in addition to an alternative for the development of affordable units off site. The requirements of CMC Section 18.185.040 apply in all districts where residential uses are permitted. For rental housing, the City Council established a threshold exempting rental projects from the Inclusionary Housing Program until 600 units have been constructed. Other exempt projects include developments proposing one to four single-family residential units, reconstruction of units that were destroyed by natural hazards, and projects that are subject to a development agreement.

Projects subject to the Inclusionary Housing Program must either include a designated percentage of affordable units or pay in-lieu fees, as specified in CMC Section 18.185.040. Residential ownership projects may either choose to dedicate 10% of the units as moderate-income or 6% at low-income. Once the 600-unit threshold has been exceeded, residential rental projects may either choose to dedicate 10% of the units as low-income or 6% at very low-income. If the percentage is calculated and results in a fraction of a unit, the program requires that the number of units be rounded up. The applicant may also choose to pay in-lieu fees for that fractional unit. If applicants would rather build units for a balanced mix of income levels, they may propose their plan to the Community Development Director, who may

¹ Assuming a 1,750-square-foot living space with an attached 400-square-foot garage on a 2,000-square-foot lot.

approve or disapprove based on their discretion. Alternatively, affordable housing ownership projects may provide the required 10% of inclusionary units as rental units set at low-income or 6% inclusionary rental units at very low-income. All affordable units must be dispersed throughout the project, have access to all provided utilities, have similar quality of exterior design, and have the same average number of bedrooms as market-rate units within the same project. Affordable units must be constructed and occupied prior to market-rate units.

The fee amount is set by the City Council via resolution, and must be sufficient to pay the proportionate cost of providing inclusionary units elsewhere in Concord. The fee may be updated by the City Council from time-to-time depending on development costs and market analysis. The money collected from in-lieu fees must only be used to support affordable housing developments and/or fund administrative tasks that support fair housing practices for affordable units.

The applicant may decide to build off-site units to satisfy all or some of the required units subject to the Inclusionary Housing Program. The applicant may either acquire and refurbish two existing multifamily units for every required inclusionary unit from their proposed project, or construct new affordable units on another property for each required inclusionary unit. If applicants choose to build off-site units, they may partner with a non-profit affordable housing developer. Approval, disapproval, and waiver authority of proposed off-site alternatives rest with the final review authority of the proposed project.

The Inclusionary Housing Program provides development incentives for projects subject to the inclusionary housing requirements. The City Council and City Manager, as indicated by CMC Section 18.185.040, may approve incentives proposed by the applicant. Incentives may take the form of financial assistance, density bonuses, modifications to zoning and/or development standards, deferral of processing fees, and an expedited processing of development applications.

All affordable units built or funded by the Inclusionary Housing Program must prioritize qualified purchases or renters who live or work within Concord.

Density Bonus Program

The Density Bonus Program (CMC Section 18.185.050) allows increased housing densities with a corresponding increase in affordable housing units. The City's adopted ordinance is currently outdated, and the City implements the Density Bonus Program in accordance with the requirements outlined in State law (**Table 16**). Through **Program 11, Incentives to Assist in Development**, the City will update its CMC Density Bonus ordinance to ensure consistency with State law. An applicant may use bonuses set forth in either the Density Bonus Program or those specified by the Transit Station Overlay District, but not both. Bonuses under the Density Bonus Program range from 5% to 35% over the maximum residential density otherwise permitted, depending on the level of affordability, the percentage of units that are affordable, and the inclusion of child care facilities in the development project.

Table 16
Percentage of Affordable Units and Corresponding Density Bonus

<i>Very Low-Income Households Earning <50% AMI</i>		<i>Low-Income Households Earning <80% AMI</i>		<i>Moderate-Income Households Earning 120% AMI Persons/Families in Common-Interest Development</i>	
<i>Percent Units Set Aside as Very Low-Income Units</i>	<i>Percentage Density Bonus</i>	<i>Percent Units Set Aside as Low-Income Units</i>	<i>Percentage Density Bonus</i>	<i>Percent Units Set Aside as Moderate-Income Units</i>	<i>Percentage Density Bonus</i>
5%	20.0%	10%	20.0%	10.0%	5.0%
6%	22.5%	11%	21.5%	11.0%	6.0%
7%	25.0%	12%	23.0%	12.0%	7.0%
8%	27.5%	13%	24.5%	13.0%	8.0%
9%	30.0%	14%	26.0%	14.0%	9.0%
10%	32.5%	15%	27.5%	15.0%	10.0%
11%	35.0%	16%	29.0%	16.0%	11.0%
—	—	17%	30.5%	17.0%	12.0%
—	—	18%	32.0%	18.0%	13.0%
—	—	19%	33.5%	19.0%	14.0%
—	—	20%	35.0%	20.0%	15.0%
—	—	—	—	21.0%	16.0%
—	—	—	—	22.0%	17.0%
—	—	—	—	23.0%	18.0%
—	—	—	—	24.0%	19.0%
—	—	—	—	25.0%	20.0%
—	—	—	—	26.0%	21.0%
—	—	—	—	27.0%	22.0%
—	—	—	—	28.0%	23.0%
—	—	—	—	29.0%	24.0%
—	—	—	—	30.0%	25.0%
—	—	—	—	31.0%	26.0%
—	—	—	—	32.0%	27.0%
—	—	—	—	33.0%	28.0%

Table 16
Percentage of Affordable Units and Corresponding Density Bonus

<i>Very Low-Income Households Earning <50% AMI</i>		<i>Low-Income Households Earning <80% AMI</i>		<i>Moderate-Income Households Earning 120% AMI Persons/Families in Common-Interest Development</i>	
<i>Percent Units Set Aside as Very Low-Income Units</i>	<i>Percentage Density Bonus</i>	<i>Percent Units Set Aside as Low-Income Units</i>	<i>Percentage Density Bonus</i>	<i>Percent Units Set Aside as Moderate-Income Units</i>	<i>Percentage Density Bonus</i>
—	—	—	—	34.0%	29.0%
—	—	—	—	35.0%	30.0%
—	—	—	—	36.0%	31.0%
—	—	—	—	37.0%	32.0%
—	—	—	—	38.0%	33.0%
—	—	—	—	39.0%	34.0%
—	—	—	—	40.0%	35.0%

AMI = area median income

Note: Density Bonus ordinance shall be amended to be consistent with State law. The City currently follows State density bonus law in the event of any conflict with its local density bonus ordinance.

Affordable Housing Incentive Program

The Affordable Housing Incentive Program (CMC Section 18.185.060) includes additional incentives for projects incorporating affordable units and permits density bonuses above those provided under CMC Section 18.185.050, in accordance with the Concord Housing Element. CMC Section 18.185.060 is only applicable in specified districts where high-density multifamily housing and residential mixed-use development are permitted. The provisions of CMC Section 18.185.060 are intended as an alternative to those in CMC Section 18.185.050 for qualifying projects, and the two provisions cannot be combined to exceed the highest density possible under either program independently. The purpose of the Affordable Housing Incentive Program is to provide incentives above and beyond those offered by the density bonus to encourage the development of affordable and mixed-income housing, consistent with the Concord Housing Element. All incentives provided by the Affordable Housing Incentive Program supersede the bonuses and incentives offered by the Transit Station Overlay District. The Airport Overlay District supersedes all incentives in the Affordable Housing Incentive Program. The Affordable Housing Incentive Program only applies to residential projects within the following zones: RM, RH, CO, NC, CMX, DMX, and DP. Projects must also satisfy one of the following criteria (CMC Section 18.185.060):

- For rental projects, at least 20% of the units in the project must be affordable to very low-income households. Another 20% must be either affordable to low or very low-income households. The total percentage of affordable units in the project must be at least 40%.
- For for-sale projects, at least 20% of the units must be affordable to low- or very low-income households. Another 20% must be affordable to households earning up to the area-wide median income (e.g., 100% AMI). The total percentage of affordable units in the project must be at least 40%.

- A minimum parcel area of at least 10,000 square feet (prior to any subdivision associated with the proposed project) is required for a project to be eligible for the provisions of this section.

The Affordable Housing Incentive Program provides for increased density and floor area standards, as shown in **Table 17**.

Table 17
Affordable Housing Incentive Program Density and Floor Area Standards

<i>Zone</i>	<i>Maximum Base Density (Specified in Division II of this Title)</i>	<i>Modified Density for Qualifying Projects</i>	<i>Maximum Base FAR (Specified in Division II of this Title)</i>	<i>Modified FAR for Qualifying Projects</i>
RM	1 unit per 1,360 SF lot area (32 DU/AC)	1 unit per 970 SF lot area (40% bonus)	N/A	N/A
RH	1 unit per 435 SF lot area (100 DU/AC)	1 unit per 300 SF lot area (45% bonus)	N/A	N/A
NC	1 unit per 1,815 SF lot area (24 DU/AC)	1 unit per 1,300 SF lot area (40% bonus)	0.35	1.0
CO	1 unit per 1,360 SF lot area (32 DU/AC)	1 unit per 970 SF lot area (40% bonus)	1.0	1.4
CMX	1 unit per 1,090 SF lot area (40 DU/AC)	1 unit per 750 SF lot area (45% bonus)	1.0	1.5
DMX	1 unit per 435 SF lot area (100 DU/AC)	1 unit per 300 SF lot area (45% bonus)	6.0	6.0
DP	1 unit per 435 SF lot area (100 DU/AC)	1 unit per 300 SF lot area (45% bonus)	4.0	4.0
TS Overlay	Add 25% to base densities above	Where 40% bonus is indicated above, replace with 50%. Where 45% bonus is indicated above, replace with 55%.	Add 25% to base FAR above	Add 20% to base FAR above

Source: CMC Section 18.185.060

FAR = floor area ratio; SF = square feet; DU/AC = dwelling units per acre; N/A = not applicable

The Affordable Housing Incentive Program provides for lot area and dimension standard alternatives as seen in **Table 18**.

Table 18
Affordable Housing Incentive Program Lot Dimension Standards

<i>Zone</i>	<i>Base Minimum Lot Size (as Specified in Division II of this Title)</i>	<i>Modified Minimum Lot Size for Qualifying Projects</i>	<i>Base Minimum Lot Width (as Specified in Division II of this Title)</i>	<i>Modified Minimum Lot Width for Qualifying Projects</i>	<i>Base Minimum Lot Depth (as Specified in Division II of this Title)</i>	<i>Modified Minimum Lot Depth for Qualifying Projects</i>
RM	1,920 (detached) 1,440 (attached)	1,800 (detached) 1,200 (attached)	24 feet (detached) 18 feet (attached)	22 feet (detached) 16 feet (attached)	80 feet (detached) 60 feet (attached)	70 feet (detached) 50 feet (attached)
RH	5,000	4,000	50 feet	40 feet	100	80 feet
NC	10,000	10,000	100 feet	100 feet	100 feet	100 feet
CO	10,000	5,000	100 feet	50 feet	100 feet	80 feet
CMX	10,000	5,000	100 feet	50 feet	100 feet	80 feet
DMX	10,000	5,000	100 feet interior 110 feet corner	50 feet interior 60 feet corner	100 feet	80 feet
DP	5,000	4,000	50 feet interior 60 feet corner	40 feet interior 50 feet corner	100 feet	80 feet
TS Overlay	N/A	N/A	N/A	N/A	N/A	N/A

Source: CMC Section 18.185.060

N/A = not applicable

The Affordable Housing Incentive Program provides for lot coverage standard alternatives for qualifying projects within the RM and RH zones, as seen in **Table 19**.

Table 19
Affordable Housing Incentive Program Lot Coverage Standards

<i>Zone</i>	<i>Base Maximum Lot Coverage (as Specified in Division II of this Title)</i>	<i>Modified Maximum Lot Coverage for Qualifying Projects</i>
RM	60% (detached) 80% (attached)	70% (detached) 85% (attached)
RH	75%	85%

Source: CMC Section 18.185.060

The Affordable Housing Incentive Program provides for height standard alternatives, as seen in **Table 20**.

Table 20
Affordable Housing Incentive Program Maximum Height Standards

<i>Zone</i>	<i>Base Maximum Height (as Specified in Division II of this Title)</i>	<i>Modified Maximum Height for Qualifying Projects</i>
RM	4 stories/40 feet	45 feet
RH	6 stories/60 feet	75 feet
NC	40 feet	45 feet
CO	30 feet	45 feet
CMX	30 feet	45 feet
DMX	200 feet	200 feet
DP	70 feet	85 feet
TS Overlay	N/A	Add 20% to figures above

Source: CMC Section 18.185.060

N/A = not applicable

The Affordable Housing Incentive Program provides for open space standard alternatives, as seen in **Table 21**.

Table 21
Affordable Housing Incentive Program Open Space Standards

<i>Zone</i>	<i>Base On-Site Open Space Square Feet per Unit (as Specified in Division II of This Title)</i>	<i>Modified On-Site Open Space/Unit for Qualifying Projects</i>	<i>Modified On-Site Open Space/Unit for Qualifying Projects if within 500 Feet of a Public Park 1 Acre or Larger</i>
RM	200 SF/unit, 60 SF of which must be private	175 SF/unit, 60 SF of which must be private	150 SF/unit, 60 SF of which must be private
RH	200 SF/unit, 60 SF of which must be private	125 SF/unit, 50 SF of which must be private	100 SF/unit, 40 SF of which must be private
NC	200 SF/unit, 60 SF of which must be private	150 SF/unit (private and/or common)	125 SF/unit (private and/or common)
CO	200 SF/unit, 60 SF of which must be private	150 SF/unit (private and/or common)	125 SF/unit (private and/or common)
CMX	200 SF/unit, 60 SF of which must be private	150 SF/unit (private and/or common)	125 SF/unit (private and/or common)
DMX	200 SF/unit, 60 SF of which must be private	100 SF/unit (private and/or common)	75 SF/unit (private and/or common)
DP	200 SF/unit, 60 SF of which must be private	100 SF/unit (private and/or common)	75 SF/unit (private and/or common)

Table 21
Affordable Housing Incentive Program Open Space Standards

<i>Zone</i>	<i>Base On-Site Open Space Square Feet per Unit (as Specified in Division II of This Title)</i>	<i>Modified On-Site Open Space/Unit for Qualifying Projects</i>	<i>Modified On-Site Open Space/Unit for Qualifying Projects if within 500 Feet of a Public Park 1 Acre or Larger</i>
TS Overlay	No further reduction beyond what is specified above	No further reduction beyond what is specified above	No further reduction beyond what is specified above

Source: CMC Section 18.185.060

SF/unit = square feet per unit; SF = square feet

The Affordable Housing Incentive Program provides for parking standard alternatives, as seen in **Table 22**.

Table 22
Affordable Housing Incentive Program Parking Standards

<i>Bedroom Count</i>	<i>Base Parking Standards</i>	<i>Modified Parking Standards for Qualifying Affordable Housing Developments</i>	<i>Modified Parking Standards for Qualifying Affordable Housing Developments within 0.5 Miles of BART</i>
Studio	1	0.67	0.5
1 bedroom	1.5	1	0.75
2 bedroom	2	1.5	1
3+ bedroom	2.5 spaces, plus 0.5 space for each additional bedroom above 3	1.75 spaces plus 0.25 spaces for each additional bedroom above 3	1.25 spaces plus 0.25 spaces for each additional bedroom above 3
Guest spaces	1 space for each four units	None required	None required
TS Overlay	Can reduce above requirements by 25%	Can reduce above requirements as noted in the last column of this table	N/A

Source: CMC Section 18.185.060

BART = Bay Area Rapid Transit; N/A = not applicable

The Affordable Housing Incentive Program provides setback incentives for all qualified projects. Setbacks may be reduced up to 20% of the base zoning requirement. Particularly, in the DMX zone, the Affordable Housing Incentive Program provides up to a 50% reduction in the front setback.

These modifications of developmental standards may be provided by the Affordable Housing Incentive Program or otherwise requested by the applicant to the review authority. All projects proposed within 300 feet of a low-density residential zoning district that are taking advantage of the Affordable Housing Incentive Program must host a neighborhood meeting and perform proper notification.

Contra Costa County Measure L

In 1990, Contra Costa County voters approved an Urban Limit Line (ULL) as a strategy aimed to conserve open space and prime farmland by limiting the extent of adjacent urban development in areas of the county. This is achieved through the creation of a line declaring the maximum extent of urban growth along the boundaries of conserved open space. In 2006, voters again approved the ULL through Measure L, which preserved the boundaries of the ULL until 2026. Further, the measure required the

County of Contra Costa to perform a jobs and housing study in 2016 to determine if the area within the ULL was adequate to support the needed economic and housing growth of the region. The study confirmed that the ULL was not a constraint to anticipated growth through 2036. The ULL is not a constraint to housing in Concord because the entire city, including the CRP area, is contained within the current boundaries of the ULL. Although the ULL prevents the City from annexing some areas along its southeastern boundary, these areas are already not developable due to steep slopes or their location within State or regional parks or other protected open space. Therefore, Measure L is not a constraint to housing because it does not prevent the use of developable land in Concord, and it focuses future growth across Contra Costa County within more developed areas.

Non-Governmental Constraints

Non-governmental constraints are barriers to building housing that the City has less control over but can influence or help support greater changes to. Examples include market constraints related to the availability of financing; the costs of land, labor, and construction; and construction timelines; as well as environmental constraints such as biological resources.

Market Constraints

Construction Financing

Construction financing costs also affect the feasibility of building new housing. During the housing boom of the late 1980s, it was not uncommon for developers to receive construction loans for 100% or more of a project's estimated future value. Following the housing market downturn of the early 1990s, however, financial institutions tightened regulations for construction loans, often requiring developers to put up at least 25% of the project value. These trends continue today, meaning that developers must usually supply at least 25% of the project value upfront, and perhaps more if the total cost exceeds 75% of the estimated value of the project.

Although there is no hard threshold for how much required up-front equity (cash) is too much before a residential project would be infeasible, the higher the proportion of equity required, the more unlikely that a developer would proceed with the project due to a higher degree of risk. Not only would it require more up-front cash, but higher equity contribution means a project must be able to achieve an even higher value at completion in order to generate the cash flow needed to meet acceptable cash-on-cash returns. These trends are anticipated to continue during the planning period.

Mortgage Financing

Home mortgage interest rates are a function of the national economy and personal credit ratings. Low rates make buying housing attractive to prospective homebuyers by decreasing monthly mortgage payments; increased rates create differences in the monthly mortgage payment by as much as a few hundred dollars for each interest point.

The Home Mortgage Disclosure Act mandates that lending institutions disclose information on the disposition of loan applications and the income, gender, and race of loan applications. **Table 23** summarizes the disposition of loan applications submitted to financial institutions in 2020 for home purchase, refinance, and home improvement loans in Concord. The loan outcome information in Table 23 includes the number of applicants who were approved, were denied, or were incomplete or withdrawn by the applicant.

Table 23
Disposition of Home Loans

<i>Loan Type</i>	<i>Total Applicants</i>	<i>Total Approved¹</i>	<i>Total Denied</i>	<i>Other²</i>
Government-Backed Purchase	258	204	11	43
Conventional Purchase	2,028	1,602	131	295
Refinance	12,714	8,934	1,076	2,704
Home Improvement	510	260	180	70
Total	15,510	11,000	1,398	3,112

¹ Approved includes loans approved by the lenders whether or not accepted by the applicant.

² Other includes loan applications that were either withdrawn or closed for incompleteness.

Land and Construction Costs

Land costs are a major contributor to overall housing production prices. Land costs make up 10% to 30% of housing costs. Land in some areas costs more than others based on the availability of services, neighborhood quality, distance to business and commercial centers, and other factors. In comparison, multifamily and mixed-use properties are likely more expensive on a per-square-foot basis and on a per-unit basis when cost as a percentage of total value is considered.

Construction costs include both “hard” and “soft” costs. Hard costs, such as labor and materials, typically account for 50% to 70% of construction costs, while soft costs, such as architectural and engineering services, development fees, construction financing, insurance, and permitting, typically average around 20% to 30% of total costs, although they can be higher for subsidized affordable housing or complex projects. A significant cost factor associated with residential building involves the cost for building materials. These can vary widely depending on the size of units and the quality of amenities offered (such as grade of carpeting and tiles, appliances and light fixtures, quality of cabinetry and woodwork, fireplaces, and other amenities). It is estimated that material costs have increased faster than inflation in recent years. From 2017 to 2020, the cost of raw materials (i.e., concrete, lumber, and steel) increased by approximately 20%, and during 2020, a shortage of materials was brought on by the global pandemic causing increases in costs and delays in product deliveries. Further, tariffs and trade issues can increase material costs.

For multifamily attached units, developers can usually benefit from economies of scale, with discounts for materials and diffusion of equipment mobilization costs. These costs can account for more than half of the total construction cost. According to Building Valuation Data released in 2019, the national average for development costs per square foot for apartments and single-family homes in 2019 were as follows:

- Type I or II, Multifamily: \$148.82 to \$168.94 per square foot
- Type V Wood Frame, Multifamily: \$113.88 to \$118.57 per square foot
- Type V Wood Frame, One- and Two-Family Dwelling: \$123.68 to \$131.34 per square foot

The costs of design, regulation, and operations do not vary much by building size, so larger buildings allow developers to spread these fixed costs over more apartments. In general, construction costs can be lowered by increasing the number of units in a development, reflecting economies of scale in multifamily construction until the scale of the project requires a different construction type that requires a higher per-square-foot cost. This is because construction costs change substantially depending on the building type. For example, high-rise concrete apartments might cost \$75 or more per square foot more than a six-story wood-frame structure on a concrete podium. Apartments four stories or fewer can typically achieve an

economy of scale, provided that the building has typical amenities and no structured parking. However, for smaller-scale and affordable or middle-income housing, onerous regulations can impose a significant burden. Because of the jump in construction costs, developers may not build to the maximum height or FAR. Mobile homes are significantly less expensive, as are precision- and factory-built housing products.

Labor costs also greatly contribute to construction costs. They are generally two to three times the cost of construction materials. A 2019 study for Smart Cities Preval found that California has lost about 200,000 construction workers since 2006. Many lost their job during the recession and found work in other industries. Pre-pandemic, the industry already faced this historic shortage of skilled labor, and the labor gaps might get even larger. California's shortage of needed construction workers, combined with rising prices in construction materials, also contribute to driving up construction costs.

Environmental Constraints

A number of environmental factors in Concord affect the character and density of development. These include natural resources, hazards, and safety concerns. Water supply and soils in Concord, as well as earthquake and flood risks, are addressed below.

Seismic and Geologic Concerns

One of the seismic concerns is in regard to potential disruption of water transportation through Contra Costa Water District (CCWD) infrastructure. The Concord Green Valley, Mt. Diablo, and Greenville Faults lie within the CCWD service area. The Concord Green Valley Fault intersects the boundary of Concord, and the Greenville Fault lies west of Los Vaqueros Reservoir in the eastern portion of the CCWD service area. There are other potential seismic sources, such as the Coastal Range Sierra Block Zone, and the Calaveras, Hayward, and San Andreas Faults. CCWD facilities within the Treated Water Service Area include a pipeline (transmission and distribution), pump stations, and storage facilities, which would experience a range of strong to severe shaking from earthquakes. Untreated water facilities in the eastern portions of the CCWD's service area include water treatment plants, untreated water conveyance facilities (canal, pipeline, and pump stations), intakes, and the Contra Loma and Los Vaqueros Reservoirs. While there is a potential risk to water supply during an extreme seismic event, not all facilities are at high risk, and the CCWD has taken precautions to avoid any potential damage and has emergency protocols during any such event to get water to residents until repairs are made.

The City has adopted the California Building Code, which has provisions to ensure new construction is built to sustain shock from seismic activity. A Special Studies Zone has been designated along the Concord Fault, and there are limitations on construction within this area to protect life and property. The Local Hazard Mitigation Plan recognizes earthquakes as the largest natural threat to Concord; however, there have been no building permits approved in high seismic severity zones in the past 3 years. The Local Hazard Mitigation Plan also recognizes landslide and liquefaction as moderate threats to Concord. Most of the risk potential exists in the steeper sections of Concord near the CRP area. However, the CRP will likely take into account these potential hazards and incorporate mitigation during build-out. Most of the existing hillside areas are zoned for open space, and the General Plan restricts residential development on slopes greater than 30%. Hillsides are generally considered to be environmentally constrained due to the complicated terrain and high costs to render the site safe and adequate for development.

Flooding

Although the Joint Hazard Mitigation Plan lists flooding as a moderate threat to Concord, there are areas of Concord designated within 500-year floodplains and 100-year floodplains. Most of these areas are along

existing creeks and waterways. This poses an environmental constraint as developments are at high risk of being damaged. As a result, most of the properties within the flood zones are not zoned for residential.

The City has adopted a Flood Management Ordinance and a Stormwater Management and Discharge Control Ordinance to manage stormwater runoff. General Plan policies require adequate building setbacks for development adjacent to creek banks and engineering standards that protect against flooding. Other policies are also in place to reduce the potential impacts associated with stormwater runoff due to new or increased intensity of urban land uses. The Safety and Noise Element and the Public Facilities and Utilities Element of the General Plan provide details on flood risk reduction policies.

Infrastructure Constraints

With the exception of the CRP area, residential development during this 6th Cycle Housing Element will primarily occur on previously developed properties, or in locations surrounded by developed areas, as described in Appendix E. Therefore, access to infrastructure, including water, sewer, and dry utilities, is available at these sites or will be accommodated. The Master Developer of the CRP must create an Infrastructure Plan and ensure new development is served by all utilities. The City's utilities receive necessary upgrades and improvements based on future growth and development anticipated by the General Plan.

Electricity and Natural Gas

Pacific Gas & Electric (PG&E) currently provides gas and electric services to Concord homes and businesses and is regulated by the California Public Utilities Commission. PG&E obtains its energy supplies from power plants and natural gas fields in Northern California, and supplies are delivered through high-voltage transmission lines. Electrical power is provided to Concord from various distribution feeders located throughout Concord. The availability of electricity and gas is adequate for this planning period, as developments within the City's limits are in range of existing utility lines. Therefore, constraints in electricity or gas for new residential developments are unlikely. Where developments are found to have an inadequate supply of power, PG&E may increase demand from power plants and natural gas fields, or additional electrical substations may be built. With exception to the CRP area, residential development during this 6th Cycle Housing Element will primarily occur on previously developed properties, or in locations surrounded by developed areas, as described in Appendix E. The Master Developer of the CRP must create an Infrastructure Plan and ensure new development is served by all utilities. The City's utilities receive necessary upgrades and improvements based on future growth and development anticipated by the General Plan.

Water Supply and Service

Concord is within the CCWD service area, which serves approximately 500,000 residents. The primary source of water for the CCWD is the Sacramento–San Joaquin Delta, which collects water from the Sierra Nevada range that is transported through the Sacramento and San Joaquin Rivers. Water is stored locally in the Los Vaqueros Reservoir south of Brentwood, the Contra Loma Reservoir in Antioch, the Mallard Reservoir in Concord, and the Martinez Reservoir in Martinez. According to the Contra Costa Urban Water Management Plan, water service is purchased and supplied primarily through the Central Valley Project, which provides up to 195,000 acre-feet per year. The CCWD charges new service fees of approximately \$30,000 for new single-family units and \$12,000 for new ADUs, attached or detached. The new service fees for single-family units include a facility reserve charge, service line charge, and meter charge. The new service fee for attached or detached ADUs include a facility reserve charge and meter charge, but not a service line charge. While these fees constrain new residential developments, it

incentivizes the development of ADUs. The next largest source of water is recycled water. There are few local supply sources or groundwater sources that meet quality standards. Due to the heavy reliance on imported water, Concord's allotment is vulnerable during drought years. Water use within the CCWD service area is modeled to increase steadily through the Urban Water Management Plan planning period ending in 2045. The County of Contra Costa's projections pay special attention to the Regional Housing Needs Allocations and expected low-income housing water usage, as well as the effects of climate change over time. The County of Contra Costa recognizes that the water supply from the Delta is declining in quality and quantity. In response, the CCWD has instated a drought contingency plan to lower water usage among its clients.

The CCWD continues to work collaboratively with municipalities in its service area to encourage recycled water use in future development projects. For example, the Concord Reuse Plan proposes to redevelop approximately 5,000 acres within CCWD's Treated Water Service Area. The CCWD worked with the City throughout the planning process to incorporate significant water conservation measures, low-water-demand development, and recycled water standards into the Concord Reuse Plan. It is estimated that the project will use recycled water in an amount equal to or greater than the net potable water demand. The expected increase in recycled water uses due to build-out of the Concord Reuse Plan amounts to approximately 2,800 acre-feet per year. With consideration for the low-income population, infill housing, and the CRP, the CCWD foresees no constraints on supplying adequate water to meet the demand growth through 2045. Through **Program 23, Water and Sewer Priority for Affordable Housing**, the City's Public Works Department will coordinate with the CCWD to ensure water infrastructure and capacity is considered for future new and affordable residential developments.

Sewers

As detailed by the City's Sewer System Management Plan, the City owns, operates, and maintains its own wastewater collection system, which is a network of gravity sewers consisting of approximately 344 miles of pipelines, 7,140 manholes, and 3 siphons. While the system services both the cities of Concord and Clayton, the Sewer System Management Plan covers only the Concord-owned assets, and anticipates expansion with the development of infill sites and the CRP. Wastewater generated within Concord is treated by the Central Contra Costa County Sanitation District via a line relief interceptor and gravity-flow connection between the City's sewage pump station and the Central Contra Costa County Sanitation District line in Martinez. The Central Contra Costa County Sanitation District's treated water distribution system consists of more than 800 miles of pipelines, 40 storage reservoirs with a total capacity of 72 million gallons, and 30 pump stations. Given the projected demand and the existing remaining treatment capacity, future developments' treatment demand can be met by the service provider. The current capacity of the treatment system is greater than the expected demand in 2035. Expansion or construction of a new wastewater treatment facility to meet the demands of the 2023–2031 Housing Element is not required by the City of Concord. The Central Contra Costa County Sanitation District charges a one-time sewerage hook-up fee of just over \$5,000 per unit and up, depending on size, location, and height of the ground. An annual Sewer Service Charge is collected for each property connected to the sewer system at a residential rate of \$660 per year for single-family units and \$625 per year for multifamily units. Both the water and sewerage connection fees, as well as subsequent service charge fees, may be a disincentive and constraint for the construction and maintenance of new housing units.

Stormwater

The City's Public Works Department provides maintenance of storm drainage facilities, including creeks, channels, and piped storm drainage systems. The City is one of 21 agencies that form the Contra Costa Clean Water Program, as well as one of the 76 local agencies that are subject to the Municipal Regional Storm Water Permit for the San Francisco Bay Area. As a requirement of the Municipal Regional Storm Water Permit, permittees are required to develop a Green Infrastructure Plan to mitigate adverse effects of urbanization in water quality of runoff. The information detailed in the City's Stormwater Green Infrastructure Plan, per Provision C.3 of the Municipal Regional Storm Water Permit, requires that new development and redevelopment projects on public or private lands minimize the area of new roof and pavement, and that pervious materials be used to allow for runoff to infiltrate underlying soils. This is one example of low-impact development of the Green Infrastructure Plan, with others including bioretention, harvest and reuse, and infiltration basins. In addition to the City's local facilities, the Contra Costa County Flood Control and Water Conservation District (Flood Control District) operates and maintains connections to its regional drainage facilities. The City works with the Flood Control District in making local drainage plans and improvements. The existing storm drain infrastructure can accommodate the projected runoff from the potential residential development anticipated for this planning cycle and does not pose a constraint. The projected stormwater runoff is not anticipated to significantly increase with future residential development given the nature and extent of existing impervious surfaces within Concord, as well as requirements set forth by the Green Infrastructure Plan to minimize runoff. Further, Title 16 Chapter 5 of the CMC establishes requirements for development and redevelopment to integrate low-impact-development practices that reduce stormwater runoff.

Analysis of Local Efforts to Remove Constraints

The City comprehensively amended its Development Code in 2012, the first amendment of that scale in approximately 50 years. The new Development Code brought the City's zoning districts and standards into alignment with housing typology of the current market demand. This update included greater clarity on standards for multifamily and affordable housing, as well as a restructuring of each zoning district and relative uses and associated standards. By pairing zoning districts with modern design styles and housing types, the City is better positioned to effectively process project applications rather than the challenging implementation of the Planned District process. Since the adoption of the Development Code in 2012, the City has adopted various amendments and tracked greater progress toward meeting General Plan goals.

The City has made strides to reduce constraints to development that are within the City's purview since the Housing Element was last updated in 2014. Reductions to constraints during the 5th Cycle Housing Element include the following, as described in City Staff Reports:

- H-1.4.2: Allow secondary units in the single-family districts in accordance with State law.
 - In October 2019, the City was awarded \$310,000 in State SB 2 Planning Grants Program funds to encourage the construction of Accessory Dwelling Units ("ADUs") in Concord by offering pre-approved architectural plans to the public and a streamlined approval process through the City's Planning Division. In late 2020, a Request for Proposals was issued to engage a design firm to create the architectural plans for the City in 2021 for launch in 2022. In the summer of 2021, the City adopted an ADU ordinance to codify ADU regulations consistent with, and more permissive than, State law.

- H-1.9.2: Continue to offer a centralized, one-stop counter for permit processing to streamline the development process.
 - In 2020, the Community Development Department implemented a number of measures during the COVID-19 pandemic to minimize barriers for applicants accessing local government services. Notably in 2020, the City implemented a Virtual Permit Center in order to allow most permit applications and payments to be submitted online. Staff expects this to streamline the permit process both during the continued pandemic, and when operations return to normal.
- H-1.4.3: Review the development codes as it related to secondary units and consider amendments to make the development of secondary units more feasible.
 - Through this program the City created an information handout/FAQ explaining the types of secondary units allowed by ministerial permit. And in the summer of 2021, the City adopted an ADU ordinance to codify ADU regulations consistent with and more permissive than State law.
- H-1.4.4: Work with the Contra Costa Water District to reduce facility reserve charges for small Accessory Dwelling Units, in an effort to add to the City's affordable housing inventory.
 - The City was able to reduce fees from the County's Water District twice during the 5th Cycle. The latest fee reduction was in 2018 in response to updates to State law related to ADUs. This program has been effective in removing constraints associated with secondary units as approximately 123 ADUs were built or permitted since initial fee reductions in 2016.
- H-1.5.3: Promote parcel consolidation to facilitate the assembly of new housing sites.
 - Through the Downtown Specific Plan (DSP), the City identified opportunity sites and parcels that may be consolidated for site development. During the 5th Cycle, the City approved several parcel consolidation projects which resulted in approximately 471 units in Downtown.
- H-2.1.1: Utilize public funds to provide assistance in the rehabilitation and conservation of deteriorated single-family homes, multifamily developments, and mobile homes.
 - In addition to supporting development, through this program, the City also assisted in the rehabilitation and preservation of 186 multifamily units and 148 single-family units affordable to lower-income households by providing \$2.9 million dollars in funds.

In addition to removing constraints to development during the 5th Cycle, the City also incentivized development through implementation of locally adopted ordinances, such as its Affordable Housing Incentive Program, and through the implementation of the DSP. During the 5th Cycle, there were approximately 425 affordable units and 1,089 market rate units built in the DSP area. Although programs from the 5th Cycle have been successful in removing constraints to development, the development through the 5th Cycle did not achieve the greater Regional Housing Needs Allocation objective of 3,478 units. For more information on the review of 5th Cycle programs, see **Appendix A, Review of 5th Cycle Programs**. The following 6th Cycle programs are primarily informed by this analysis and as identified throughout this appendix, and will remove constraints to development, including affordable housing and special needs housing:

- Through **Program 2, Addressing Constraints to Development**, the City will amend the Development Code where necessary to remove constraints to the development of housing, including housing for extremely low-income households This program will ensure that a variety of housing types are permitted per the State law.

- Through **Program 5, Affordable Housing Streamlining**, the City will continue to process SB 35 applications consistent with State law. In addition, the City will amend the Development Code, application forms, and procedures for consistency with any future changes to State law. This program will assist in developments for extremely low-, very low-, low-, and moderate-income households by removing constraints in the permitting process.
- Through **Program 9, Middle Density**, the City will provide a reduction of development standards in exchange for small-lot, medium-density residential development throughout the planning period. The provisions of SB 9 will be implemented to establish ministerial review procedures for proposed lot splits of existing single-family residential lots.
- Through **Program 15, Objective Design Standards**, the City will require that any new design standards developed and imposed by the City are objective without involvement of personal or subjective judgement by a public official, and will be uniformly verifiable by reference to the City’s regulations in accordance with the requirements of the Housing Crisis Act of 2019.
- Through **Program 22, Support for People Experiencing Homelessness**, the City will remove any constraints that adversely affects people experiencing homelessness or are in need of supportive housing. This program will amend the Development Code to be consistent with State requirements, and includes provisions to allow supportive housing, emergency shelters, and Low-Barrier Navigation Centers as by-right in mixed-use zones or not to be subject to the Design and Site Review process.
- Through **Program 23, Water and Sewer Priority for Affordable Housing**, the City will ensure that water and sewage capacity will not be a constraint to the future development of affordable residential housing by coordinating with the Contra Costa Water District on the City’s 6th Cycle goals.

Further details on these programs can be found in the “Program Implementation” section of the Housing Element.

Non-governmental constraints are generally market driven and outside the control of local government; however, the City can take action to help alleviate some of these constraints in the form of regulatory relief and increased certainty in the development process. The policies and programs set forth in the 6th Cycle Housing Element demonstrate the City’s commitment to the reduction of barriers to development while protecting other interests, such as quality of life, parks and open space, and local resources.

Quantified Objectives

Table 24 summarizes the quantifiable objectives outlined in the Housing Element.

Table 24
Summary of Quantifiable Objectives

<i>Income/Affordability Category</i>	<i>RHNA</i>	<i>New Construction</i>	<i>Units to be Rehabilitated¹</i>	<i>At-Risk Units to be Preserved²</i>
Extremely Low/ Very Low	1,292	375	150	767
Low	744	594	150	0
Moderate	847	847	0	0

Above Moderate	2,190	2,190	0	0
Total	5,073	4,006	300	767

¹ Based on rehabilitation trends during the 5th Cycle planning period.

² At-risk units are those units with affordability restrictions that will expire in the next 10 years.

RHNA = Regional Housing Needs Allocation

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Appendix D: Affirmatively Furthering Fair Housing

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Introduction

State law prohibits discrimination in the development process, real property transactions, and rental agreements, and it is the policy of the City of Concord (City) to uphold the law in this regard. Fair housing issues are addressed in Concord through coordination with fair housing organizations to process complaints regarding housing discrimination and to provide counseling in tenant/property owner disputes, as further detailed within this analysis.

Assembly Bill 686 requires that all Housing Elements due on or after January 1, 2021, contain an Assessment of Fair Housing consistent with the core elements of the analysis required by the Federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015.

Under State law, affirmatively further fair housing means, “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

There are three components to this requirement as it relates to the Housing Element:

1. Include a program that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes (applies to housing elements beginning January 1, 2019).
2. Conduct an Assessment of Fair Housing that includes a summary of fair housing issues, an analysis of available Federal, State, and local data and local knowledge to identify fair housing issues, and an assessment of the contributing factors for the fair housing issues.
3. Prepare the Housing Element land inventory and identification of sites through the lens of Affirmatively Furthering Fair Housing.

This analysis uses data available through the U.S. Census Bureau, the AFFH Mapping Tool provided by the California Department of Housing and Community Development (HCD), the Association of Bay Area Governments (ABAG), and local data provided by the City and its partners. It should be noted that the maps provided by HCD’s AFFH Mapping Tool consider all areas at the census tract, block group, city, and county levels without consideration for the built land. For this reason, unbuilt areas or areas without housing, such as the Concord Naval Weapons Station, contain data that is not accurately representative of the built environment.

Summary of Demographics

In April 2021, ABAG and the Metropolitan Transportation Commission (MTC) released the Housing Needs Data Report for the City of Concord to inform the analysis needed for the Housing Element. The data provided by ABAG, as well as other available data, is further detailed in **Appendix B, Housing Needs Assessment**, of the Housing Element. In addition, the following information related to Concord’s demographics is further detailed in Appendix B:

- **Population.** As of 2020, Concord’s estimated population was 130,143. Concord’s population under the age of 18 was reported at 26,659, and the population 65 and older was 19,402. These age groups represent 20.6% and 15.0% of Concord’s population, respectively. Concord’s population has increased by 6.8% from 2000 to 2020, which is lower than the overall Bay Area growth rate.

- **Race/Ethnicity.** As of 2020, 48.6% of Concord’s population was White, 3.4% was African American, 13.0% was Asian, and 29.9% was Hispanic or Latinx. People of color in Concord comprise a proportion below the Bay Area’s overall proportion.
- **Employment.** Concord residents most commonly work in the Health and Educational Services industry. From January 2010 to January 2021, the unemployment rate in Concord decreased by 5.4%. Since 2010, the number of jobs located in the jurisdiction increased by 14,080 (29.7%).
- **Number of Homes.** The number of homes in Concord increased 0.5% from 2010 to 2020, which is below the growth rate for Contra Costa County and below the growth rate of the region’s housing stock during this time period.
- **Home and Rent Prices.** The largest proportion of homes had a value in the range of \$500,000 to \$750,000 in 2019. Home prices increased by 75.2% from 2010 to 2020. The typical contract rent for an apartment in Concord was \$1,570 in 2019. Rental prices increased by 44.5% from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to earn \$63,120 per year.
- **Housing Type.** In 2020, 57.9% of homes in Concord were single-family detached, 6.8% were single-family attached (e.g., townhomes), 7.3% were small multifamily (2–4 units), and 24.3% were medium or large multifamily (5+ units). From 2010 to 2020, the number of single-family units increased more than multifamily units. Generally, in Concord, the share of the housing stock that is detached single-family homes is above that of other jurisdictions in the region.
- **Displacement/Gentrification.**¹ According to research from the University of California, Berkeley, 36.3% of households in Concord live in neighborhoods that are susceptible to or experiencing displacement, and 0.0% live in areas at risk of or are undergoing gentrification. A total of 20.7% of households in Concord live in neighborhoods where low-income households are likely excluded due to prohibitive housing costs.
- **Neighborhood Resources.** A total of 11.6% of residents in Concord live in neighborhoods identified as “Highest Resource” or “High Resource” areas by State-commissioned research, while 52.9% of residents live in areas identified by this research as “Low Resource” or “High Segregation and Poverty” areas. These neighborhood designations are based on a range of indicators covering areas such as education, poverty, proximity to jobs and economic opportunities, low pollution levels, and other factors.
- **Special Housing Needs.** In Concord, 12.0% of residents have a disability of any kind and may require accessible housing. Additionally, 10.6% of Concord households are larger households with five or more people that likely need larger housing units with three bedrooms or more. And 11.4% of households are female-headed families, which are often at greater risk of housing insecurity.

Assessment of Fair Housing

¹ Gentrification occurs when historically disinvested neighborhoods experience an influx of affluent populations, resulting in higher local rents and property values and displacing existing residents and businesses. The result might not be intended, but its process could ultimately transform a neighborhood’s character, demographics, and socioeconomic integrity. Long-term residents of a community are at risk of displacement as a result of gentrification because they may not be able to afford to live in their neighborhood as property values and cost of living increase. These are often marginalized people of color and those earning lower incomes. Similarly, small and locally owned businesses may be threatened by increased economic competition from larger chains. Gentrification can be considered a negative byproduct of redevelopment and revitalization.

Fair Housing Enforcement and Housing Outreach Capacity

The 2020 Analysis of Impediments to Fair Housing Choice for the Contra Costa County Consortium serves as the fair housing planning document for the cities of Antioch, Concord, Pittsburg, and Walnut Creek, and Contra Costa County, as well as the Housing Authorities of Contra Costa County, Richmond, and Pittsburg. As a part of the consolidated planning process, entitlement communities that receive Community Development Block Grants, HOME Investment Partnerships, Emergency Shelter Grants, and Housing Opportunities for Persons with AIDS funds are required to certify to the U.S. Department of Housing and Urban Development (HUD) that they are affirmatively furthering fair housing. The Contra Costa County Consortium is a joint effort to prepare, conduct, and submit to HUD its certification for AFFH, which is presented in the Analysis of Impediments to Fair Housing Choice.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor. The Analysis of Impediments examines local housing conditions, economics, policies, and practices to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The Analysis of Impediments assembles fair housing information, identifies existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

There are several organizations in the Contra Costa County Consortium communities that provide fair housing services, including outreach and education, complaint intake, and testing and enforcement activities, for both providers and consumers of housing. These organizations include HUD; the California Department of Fair Employment and Housing, which is substantially equivalent to HUD in the State; and the Eden Council for Hope and Opportunity (ECHO), which conducts fair housing testing and provides counseling, mediation, and education in Concord and other cities in Contra Costa County (except Pittsburg) and unincorporated Contra Costa County. In addition, the City contracts with ECHO for fair housing services, and ECHO also operates a rent review and eviction harassment program for the City of Concord. ECHO also conducts fair housing investigations and testing.

The fair housing outreach capacity of the City exists through its continued contract with ECHO. ECHO provides the following services on behalf of the City:

- **Fair Housing Tester Training** – Tester Training provides training for persons interested in assisting ECHO in uncovering housing discrimination in Concord. Testers play an integral part in helping ECHO investigate complaints of housing discrimination. Testers are trained to pose as home seekers, collect information, and report their experiences to ECHO housing staff.
- **First-Time Home Buyer Counseling** – ECHO provides one-on-one counseling on the homebuying process. The housing counselor is responsible for reviewing all documentation collected from the potential homebuyers, examining and identifying barriers to homeownership, creating an action plan with the potential homebuyers, assessing their preparedness for the purchase, and preparing them for the responsibility of being homeowners. More specifically, the housing counselor reviews the credit report with the clients, determines what steps need to be taken to improve adverse credit, begins to develop a budget based on current income and expenses, and provides counseling on money-saving methods.

- **First-Time Home Buyer Education** – ECHO provides trainings to assist potential home buyers on the homebuying process. This includes information on how to determine if one is ready for homeownership, lender selection guidance, home shopping guidance, information on closing costs, and training on how to be a successful homeowner.
- **Rent Review and Eviction Programs** – ECHO provides a process by which residents can submit concerns as they relate to increases in rent or eviction so that complaints may be investigated.
- **Tenant/Landlord Services** – ECHO provides information to tenants and property owners on rental housing issues, such as evictions, rent increases, repairs and habitability, harassment, illegal entry, and other rights and responsibilities regarding the tenant/property owner relationship. ECHO has trained mediators to assist in resolving housing disputes through conciliation and mediation. It makes referrals to legal services for advice and representation on housing-related issues, including evictions, rent increases, repairs and habitability, and harassment. The primary objective of the program is to build awareness of housing laws and prevent homelessness.

HUD’s fair housing complaint data is provided for 2010 and 2020² and was calculated for the Contra Costa County service area. In 2020, there were seven fair housing cases, and the most common basis for a complaint was disability. Other 2020 complaints were on the basis of race and familial status. In 2010 there were 37 total cases for the Contra Costa County service area, where the most common basis for complaints were disability first and race second; other complaints were on the basis of familial status. Fair housing cases were significantly lower in 2020 than in 2010, and most notably those cases on the basis of race have dropped significantly.

Data available through HUD from 2013 to 2021 shows that within Concord there were 40 total fair housing cases reported during this period. Seven cases were on the basis of disability, three were on the basis of race, and one was on the basis of sex; all others were not categorized because they were found to not be valid, or there was a failure to respond or a decision not to pursue on behalf of the complainant. Concord experienced approximately 0.31 total inquiries per 1,000 people from 2013 to 2021, indicating a moderately low rate of complaints, where a number greater than 1 per 1,000 people would be considered high.

In addition, the following resources intended to address issues or promote compliance with housing discrimination laws and/or fair housing laws and regulations are available to City residents, including Bay Area Legal Aid, which works to eliminate housing discrimination through education, outreach, and enforcement throughout Contra Costa County. Bay Area Legal Aid provides free civil legal advice, counsel, and representation to low-income individuals, and is also the region’s leading provider of legal services to individuals who face discrimination in housing. Bay Area Legal Aid has a Richmond office to serve Contra Costa County residents. Specifically, the office helps clients make complaints to government agencies, investigates unfair treatment, advocates to property owners on behalf of tenants, and sues property owners if necessary. Bay Area Legal Aid also has “remote advocacy sites” in Antioch, Concord, and Pittsburg.

The Housing and Economic Rights Advocates is a Statewide, not-for-profit legal service and advocacy organization that provides free legal services, consumer workshops, training for professionals, and

² California Department of Housing and Community Development, AFFH Data and Mapping Resources provides total fair housing complaints for 2010 and 2020.

community organizing support. Legal services are focused on fair housing issues such as fighting discrimination in financial services, predatory lending, and problems with homeowners' associations.

Findings, Lawsuits, Enforcement Actions, Settlements, or Judgments

Compliance with Existing Fair Housing Laws and Regulations

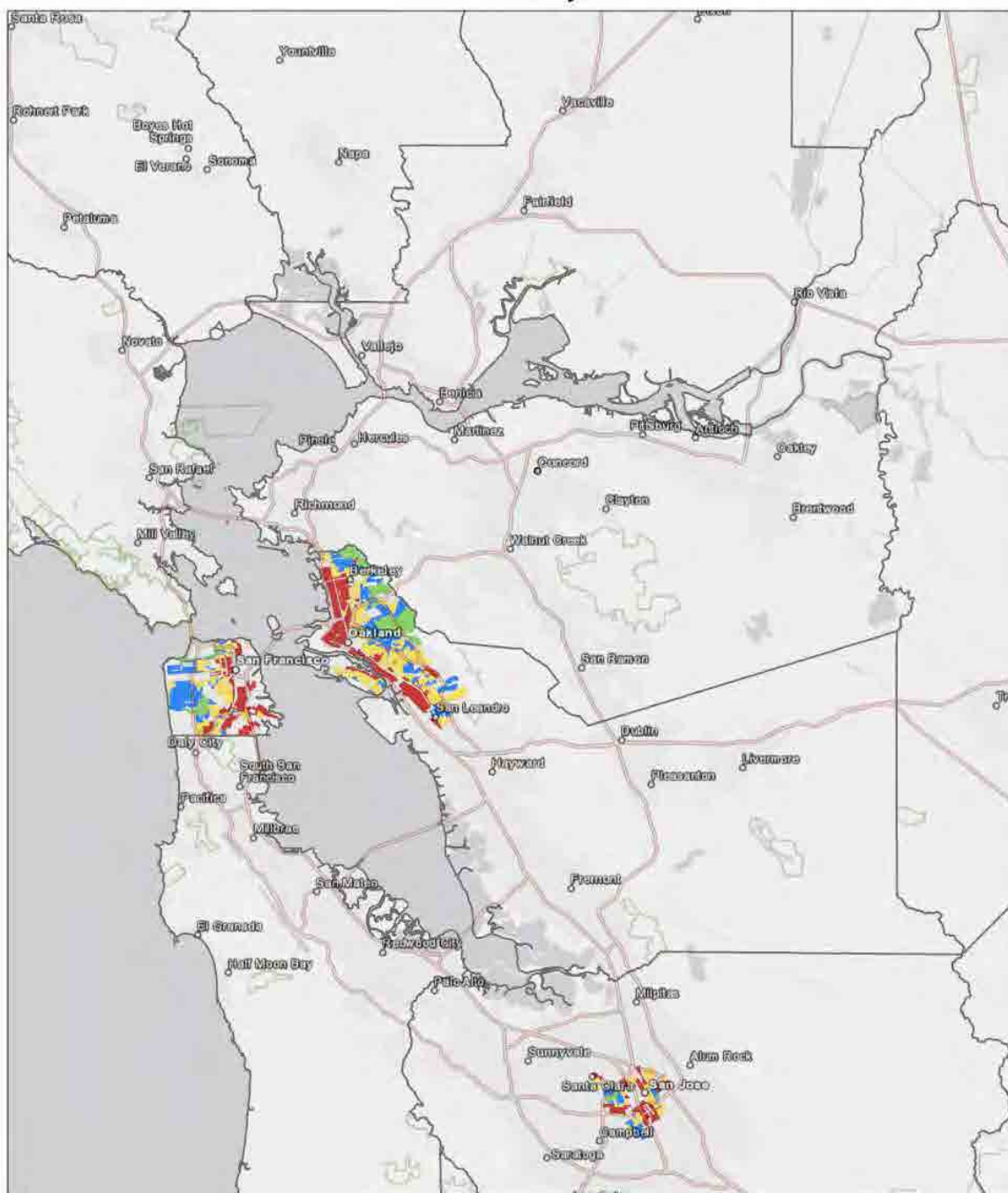
The City assists local fair housing organizations to refer complaints regarding housing discrimination within Concord and to connect residents with available fair housing resources. The City publicizes the availability of fair housing services through its website.

Additionally, programs of the Housing Element will further publicize fair housing laws and regulations. Through **Program 4, Annual Progress Report**, the City will hold annual housing forums, inviting local housing advocacy groups, developers, and other interested parties to discuss progress being made toward the goals and objectives of the Housing Element. Through **Program 8, Fair Housing**, the City will continue to affirmatively further fair housing by participating in the Analysis of Impediments to Fair Housing Choice every 5 years and continue contracts with ECHO throughout the planning period for services related to fair housing. Through **Program 20, Residential Tenant Protection**, the City will facilitate fair housing by providing tenant protection through its Residential Tenant Protection Program and by taking further action to prohibit discrimination, violations of tenant's rights to privacy, and property owner retaliation through a residential Tenant Anti-Harassment Protection ordinance.

Integration and Segregation Patterns and Trends Related to People with Protected Characteristics and Lower Incomes

Residents in highly segregated, predominantly Black and Hispanic or Latinx neighborhoods experience vastly poorer life outcomes than residents of predominantly White neighborhoods in income, housing equity, educational attainment, and life expectancy, according to research from the University of California, Berkeley (UC Berkeley). Like many regions throughout the United States, the Bay Area has a history of excluding non-White people from the housing market through practices such as mortgage redlining. Mortgage redlining is a mapping exercise used to guide mortgage lending desirability in residential neighborhoods based on racial and ethnic demographics, making it difficult for people of color to access loans for homeownership. **Figure 1, Redlining in the Region in 1935**, shows a map of redlining that took place in the area in 1935. No portions of Concord or any cities within Contra Costa County were identified through historic home mortgage loan maps. Although redlining practices have since been made illegal, access to wealth provided through mortgage loan access has primarily been afforded to the White population, providing White people with increased opportunities to gain more wealth through access to things like education and financial investments. Affirmatively furthering fair housing involves overcoming patterns of segregation to foster more inclusive communities.

Figure 1: Redlining in the Region in 1935

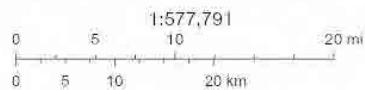


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County Boundaries

(A) Home Owners Loan Corporation Redlining Grade (University of Richmond, 2021)

- A (Best)
- B (Still Desirable)
- C (Declining)
- D (Hazardous)



Race/Ethnicity

Similar to many cities across California and the rest of the United States, Concord is becoming more racially and ethnically diverse. In 2000, the non-White population represented 37% of Concord’s population, while in 2019, 51% of Concord’s residents were non-White, as shown in **Figure 2, Race/Ethnicity in Concord 2000–2019**. Concord has slightly less overall diversity when compared to Contra Costa County and the Bay Area, which had population rates of 56% and 61% of non-White people in 2019, respectively. The current population within Concord is predominately White (49%); however, when compared to California’s total population, which consists of nearly 72% White people, Concord is much more racially diverse. **Figure 3, Race/Ethnicity in Concord, Contra Costa County, and the Bay Area in 2019**, shows the percentage of the total non-White populations.

Figure 2: Race/Ethnicity in Concord 2000–2019

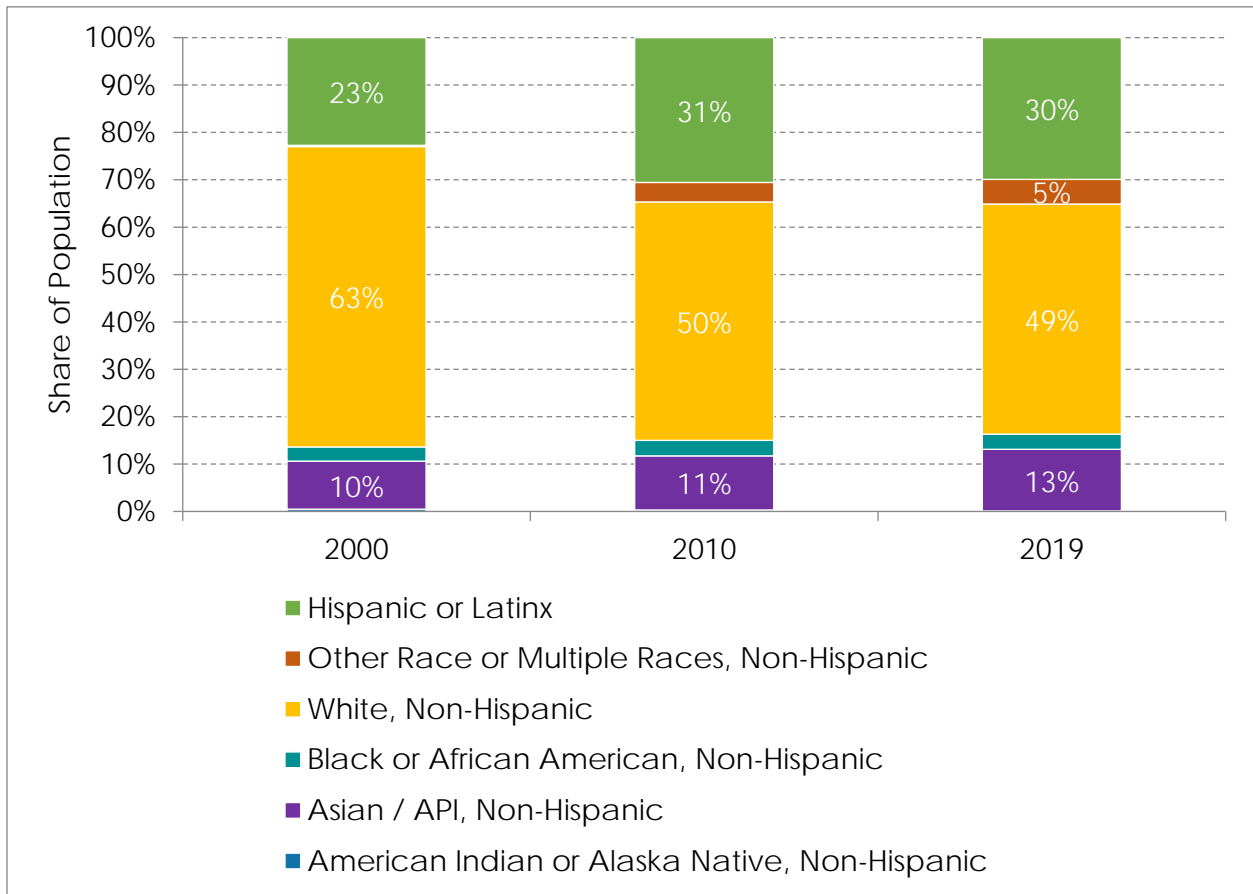
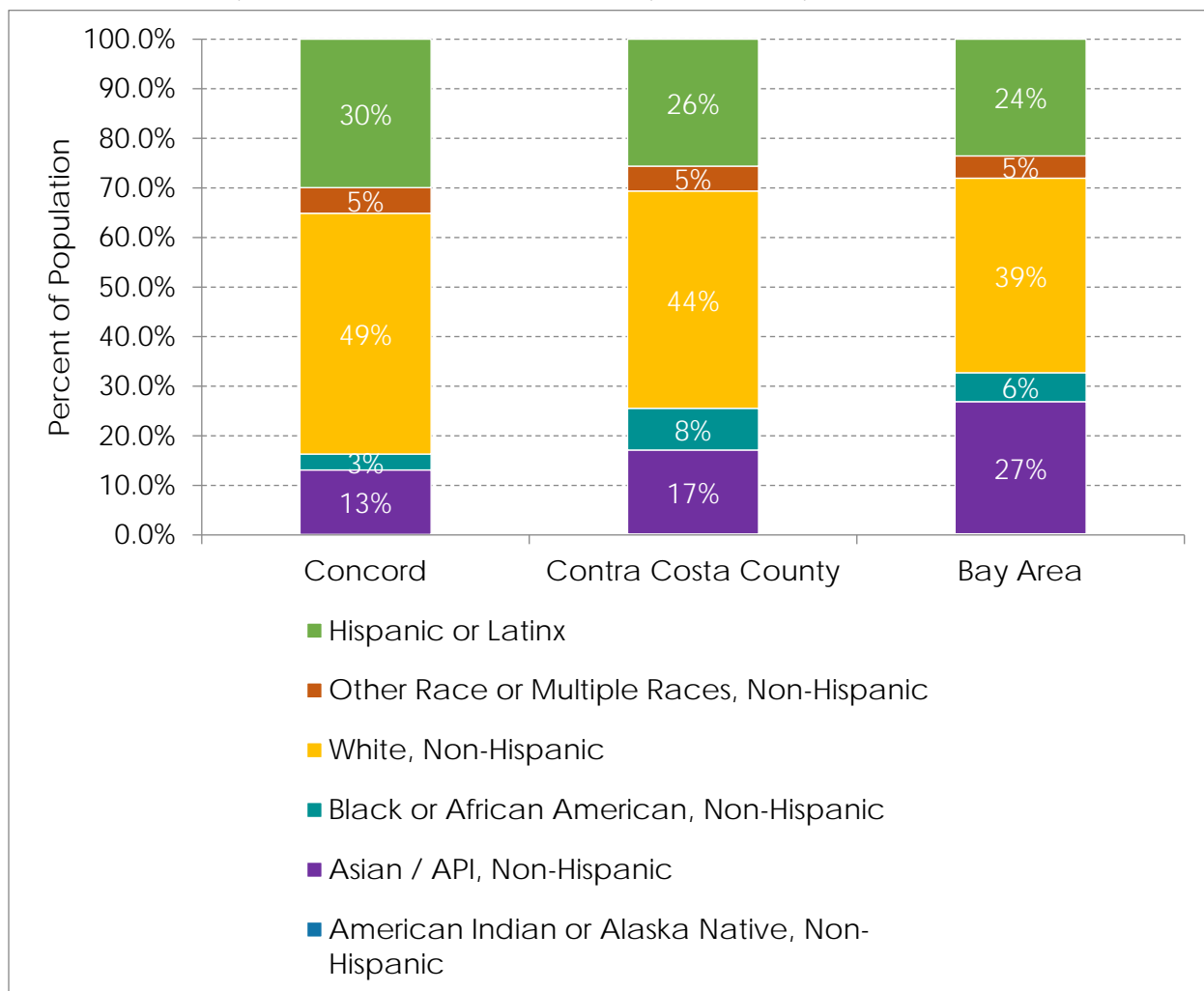


Figure 3: Race/Ethnicity in Concord, Contra Costa County, and the Bay Area in 2019



Although the City has become more racially and ethnically diverse in recent years, the distribution of where people live through the lens of race/ethnicity can illustrate patterns of integration and segregation. As shown in **Figure 4, Predominant Population – White Majority Tracts**, most census tracts within Concord are predominantly White, by either a sizeable (10% to 50%) or predominant measure (over 50%). This leaves census tracts encompassing the Concord Naval Weapons Station and in the southwest near the Monument Boulevard Corridor as non-White majority tracts. However, as shown in **Figure 4a, Predominant Population – White Majority Tracts (Regional)**, the percentage of predominantly White population in Concord is lower compared to surrounding areas of Contra Costa County, especially to the southwest.

Figure 5, Predominant Population – Hispanic/Latinx Majority Tracts, depicts census tracts within Concord that are predominantly composed of Hispanic/Latinx residents. These tracts are primarily located within the central/western portion of Concord near Monument Boulevard and Downtown, which consist of the neighborhoods of Central Concord, Four Corners, Ygnacio Valley, Olivera, and Port Chicago. As indicated in **Figure 5a, Predominant Population – Hispanic/Latinx Majority Tracts (Regional)**, these are some of the few census tracts that are predominantly made up of Hispanic or Latinx residents within the surrounding areas of Contra Costa County.

Figure 6, Predominant Population – Asian Majority Tracts, illustrates one census tract within Concord that has a sizeable proportion of Asian residents, overlapping the Concord Naval Weapons

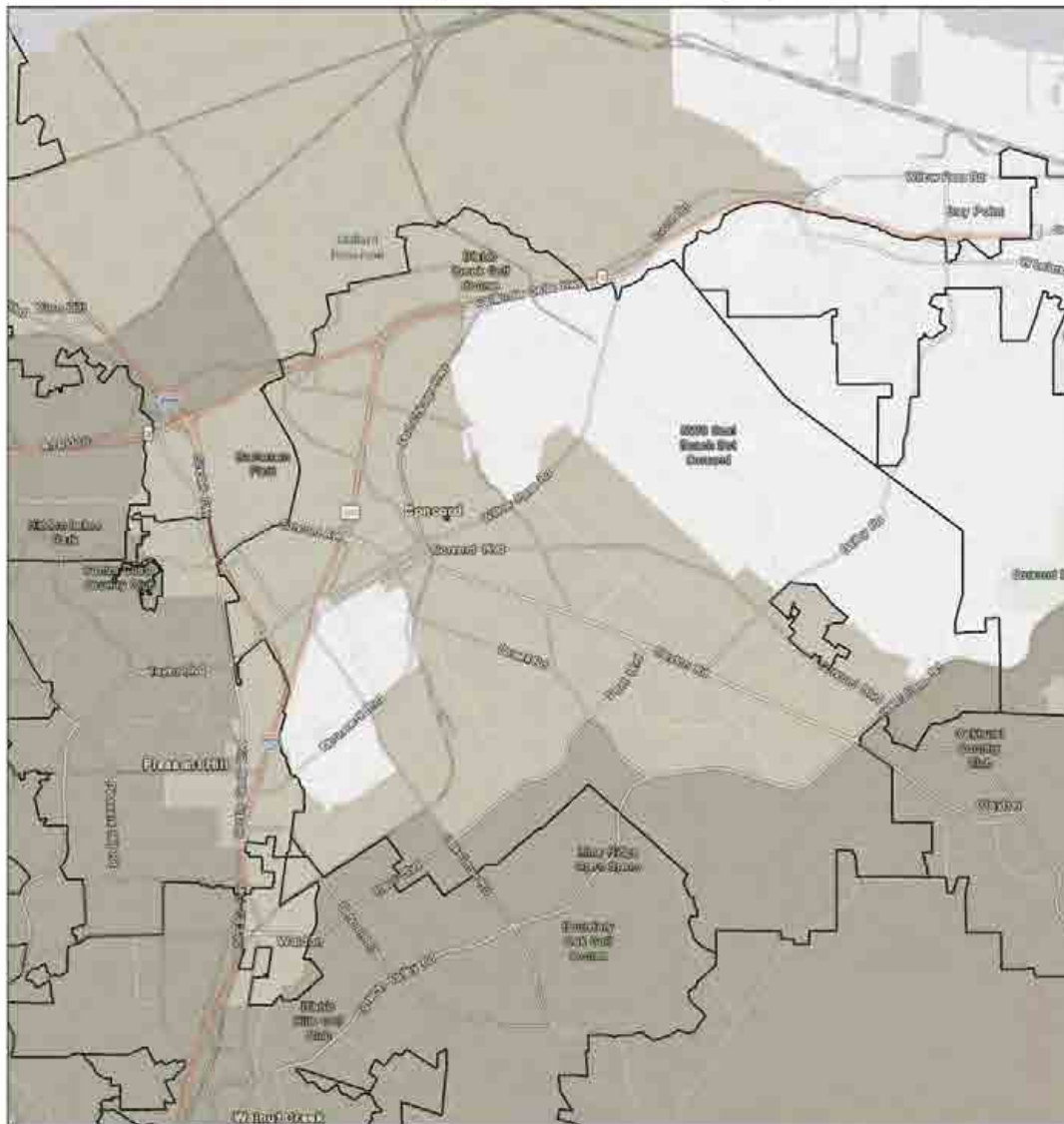
Station. The population can be attributed to the fact that the tract encompasses a residential area of the neighboring City of Pittsburg. This tract is along the northeastern border of Concord, and is the only sizeable tract with an Asian population within Contra Costa County (**Figure 6a, Predominant Population – Asian Majority Tracts (Regional)**).

Since Black or African American and Native American/Indigenous populations account for a small percentage of the total population (13% and 3%, respectively), there are no census tracts within Concord inhabited by predominantly African American/Black populations or Native American/Indigenous populations.

The block groups with the highest percentage of predominantly non-White residents are located in the western portion of Concord, as shown in **Figure 7, Racial Demographics – Percentage of Non-White Populations (2018) – Block Group**, with the non-White population of this area exceeding 80%. When compared to the region, the cities near Concord (except those to the north and northeast) have higher percentages of White populations and lower percentages of non-White populations, such as Clayton, Walnut Creek, and Pleasant Hill. As shown in **Figure 7a, Racial Demographics Percentage of Non-White Populations (2018) – Block Group (Regional)**, the Bay Point community and the cities of Pittsburg and Antioch to the northeast contain several census block groups that are inhabited by higher percentages of non-White populations than Concord.

Figure 4: Predominant Population – White Majority Tracts

Predominant Population - White Majority Tracts



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City/Town Boundaries

(R) Predominant Population - White Majority Tracts

Sizeable (gap 10%--50%)

Predominant (gap > 50%)

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Figure 4a: Predominant Population – White Majority Tracts (Regional)

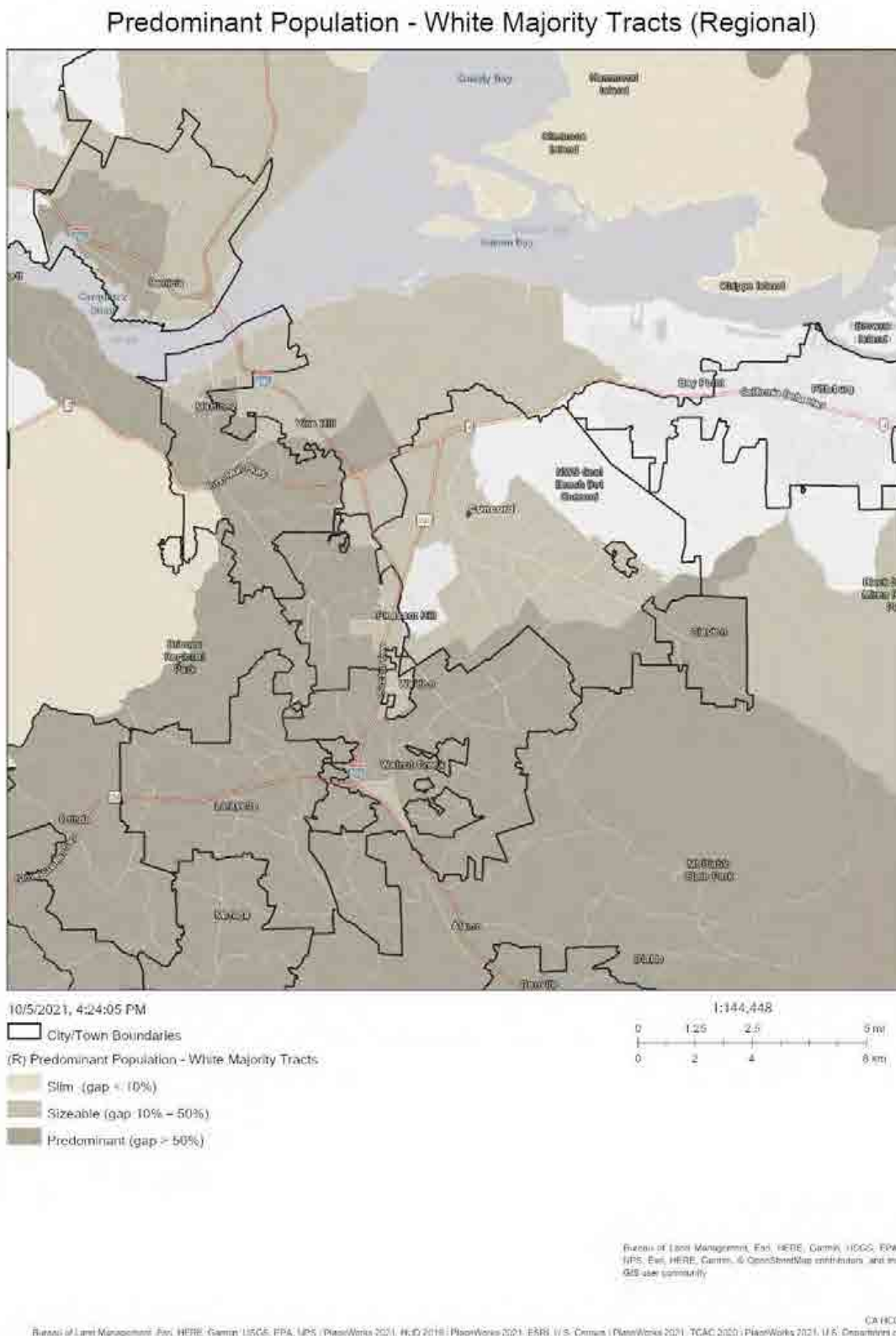


Figure 5: Predominant Population – Hispanic/Latinx Majority Tracts

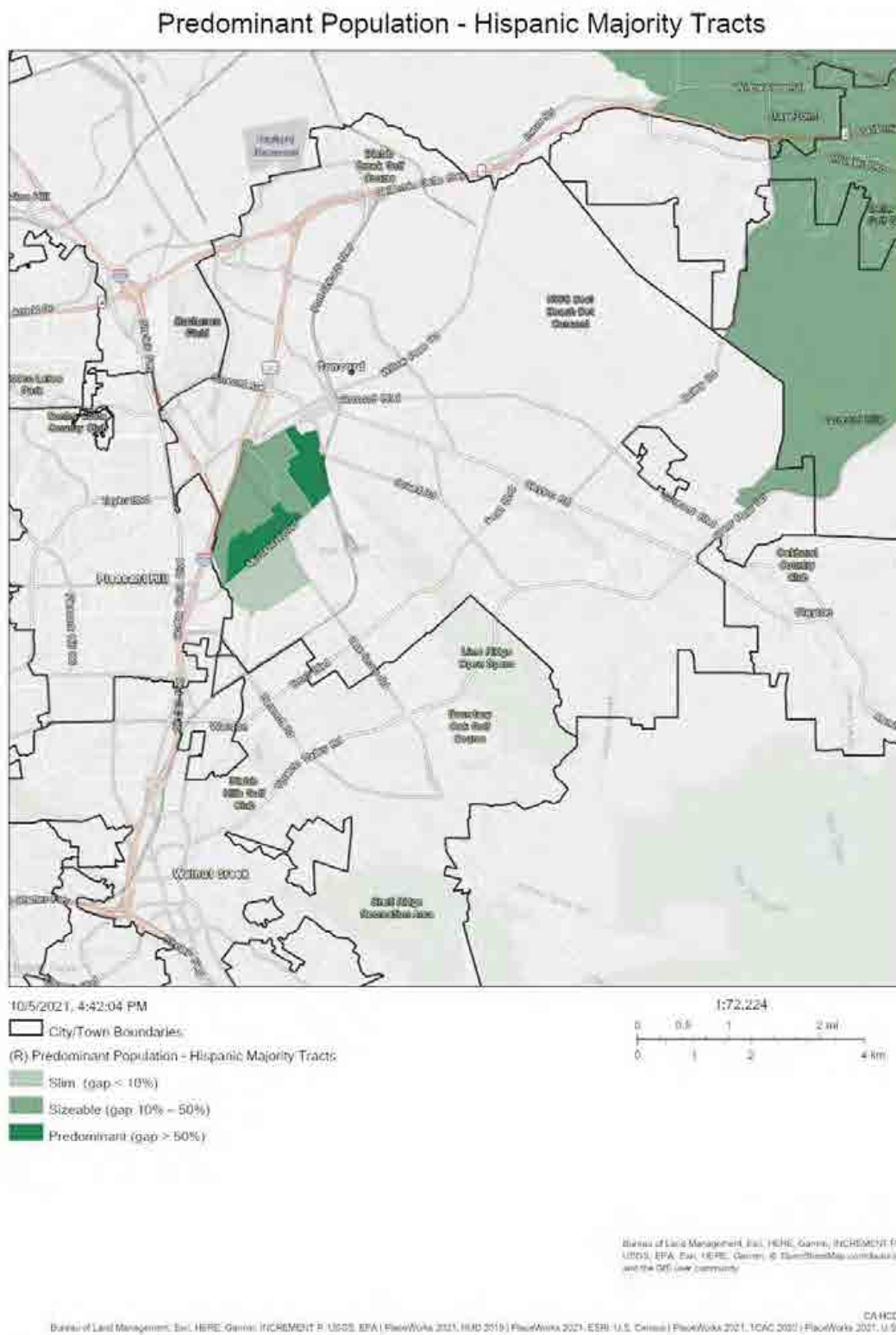


Figure 5a: Predominant Population – Hispanic Majority Tracts (Regional)

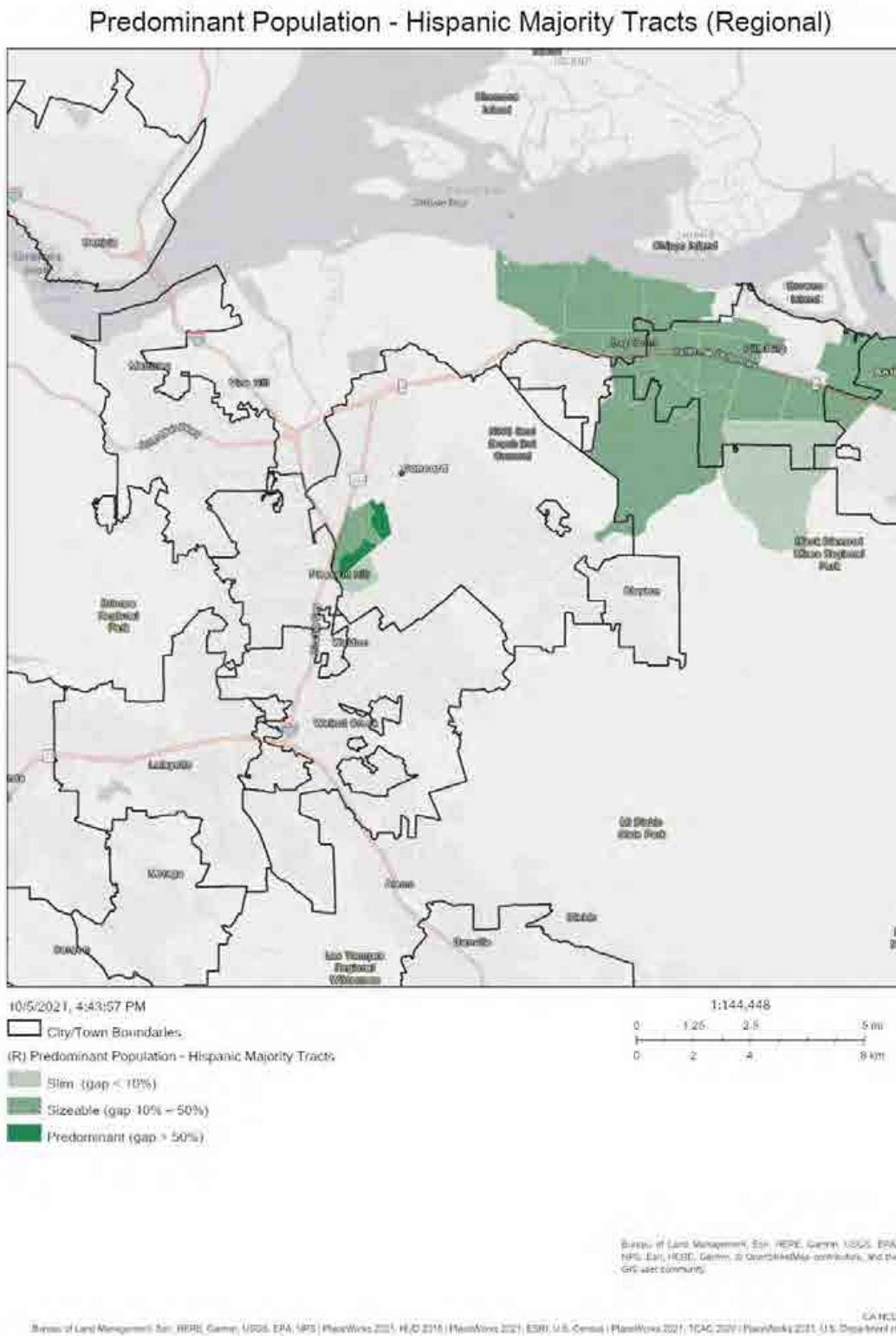


Figure 6: Predominant Population – Asian Majority Tracts

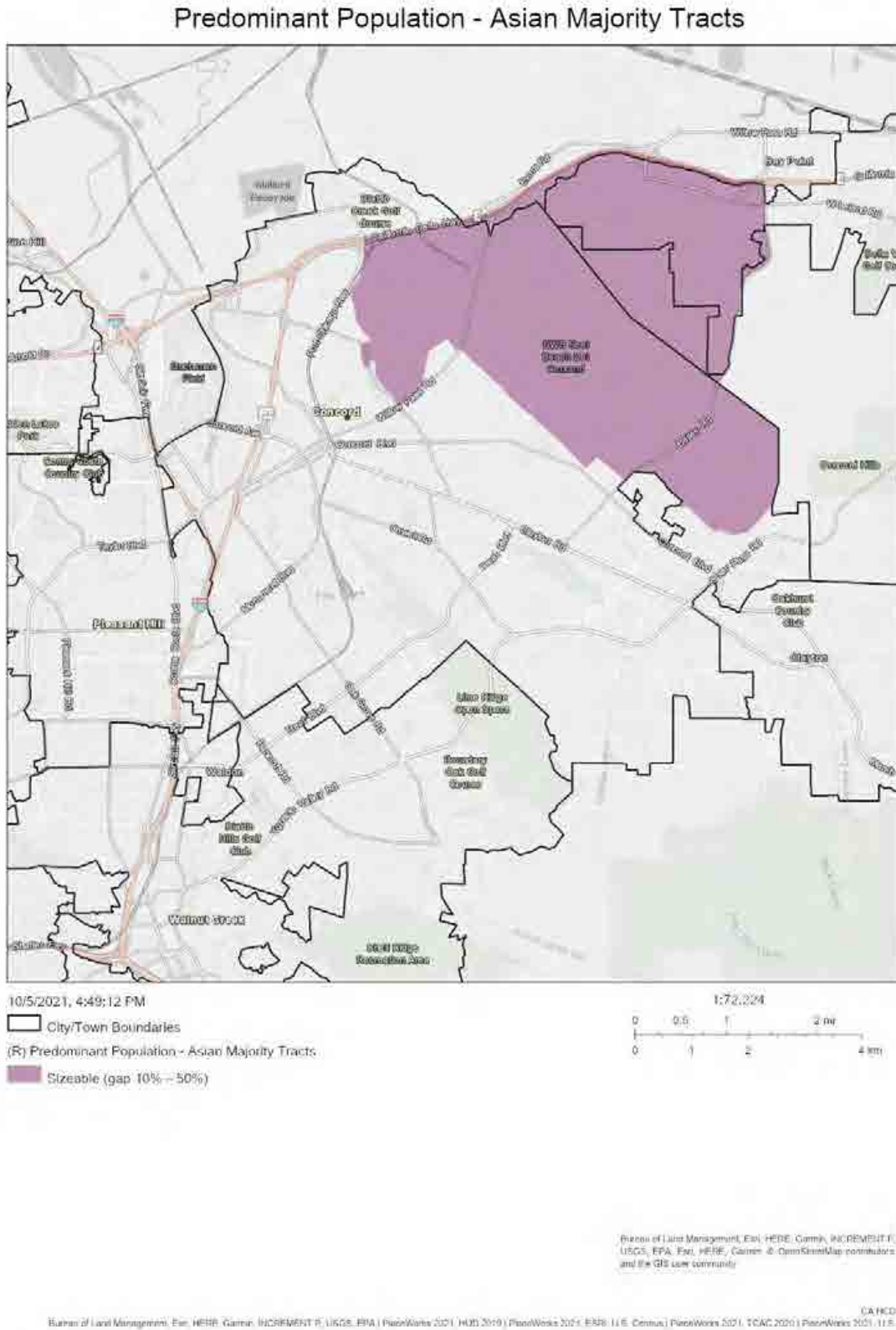
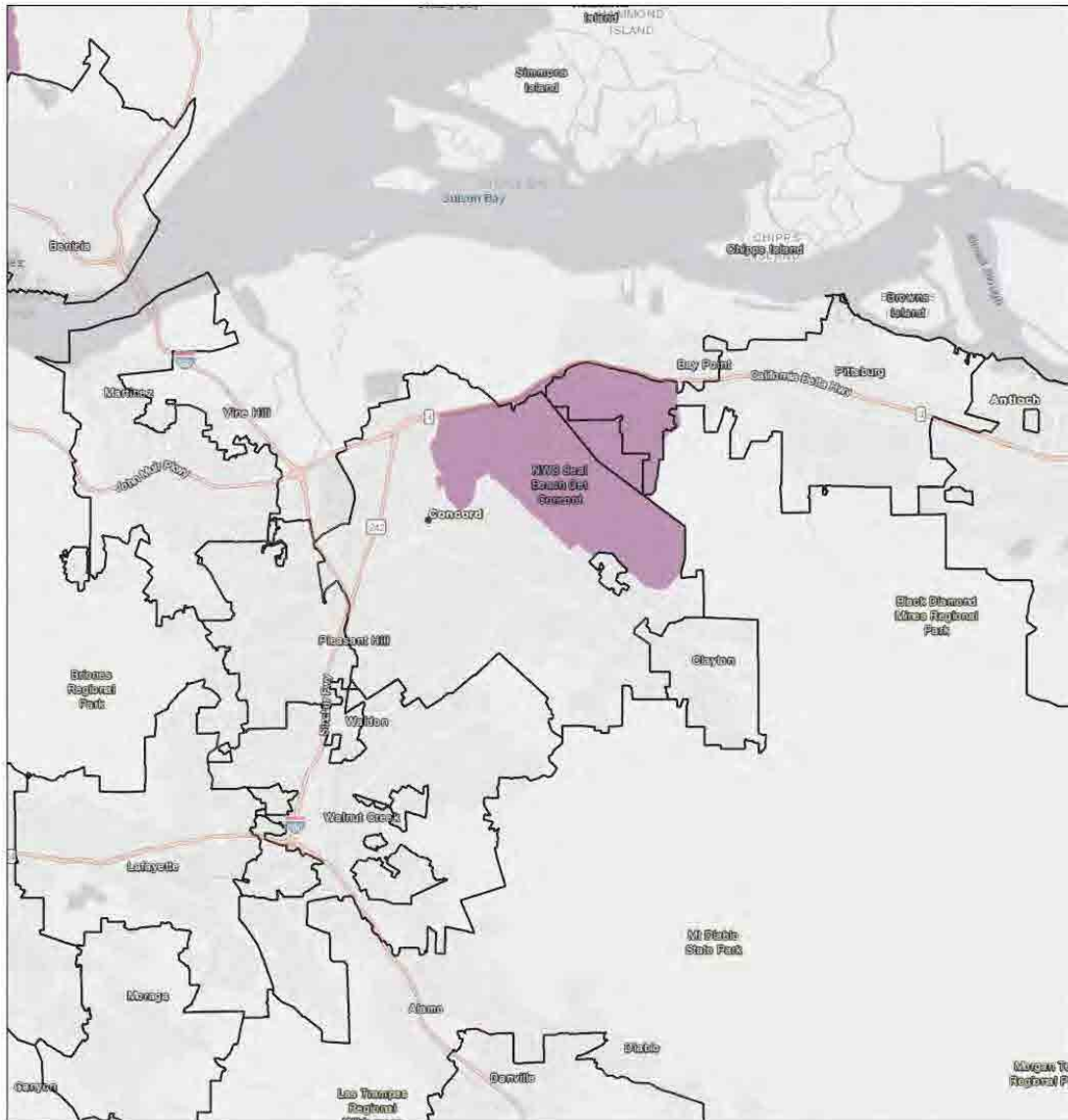





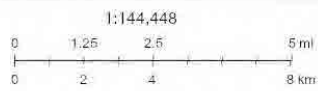
Figure 6a: Predominant Population – Asian Majority Tracts (Regional)

Predominant Population - Asian Majority Tracts (Regional)



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-  City/Town Boundaries
-  (R) Predominant Population - Asian Majority Tracts
-  Sizeable (gap 10% - 50%)



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Figure 7: Racial Demographics – Percentage of Non-White Populations (2018) – Block Group

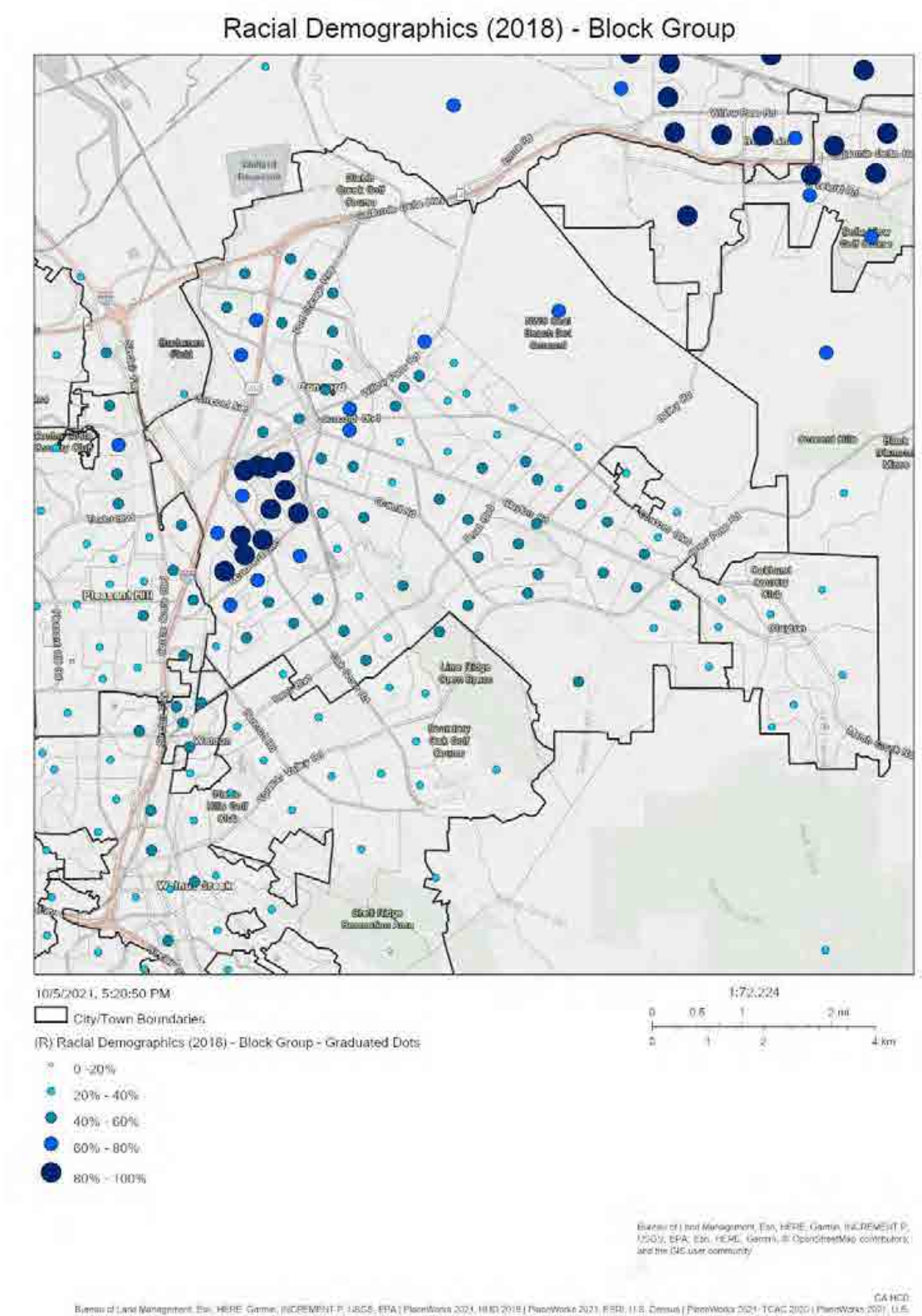
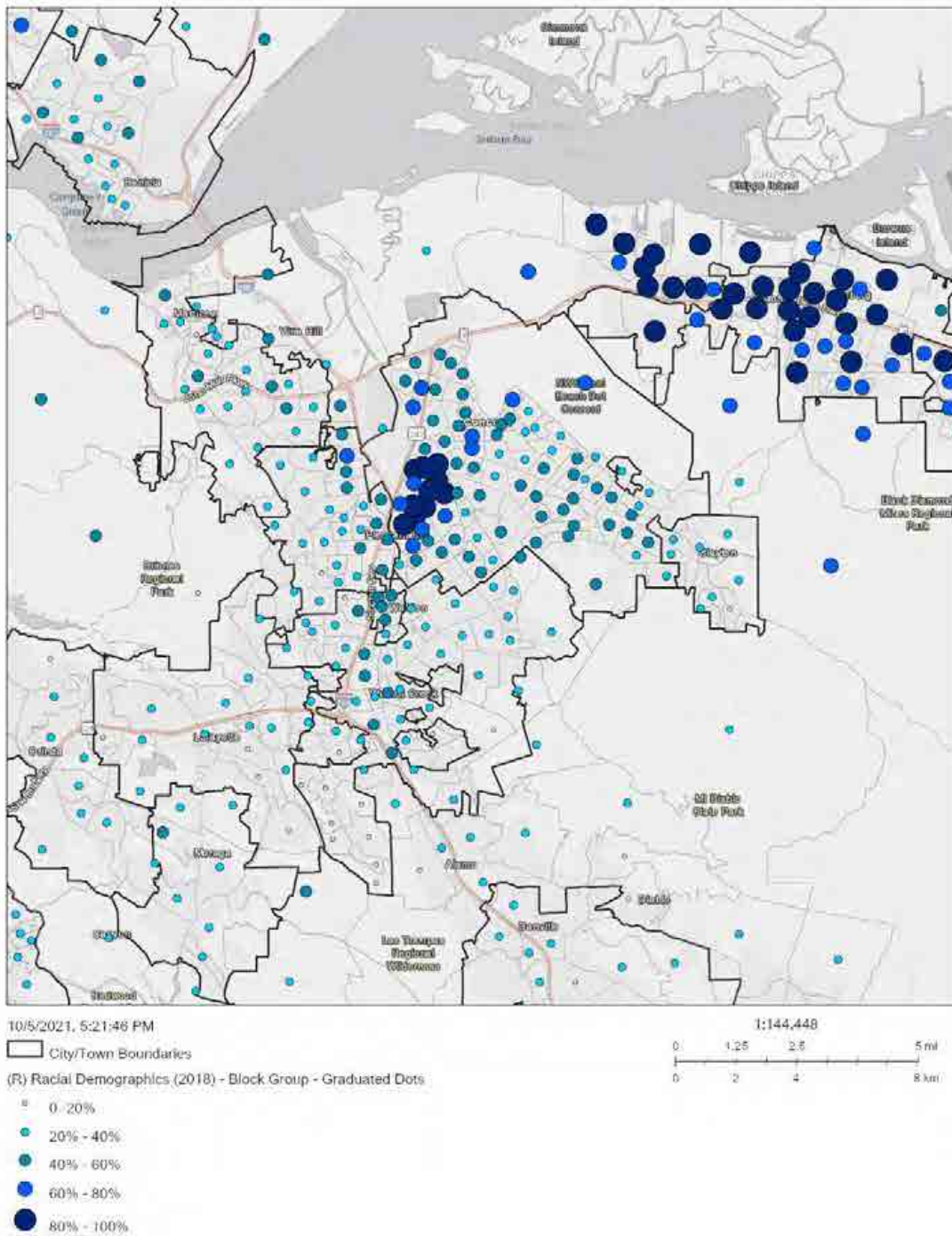


Figure 7a: Racial Demographics Percentage of Non-White Populations (2018) – Block Group (Regional)



In addition to looking at the racial compositions of an area, another measure of segregation between two groups is the diversity index (DI). The DI measures the degree to which two racial or ethnic groups are distributed across a geographic area. The DI varies between 0 and 100 and measures the percentage of one group that would have to move across neighborhoods to be distributed the same way as the second group. A DI of 100 indicates conditions of total integration under which both groups are distributed in the same proportions across all neighborhoods. A DI of 0 indicates conditions of total segregation such that the members of one group are located in completely different neighborhoods than the second group. This is a helpful metric because it can show which race or ethnicity is the most segregated. **Figure 8, Diversity Index 2010**, and **Figure 9, Diversity Index 2018**, show the variation in the rate of diversity within the block groups in Concord. These show that block groups within Concord have become increasingly diverse between 2010 and 2018, with the highest diversity concentrated in the northwestern block groups. At a regional level, cities to the southwest of Concord have more block groups with low diversity indices, and cities to the northeast of Concord indicate greater diversity, with a high number of block groups with moderate to high diversity indices.

Figure 8: Diversity Index 2010

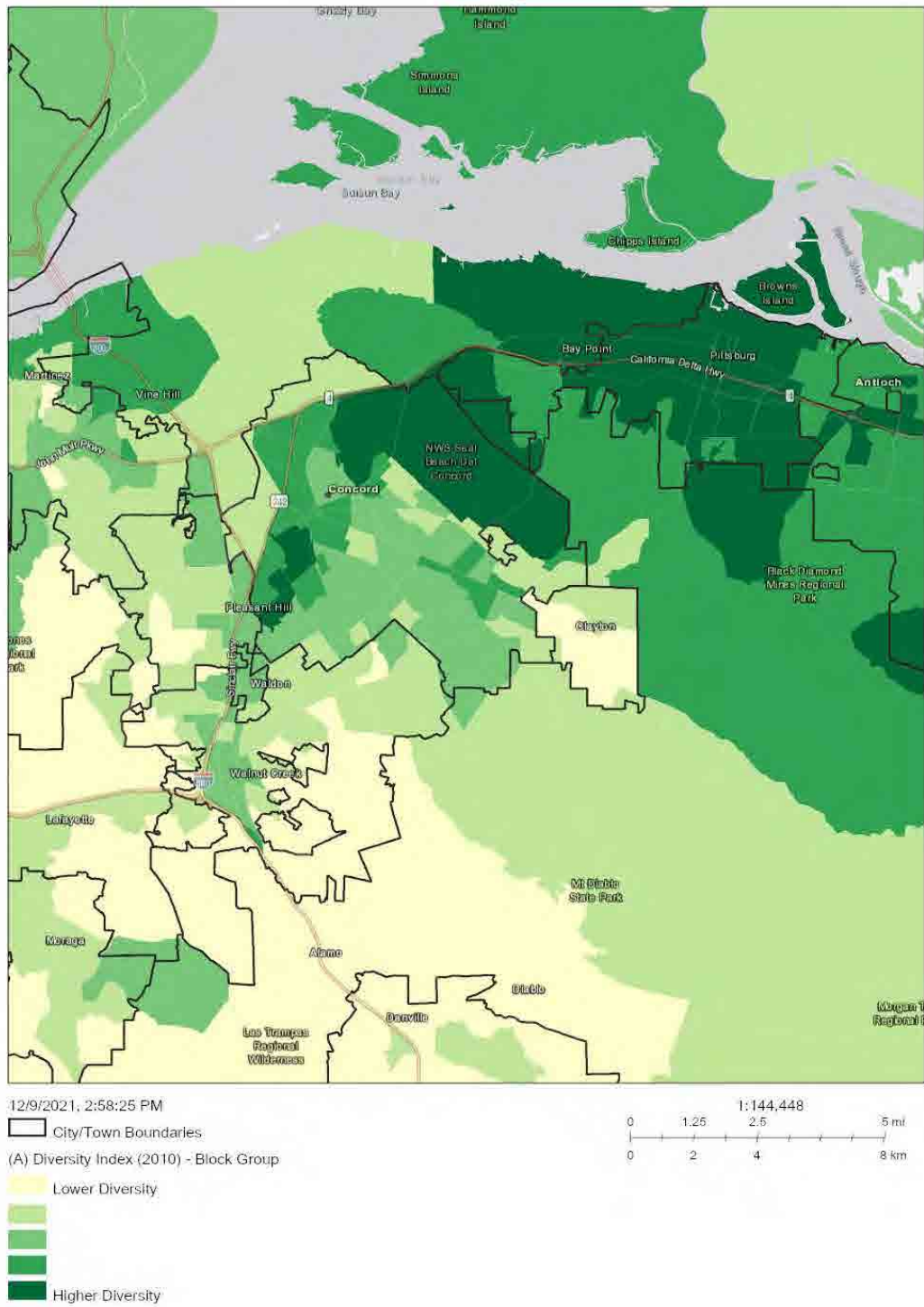
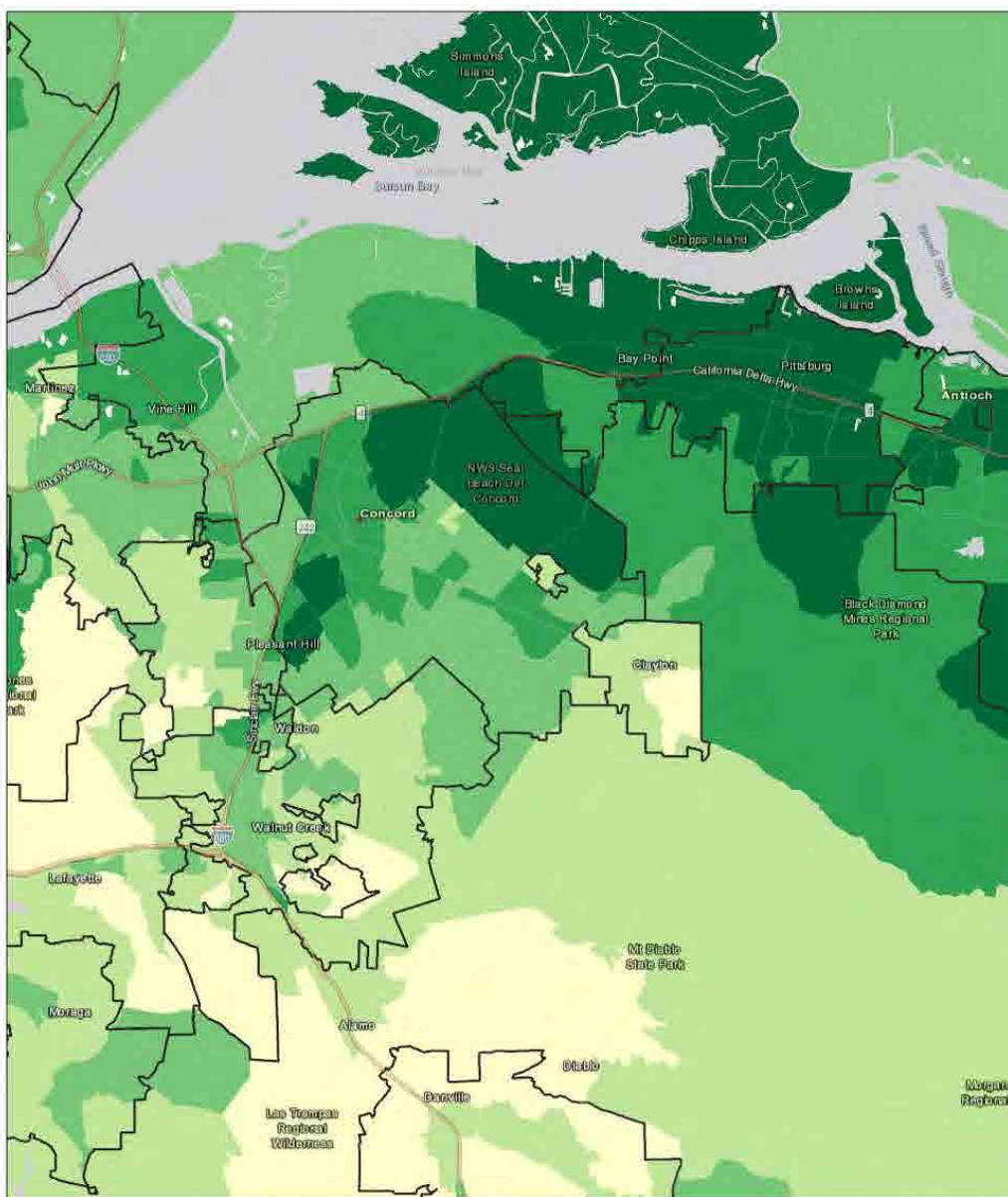


Figure 9: Diversity Index 2018



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City/Town Boundaries

(A) Diversity Index (2018) - Block Group

- Lower Diversity
- 40 - 55
- 55 - 70
- 70 - 85
- Higher Diversity

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Income

Recent U.S. Census Bureau estimates regarding poverty status of households in Concord are shown in **Figure 10, Poverty Status – Tract**. As seen in this map, there are low concentrations of poverty within census tracts along the southern, eastern, and northern areas of Concord, with poverty rates less than 10% of the population. Within the central/western portion of Concord, there are census blocks that report poverty rates from 10% to 20% and 20% to 30% of the total population. This area of Concord coincides with higher diversity and majority non-White census tracts. This may indicate that non-White populations experience a higher poverty rate and lower median income as compared to White populations in Concord. According to ABAG/MTC’s Housing Needs Data Report, 57% of Hispanic or Latinx households and 60% of Black or African American households have a median income less than or equal to 80% of the Area Median Income (AMI) and are considered lower income, and 48% of White households have a median income less than or equal to 80% of the AMI and are considered lower-income. Black residents have the largest percent of households with a median income equal to 30% or less of AMI and are considered extremely low income, with 29% of households making 30% or less of the AMI, followed by other race or multiple races (non-Hispanic or Latinx) at 25% of the households, and American Indian or Alaska Native at 22% of households. For comparison, White and Asian households have the lowest percent of extremely low-income households, with 13% and 14%, respectively. The central/western portion of Concord experiences slightly higher poverty rates compared to neighboring communities to the north, west, and south, and similar poverty rates compared to neighboring communities to the northeast within Bay Point and the cities of Pittsburg and Antioch (see **Figure 10a, Poverty Status (Regional) – Tract**). Overall, Concord experiences lower poverty rates since the last assessment, which spanned 2010–2014 (see **Figure 11, Poverty Status (ACS 2010–2014) – Tract**).

Figure 12, Median Income – Block Group; Figure 12a, Median Income – Block Group (Regional); and Figure 12b, Median Income (ACS 2010–2014) – Block Group, depict the trends and patterns of the local and regional median income over time. Mirroring the poverty rate, median income increased over time as poverty rates have decline; median incomes are lower in the central/western portion of Concord, with certain blocks ranging between the two categories of “less than \$87,100” and “less than \$55,000.” The eastern and southern areas of Concord experience higher median incomes, with incomes “less than \$125,000” and “greater than \$125,000,” which indicate patterns of income segregation. Areas northeast within the cities of Bay Point, Pittsburg, and Antioch have generally more areas with lower-income than the more affluent parts of Concord. Median incomes in parts of neighboring communities to the west and south are generally higher, with median incomes in the “less than \$87,100,” “less than \$125,000,” and “greater than \$125,000” categories in the cities of Alamo and Danville.

Figure 10: Poverty Status – Tract

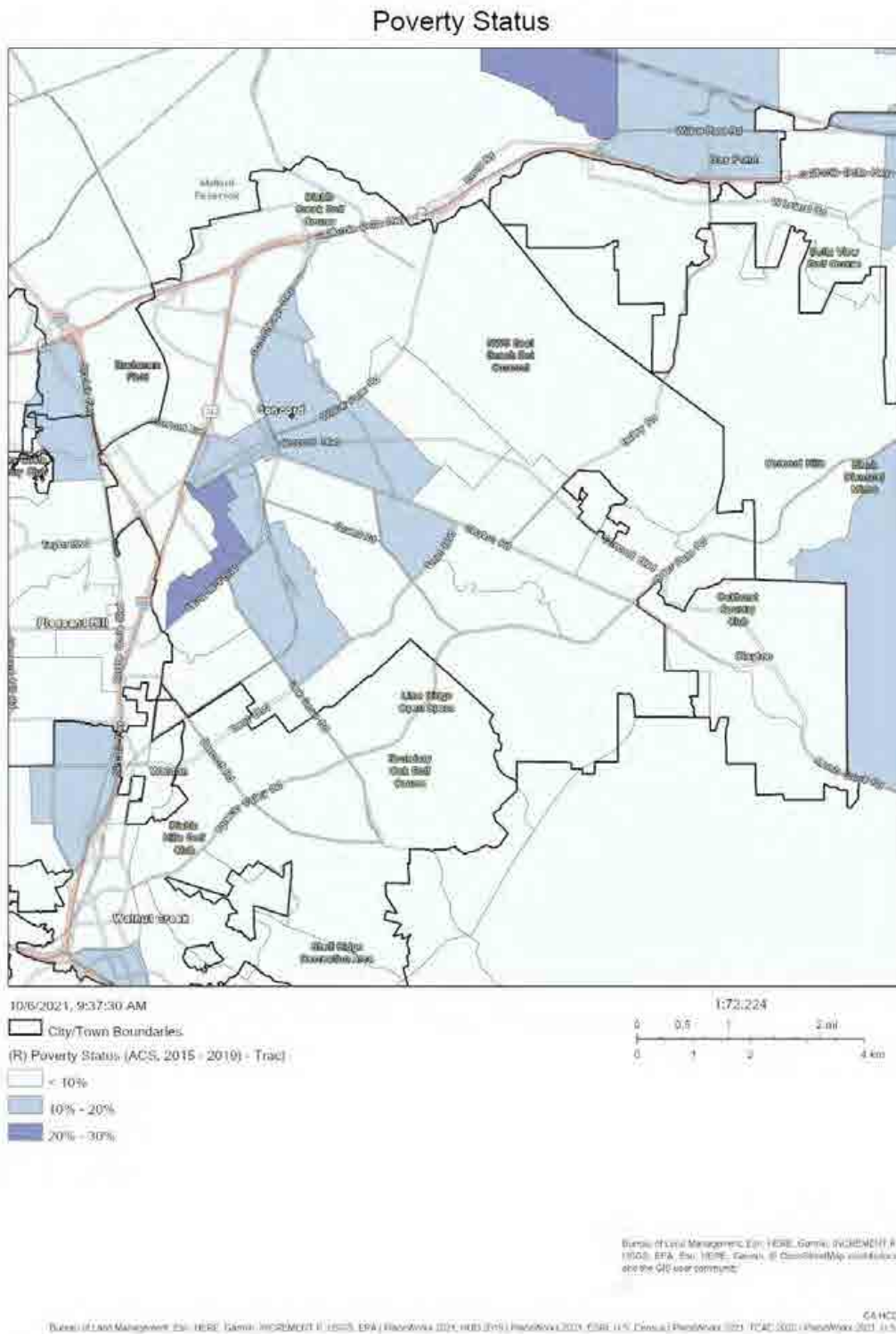
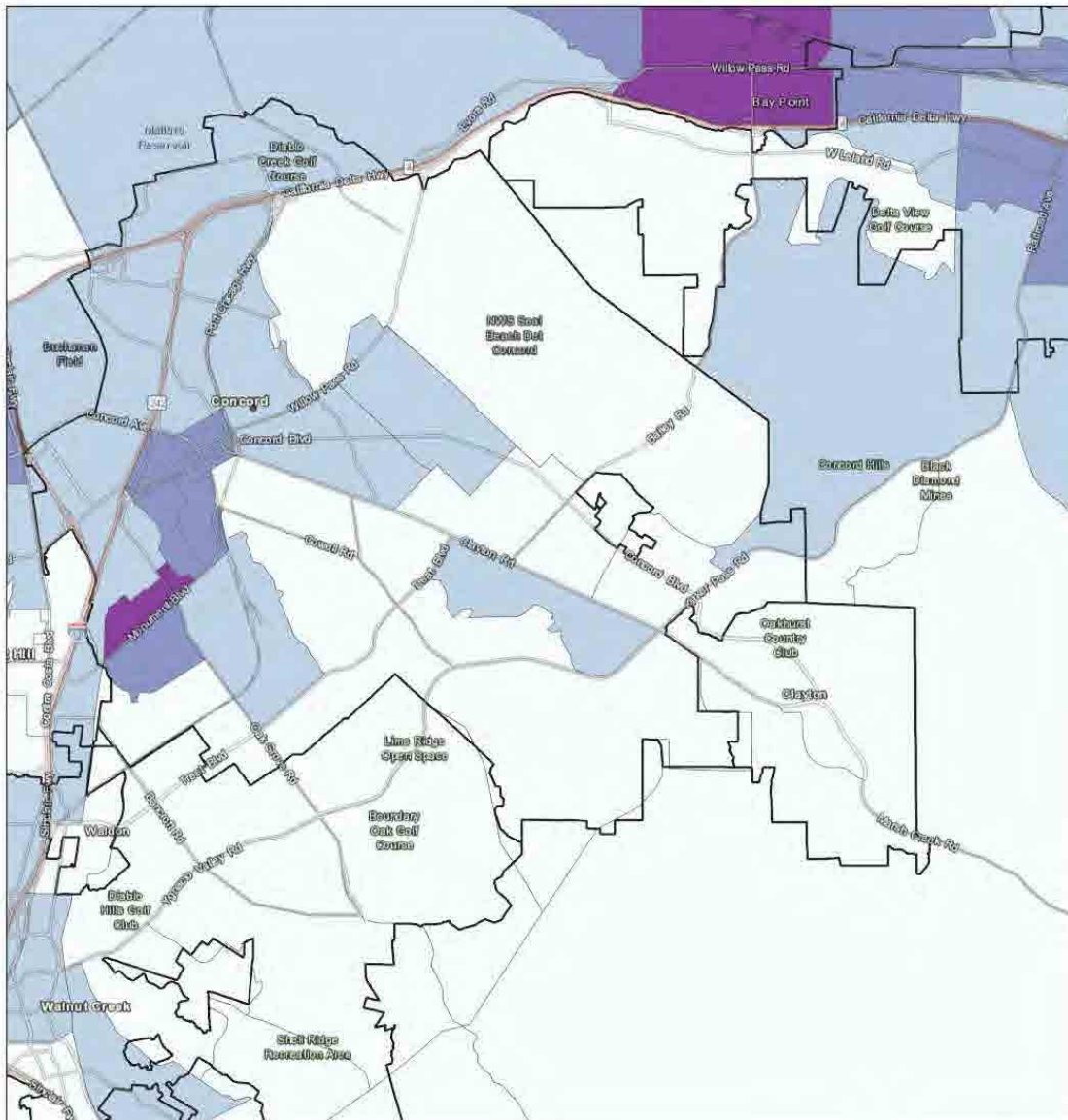


Figure 11: Poverty Status (ACS 2010–2014) – Tract

Poverty Status (ACS 2010-2014)



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City/Town Boundaries

(A) Poverty Status (ACS, 2010 - 2014) - Tract

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%

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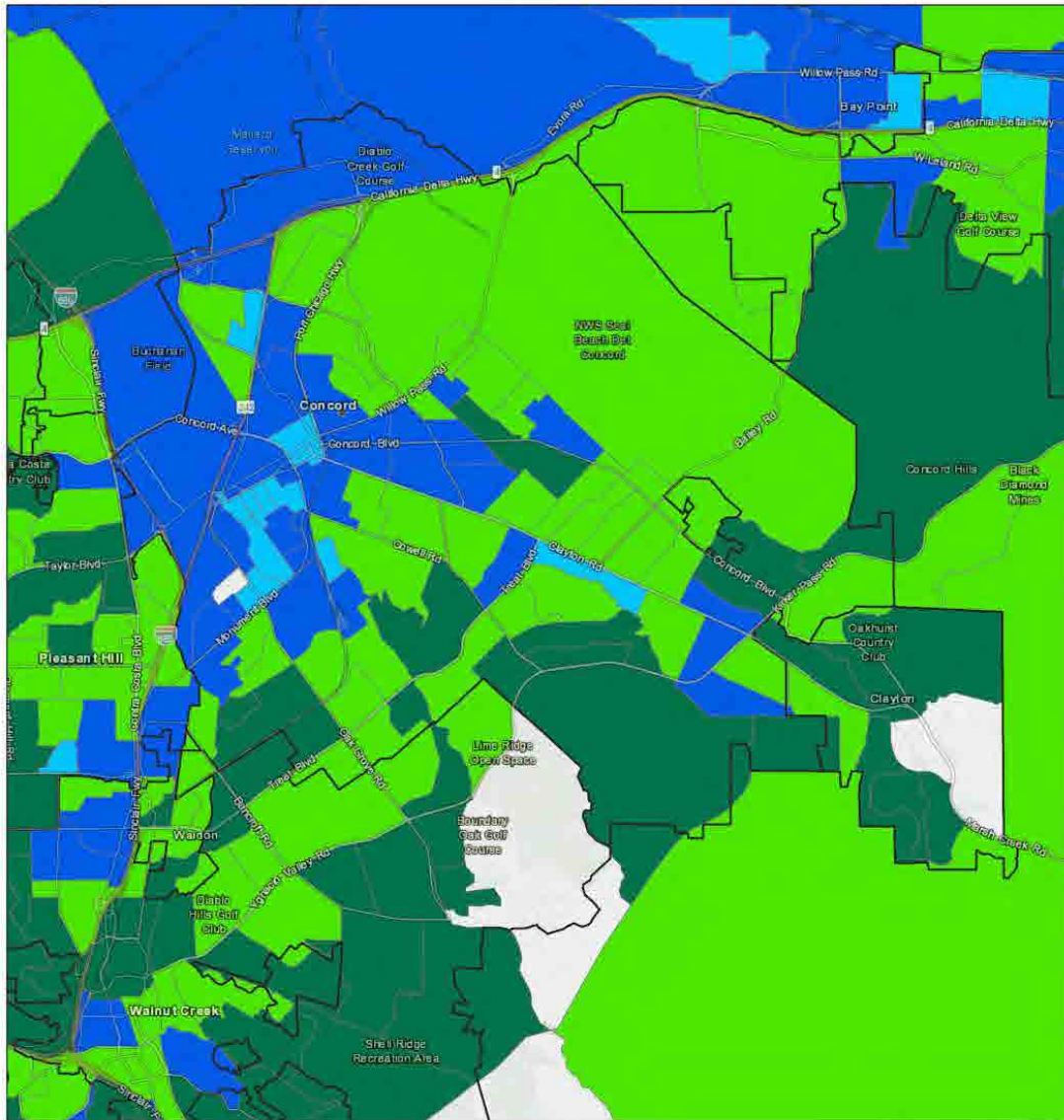
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Figure 12: Median Income – Block Group

Median Income (ACS 2015 - 2019)



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City/Town Boundaries

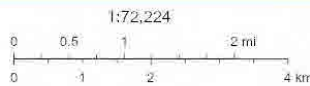
(R) Median Income (ACS, 2015-2019) - Block Group

< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000

Greater than \$125,000

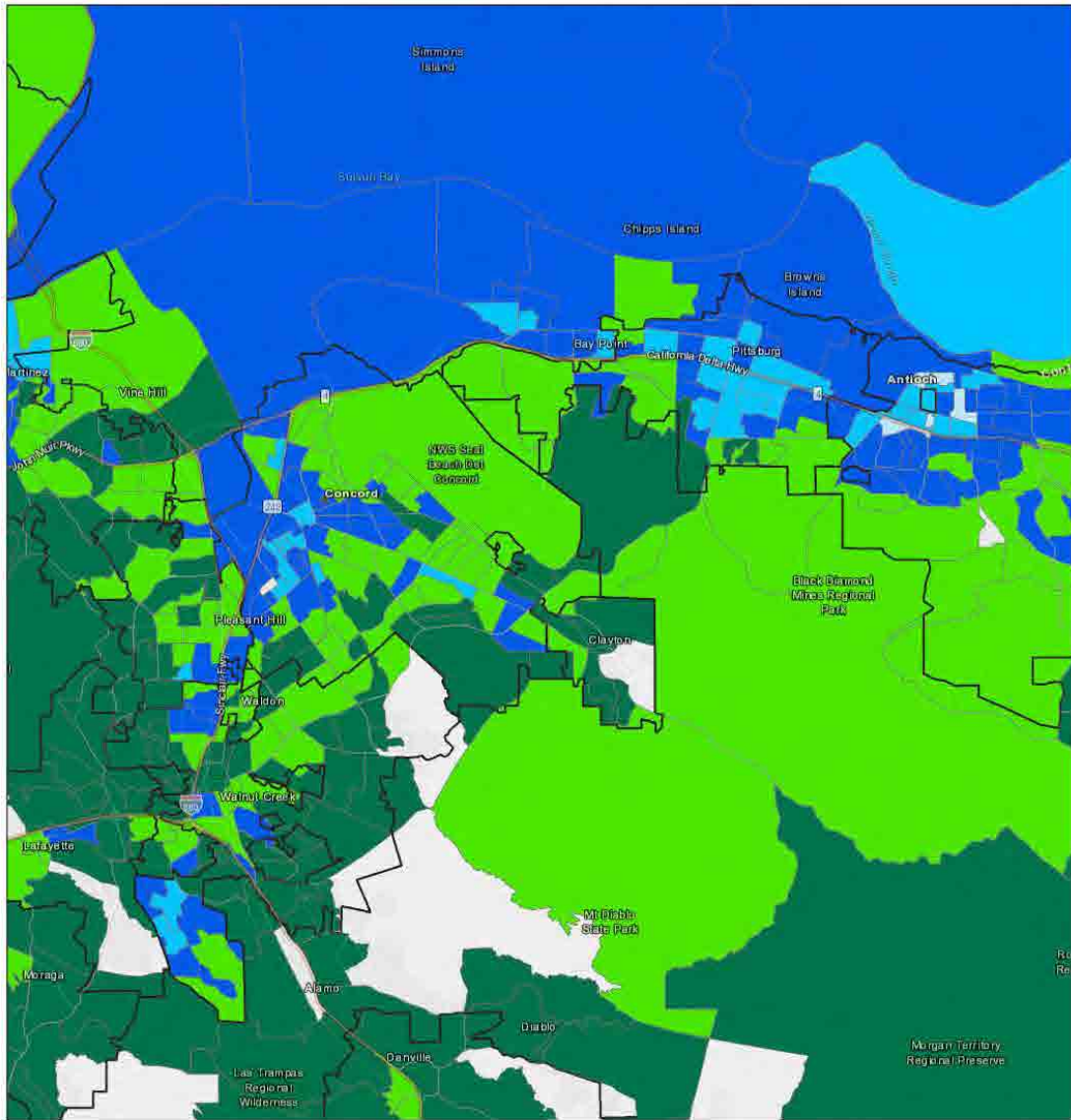


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Figure 12a: Median Income – Block Group (Regional)

Median Income (ACS 2015 - 2019)

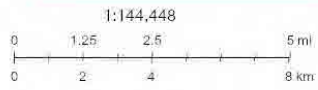


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City/Town Boundaries

(R) Median Income (ACS, 2015-2019) - Block Group

- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000

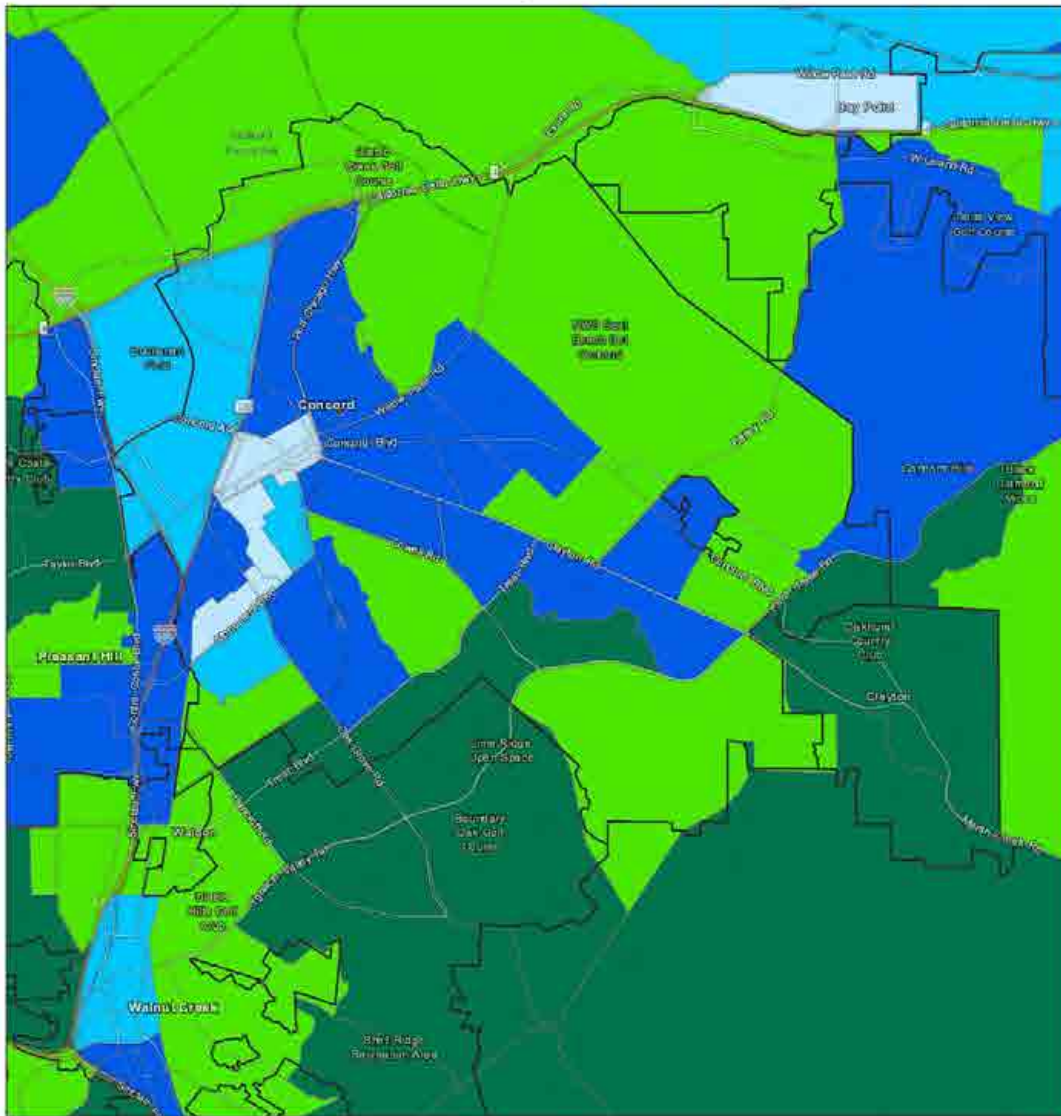


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Figure 12b: Median Income (ACS 2010–2014) – Block Group

Median Income (ACS 2010 - 2014)



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City/Town Boundaries

(A) Median Income (ACS, 2010-2014) - Tract:

- < \$40,000
- < \$60,000
- < \$80,000
- < \$100,000
- Greater than \$100,000

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Familial Status

Female-headed households with children comprise 20% to 40% of the households in five census tracts within the central/western portion of Concord, as shown in **Figure 13, Female-Headed Household – Tract**. Otherwise, the remaining census tracts in Concord have less than 20% female-headed households with children. Most of the region experiences this rate (less than 20%) of female-headed households with children; however, there are some tracts in northeast Contra Costa County, in Bay Point, and the cities of Pittsburg and Antioch that experience similar or higher levels of female-headed households compared to the central/western portion of Concord (see **Figure 13a, Female Headed Households (Regional) – Tract**).

As shown in **Figure 14, Percent of Children in Married/Couple Households – Tract**, the southeastern portion of Concord has high percentages of children in married households (above 80%). **Figure 15, Percent of Population 18 Years and Over in Households Living with Spouse – Tract**, indicates that most census tracts in Concord have populations of adults (18 years or older) who live with spouses, at a rate of 40% to 60%. Within all Concord census tracts except for one, less than 20% of households over 18 years of age live alone. Based on race, ethnicity, and income data, the proportion of the population 18 years and over in households living with a spouse is the least in census tracts that are majority non-White and where poverty is high. These trends are similar to neighboring communities within the region.

Figure 13: Female-Headed Household – Tract

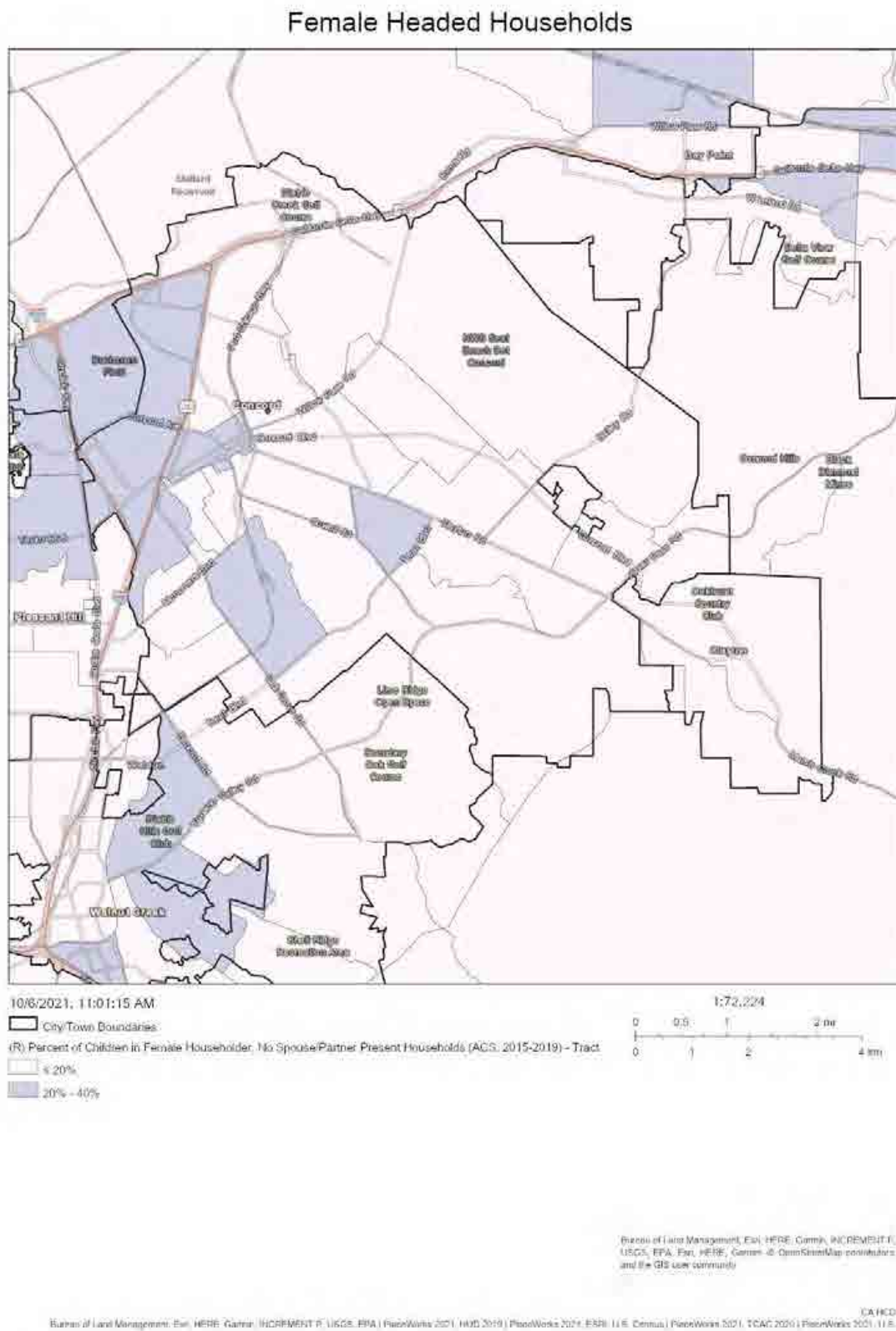


Figure 13a: Female-Headed Households (Regional) – Tract

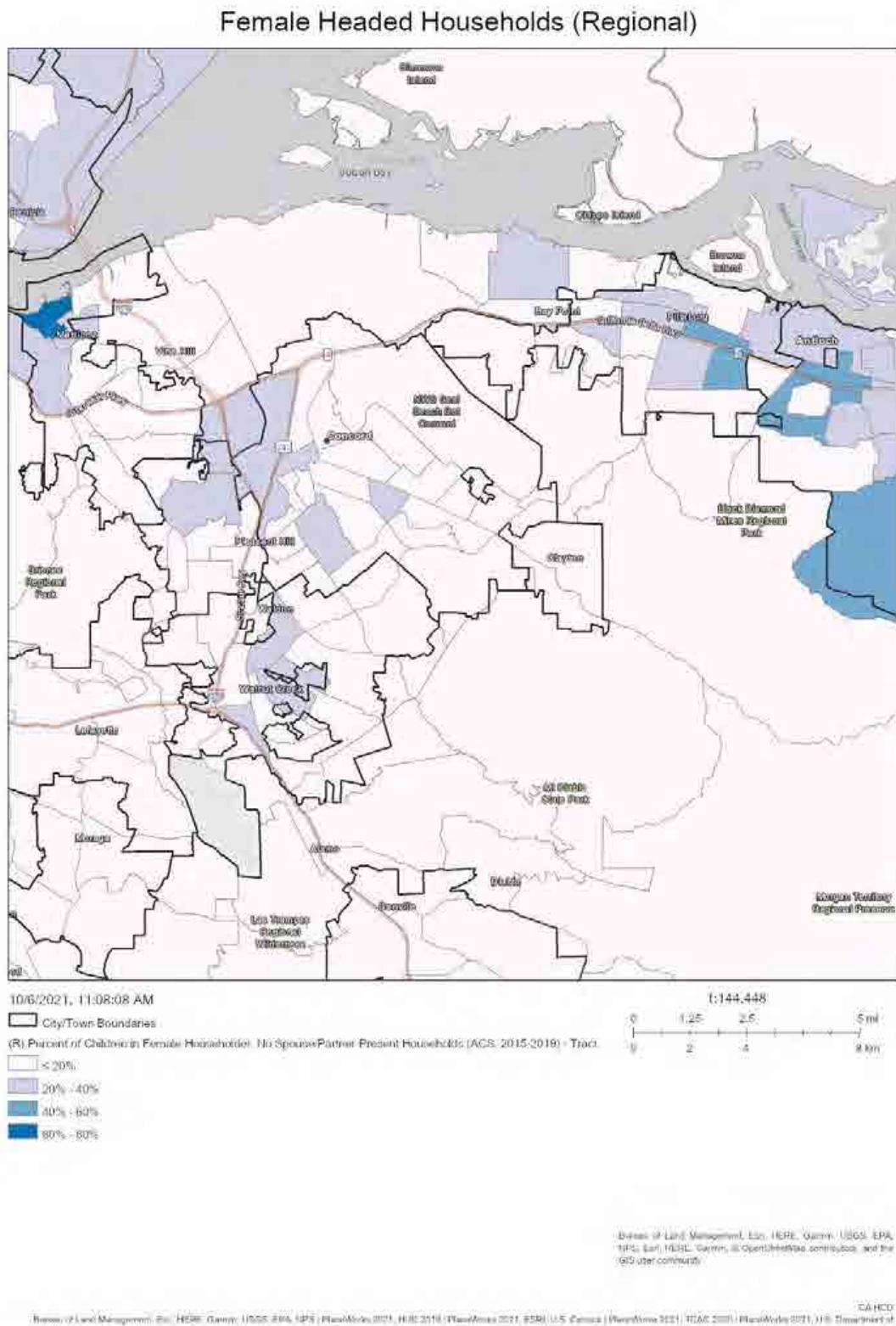


Figure 14: Percent of Children in Married/Couple Households – Tract

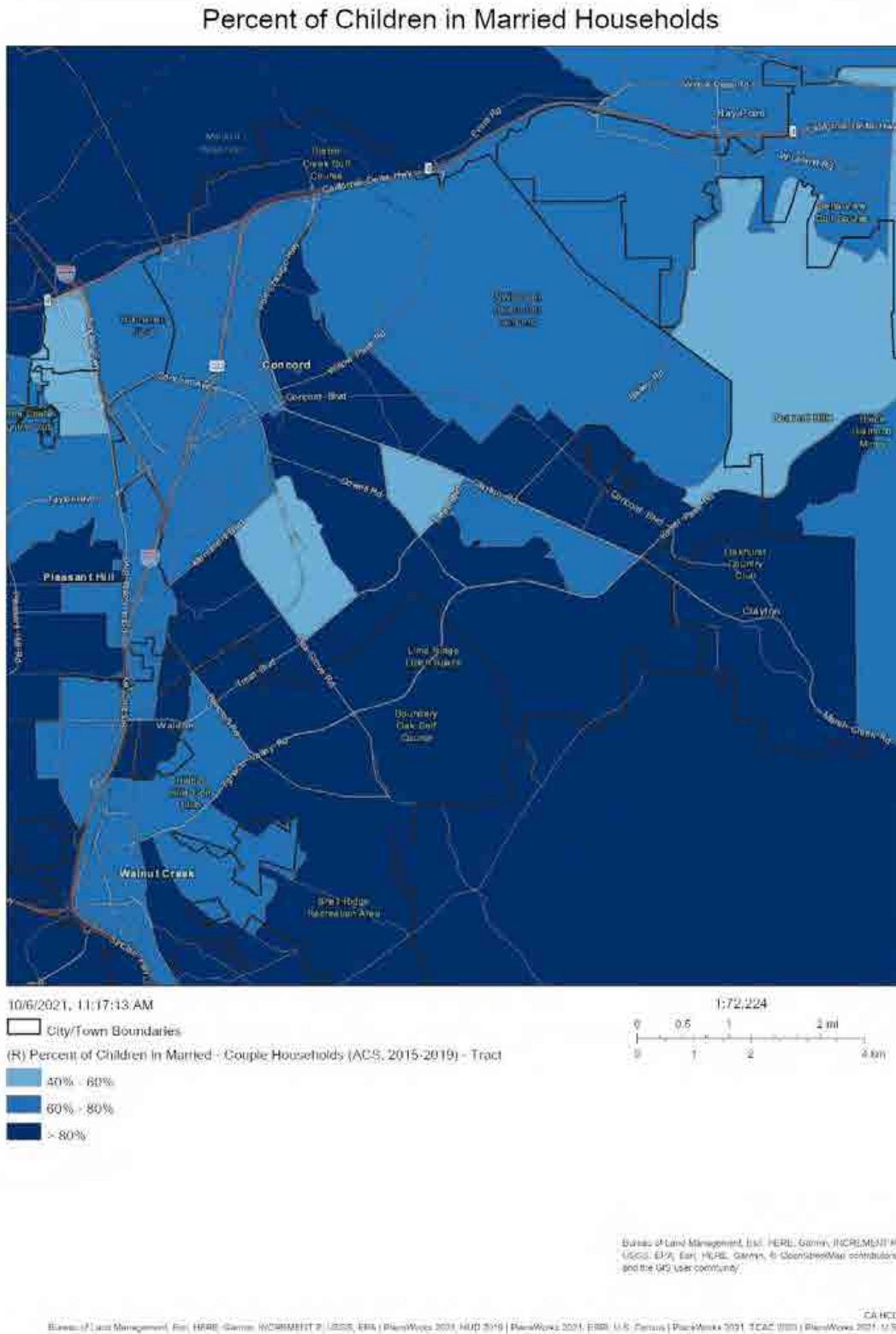
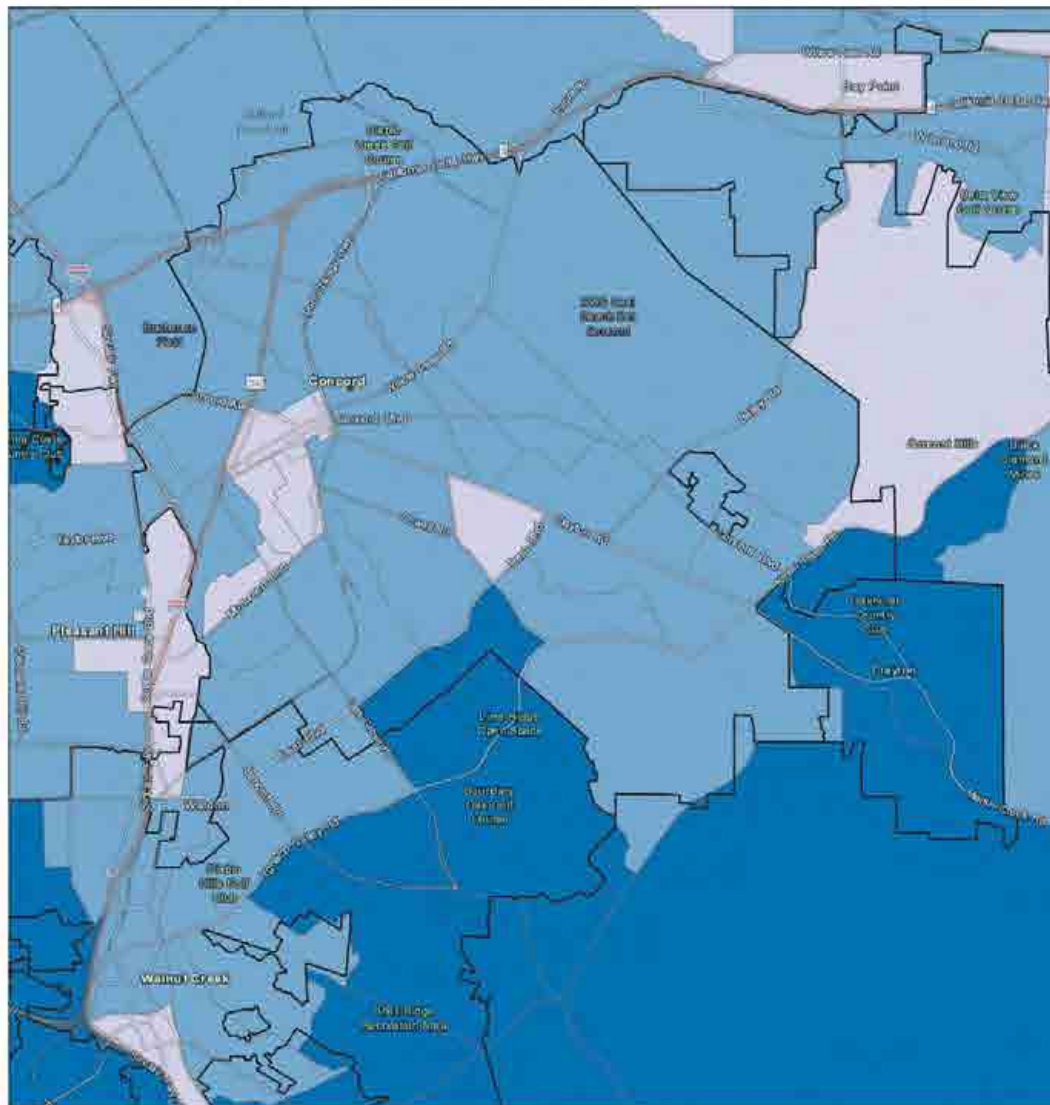


Figure 15: Percent of Population 18 Years and Over in Households Living with Spouse – Tract

Population 18 Years and Over Living with Spouse



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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

- 20% - 40%
- 40% - 60%
- 60% - 80%



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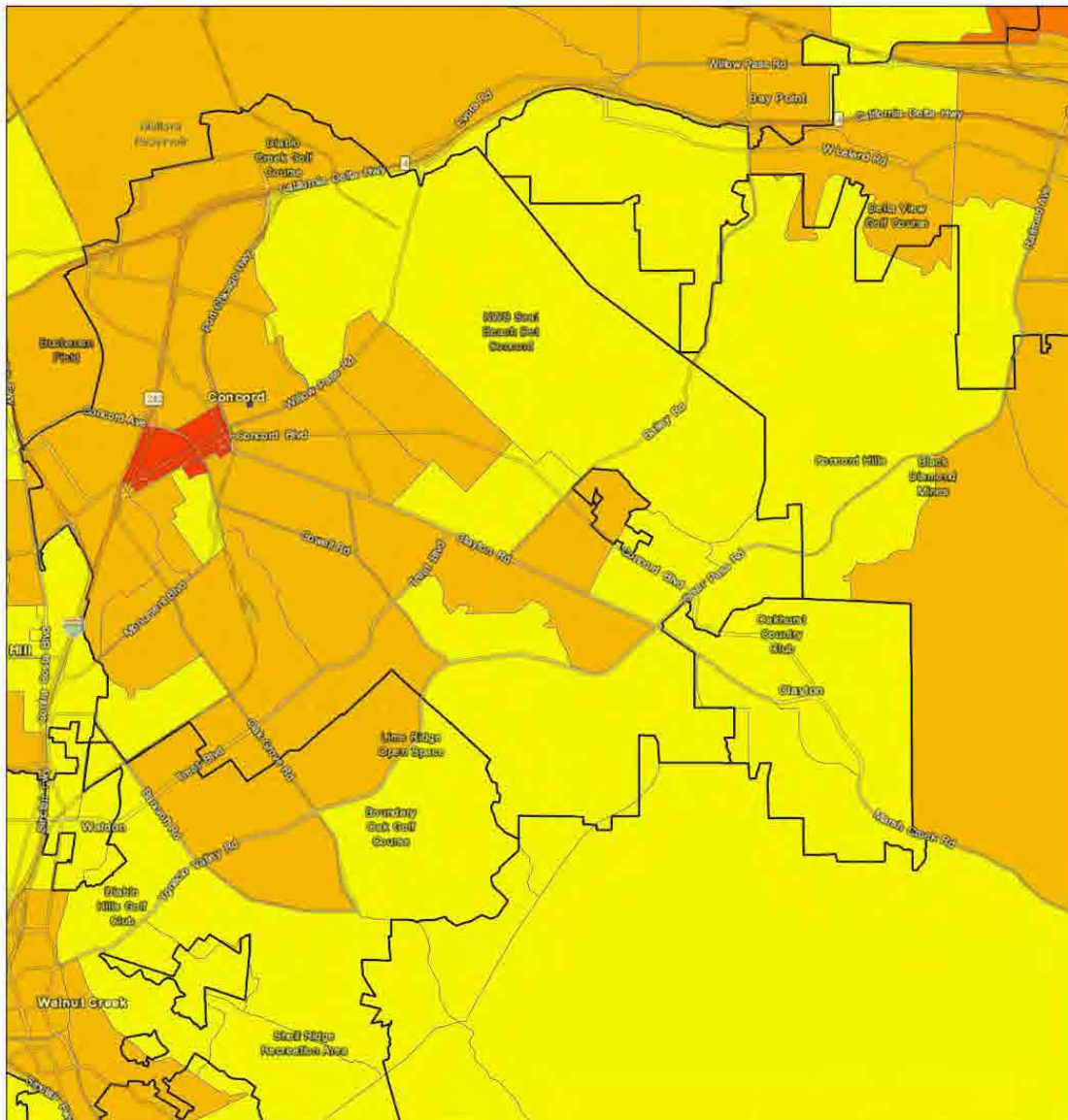
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Persons with Disabilities

As shown in **Figure 16, Population with a Disability – Tract**, the percentage of residents reporting a disability is 10% to 20% throughout most census tracts in Concord; there are eight census tracts, mostly in the eastern portion of Concord, that report less than 10% of its residents with disabilities, and one census tract that reports 30% to 40% of residents with disabilities, likely due to the proximity to services such as grocery stores, clinics, and access to transportation (see the section “Disparities in Access to Opportunity,” below). As highlighted in Appendix B, Needs Assessment, the racial group with the highest percent of persons with a disability is the American Indian and Alaska Native population with 26.6%, followed by the Black or African American population with 14.6%, and the White population with 13.4%. This is significant because the Black or African American population experiences the highest rates of poverty at 18.9%; further, as indicated in the “Income” section in this analysis, 60% of Black or African American residents have a median income less than 80% of the AMI and are considered lower income. Therefore, Black or African American families or persons with a disability are more likely to experience major challenges for housing and care. Generally, the percent of the population with a disability remained constant over time in Concord and adjacent communities. The incidence of disabilities is moderate in Concord compared to areas of the region to the east and north, and slightly higher than those areas to the west and southwest (see **Figure 16a, Population with a Disability (Regional) – Tract**). There appears to be no distinct difference between rates of disabilities in Concord compared to the greater region.

Figure 16: Population with a Disability – Tract

Population with a Disability



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City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%

1:72,224

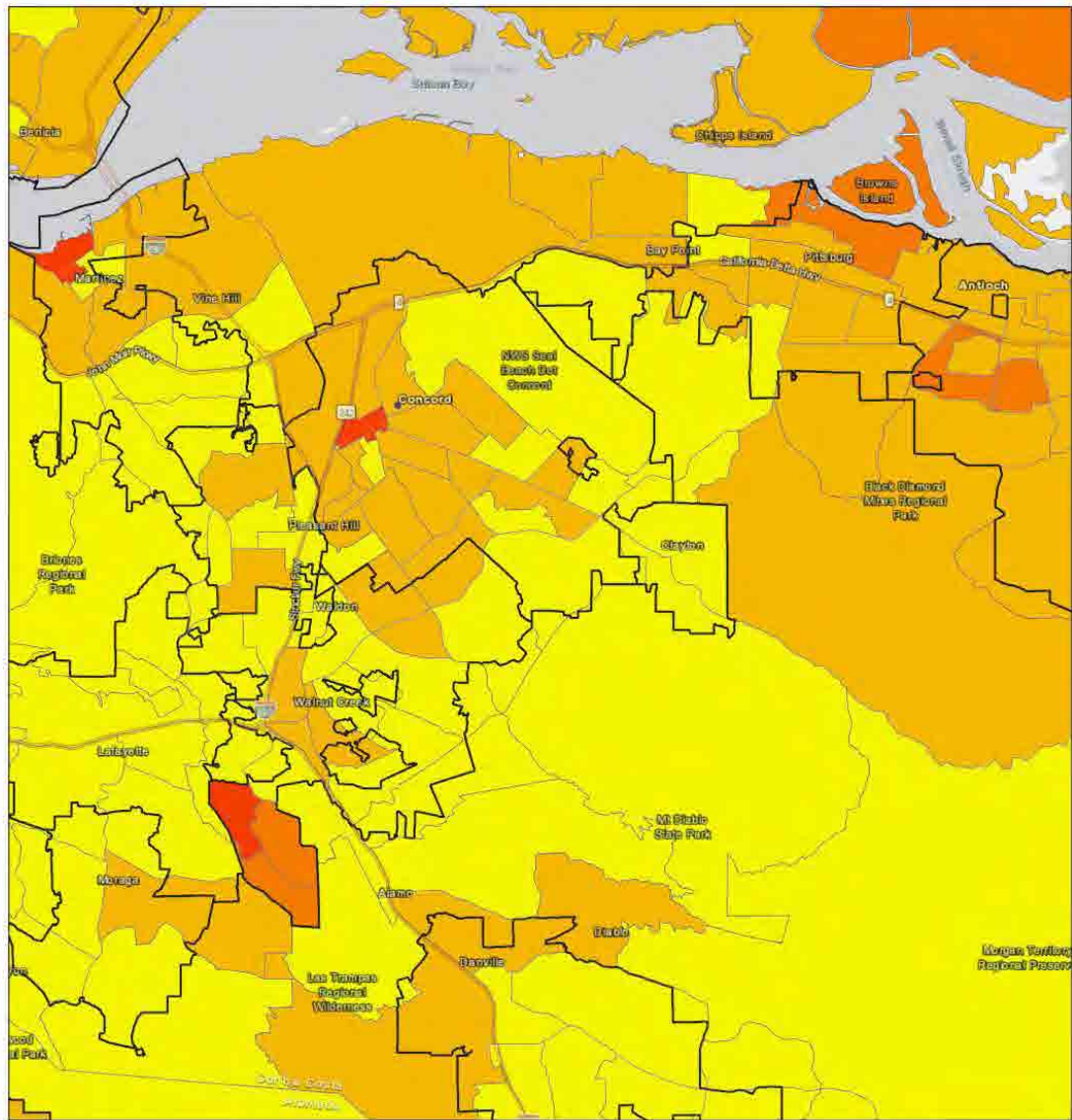


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Figure 16a: Population with a Disability (Regional) – Tract

Population with a Disability (Regional)



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City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%

1:144,448

0 1.25 2.5 5 mi

0 2 4 8 km

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Findings

Patterns over time show that Concord has become much more diverse, demonstrating increased rates of integration and higher rates of racial and ethnic diversity. Patterns across race and ethnicity, household income, familial status, and disability status are most apparent in what is referred to as the central/western portion of Concord, which consists of the neighborhoods of Central Concord, Four Corners, Ygnacio Valley, Olivera, and Port Chicago. In general, this central/western portion of Concord has higher rates of racial and ethnic diversity, which became more apparent from 2010 to 2018; has higher concentrations of households that earn less than or equal to the AMI; demonstrates some overlap with female-headed households and lower rates of children in a married couple household; and shows high proportions of the population with a disability. What this data indicates is that while the central/western portion of Concord is both diverse and home to many non-White households, it experiences a higher rate of poverty, disability, overcrowding (see the section “Overcrowding,” below), and unmarried/single households. This illustrates that segregation and disparities exists spatially, even though the overall growth of Concord shows increased diversity.

There are sites identified to accommodate the City’s housing needs, or Regional Housing Needs Allocation (RHNA), located within the previously identified central/western area of Concord, which include a mix of low-, moderate-, and above moderate-income sites (see **Appendix E, Sites Analysis**). The southeastern portions of Concord, most notably the area known as Lime Ridge, conversely has patterns that demonstrate lower rates of racial and ethnic diversity, higher household incomes, and lower rates of female-headed households and populations with a disability. It should be noted that the Lime Ridge community is significantly less dense than communities to the west and central portions of Concord, as it consists of suburban development surrounded by natural areas of conservation. Therefore, selection of lower-income sites in this area is limited because zoning is not adequate for lower-income households per HCD’s criteria. In comparison to some of the surrounding communities, Concord is more integrated as it relates to race/ethnicity and median income.

The Sites Analysis’ identification of sites in this central/western area do not exacerbate patterns of segregation, because: (1) the Sites Analysis is merely an indicator of capacity for new development but does not influence or determine what income levels the market will ultimately provide; (2) the programs of the Housing Element will help to reverse and improve patterns of segregation throughout the community by strengthening tenant protections, incentivizing the production and preservation of deed-restricted affordable units, targeting grants funds and outreach to the R/ECAP, and leveraging and advocating for more affordable housing funds for the City; and (3) the Housing Element Update will increase opportunities for medium and high residential densities in areas with access to resources, outside of lower-resource areas, through the rezoning program in Objective 8.6.

Racially and Ethnically Concentrated Areas of Poverty

Racially and Ethnically Concentrated Areas of Poverty and Areas of Affluence

An area is designated a racially and ethnically concentrated area of poverty (R/ECAP) if two conditions are satisfied: first, the non-White population, whether Hispanic or non-Hispanic, must account for at least 50% of the census tract population, and second, the poverty rate in that census tract must exceed

either 40% or three times the overall poverty rate, whichever is lower. As shown in **Figure 17, Racially or Ethnically Concentrated Areas of Poverty (2009–2013)**, from 2009 to 2013 there was one tract within the western portion of Concord that was designated as a R/ECAP. There are no other tracts in Concord or Contra Costa County that are classified as R/ECAPs. In 2021, there were no tracts or block groups in Concord that are considered to be areas of high segregation and poverty.

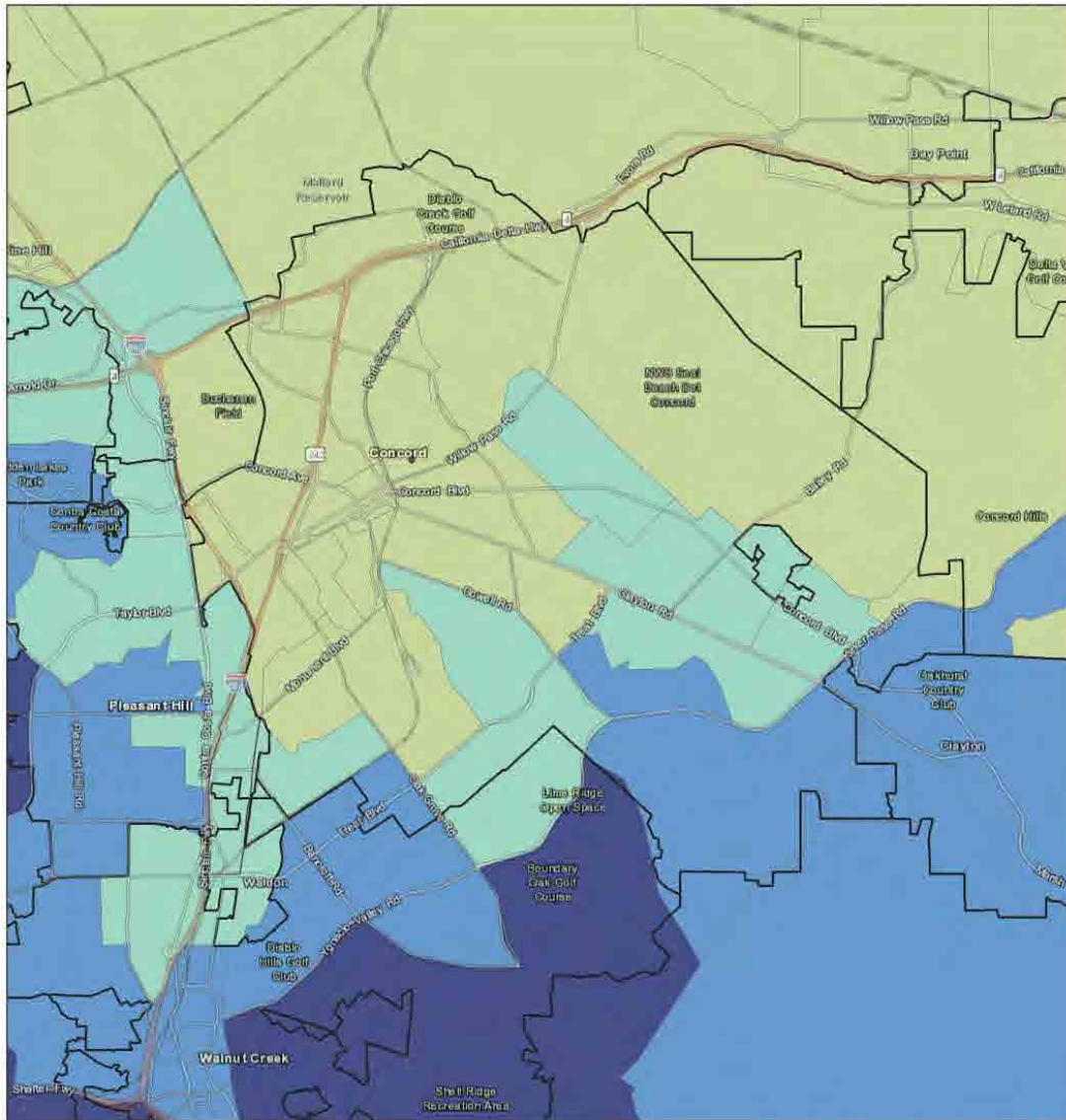
While R/ECAPs indicate high concentrations of non-White residents where a disproportionate number of residents live in poverty, racially concentrated areas of affluence (RCAAs) indicate census tracts where 80% of the population is White and the median household income is \$125,000 or more. The southeastern portion of Concord includes four tracts that have a predominantly (above 50%) White population with median incomes greater than \$125,000. However, because none of these tracts have a White population of over 80%, they would not be classified as RCAAs.

Three census tracts in the south/southeastern portion of Concord are identified as “high resource,” as shown in the Tax Credit Allocation Committee/Housing Community Development (TCAC/HCD) Opportunity Map, **Figure 18, TCAC/HCD Opportunity Map – Tract**. Several tracts in the central/southern area of Concord are identified as “moderate resource”; the remainder of tracts in Concord are identified as “low resource.”

As discussed earlier and as shown in **Figure 4a, Predominant Population – White Majority Tracts (Regional)**, and **Figure 18a, TCAC/HCD Opportunity Map (Regional) – Tract**, cities near Concord (except those to the north and northeast) are predominantly White and designated as high resource areas, while cities to the north and northeast are considerably less White and designated as low resource areas.

Figure 18: TCAC/HCD Opportunity Map – Tract

TCAC/HCD Opportunity Areas



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource

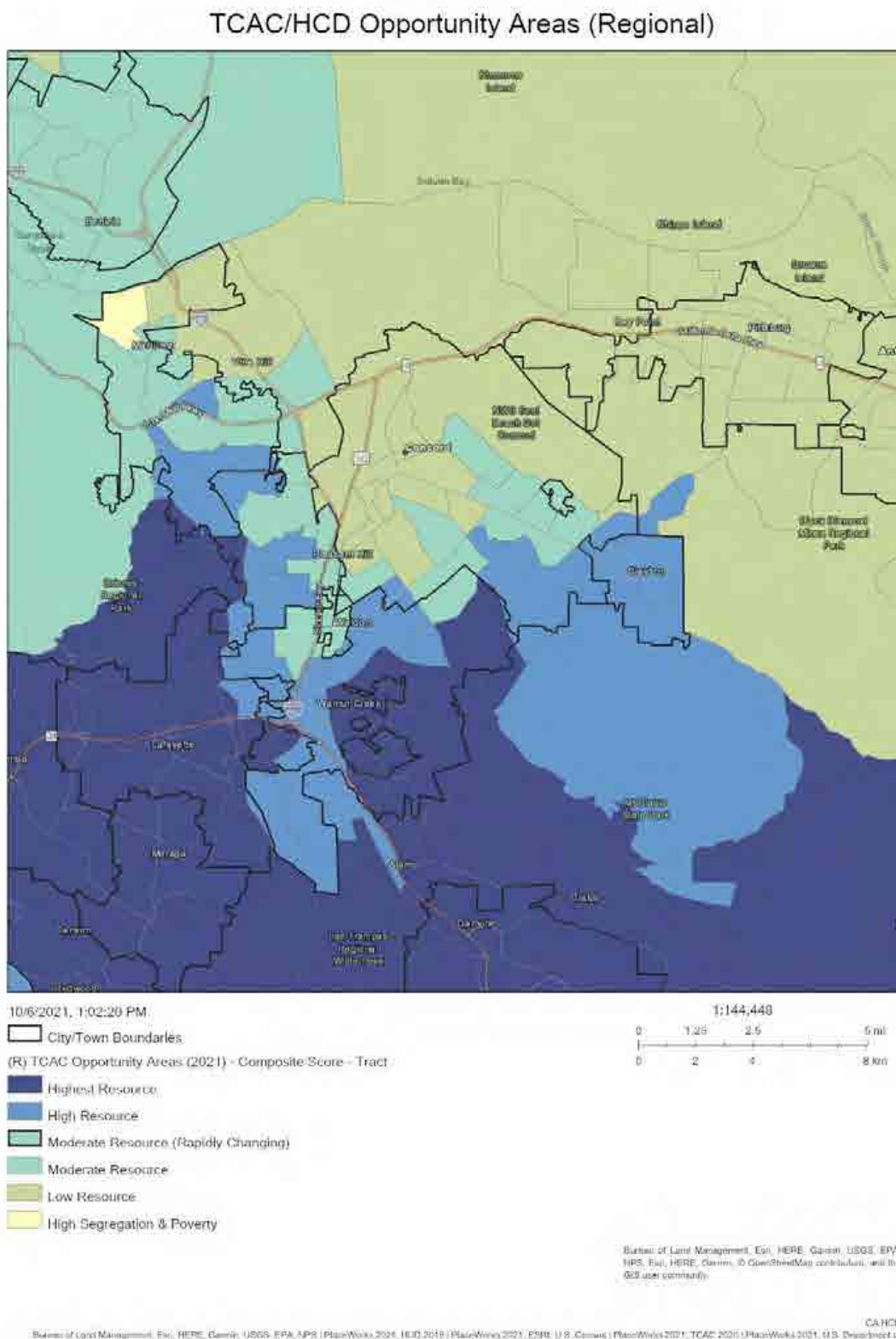
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Figure 18a: TCAC/HCD Opportunity Map (Regional) – Tract



Findings

According to the 2021 TCAC/HCD Opportunity Area Map, Concord is predominately composed of designated “low resource” and “moderate resource” areas. Resource areas are designated based on index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, concentration of poverty, and levels of environmental pollutants, among others. TCAC high resource areas increase opportunities for affordable housing developers that qualify for tax credits.

As described above, there is one tract within the western portion of Concord that is considered a R/ECAP. This tract meets the criteria of a R/ECAP because the rate of poverty is high, and the tract is majority non-White. In particular, the tract consists of households primarily of Hispanic or Latinx background, as shown in Figure 5. According to 2019 ACS Census data, Hispanic or Latinx households account for 12.8% of the population that experience poverty in Concord. This tract encompasses the southwestern Monument Boulevard corridor, which, according to local knowledge, includes older multi-family complexes that are often affordable to lower-income residents. This corresponds to the low homeownership rate and lower incomes that are characteristics of many non-White households, as described in Appendix B, Household Income and Extremely Low-Income Households. Through **Program 19, Replacement Requirements** of the Housing Element the City requires that housing development projects provide at least the same number of dwelling units as any units demolished to build the project, including any affordable units existing on the site within the past five years.

Additionally, the City also requires that for demolished units subject to certain affordability restrictions or occupied by low- or very low-income households, the project must meet applicable requirements for affordability, relocation benefits, and right of first refusal for existing occupants. There are no other tracts in Concord or Contra Costa County that are classified as R/ECAPs. Concord does not have any RCAAs, which are defined as areas that are over 80% White with median household incomes of over \$125,000. However, it should be noted that other areas of Contra Costa County have RCAAs and are not as racially diverse or affordable for lower-income households as Concord.

The City is not aware of any specific policies, practices, or investments that have led to the establishment of the R/ECAP referenced above. Based on historic zoning maps, it appears this area was one of several in the western portion of Concord that were zoned for high-density development during the City’s post-war boom, yet the other high-density areas have not developed into R/ECAPs. It appears that several factors have contributed to the development of this R/ECAP, including its relatively early development (contributing to the age of the housing stock), the relatively large concentration of higher-density housing, and the proximity to Interstate 680 and Monument Boulevard, which may have contributed to lower rents and property values in this area due to higher noise and air pollution levels. The area’s distance from Downtown Concord and other major nodes of commercial activity may have also contributed to its lower rents and property values (and corresponding higher poverty rate).

The sites identified to accommodate the lower-income RHNA are not located within the R/ECAP at the request of the community and in compliance with HCD guidelines to help ensure that R/ECAP conditions (i.e., concentration of poverty) are not exacerbated. Within the R/ECAP, capacity is identified for one (1) site to accommodate eight (8) above moderate-income units. This site consists of one vacant parcel and one parcel with a singlefamily unit, ensuring there is no risk of displacement. While the Sites

Inventory identifies where capacity exists to accommodate the RHNA, in accordance with the State’s site feasibility criteria, the programs of the Housing Element aim to improve conditions of, and reverse patterns of, segregation. Specific programs in the Housing Element that aim to reverse patterns of R/ECAPs in the City include Program 8, in which the City will rezone sites outside of low resource areas of the City, which will be suitable for and conducive to medium and high density residential development. These identified areas will increase funding eligibility for the production of affordable housing and provide opportunity to lower-income households.; Program 20, where the City will conduct bilingual outreach within the R/ECAP related to tenant protections; and Program 24, where the City will conduct bilingual outreach in the R/ECAP, including an in-person training on displacement as it relates to short term vacation rental regulations; refer to the section “Sites Analysis AFFH Assessment,” below for more information.

Disparities in Access to Opportunity

In general, lower-income households and racially segregated communities are commonly disproportionately impacted by a combination of locational factors such as proximity to landfills, areas prone to flooding, freeways, industrial areas, and other toxins and pollutants.

The location of affordable housing in areas proximate to resources provides lower-income residents with increased access to opportunities such as increased education through quality schools, employment options, transportation options, low poverty exposure, and environmentally healthy neighborhoods. Research indicates that among various economic and social factors, being in proximity to certain amenities can encourage positive critical life outcomes. Areas that offer lower-income households the best chance at economic advancement, high educational attainment, and good physical and mental health are ideal for affordable housing development.

Education

Concord’s education domain score represents a range of education outcomes. As shown in **Figure 19, Education Domain Score – Tract**, Concord’s education domain score ranges from less than 0.25 to over 0.75, which indicates a range of education outcomes from “less positive” to “more positive.” When comparing the education domain score to White-majority tracts, it appears that populations with predominantly White populations (over 50% White, in the southeastern portion of Concord) experience higher positive education outcome scores. Contrarily, greater percentages of non-White populations, in the western/central part of Concord, generally experience less positive education outcome scores. Similarly, tracts shown to have a median income of \$125,000 or more also have higher educational outcomes.

Concord’s education domain score is generally lower compared to communities to the northwest, west, and south, but slightly higher when compared to communities to the northeast and east (see **Figure 19a, Education Domain Score (Regional) – Tract**).

TCAC Opportunity Areas education domain scores consider math and reading proficiency (percentage of 4th graders who meet or exceed math proficiency and literacy standards), high school graduation rates (percentage of high school cohort that graduated on time), and student poverty rate (percent of students not receiving free or reduced-price lunch). Therefore, the methodology does not capture educational opportunities available in Concord. Concord’s public education system is primarily served by Mount Diablo Unified School District (MDUSD). MDUSD serves more than 29,000 students at 53 school sites in Contra Costa County in the cities of Clayton, Concord, and Pleasant Hill; portions of

Martinez, Pittsburg, and Walnut Creek; and the unincorporated communities of Bay Point, Lafayette, and Pacheco. MDUSD has an Equity and Disproportionality Department that aims to develop and implement an inclusive learning environment by identifying structures, policies, and practices that may preclude or further their vision for inclusive learning environments where all families and students thrive. MDUSD provides several services and programs that support lower-income households and special needs groups, such as free/low-cost internet, English learner and dual-language programs, college readiness and afterschool programs, and adult education programs for parents.

The Mount Diablo CARES Expanded Learning Program (MDUSD CARES) is a free comprehensive afterschool program with academic and nutrition activities for students in transitional kindergarten through high school in 18 school sites within MDUSD, 10 of which are located in Concord. The program is in-person, with virtual opportunities and resources for students. According to the MDUSD CARES webpage, the program is used predominantly by 53% Hispanic and Latinx students, followed by 20% Other White students, and 15% Black or African American students. Approximately 86% of students served by this program (2,175 total students) qualify for free/reduced lunch.³ Therefore, the program serves a majority of lower-income households.

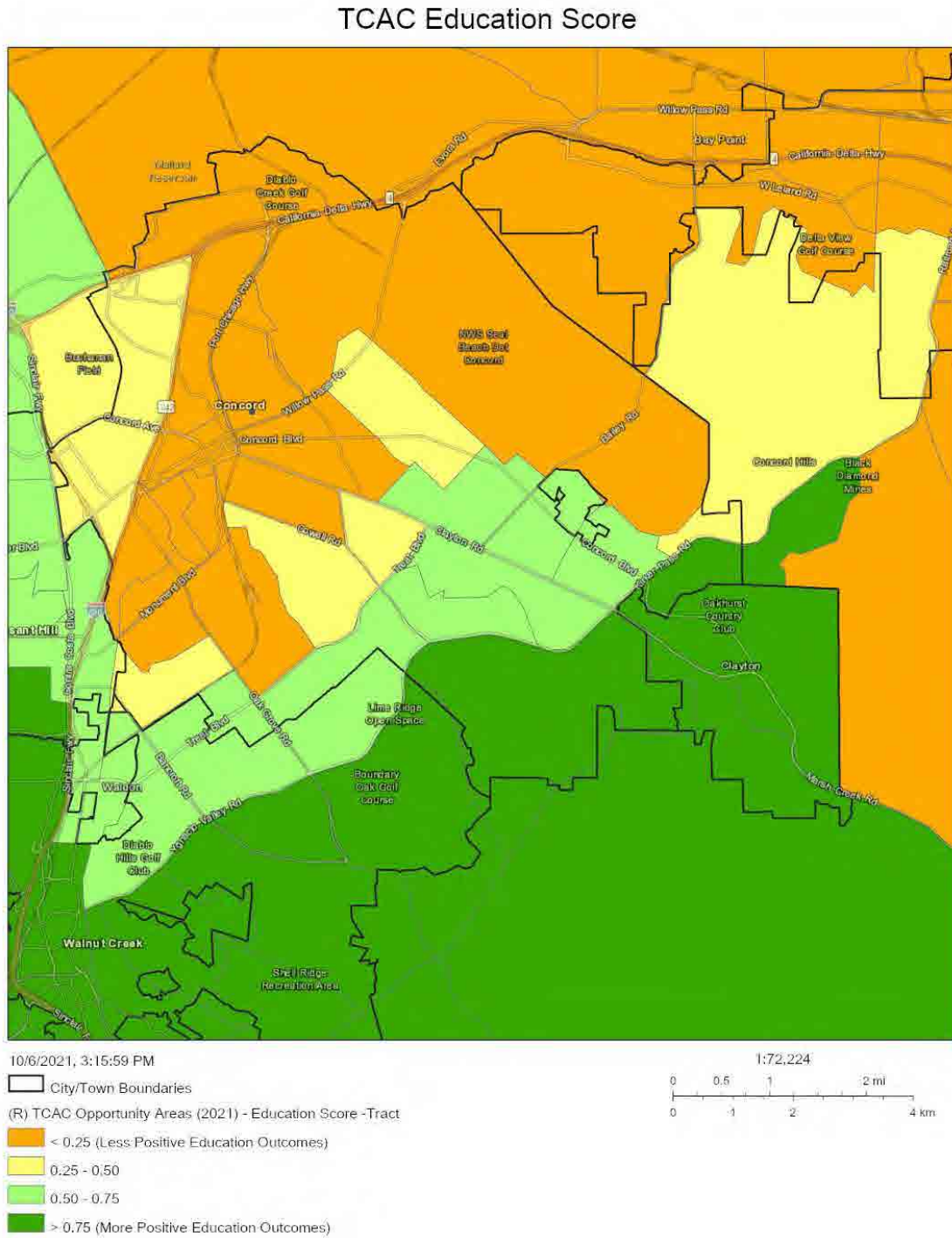
The adult education program helps more than 7,500 adults each year and provides career and technical education, adult basic education, high school diploma and high school equivalency, parent education, English as a second language, family literacy, citizenship, and programs for adults with disabilities. Another local program that supports education in Concord is the Contra Costa Workforce Collaborative. The Contra Costa Workforce Collaborative's Loma Vista Adult Center, located in Concord, supports youth and young adults (16 to 24) who have barriers to graduating from school, finding a job, or launching a career. The Contra Costa Workforce Collaborative also partners with America's Job Center of California/EASTBAY Works, which offers employment and workforce services, occupational skills training, and educational programs.

Additionally, while the City does not have control over the school district, Concord collects a childcare fee through the Building Division prior to issuance of a Certificate of Occupancy for non-residential projects based on 0.5% of the project's valuation. This fee collects substantial funds that fund the Concord Child Care Program, which partially funds the MDUSD CARES program.

³ C.A.R.E.S. Home Page. Retrieved April 21, 2022.

https://www.mdusd.org/pf4/cms2/view_page?d=x&group_id=1516177889995&vdid=i4a1rm2yu0.

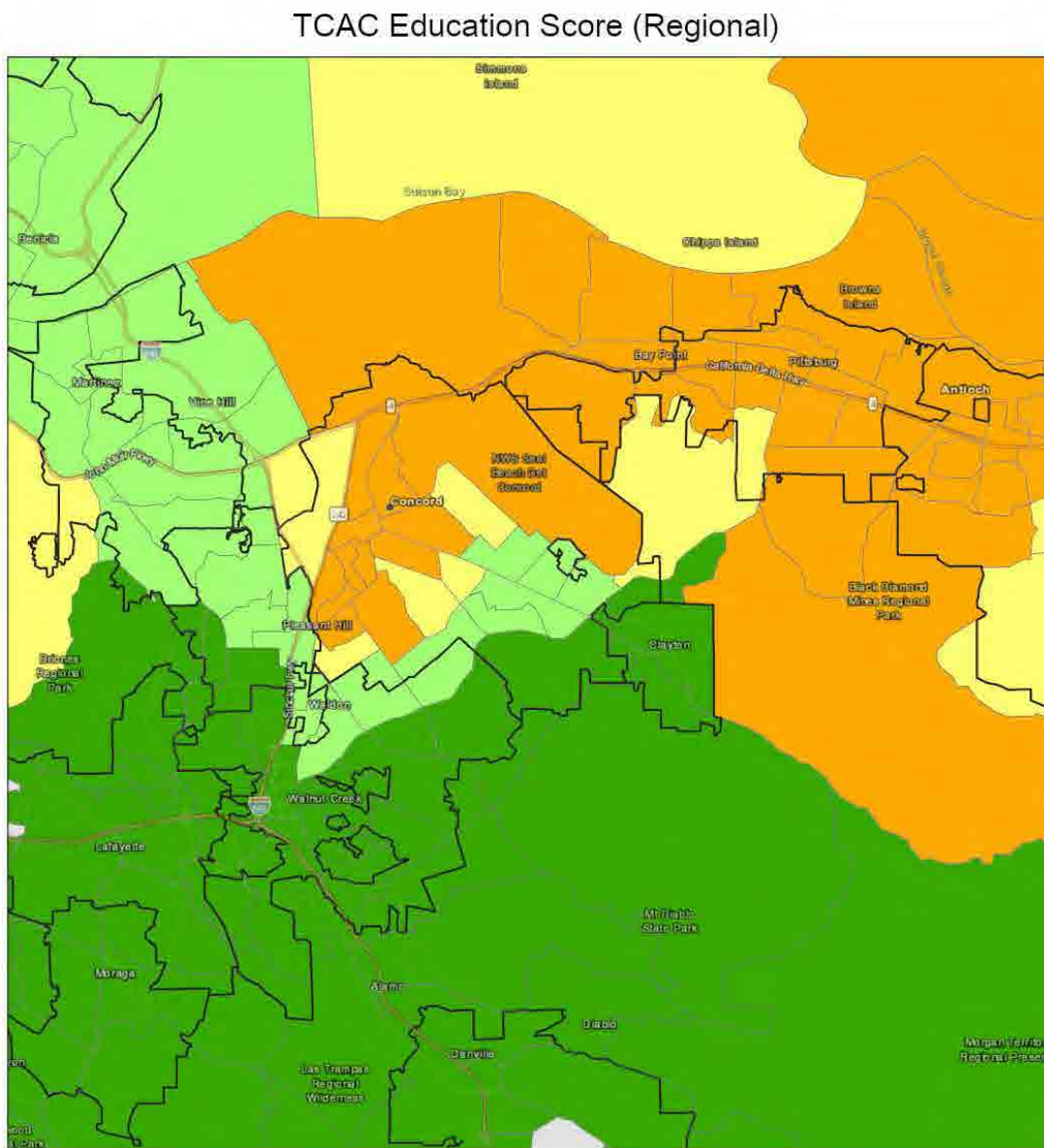
Figure 19: Education Domain Score – Tract



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Figure 19a: Education Domain Score (Regional) – Tract



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Education Score -Tract

- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Education Outcomes)
- No Data

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Employment

Concord's economic domain score represents poverty (percent of population with income above 200% of federal poverty line), adult education (percent of adults with a bachelor's degree or above), employment (percent of adults aged 20 to 64 who are employed in the civilian labor force or in the armed forces), and job proximity (number of jobs filled by workers with less than a BA that fall within a given radius that is determined by the typical commute distance of low-wage workers in each region of each census tract population weighted centroid).⁴ As shown in **Figure 20, Economic Domain Score – Tract**, Concord's score ranges from 0.00 to 0.50 across all census tracts except one tract that scored 0.52 in the very southeast corner of Concord (this tract overlaps with Clayton). This indicates that, overall, Concord has a low to medium economic outcome; scores higher than 0.75 are considered more positive and scores less than 0.25 are considered less positive. Compared to the region (**Figure 20a, Economic Domain Score (Regional) – Tract**), the tracts in Concord generally score higher than communities to the northeast (Bay Point and the cities of Pittsburg and Antioch) and lower than communities to the southwest (cities of Walnut Creek, Moraga, and Lafayette).

Figure 21, Jobs Proximity Index (HUD 2014–2017) – Block Group, indicates that the western portions of Concord have better access to employment based on proximity scores ranging from over 80 (closest proximity) in the highest block groups, to below 20 (farthest proximity) in the eastern portion of Concord. This trend is shown regionally in **Figure 21a, Jobs Proximity Index (HUD 2014–2017) (Regional) – Block Group**, with higher scores to the west and lower scores to the east. Notably, more affluent areas with higher proportions of White populations in the southeast portions of Concord are actually farther from jobs.

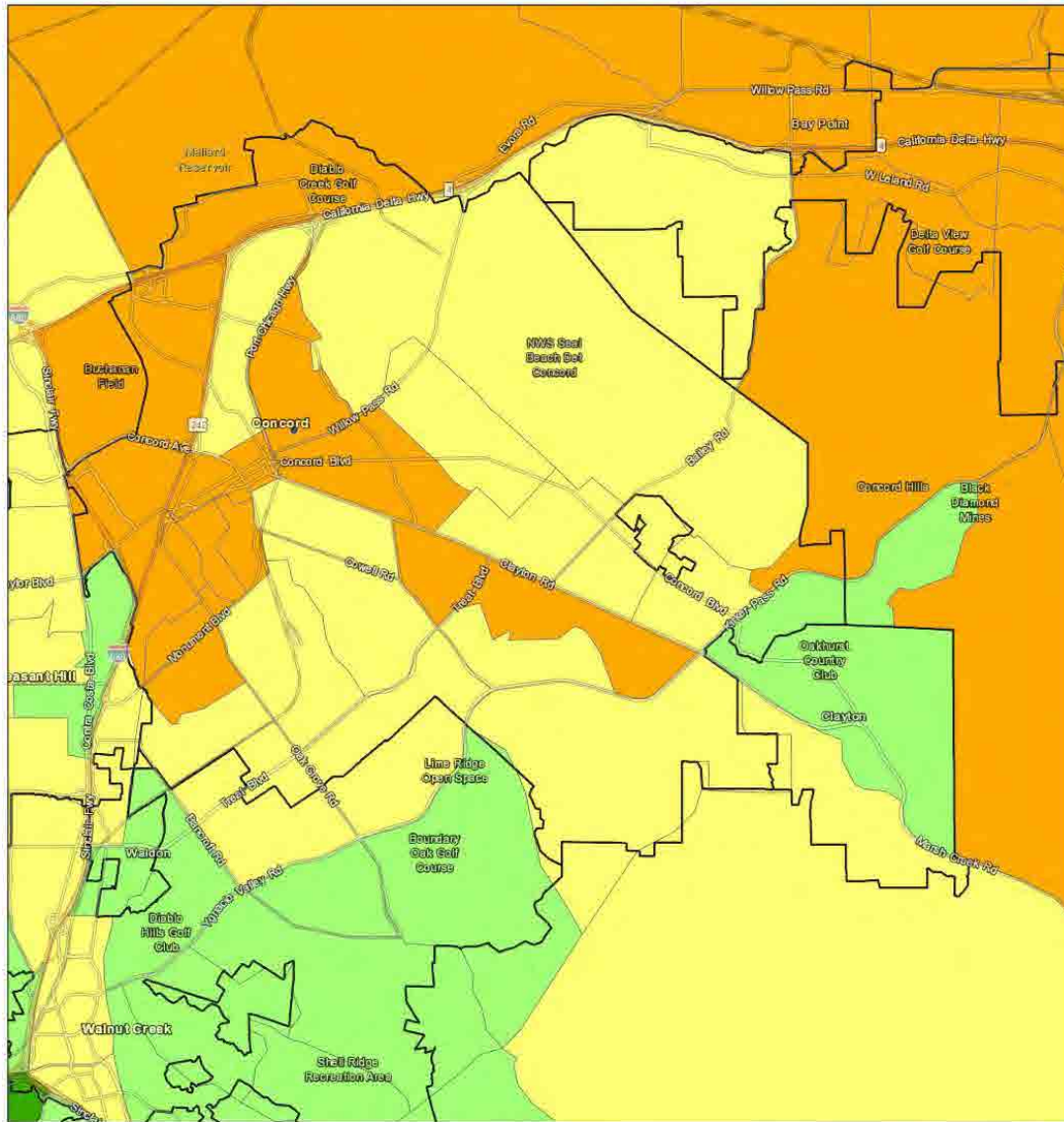
Poverty rates and median income trend with the regional economic domain scores. Communities southwest of Concord enjoy high economic domain scores (higher median income, lower poverty rates), while communities to the northeast experience lower economic domain scores (lower median income, higher poverty rates).

Figure 22, Job Access Score, from the Center for Neighborhood Technology (CNT), shows indices based on employment location and variety of employment types. As shown in Figure 22, Concord's central and western areas indicate moderate to high index scores. The eastern and southeast areas of Concord experience moderate and lower index scores from 4–6 to 2–4. At a regional level, the cities east of Concord, including Bay Point, Pittsburg, and Nortonville, also experience lower job access index scores, and the cities west and southwest of Concord experience higher scores, with Walnut Creek identified as an area with the highest jobs access scores.

⁴ Methodology for the Draft 2020 TCAC/HCD Opportunity Map. (n.d.). Retrieved April 22, 2022. <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>.

Figure 20: Economic Domain Score – Tract

TCAC Economic Score



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

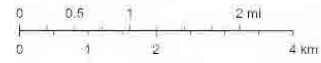
< 0.25 (Less Positive Economic Outcome)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Economic Outcome)

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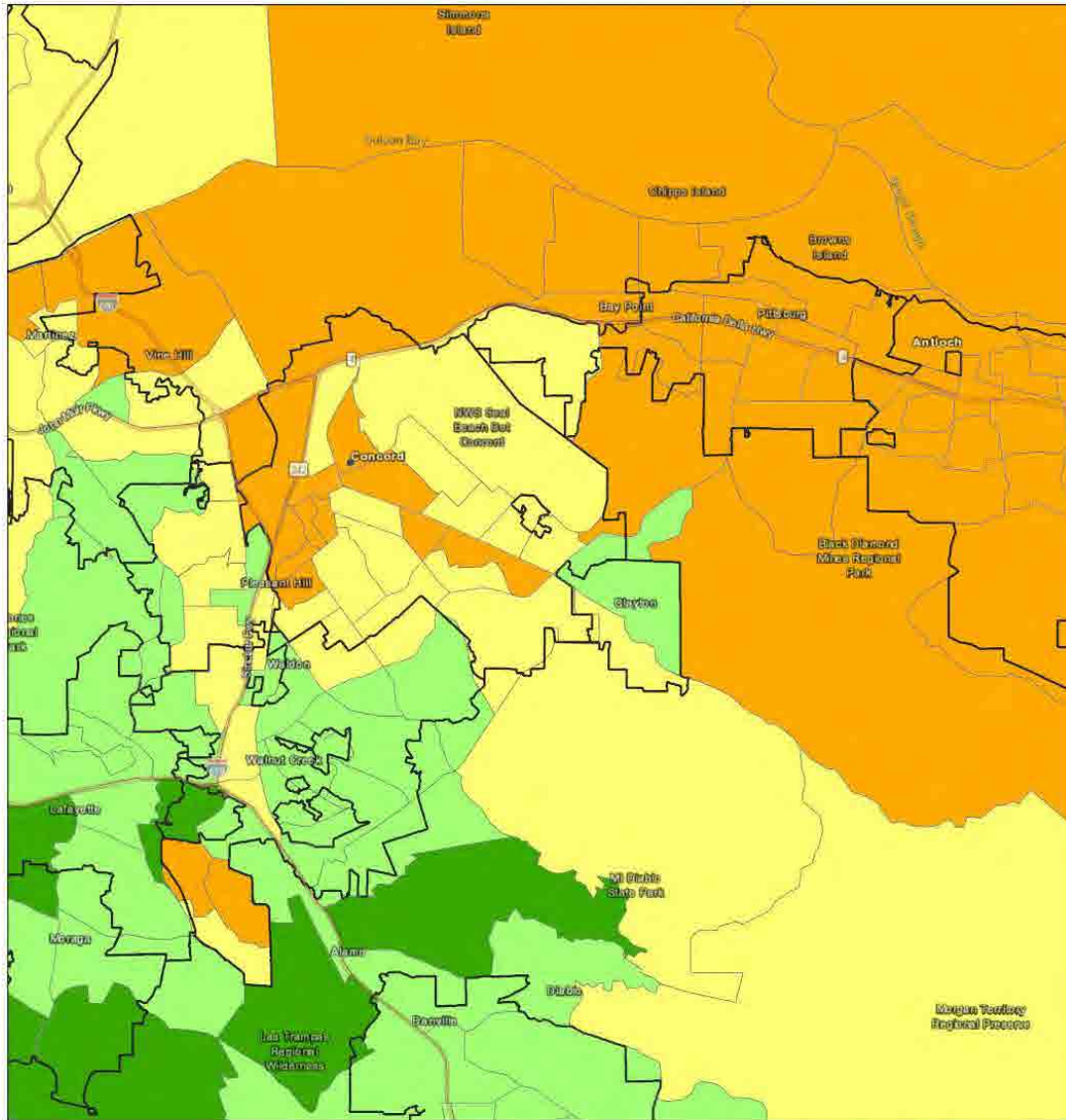


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Figure 20a: Economic Domain Score (Regional) – Tract

TCAC Economic Score (Regional)



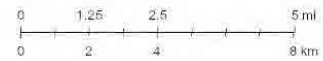
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Economic Score - Tract

- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)

1:144,448



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CA HCD

Figure 21: Jobs Proximity Index (HUD 2014–2017) – Block Group

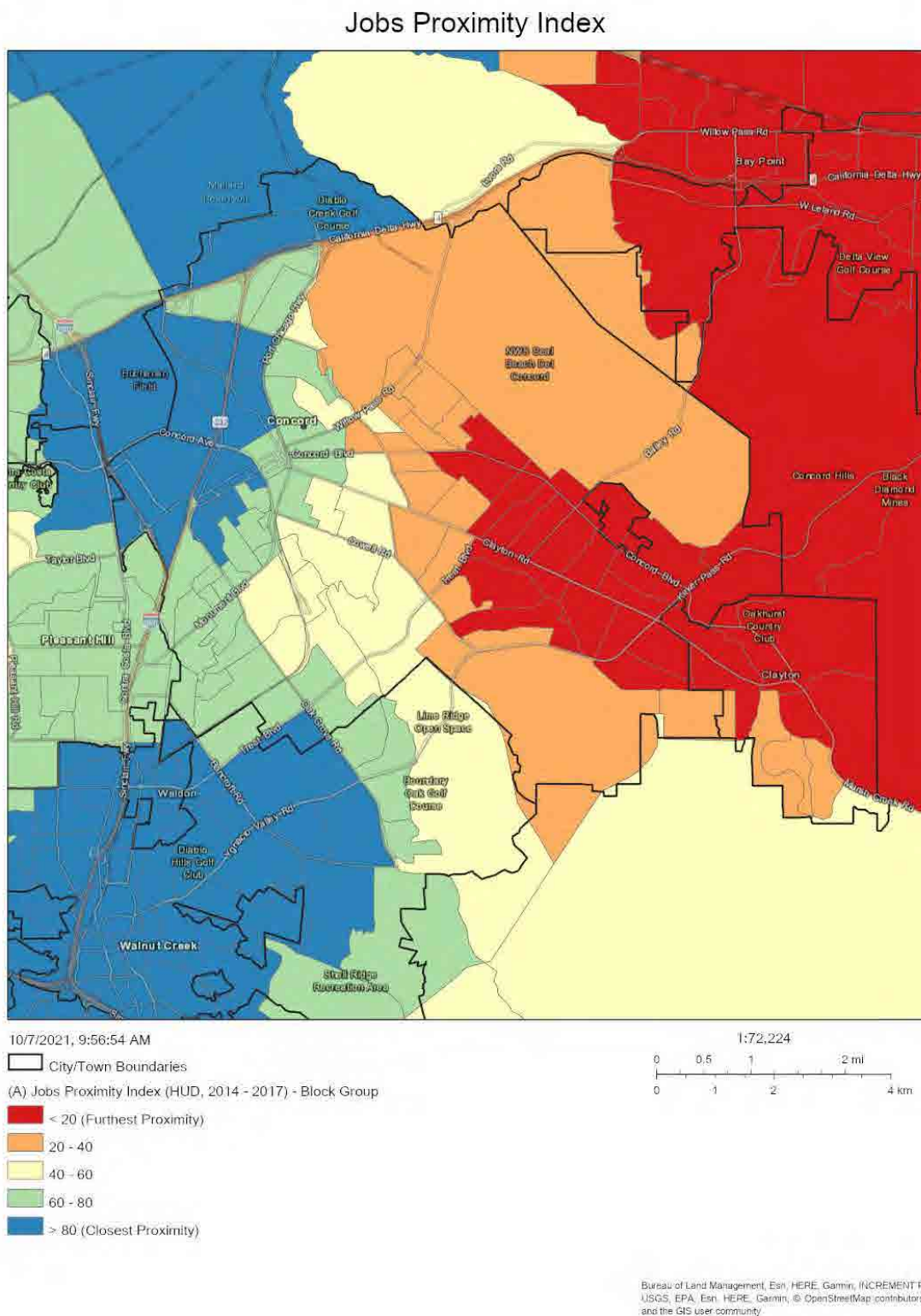


Figure 21a: Jobs Proximity Index (HUD 2014–2017) (Regional) – Block Group

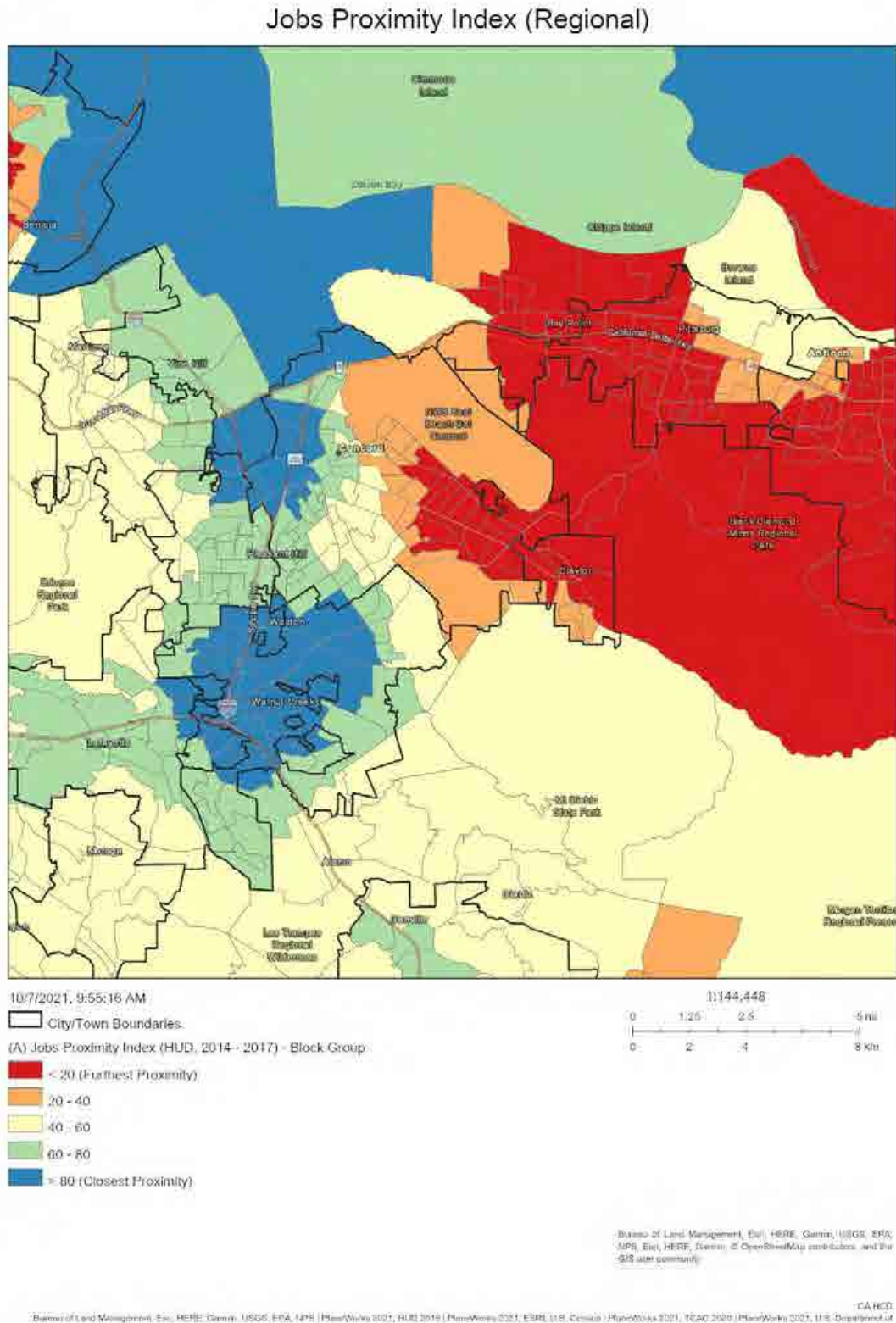
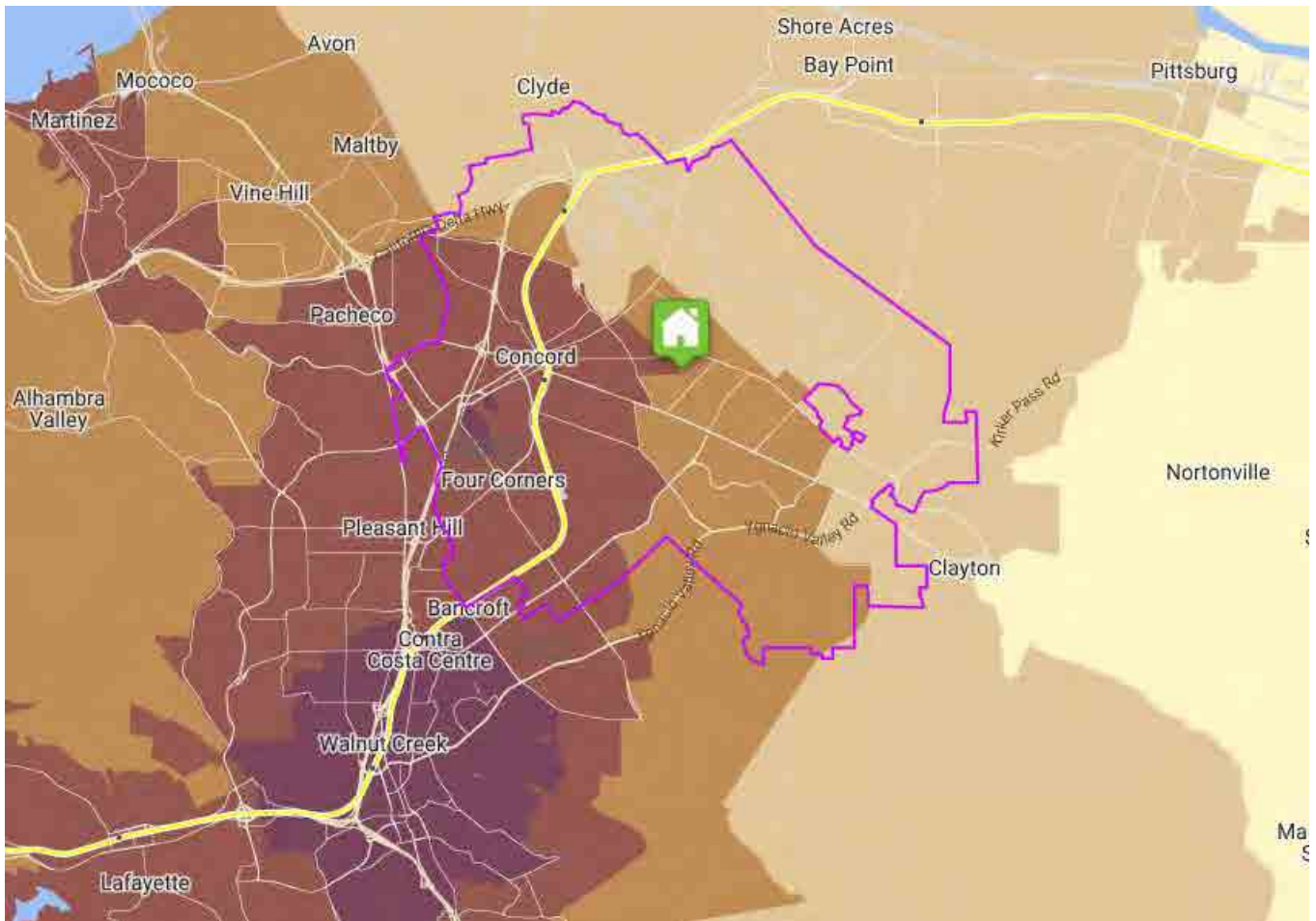
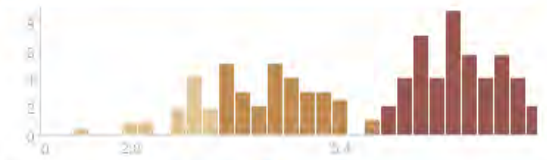


Figure 22: Job Access Score



Job Access Score (0-10)



Job Access Score (0-10) ?
 Average: 6.0 Range: 2.2 - 8.0

Population	Household	Neighborhood
< 2	Population: 0	% of Population: 0%
2 - 4	12,204	9.7%
4 - 6	42,267	33.4%
6 - 8	68,889	54.5%
8 +	3,106	2.5%
Total	126,466	100%

Source: CNT 2017

Transportation

Concord is served by a public transportation system that spans local and regional areas, including the County Connection bus service and the Bay Area Rapid Transit (BART) District. Transportation costs are largely a function of the location of housing in the citywide and regional context. The ability to access quality housing in locations that provide access to convenient public transit has a major impact on overall household costs and a household's ability to access quality employment, recreation, health care, education, and other necessities that provide opportunities for living healthy and prosperous lives. Access to public transit and the cost of transportation is a key consideration for fair housing access.

Concord has two BART stations and bus lines that run through most portions of Concord, as shown in **Figure 23, Concord Transportation and Walkability**. Downtown Concord and the surrounding neighborhoods have the greatest access to public transit and score the highest walkability index score, as many of the bus lines converge at the Downtown Concord BART station. Those areas of Concord that are most diverse, have higher concentrations of households with a disability, and have higher rates of households living in poverty also have the greatest access to public transit. **Figure 24, County Connection System Map**, shows public transit connections across Contra Costa County and to adjoining counties. This map demonstrates that as a centrally located city, Concord is a major intersection of transit lines across Contra Costa County. **Figure 25, BART Station Map**, details the expanse of access provided by the BART system, providing increased access to opportunities across the region. **Figure 26, Transportation Costs**, from the CNT, indicates that areas near the central and western areas of Concord spend the least amount of their income on transportation (approximately 8%-12%), and areas in the east and southeast part of Concord indicate moderate to high spending on transportation, ranging from 15% to more than 29% of income. This is likely due to an increased reliance on automobiles and less access to bus and rail transit. At a regional level, cities north and east of Concord also spend more of their income on transportation. Cities southwest of Concord, including Pleasant Hill and Walnut Creek, are also well serviced by transit, similar to areas in central/western Concord, and therefore indicate less percent of income spent on transportation.

Figure 23: Concord Transportation and Walkability

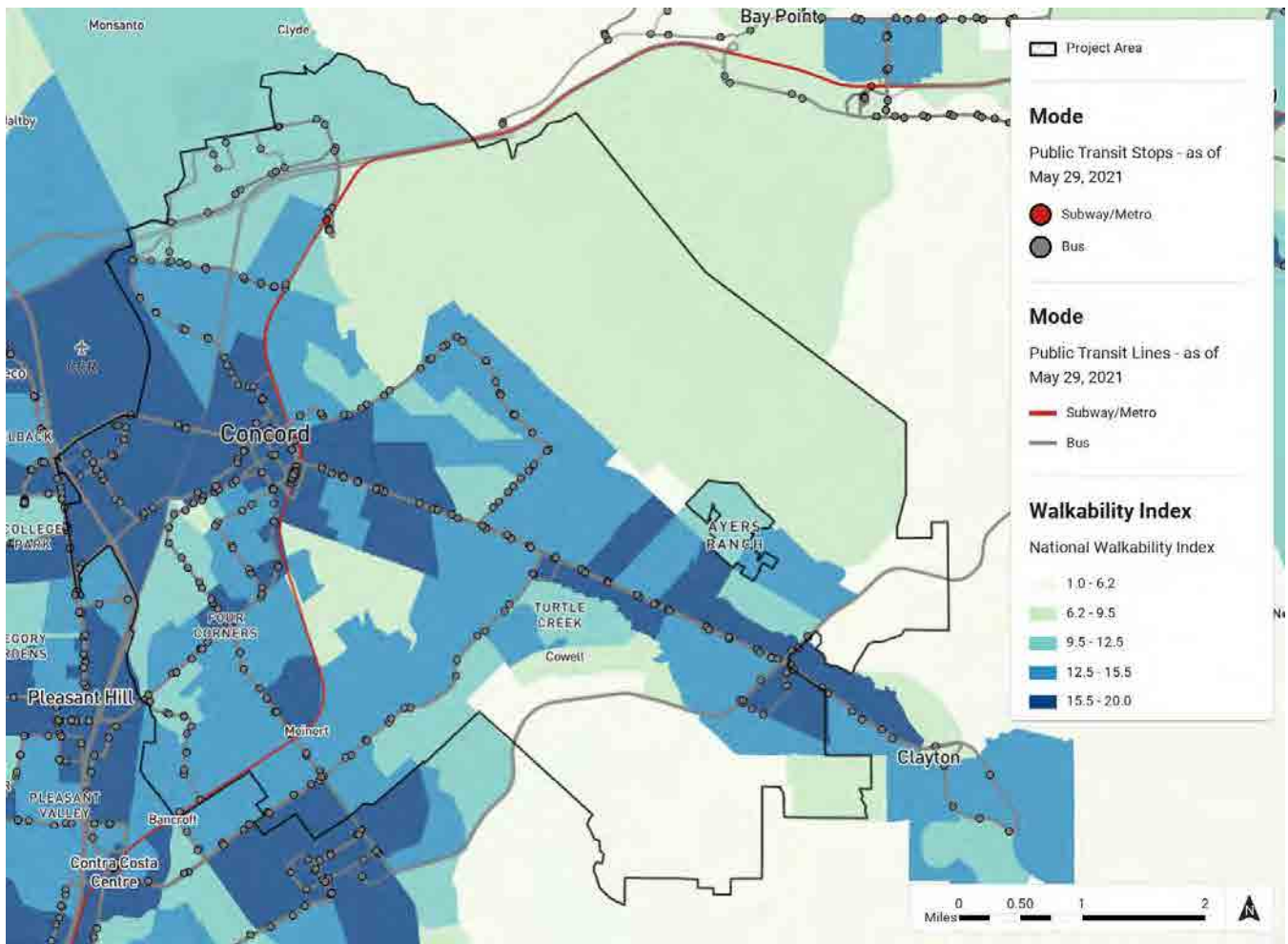


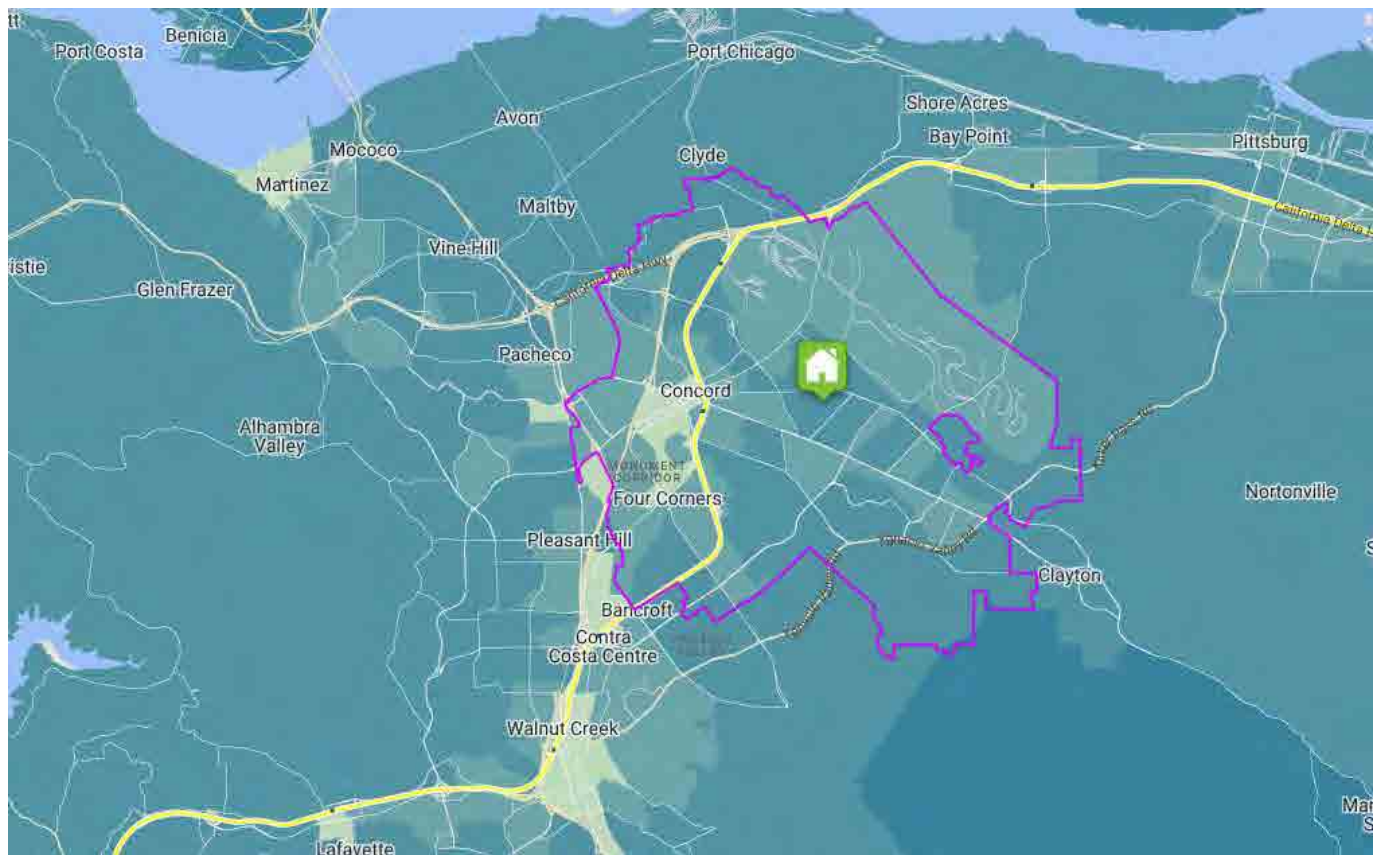
Figure 24: County Connection System Map



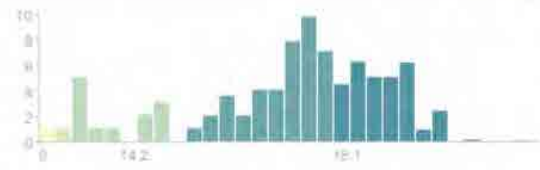
Figure 25: BART Station Map



Figure 26: Transportation Costs



Transportation Costs % Income



Transportation Costs % Income ?

Average: 17% Range: 13 - 22

Population	Household	Neighborhood
< 8%	Population	% of Population
8 - 12%	0	0%
12 - 15%	0	0%
15 - 18%	16,069	12.7%
18 - 22%	56,691	44.8%
22 - 26%	53,703	42.5%
26 - 29%	2	0%
29%+	0	0%
Total	126,465	100%

Source: CNT 2017

Healthy Environment

Concord's environmental domain score varies throughout Concord, as indicated in **Figure 27, Environmental Domain Score – Tract**. The environmental domain score relies on 12 indicators that are used in the California Office of Environmental Health Hazard Assessment's CalEnviroScreen 3.0 tool. The indicators are as follows:

1. Ozone Concentrations
2. PM_{2.5} Concentrations
3. Diesel PM Emissions
4. Drinking Water Contaminants
5. Pesticide Use
6. Toxic Releases from Facilities
7. Traffic Density
8. Cleanup Sites
9. Groundwater Threats
10. Hazardous Waste Generators and Facilities
11. Impaired Water Bodies
12. Solid Waste Sites and Facilities

Most tracts in Concord score positively for environmental outcomes. The western-most portion of Concord scores less positively (less than 0.25), likely due to the proximity to the adjacent Buchanan Field Airport, while the eastern portion scores more positively (0.75 to 1.0). Higher-scoring tracts throughout the eastern portion of Concord also have populations of predominantly White residents and higher household incomes. With the exception of the former Concord Naval Weapons Station, tracts with existing or planned residential uses have an environmental outcome score of at least 0.5, indicating moderately high to high environmental outcomes. Also, as shown in **Figure 27a, Environmental Domain Score (Regional) – Tract**, communities to the northeast experience lower environmental scores, whereas communities to the southwest and southeast experience higher environmental scores.

Figure 28, School and Parks, indicates the location of public school and parks in Concord. Public schools and parks are generally evenly spread and accessible to all residents, except for the location of the Lime Ridge Open Space and Concord Naval Weapons Station, which are not currently occupied by residences. In general, all schools are located in close proximity or adjacent to a public park, which is reflected in Figure 28.

While Figures 27 and 28 indicate environmental outcomes related to pollutants, hazards, traffic, and access to green space, they do not consider accessibility to grocery stores and healthy foods, which form part of a healthy environment through the lens of environmental justice and equity. **Figure 29, Access to Healthy Food**, indicates that there are clusters of supermarkets and grocers in the central and western areas of Concord along Willow Pass Road and Monument Boulevard. In the southeast areas along Clayton Road, a few grocery stores are clustered generally in between Treat Boulevard and Ygnacio Valley Road.

Figure 27: Environmental Domain Score – Tract

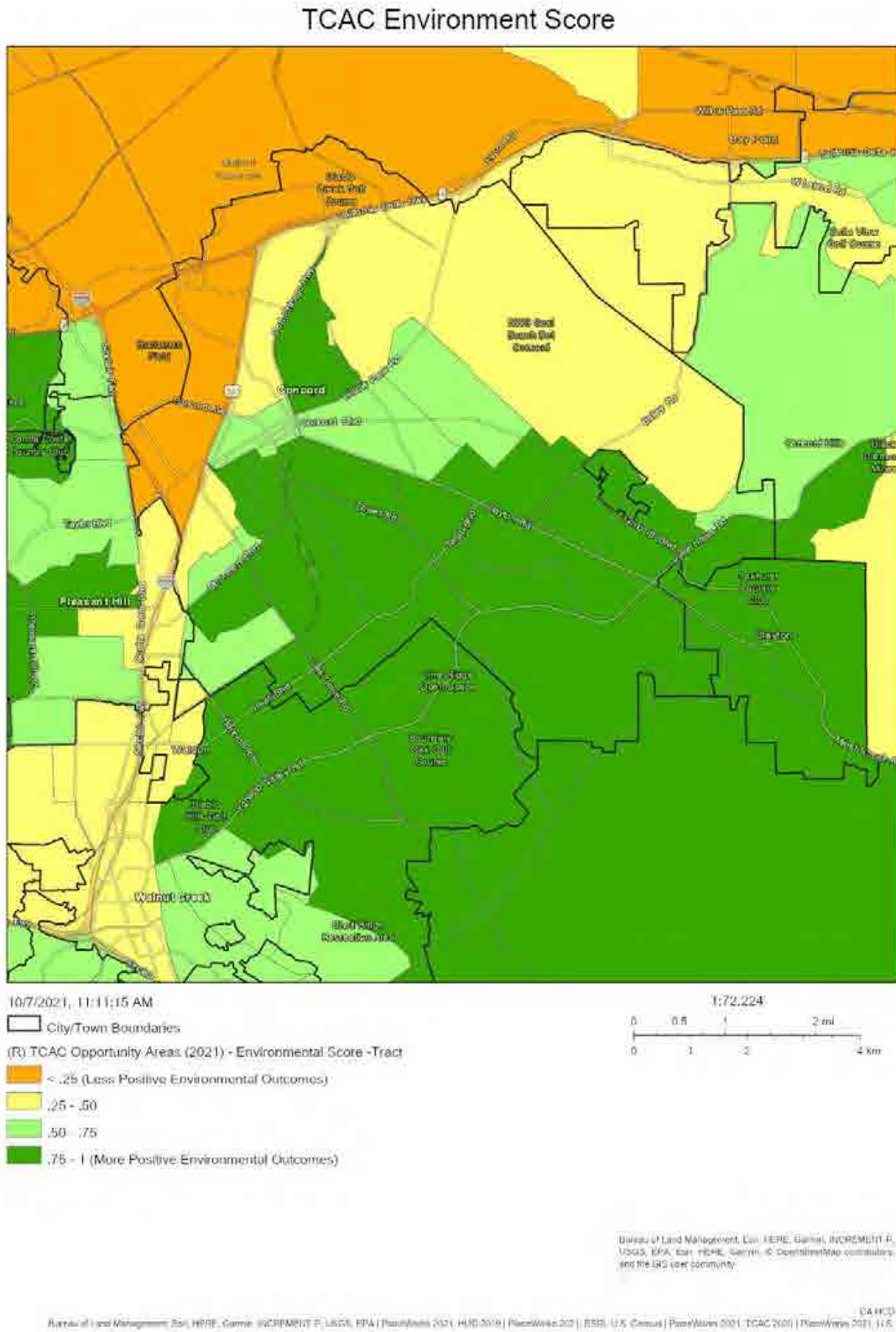
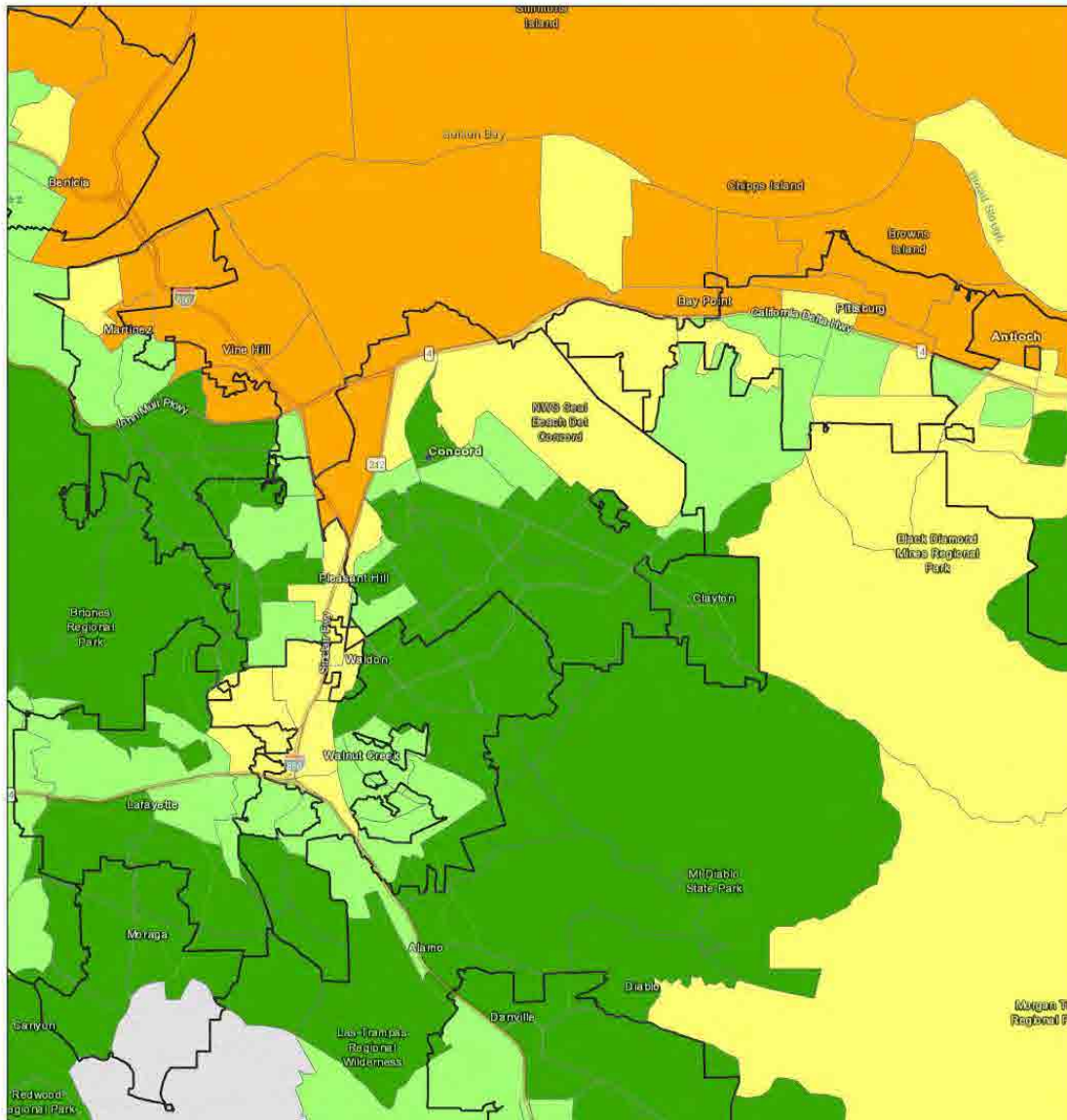


Figure 27a: Environmental Domain Score (Regional) – Tract

TCAC Environment Score (Regional)



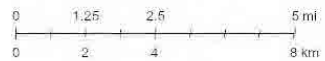
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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract

- < .25 (Less Positive Environmental Outcomes)
- .25 - .50
- .50 - .75
- .75 - 1 (More Positive Environmental Outcomes)
- No Data

1:144,448



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CA HCD

Figure 28: Schools and Parks

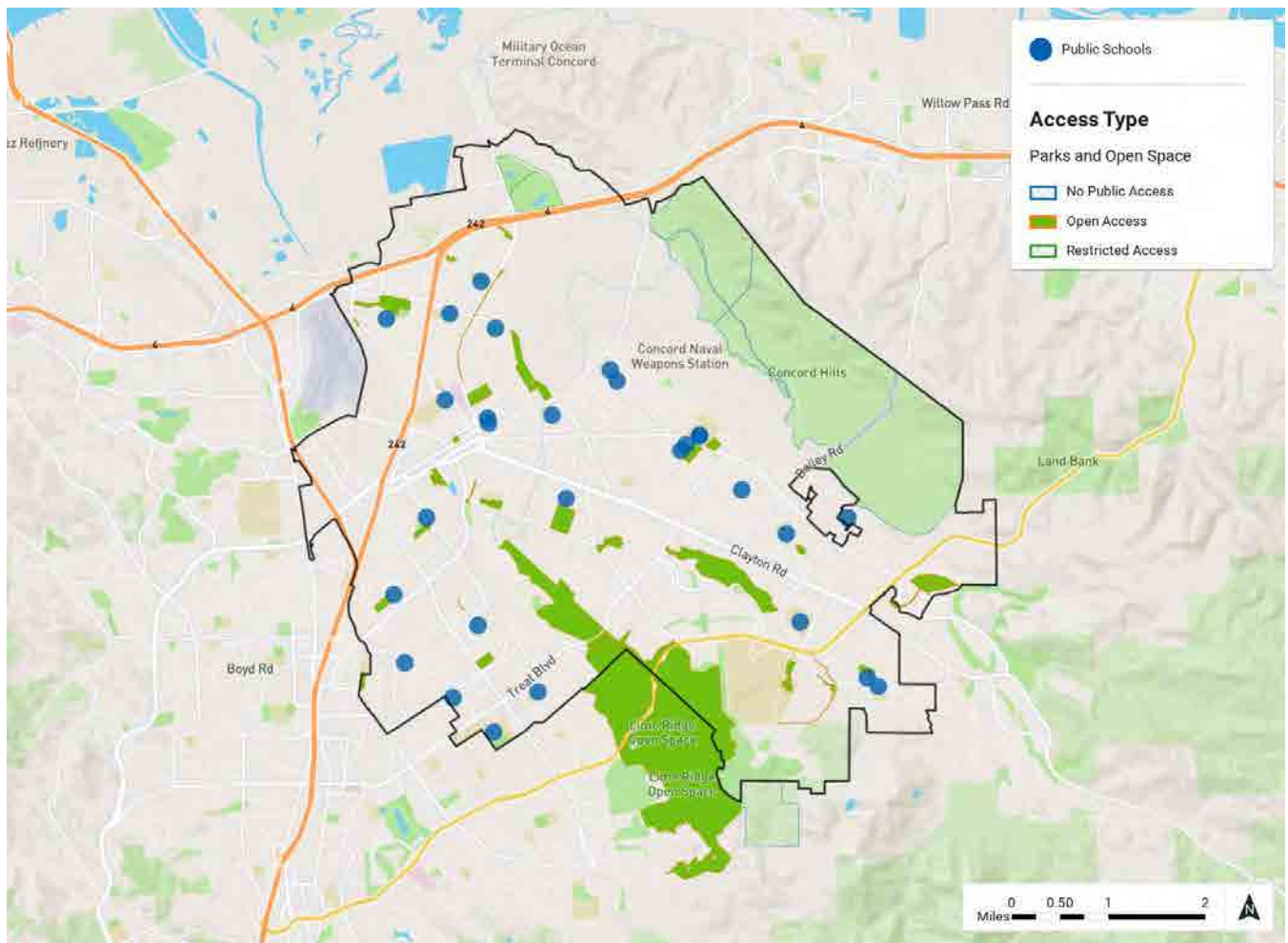
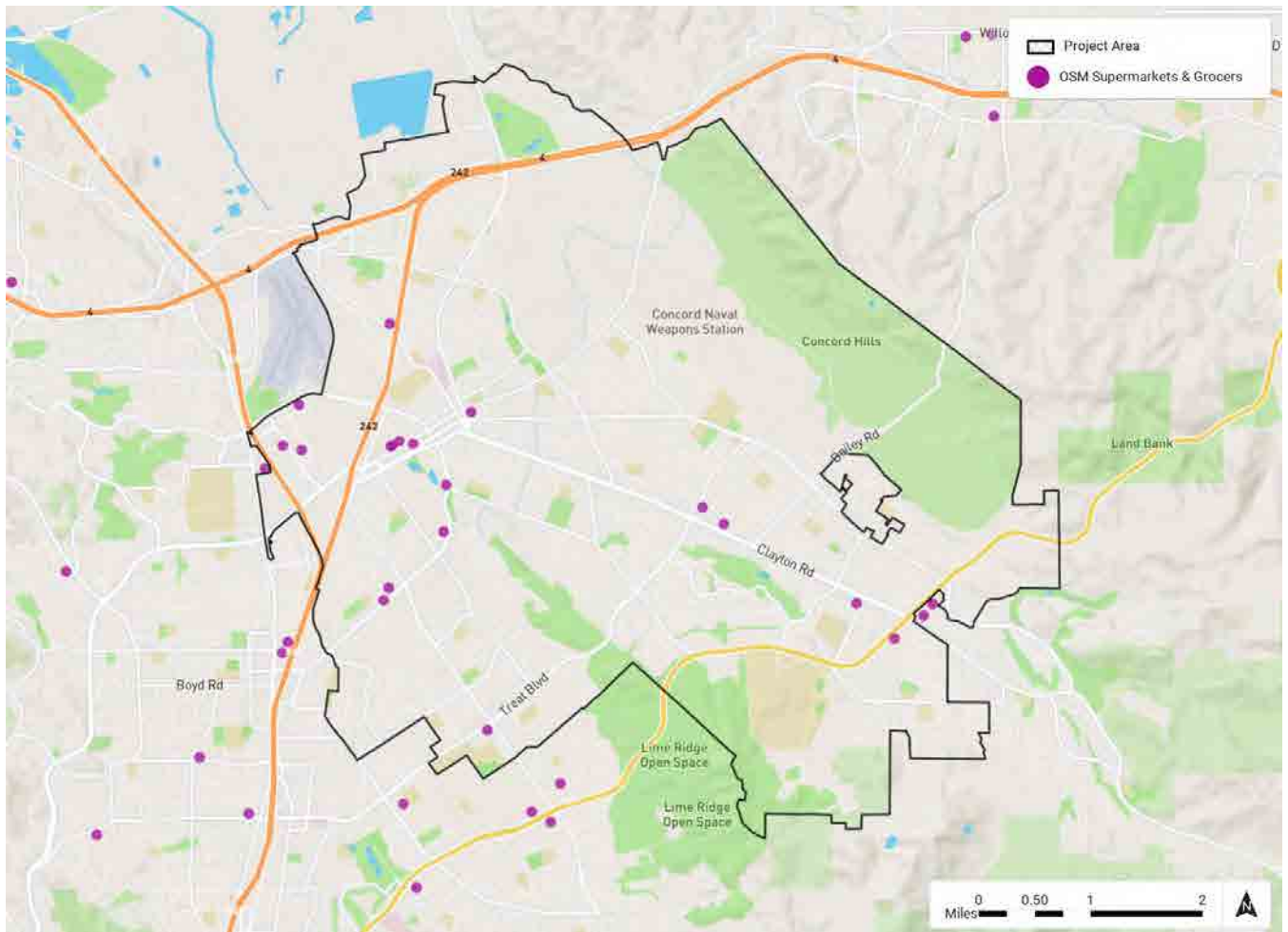


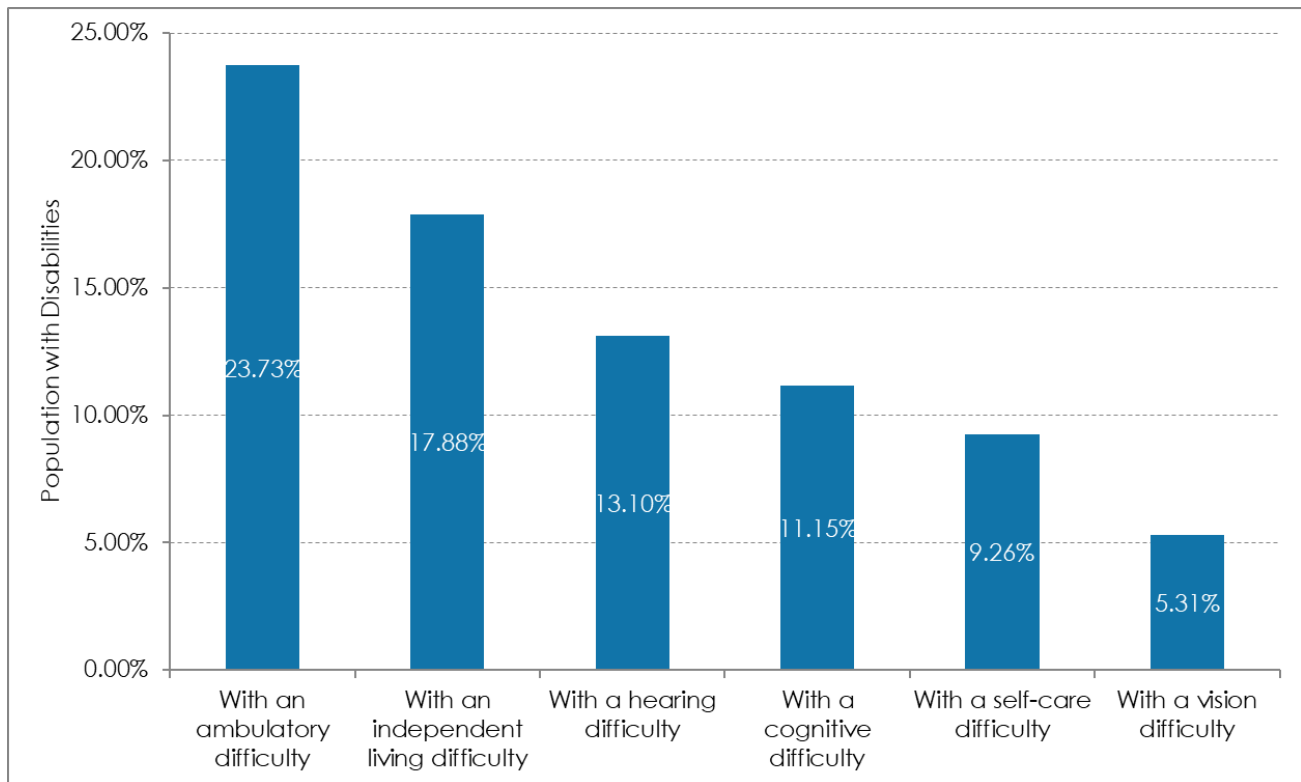
Figure 29: Access to Healthy Food



Disparities in Access to Opportunity for Persons with Disabilities

As discussed above, the percentage of residents reporting having a disability is 10% to 20% in most census tracts in Concord; there are eight census tracts, mostly in the eastern portion of Concord, that report less than 10% of its residents with disabilities, and one census tract that reports 30% to 40% residents with disabilities. Further, in 2019, 24% of adults age 65 years and older in Concord living with a disability had ambulatory difficulty (see **Figure 30, Disability by Type for Older Adults in Concord (65 and Older)**); this designation means that this population has difficulty walking and/or climbing stairs, which could lead to difficulty in doing errands, such as visiting a doctor’s office or shopping. As the population ages, mobility among older adults can become increasingly limited, and those living with ambulatory disabilities would have lower access to opportunities. Those areas of Concord with the highest concentrations of households with a disability overlap with positive environmental outcomes and high access to public transit. However, there is significant overlap of populations with a disability and low economic outcomes and education outcomes.

Figure 30: Disability by Type for Older Adults in Concord (65 and Older)



Findings

As demonstrated in this section, Concord has a range of scores that gauge access to education, employment, transportation, and environmental opportunity. Generally, the southeastern portion of Concord experiences higher economic, educational, and environmental outcomes compared to the western portion. The western portion of Concord generally has higher proximity to jobs and public transportation. There are greater proportions of White residents with higher median incomes in the southeastern portion of Concord. Therefore, there is a relationship between these subgroups and access to opportunity. In general, White residents earning higher median incomes have greater access to economic, education, and environmental opportunities, as scored by the TCAC/HCD Opportunity

Areas methodology, but lower access to public transit and proximity to jobs. Households in the southeastern portion of Concord have higher rates of vehicle ownership, higher rates of vehicle miles traveled, and higher transportation costs (see Figure 26).

The sites identified in the Sites Analysis (Appendix E) incorporate substantial revisions made during the community input process to reduce the concentration of lower-income sites within the central and western portions of Concord, particularly in the Monument Corridor (R/ECAP) and Downtown. However, as outlined in Appendix E, criteria for selecting lower-income sites, including a default density of 30 dwelling units per acre, capacity is identified in the central and western portions of Concord as they permit higher densities, unlike other areas of the City. Nonetheless, this area is close to transit and freeways that provide strong access to shopping, food, recreation, employment, higher education, social services, and cultural amenities locally and throughout the Bay Area. Because the majority of Concord falls within “Low and Moderate Resource” areas on the TCAC composite scoring map, most of the identified sites, including those eligible for lower-income housing, fall under the “Low Resource” and “Moderate Resource” TCAC designations. However, as indicated in the sections above, the area is well serviced by transit, grocery stores, and educational programs and resources that are not considered in the TCAC methodology. Nevertheless, through the programs of the Housing Element, the City will address fair housing issues related to the City’s “Low and Moderate Resource” designations through the following actions that will increase access to opportunity: Program 1 in which the City will take a number of actions to incentivize and promote the production of ADUs; Program 6 where the City will increase opportunities for the development of affordable housing; Program 8 in which the City will identify and rezone areas appropriate for medium and high residential densities, specifically in areas with access to resources; and Program 9 where the City will facilitate middle density housing through a reduction in development standards; refer to the section “Sites Analysis AFFH Assessment,” below.

Disproportionate Housing Needs, Including Displacement

When historically disinvested neighborhoods experience an influx of more affluent residents, this can result in higher local rents and property values, displacing existing residents and businesses.

Displacement is often a result of gentrification, and while it may not be intended, its process could ultimately transform a neighborhood’s character, demographics, and socioeconomic integrity.

Households that face some level of insecurity in their housing are those that are most vulnerable to displacement. Long-term residents of a community are at risk of displacement as a result of gentrification because they may not be able to afford to live in their neighborhood as property values and the cost of living increase. These are often marginalized people of color and those earning lower incomes. Access to homeownership provides increased security for households, as homeowners are less susceptible to sudden increases in the cost of housing. Homeownership is often cited as the largest asset of most households in the United States, and, for many households, provides opportunity to build wealth. Over generations, many households have used wealth gained through homeownership to send their children to college or invest in other opportunities, creating access to more wealth.

Indicators of displacement vulnerability can be seen through disproportionate housing needs as it relates to cost-burdened households, overcrowded households, and the quality of housing, among other factors.

As indicated in **Figure 31, Housing Tenure by City, County, and Region**, in 2019, approximately 60% of Concord’s occupied housing stock was owner-occupied and approximately 40% was renter-occupied.

In terms of regional context, Concord’s rate of owner-occupancy is lower than Contra Costa County (66%), but higher than the overall Bay Area (56%). **Figure 32, Housing Tenure by Race/Ethnicity**, shows that White and Asian residents have the highest rates of homeownership in Concord, and that Black or African American, Hispanic or Latinx, and other races have the lowest rates of homeownership.

Figure 31: Housing Tenure by City, County, and Region

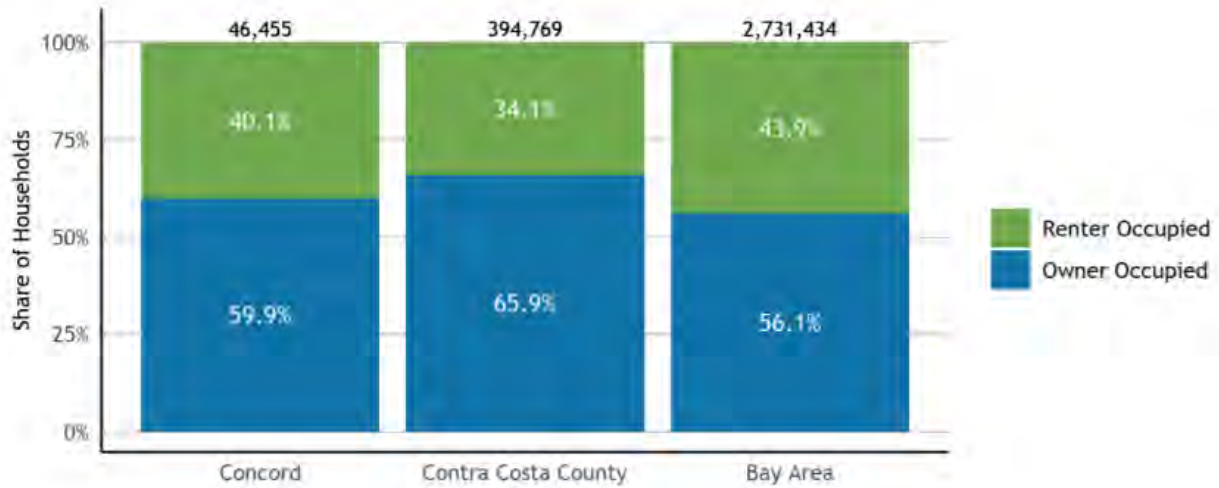
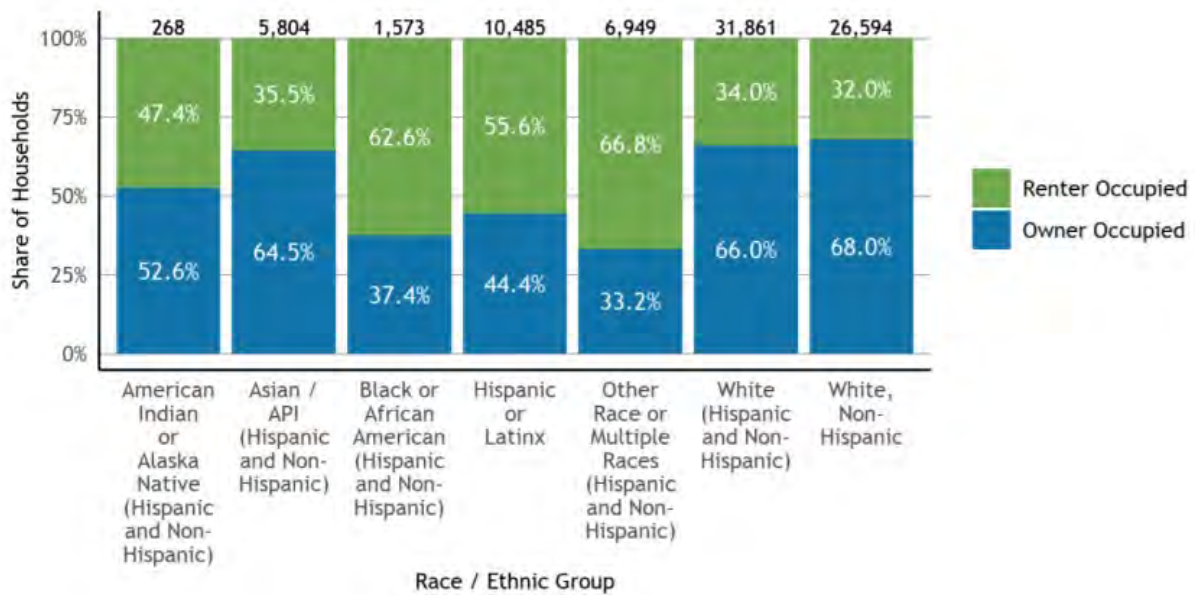


Figure 32: Housing Tenure by Race/Ethnicity in Concord



Cost Burden

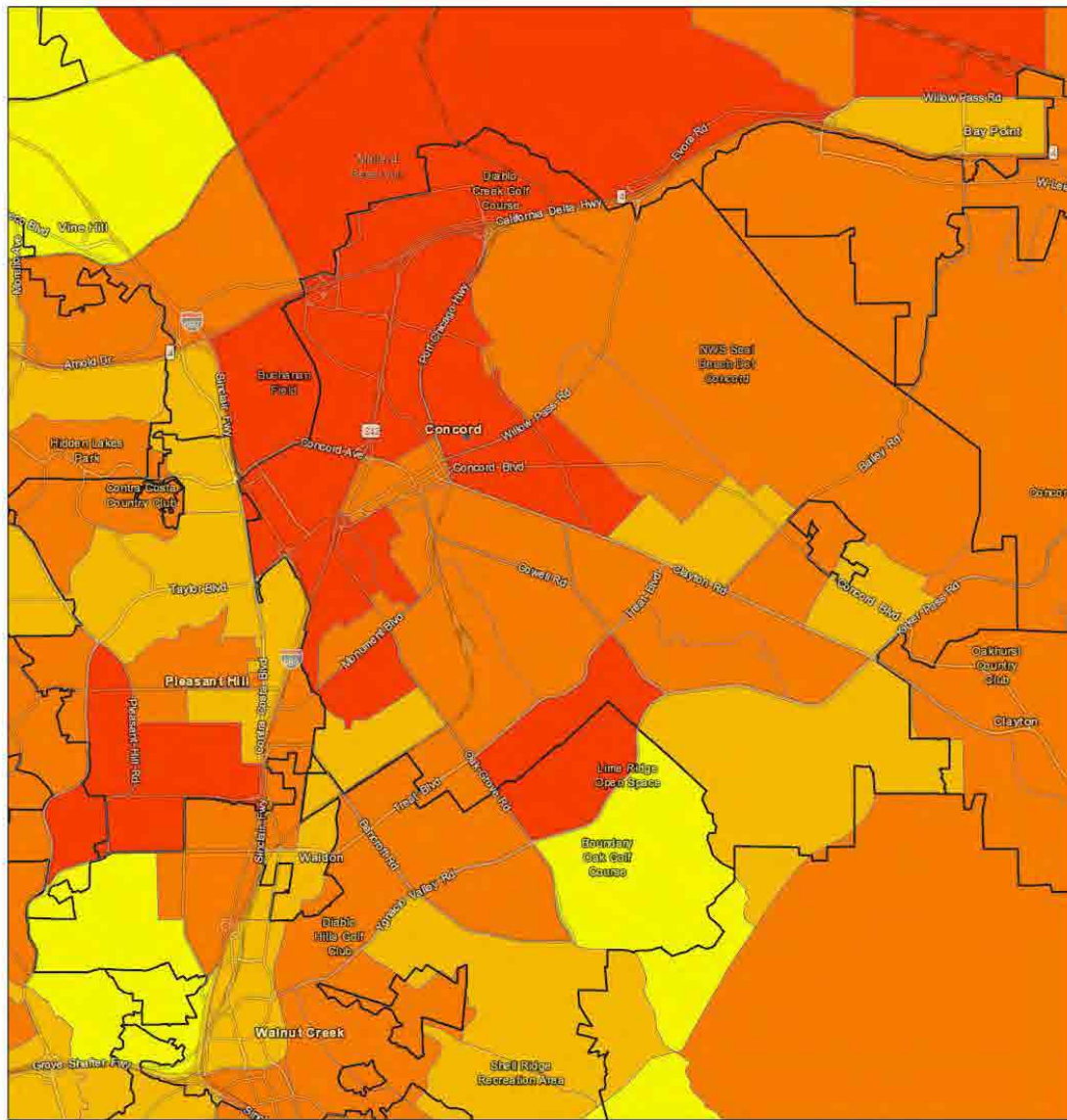
Households are considered to be “burdened” by their housing costs when they spend more than 30% of their income on housing costs. Housing costs for owner-occupied households are calculated based on the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property (including payments for the first mortgage, second mortgages, home equity loans, and other junior mortgages); real estate taxes; fire, hazard, and flood insurance on the property; utilities (electricity, gas, and water and sewer); and fuels (e.g., oil, coal, kerosene, wood). It also includes, where appropriate, the

monthly condominium fee for condominiums and mobile home costs (personal property taxes, site rent, registration fees, and license fees). Housing costs for renter-occupied households considered the contract rent plus the estimated average monthly cost of utilities (electricity, gas, and water and sewer) and fuels (e.g., oil, coal, kerosene, wood) if these are paid by the renter (or paid for the renter by someone else). The renter cost burden in Concord can be seen in **Figure 33, Renter Cost Burden – Tract**, where approximately 20% to 80% of the population within the given census tract is considered to be cost burdened. Western portions of Concord face higher percentages of renter households that are cost burdened (60% to 80%). Households that are cost burdened in western Concord are more likely to be non-White and have a median household income that is less than the median State income, as shown in Figure 7 and Figure 12. **Figure 34, Homeowner Cost Burden – Tract**, shows that Concord homeowners are less cost burdened by their housing costs than renter households, representing 20% to 40% of the population in most tracts. These trends are consistent with the regional context and neighboring communities.

In 2019, approximately 21.6% of households spent 30% to 50% of their income on housing costs, while 17.3% of households are severely cost burdened and use the majority (over 50%) of their income for housing. When comparing cost-burdened households across housing tenure in Concord, 26.6% of renters spend 30% to 50% of their income on housing, compared to 18.8% of those who own (see **Figure 35, Cost Burden by Tenure**). Furthermore, 27.4% of renters and 10.4% of owners are severely cost-burdened by spending 50% or more of their income on housing.

As described in Appendix B in the section “Household Income and Extremely Low-Income Households,” race and ethnicity are historically impacted by past discriminatory Federal and local housing policies. As a result, non-White residents often experience housing insecurity because they are the most cost burdened and have higher proportions of households with low median household incomes. Approximately 28% of Hispanic or Latinx residents and 23% Black or African American, Non-Hispanic residents experience cost burden, spending 30% to 50% of their income on housing. However, a larger disparity exists for Black or African American, Non-Hispanic residents, as they are the most severely cost burdened, with 33.8% of households spending more than 50% of their income on housing in comparison to 19% of Hispanic or Latinx residents who are severely cost burdened spending 50% or more of their income on housing. To offset the cost of housing, many non-White residents live in units with insufficient capacity for their households, as further explained in the following section.

Figure 33: Renter Cost Burden – Tract



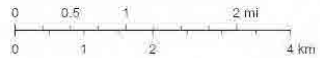
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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

- <20%
- 20% - 40%
- 40% - 60%
- 60% - 80%

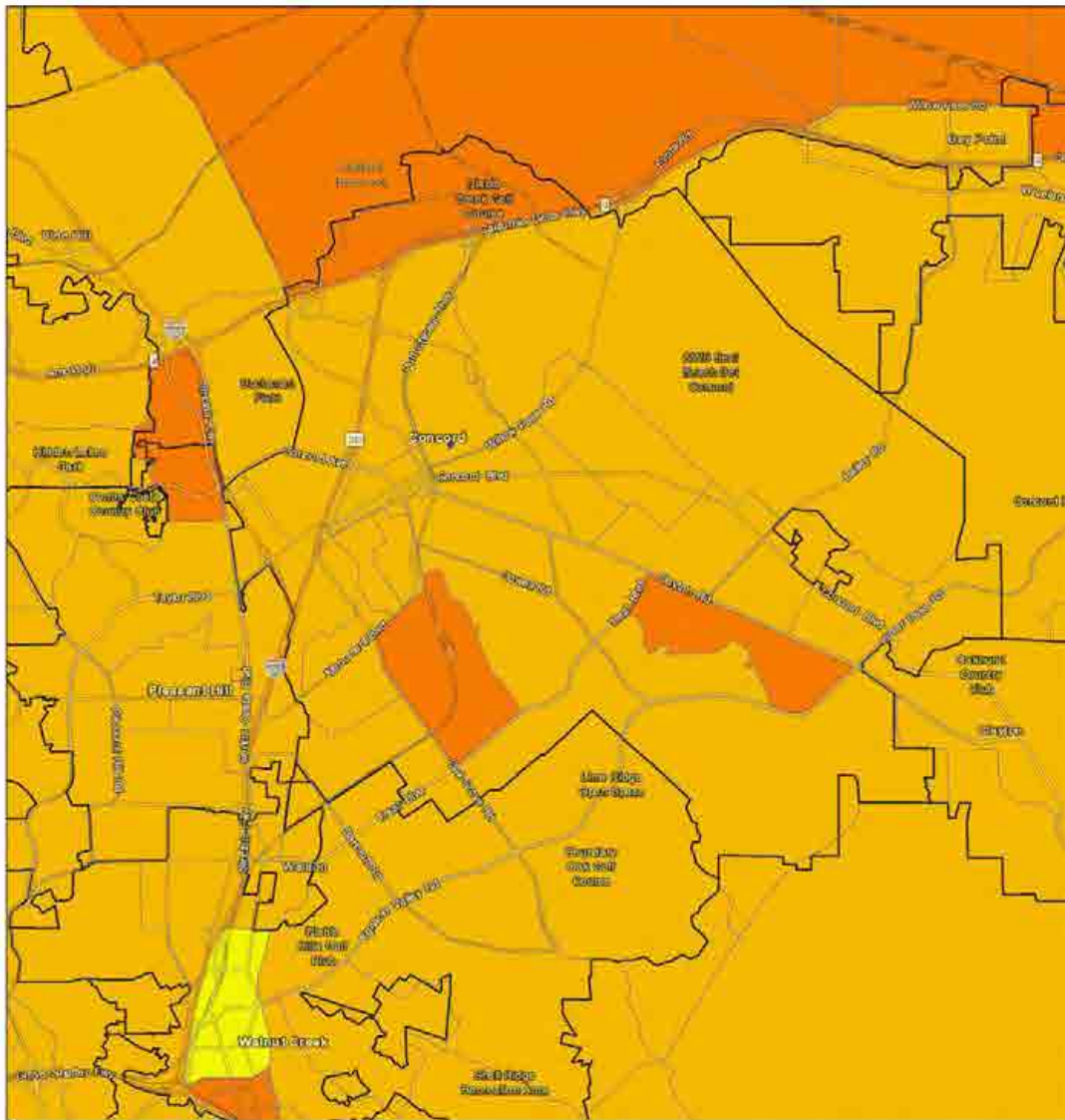
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Figure 34: Homeowner Cost Burden – Tract



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City/Town Boundaries

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

< 20%

20% - 40%

40% - 60%

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Figure 35: Cost Burden by Tenure



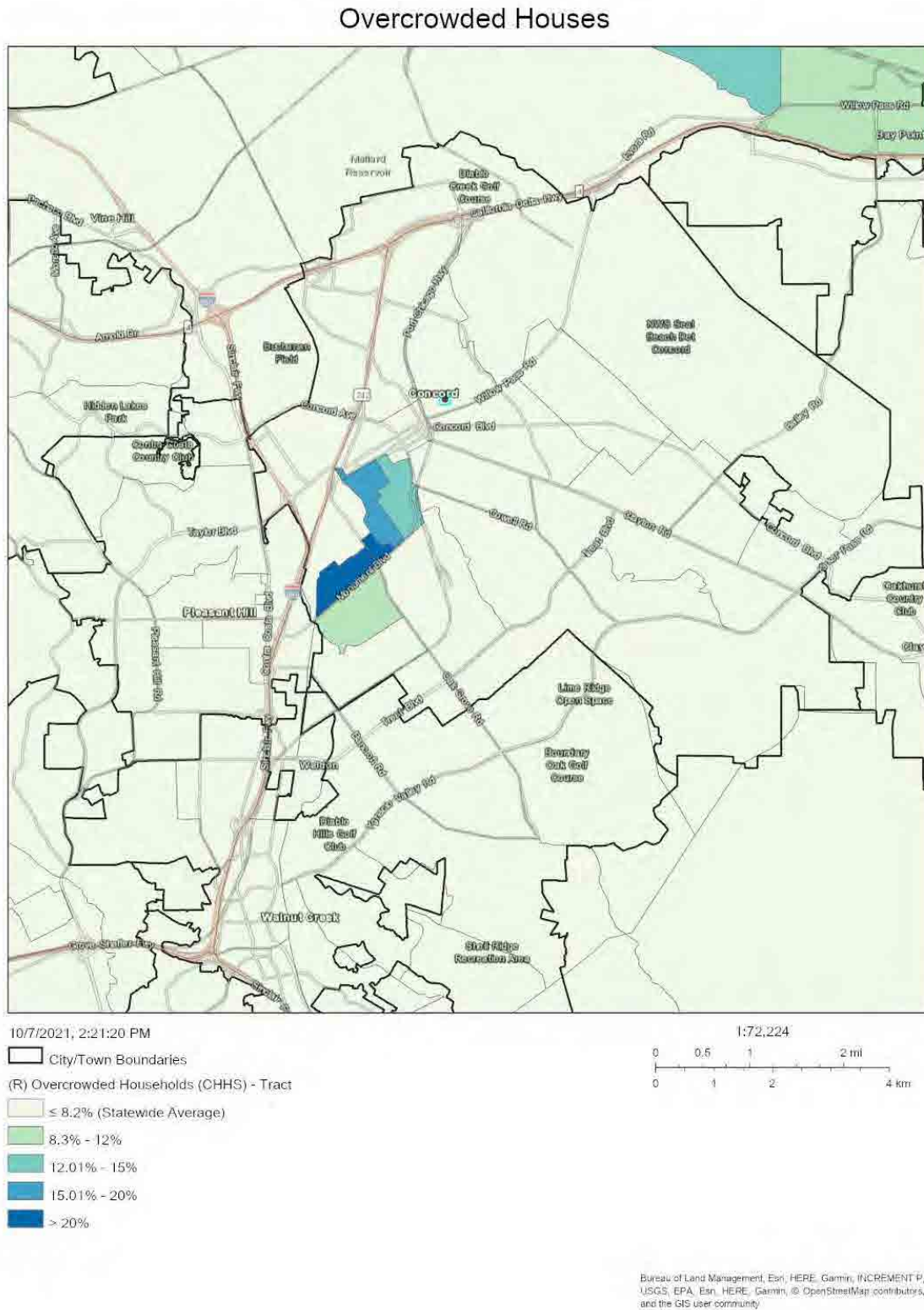
Overcrowding

Overcrowding is defined by the U.S. Census Bureau as a housing unit occupied by more than one person per room. A severely overcrowded household is defined as one with more than 1.5 persons per room. As shown in **Figure 36, Overcrowded Households – Tract**, overcrowded households in Concord are located in the western/central portion of Concord, ranging from 8.3% to over 20%; the rest of Concord is less than the Statewide average of 8.2%. **Figure 36a, Overcrowded Households (Regional) – Tract**, indicates that the central/western portion of Concord has higher rates of overcrowded households compared to most neighboring communities in the region. However, to the northeast, Bay Point and the cities of Pittsburg and Antioch also have tracts that report higher rates of overcrowded households. There are low rates of severely overcrowded households within Concord; all tracts with reported data indicate less than 5% of households as severely overcrowded.

Income, poverty, and lack of affordable housing are contributing factors to overcrowding as residents may live in homes with insufficient capacity to offset the burden of rent. Homes with more bedrooms tend to be more expensive and are naturally less affordable to lower-income households with multiple members. When comparing the overcrowded household tract map to the percentage of non-White populations by tract, the western/central areas, where the population is over 80% non-White residents, experience higher rates of overcrowding. Those areas near Downtown in the western/central portion of Concord, including the census tract identified as a R/ECAP, also have increased rates of racial and ethnic diversity, high rates of cost burden by both renters and homeowners, and high concentrations of low to moderate household incomes. Hispanic or Latinx residents (of any race) and those that identify as Other or Multiple Races experience the highest rate of overcrowding, accounting for approximately 40% of all households that experience overcrowding, as detailed in Appendix B in the section “Household Income and Extremely Low-Income Households.” This is significant because the Hispanic or Latinx population is the second-largest racial/ethnic group in Concord. This indicates that overcrowding disproportionately affects non-White households as opposed to White households in Concord.

When comparing the number of households experiencing overcrowding by race to the total number of households by race, American Indian or Alaskan Native and Black or African American populations are proportionally the most likely to experience overcrowding than any other race or ethnicity. According to the ABAG/MTC Housing Needs data, Black or African American households make up 10.2% of total households experiencing overcrowding, which equates to 24% of Black or African American total households. For comparison, while Other Race or Multiple Races indicates the highest percentage of overcrowded households at 20.1%, it equates to 10.7% of Other Race or Multiple Races total households. White, non-Hispanic households experience the least amount of overcrowding, with less than 1% of White, non-Hispanic total households.

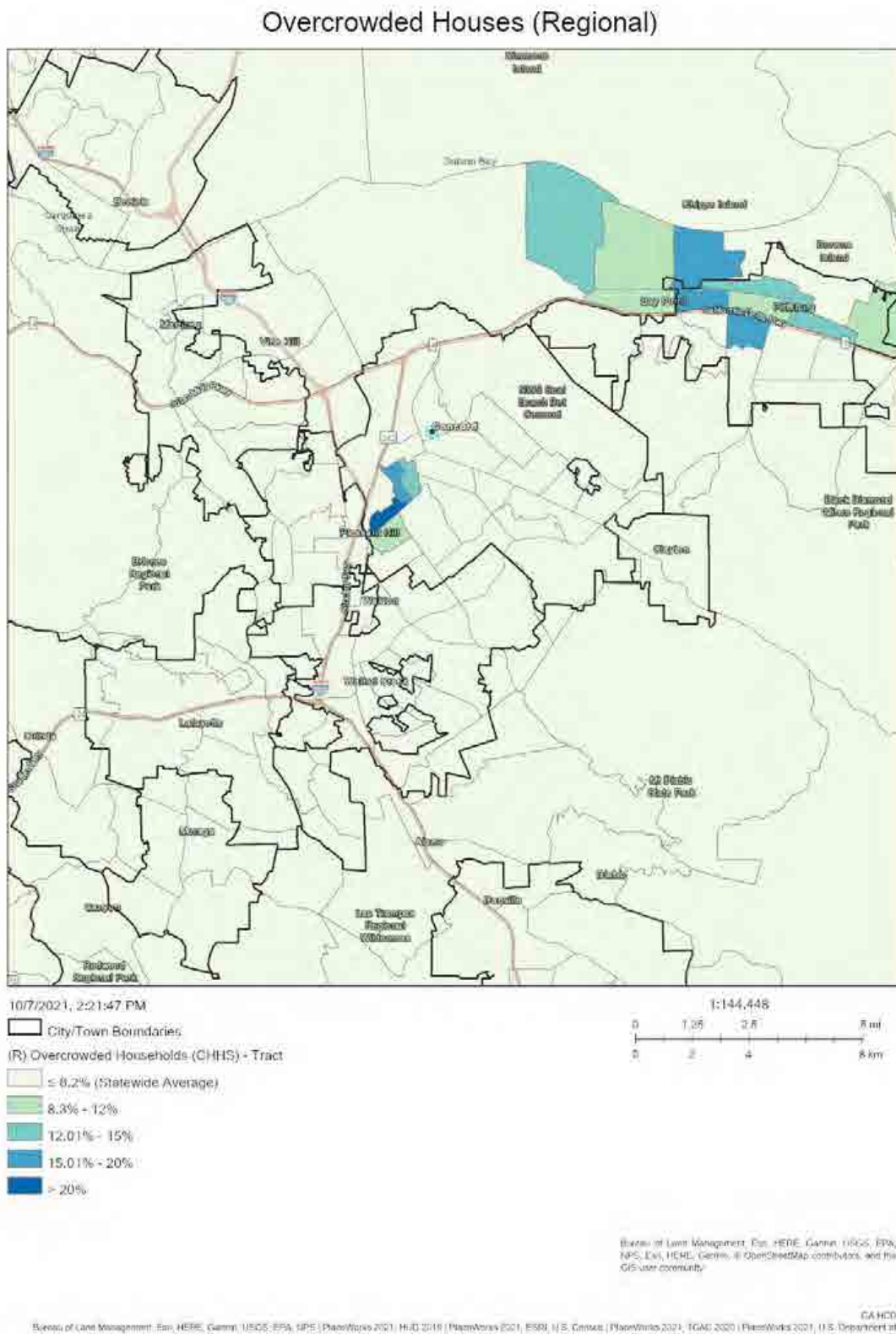
Figure 36: Overcrowded Households – Tract



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Figure 36a: Overcrowded Households (Regional) – Tract

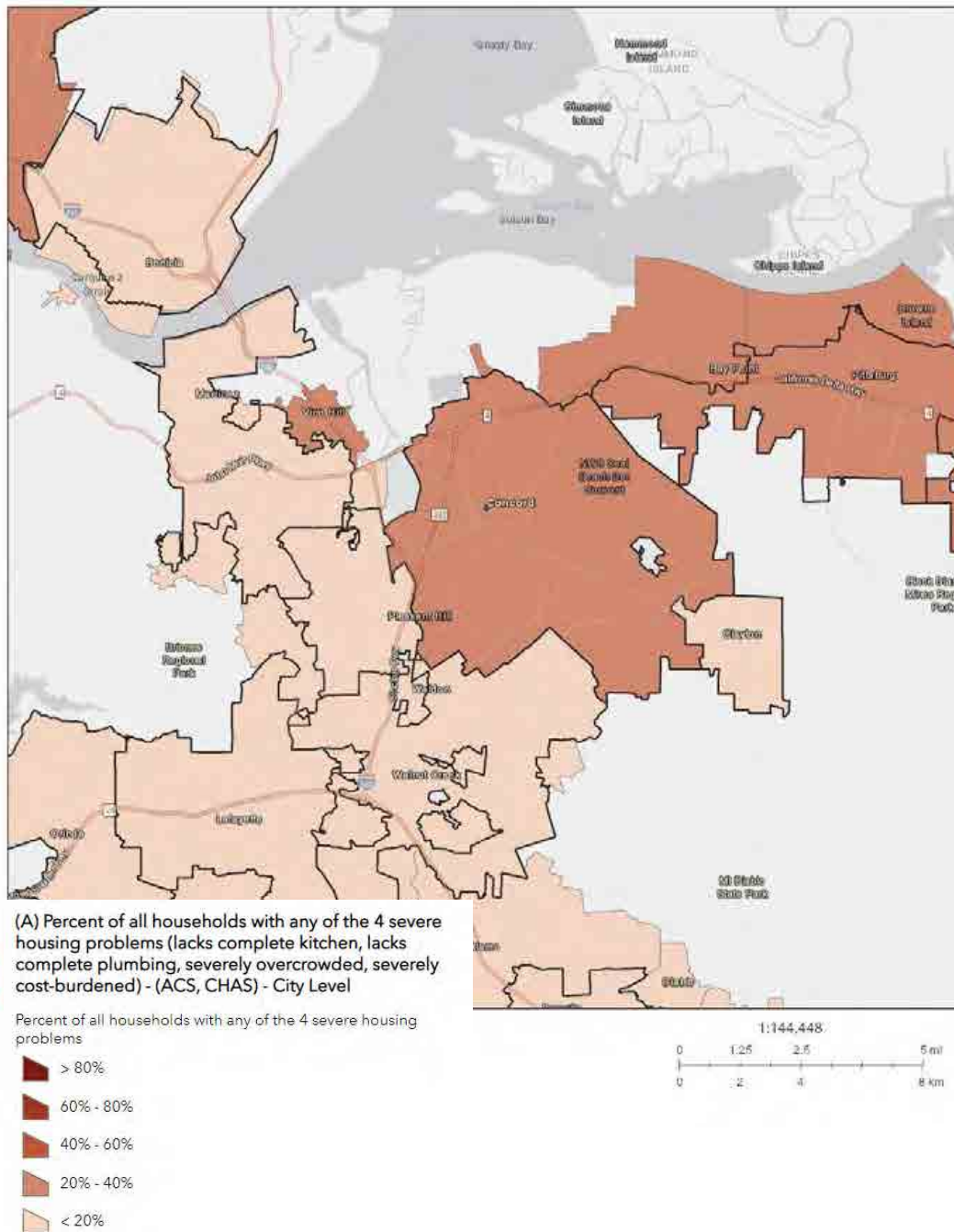


Substandard Housing

Substandard housing is classified as housing meeting any one of these four criteria: (1) lack of complete kitchen facilities, (2) lack of complete plumbing facilities, (3) more than one person per room (overcrowding), and (4) monthly housing costs exceeding 30% of monthly income (cost burden).

Figure 37, Percent of Households in Substandard Housing – City Level, shows the percentage across Concord that is subject to substandard housing under any of the four categories described above. As shown, 20% to 40% of Concord households are classified as substandard. According to this figure, communities to the west, southwest, and southeast experience lower rates of substandard housing (less than 20%), and communities to the northeast experience similar rates of substandard housing (20% to 40%) compared to Concord as a whole.

Figure 37: Percent of Households in Substandard Housing – City Level



Homelessness

The 2019 Point-in-Time Count for Contra Costa County revealed 2,295 people experiencing homelessness throughout Contra Costa County, 1,627 of whom were unsheltered. **Table 1, Homelessness by Household Type and Shelter Status in Contra Costa County**, shows the number of people experiencing homelessness by household type and shelter status. Approximately 70% of the population experiencing homelessness is unsheltered, indicating a strong need for emergency and transitional shelters in Contra Costa County. Approximately 60% of those households with children experiencing homelessness are residing in emergency or transitional shelters, while only 24% of households without children are residing in emergency or transitional shelters. **Figure 38, Racial Group**

Share of General and Populations Experiencing Homelessness, and Figure 39, Hispanic or Latinx Share of General Population and Population Experiencing Homelessness, detail the racial and ethnic distribution of those experiencing homelessness. Most significantly, Black or African American people and the American Indian or Alaska Native population are disproportionately represented among those experiencing homelessness. This can be attributed to the fact that Black or African American residents experience the highest rate of poverty and account for 18.9% of racial/ethnic groups that experience poverty in Concord, as described in Appendix B in the section “Groups with Special Housing Needs.” Considering that Black or African American and American Indian or Alaska Native residents are a small proportion of Concord’s population, yet experience higher rates of poverty and homelessness, indicates a significant disparity in wealth, income, and affordable housing for these groups.

Table 2, Characteristics for the Population Experiencing Homelessness, details specific known characteristics of those experiencing homelessness by shelter status. Those with an extreme mental illness represent the largest proportion of those experiencing homelessness. **Figure 40, Students in Local Public Schools Experiencing Homelessness,** provides the number of students at city, county, and regional levels over the years. Reporting year 2018–2019 saw the highest rates of students experiencing homelessness at all levels, with declining numbers in the 2019–2020 reporting year.

Through **Program 22, Support for People Experiencing Homelessness,** the City will amend the Development Code to be consistent with State requirements, facilitating the production of housing that meets the need of those experiencing homelessness. This includes removing constraints to supportive housing and Low-Barrier Navigation Centers by allowing developments by-right in certain zones and allowing flexibility in discretionary processes. Additionally, the City provides case management services to assist in outreach and connect those experiencing homelessness to available resources and will also develop a strategic plan to address homelessness within the planning period.

**Table 1
Homelessness by Household Type and Shelter Status in Contra Costa County**

<i>Shelter Status</i>	<i>People in Households Composed Solely of Children Under 18</i>	<i>People in Households with Adults and Children</i>	<i>People in Households without Children Under 18</i>
Sheltered – Emergency Shelter	0	159	359
Sheltered – Transitional Housing	0	32	118
Unsheltered	0	128	1,499

**Table 2
Characteristics for the Population Experiencing Homelessness**

<i>Shelter Status</i>	<i>Chronic Substance Abuse</i>	<i>HIV/AIDS</i>	<i>Severely Mentally Ill</i>	<i>Veterans</i>	<i>Victims of Domestic Violence</i>
Sheltered – Emergency Shelter	86	4	128	25	28
Sheltered – Transitional Housing	31	1	27	14	6
Unsheltered	377	4	364	75	80

Figure 38: Racial Group Share of General and Populations Experiencing Homelessness

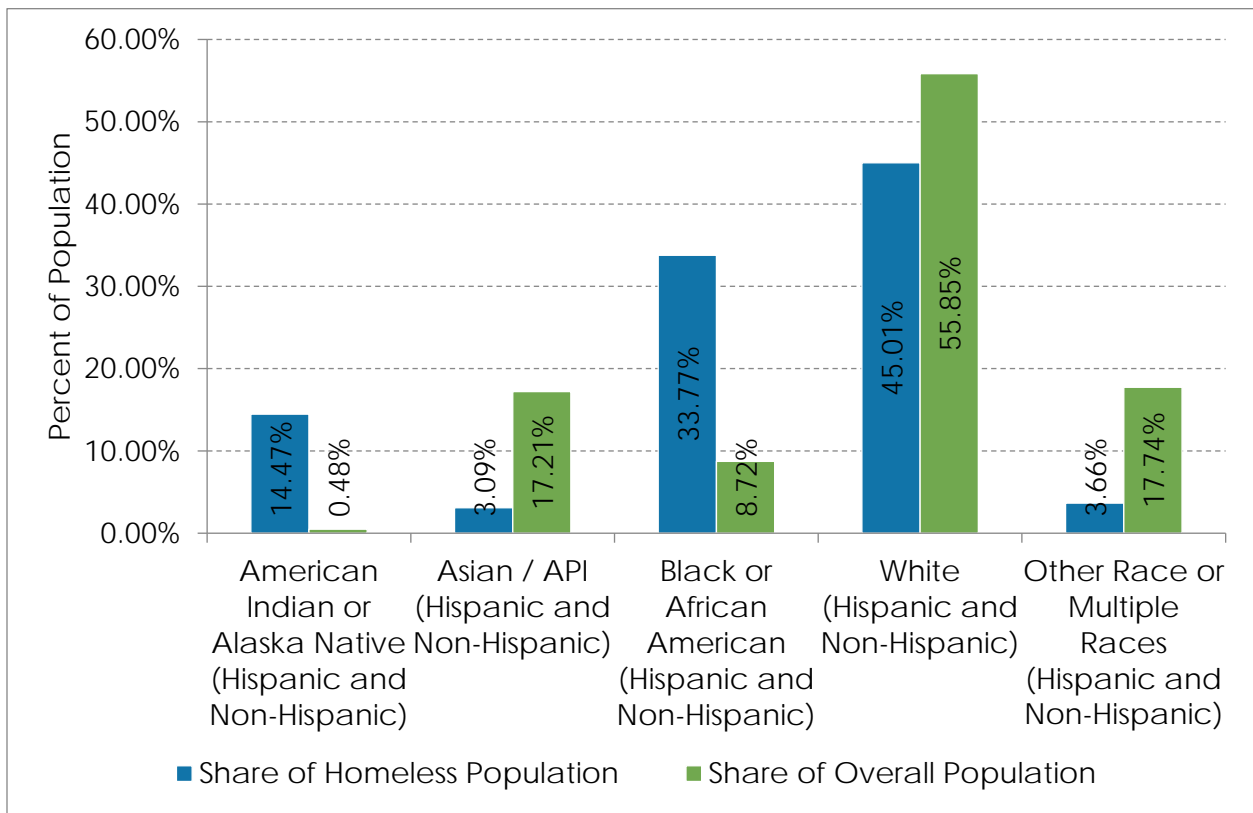


Figure 39: Hispanic or Latinx Share of General Population and Population Experiencing Homelessness

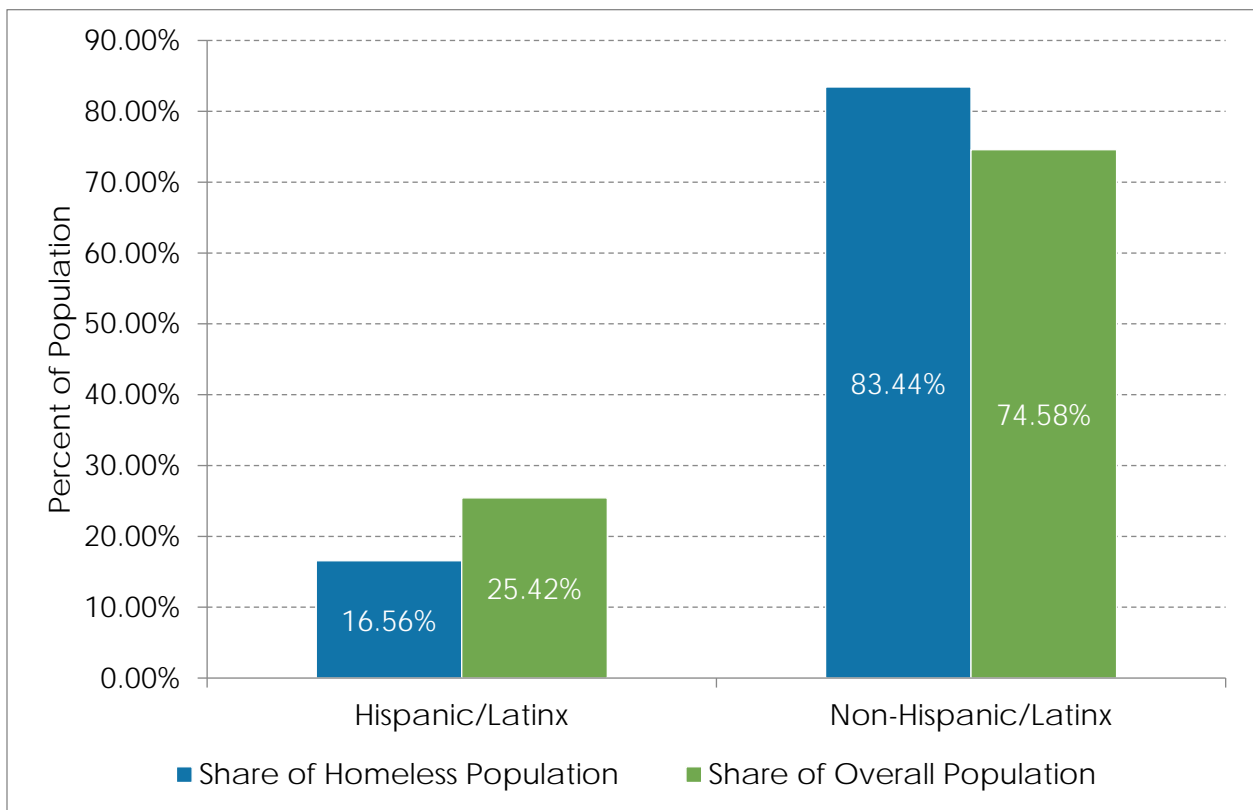
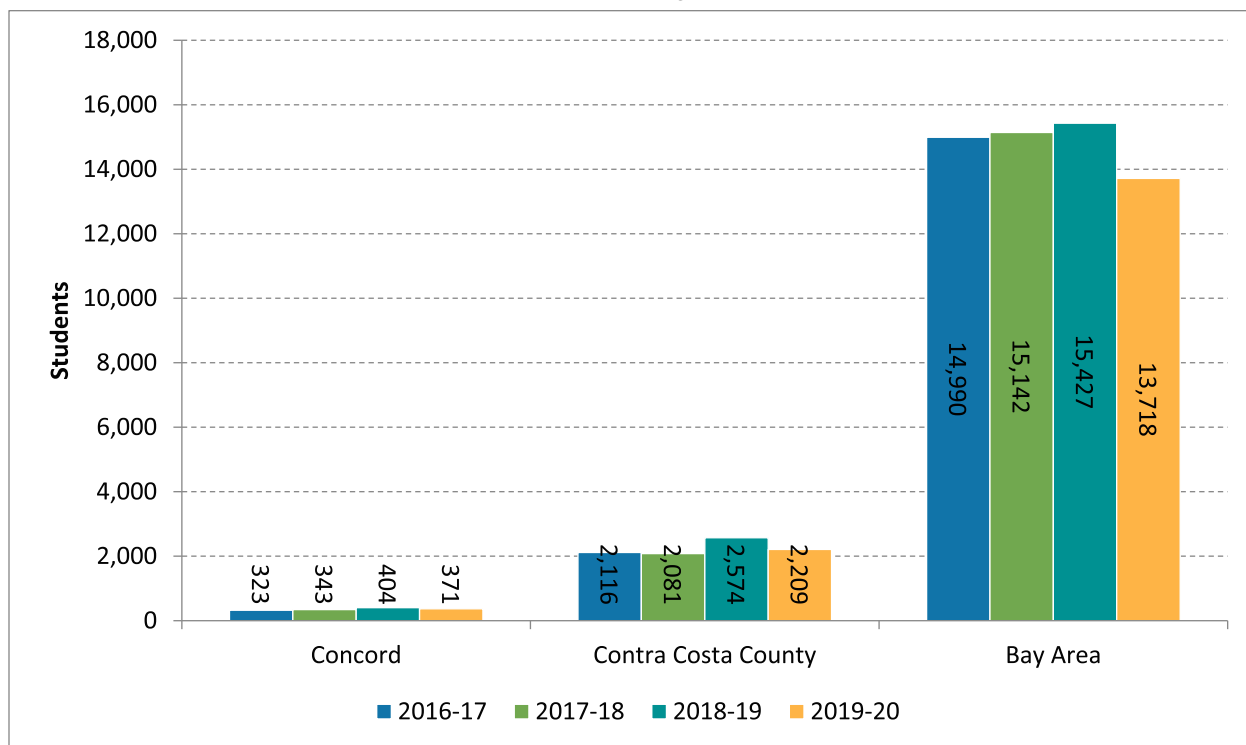


Figure 40: Students in Local Public Schools Experiencing Homelessness



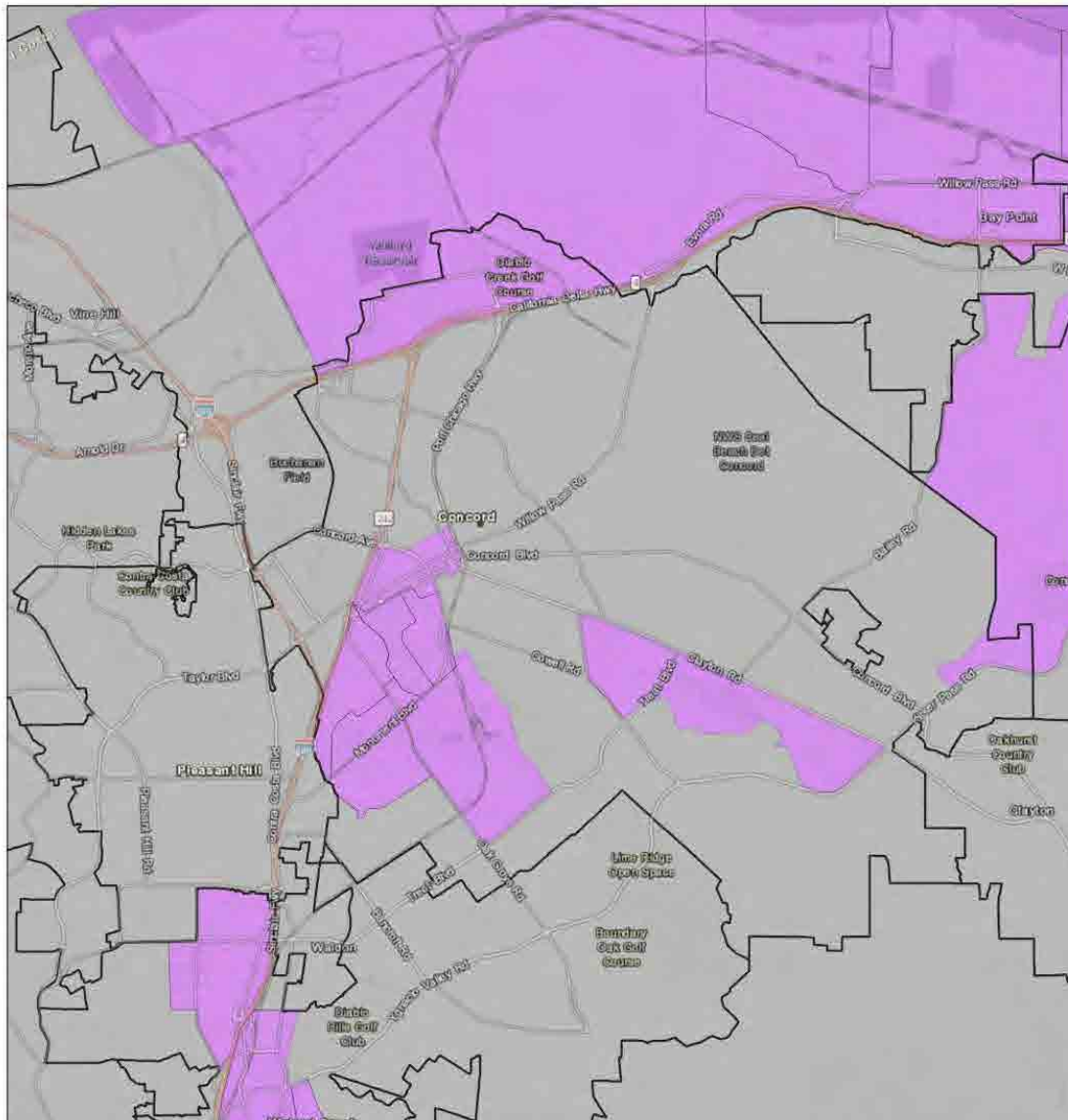
Displacement

Displacement of existing residents can occur for various reasons, including investment, disinvestment, and disasters. Gentrification is often cited as a cause for displacement. Gentrification occurs when historically disinvested neighborhoods experience an influx of affluent residents, resulting in higher local rents and property values and displacing existing residents and businesses. Displacement may not be an intended result, but this process could ultimately transform a neighborhood’s character, demographics, and socioeconomic integrity. Long-term residents of a community are at risk of displacement as a result of gentrification because they may not be able to afford to live in their neighborhood as property values and cost of living increases. These are often marginalized people of color and those earning lower incomes. Similarly, small and locally owned businesses may be threatened by increased economic competition from larger chains. Gentrification can be considered a negative byproduct of redevelopment and revitalization, and in competitive housing markets, gentrification can occur without investment in a community.




According to the Urban Displacement Project, a research collaboration between UC Berkeley and the University of California, Los Angeles, 36.3% of households in Concord live in neighborhoods that are susceptible to or experiencing displacement. **Figure 41, Displacement Vulnerability – Tract**, shows which areas are “vulnerable” to displacement. Displacement vulnerability considers those factors that indicate the level of potential burden households may face when there are changes in the housing market. Households that already face some level of residential insecurity are more vulnerable to fluctuations as it relates to housing. Those areas that are most vulnerable to displacement overlap with areas of Concord that have higher rates of household overcrowding, household overpayment, and lower-income households, which are all indicators of displacement vulnerability. Many non-White, people of color reside in the areas identified as vulnerable.

Figure 41: Displacement Vulnerability – Tract

Displacement Vulnerability Map



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-  City/Town Boundaries
- (A) Sensitive Communities (UCB, Urban Displacement Project)
-  Vulnerable
-  Other



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Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. CAHCD

Investment-Driven Displacement

Gentrification is evaluated through demographic and economic data that demonstrate recent neighborhood changes that may indicate ongoing gentrification and displacement, especially in communities with higher vulnerability to displacement and potential for gentrification. This considers data related to recent real estate activity, spikes in real estate sales prices, increases in the proportion of White residents, rising property values, increased construction activity, increases in rent prices, changes in median length of tenure (indicating that there are fewer long-time residents), increases in residents with greater educational attainment, increases in homeownership, and increases in median household incomes. As indicated in **Figure 42, Gentrification and Displacement**, there are no tracts within Concord that are actively undergoing gentrification.

The tracts identified as vulnerable to displacement are designated as “low-income/susceptible to displacement” in Figure 42. Further, there are areas shown as “at risk of becoming exclusive.” Those areas that are at risk of becoming exclusive include moderate- to high-income areas that exhibit patterns of neighborhood changes, stated above, for future exclusion of lower-income households.

As indicated in **Figure 43, Mobile Home Parks (Regional)**, Concord has a relatively high concentration of mobile home parks, especially compared to communities to the west and southwest. Redevelopment of these properties could leave existing residents at risk of displacement.

Figure 42: Gentrification and Displacement

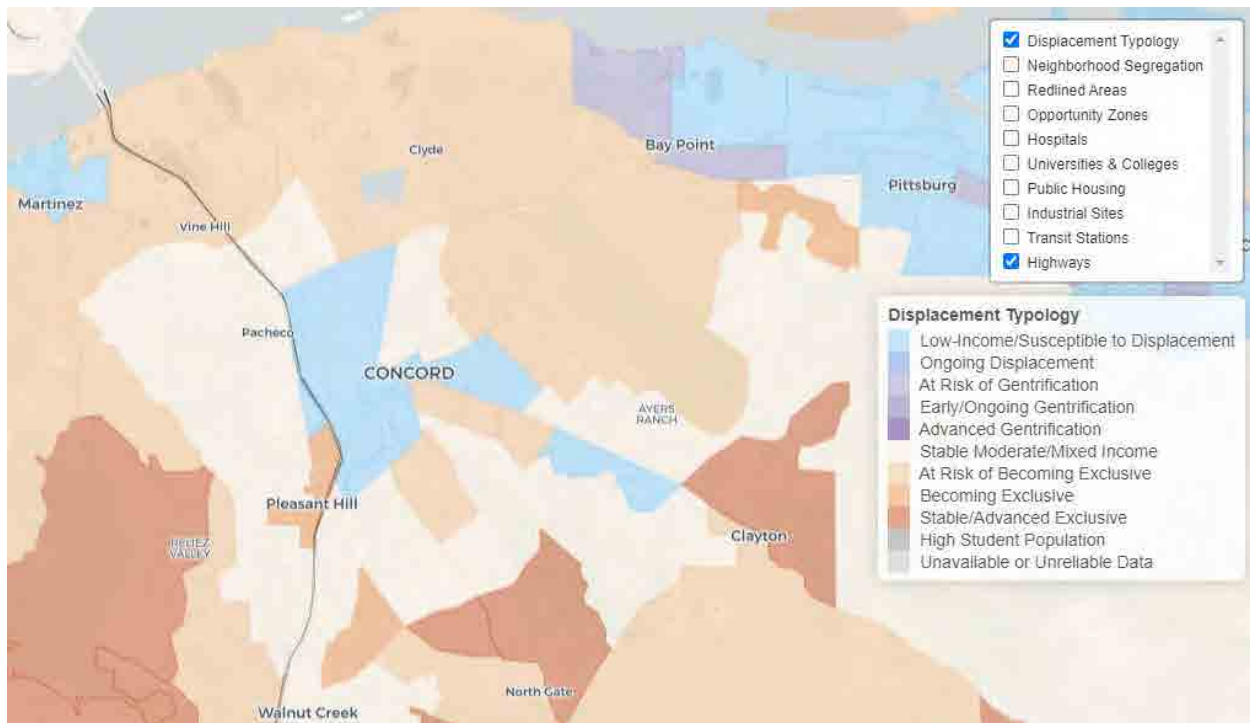
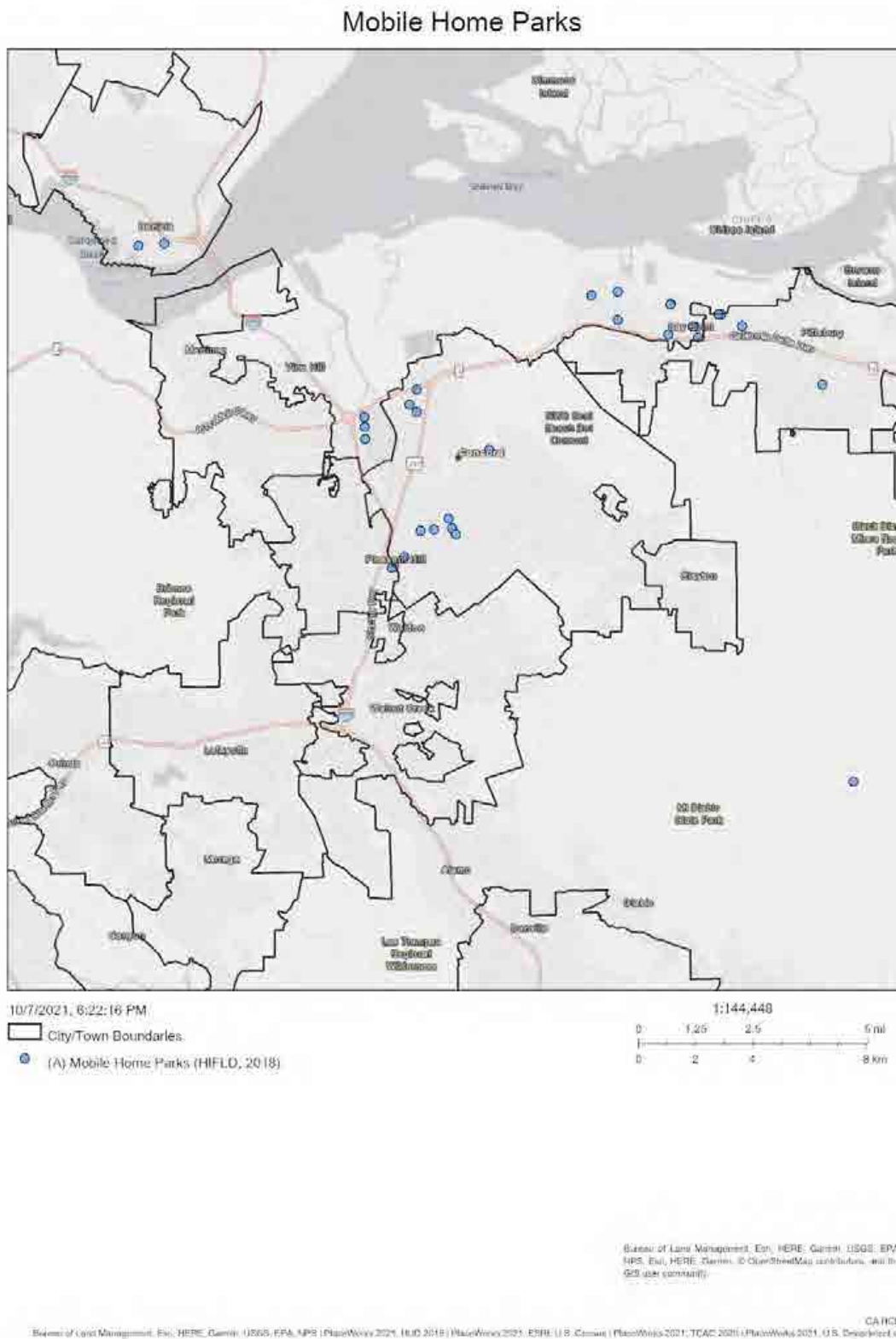


Figure 43: Mobile Home Parks (Regional)



Historically Disinvested Places and Disinvestment Driven Displacement

Through an analysis of disinvestment-driven displacement, there are no known historic policies or planning decisions related to the displacement of the City's residents.

Disaster-Driven Displacement

Through an analysis of historical disasters that have occurred in the Bay Area, it was found that no previous disasters in this region have significantly impacted housing or caused displacement of the City's residents. However, Concord exists in a region where seismic activity is common and the risk of an earthquake is high. Therefore, the displacement of vulnerable populations within Concord due to disasters is possible.

Findings

The non-White population in Concord experiences cost burden and is more susceptible to living in overcrowded or substandard housing and experiencing homelessness, and is more vulnerable to displacement. Black or African American and Hispanic or Latinx households are the most vulnerable because they make up a high percentage of renter households, and renter households experience cost burden more than homeowners. As is reflected by the data in this section, Black or African American and Hispanic or Latinx households experience similar rates of cost burden (30%–50% of income spent on housing), and Black or African American households experience severe cost burden (more than 50% of income spent on housing). The western/central areas of Concord with the highest disproportionate housing needs correlate with areas of higher racial/ethnicity diversity and lower-income household spatial patterns (see the section “Integration and Segregation Patterns and Trends,” below). These areas are also identified as low-income/susceptible to displacement. As such, the sites identified in the Sites Analysis (Appendix E) address the housing needs identified in this section by identifying capacity for all income groups, including lower-income households, which will improve conditions of cost burden, overcrowding, substandard housing, and vulnerability to displacement, as affordable housing provides security for lower-income households. The sites identified in Appendix E paired with programs in the Housing Element such as the rezoning program in Program 8 will further address these needs by creating additional opportunities for lower-income households to access high resources areas. Additionally, through Program 8, the City will coordinate with Bay Area Housing Finance Authority (BAHFA), established through Assembly Bill (AB) 1487, and with County staff and elected officials to determine potential funding that will be available to programs and/or projects within Concord through new affordable housing revenue streams available from AB 1487 and Measure X, refer to the Housing Element, Program Implementation for a detailed description of this program. Through **Program 1** the City will take a number of actions to incentivize and promote the production of ADUs; **Program 6** the City will increase opportunities for the development of affordable housing; and **Program 9** the City will facilitate middle density housing through a reduction in development standards. Further, through **Program 10, Homeownership Assistance**, the City is committed to conduct an evaluation of best practices for the development and implementation of a Tenant Opportunity to Purchase Act (TOPA) and/or Community Opportunity to Purchase Act (COPA) program.

Other programs that aim to address displacement risk through preserving the housing stock include **Program 17, Preservation and Housing Rehabilitation Risk**, **Program 18, Preservation of At-Risk Affordable Housing Units**, and **Program 24, Short Term Rentals**. Through Program 17, the City will

continue to contract with Habitat for Humanity, or a similar provider, to administer the Housing Rehabilitation Loan and Grant Program to assist low-income homeowners of single-family and mobile homes to address accessibility issues for persons with disabilities, among other needed repairs. Through Program 18, the City will continue to contract and coordinate with Compliance Services, or similar provider, to monitor compliance of City-funded affordable multifamily housing properties. When units are found to be at risk of conversion to market rate, the City will coordinate with the service provider and property owners at least 2 years in advance of conversion to market rate to work toward solutions for retaining affordability. Through Program 24, the City will conduct an evaluation of best practices for the development of regulations to address displacement of residential tenants due to conversion of conventional dwelling units to short term rentals. Refer to the section “Sites Analysis AFFH Assessment,” below, for additional programs that address disproportionate housing needs as it relates to the selection of sites identified to accommodate the City’s housing needs.

Sites Analysis AFFH Assessment

Sites identified to accommodate the City’s RHNA have been selected in a manner that affirmatively furthers fair housing. This has been done by minimizing the number of sites in the R/ECAP, identify current capacity to accommodate sites at all income levels while meeting the specific criteria for lower-income sites, and informing the programs of the Housing Element by advancing fair housing through the availability of sites, location of housing opportunities and housing types, and investments and outreach to the community. The Sites Inventory Form identifies the selected sites by parcel(s), the number of projected units or net new capacity, and affordability. This section analyzes the sites identified to accommodate the City’s RHNA as it relates to the extent to which the location and distribution of sites, at all income levels, paired with programs in the Housing Element will help to ameliorate existing patterns of segregation and/or exclusion of members of protected categories, R/ECAP, disparities in access to opportunity, disproportionate housing needs and displacement as identified in previous sections of this appendix (**Appendix D, Affirmatively Furthering Fair Housing**).

Integration and Segregation Patterns and Trends

Race/Ethnicity

As discussed in earlier sections, the City has become more diverse, and a large percentage of the non-White population resides in the western/central areas of the Concord. The selection of sites identified in Appendix E for lower-income sites is limited to this area as the States’ criteria for lower-income prohibits from identifying in low density areas., Through this analysis, findings indicate that White households in Concord generally reside outside of this area and live in areas associated with higher median household income, less dense areas, and higher access to resources in accordance with the TCAC maps. While the City cannot directly control racial integration, through the programs of the Housing Element, the City will promote mixed-income neighborhoods and subsequently more racially and ethnically integrated neighborhoods. While the City has adequate capacity to accommodate the RHNA at all income levels, to affirmatively further fair housing, the City has committed to a number of actions to reduce patterns of segregation through investments in community resources and outreach, programs to increase funding opportunities in the City, the facilitation and incentivization of the production of affordable housing, and a number of tenant protective actions. For example, through Program 8, the City will rezone high resource areas of the City for medium and high densities to support

the production of affordable housing through increased opportunities for TCAC funding at densities that are conducive to affordable housing development. Further, through Program 25, the City will advocate for revisions to the TCAC methodology to increase areas of the City that are considered high resource, given the limited amount of area that is identified as high resource.

Programs in the Housing Element that support the development of housing for various income levels are described in the section “Income,” below.

Income

There is a wealth gap in Concord as household income at the block group level varies from less than \$55,000 to greater than \$125,000. The spatial distribution of the Sites Analysis (Appendix E) improves conditions of income segregation by integrating sites of all income levels in various median-income group categories. Appendix E includes a citywide map detailing the location of the sites. Many sites are generally located in the western/central area of Concord—generally bound by State Route 242 to the northwest, Treat Boulevard to the south, Farm Bureau Road to the east—because the greatest density and capacity to accommodate the City’s RHNA exists here. However, there is no concentration or cluster of a particular income group, and sites at various income groups are evenly dispersed. As such, the selection of sites promotes mixed-income neighborhoods and expands opportunities for lower-income households in areas with higher median incomes, and moderate- and above moderate-income households in areas with lower median incomes.

Programs in the Housing Element that support the development of sites identified includes **Program 3, Affordable Housing Development Assistance**. The City will actively work with the development community to assist in the development of affordable housing, especially housing for extremely low-income households and households with special housing needs. Through **Program 5, Affordable Housing Streamlining**, the City will amend its Development Code to codify the requirements of Senate Bill (SB) 35 as well as process all applications subject to streamlining procedures consistent with State law to facilitate and assist in the development of housing for extremely low-, very low-, low-, and moderate-income households. Through **Program 6, By-Right Development**, the City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20% or more of the units are affordable to lower-income households on vacant or underutilized sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements. Through **Program 11, Incentives to Assist in Development**, the City will continue to provide financial and regulatory incentives to proactively encourage and facilitate the development of affordable housing by amending the local density bonus ordinance and offering affordable housing incentives beyond what is permitted under the State Density Bonus program. Additionally, through **Program 8, Fair Housing** the City will rezone areas outside of low resource areas that are appropriate for medium and high residential densities, specifically in areas with access to resources, amenities, and/or public transit.

R/ECAP

No lower-income sites are identified within the R/ECAP located in the western area of Concord. Therefore, the selection of sites does not exacerbate conditions of racially and ethnically concentrated areas of poverty. Through programs such as Program 8, the City will identify and rezone areas with access to opportunity, outside of lower resource areas, to increase opportunities for lower-income households and

aims to improve conditions of the R/ECAP by expanding opportunities for lower-income households facing poverty outside of this area.

Through Program 3, the City will promote the availability of adequate lower-income sites, per HCD criteria, and engage developers through resources that support development activity and maintain a link to State and Federal low-interest land acquisition/construction funds available for development of housing affordable to extremely low-, very low-, low-, and moderate-income households. Through Program 11 the City will continue to provide financial and regulatory incentives, such as streamlined ministerial approval, reduced fees, parking reductions, and direct financial allocations, to proactively encourage and facilitate the development of affordable housing for lower-income households, particularly those with extremely low incomes. Additionally, through Program 20, the City will provide Citywide education and technical assistance to tenants to ensure they are aware of all federal, State, and local tenant protections in place and resources for reporting potential issues with more intensive, bilingual outreach regarding tenant protections in the R/ECAP along Monument Boulevard.

Access to Opportunity

Sites identified for all income groups are located in areas identified as “Low Resource” and “Moderate Resource” by the TCAC methodology. Since most areas with higher densities are identified as “Low Resource” and “Moderate Resource,” the majority of capacity identified for all income groups are located in these areas. The selection of sites for lower-income groups per HCD criteria is limited to central/western areas of Concord because they allow for greater densities and zoning designations meet the default density requirements; therefore, the sites selected exacerbate conditions related to lower-income sites in “Low Resource” areas per TCAC methodology. However, these areas of Concord are also identified as having greater access to local resources, including high access to public transit, public schools that support lower-income households, special needs groups, and adult career development. Nevertheless, the City will address fair housing issues, including the City’s “Low and Moderate Resource” designation through actions that will increase access to opportunity. This includes Program 8, in which the City will include the topic of a community land trust fund as an agenda item for discussion with the Contra Costa County Consortium to raise awareness of a Community Land Trust (CLT) and work at the regional level to develop opportunities for the Contra Costa County Consortium to attract outside experts who can support communities in the formation of a CLT. Additionally, through Program 8, the City will also rezone sites to create new capacity in a manner that increases geographic equity and opportunities for residents by identifying and rezoning areas appropriate for medium and high residential densities, specifically in areas located in the “Highest Resources” TCAC category, and with access to amenities and/or public transit. Additionally, through Program 8 the City will coordinate with Bay Area Housing Finance Authority (BAHFA), established through Assembly Bill (AB) 1487, and with County staff and elected officials to determine potential funding that will be available to programs and/or projects within Concord through new affordable housing revenue streams available from AB 1487 and Measure X which includes funding (\$10 million in year one and an ongoing annual allocation of \$12 million) for the establishment of an affordable housing trust fund with a top priority of building permanent housing for households earning less than 50% of the Area Median Income.

Through **Program 21, Special Housing Needs**, the City will continue to implement development fees on new construction and tenant improvements to provide continued funding for the Concord Child Care Program, which positively impacts educational access to opportunity through the funding of the

MDUSD CARES program. **Program 1, Accessory Dwelling Units**, also increases access to opportunity by increasing housing in areas already identified as “Highest Resource.” Specifically, the program objective is to develop and adopt an affordable ADU incentive program that can be offered as affordable to lower- and moderate-income households, increasing opportunities for capturing new capacity in established single-family neighborhoods, which are typically located in the “Highest Resource” areas of Concord.

Disproportionate Housing Needs, Including Displacement

The sites identified in Appendix E paired with programs in the Housing Element such as the rezoning program in Program 8 will address disproportionate housing needs by creating additional opportunities for lower-income households to access high resources areas. Additionally, programs in the Housing Element that address fair housing issues related to disproportionate housing needs by increasing opportunities for homeownership include **Program 10, Homeownership Assistance**, in which the City will continue to offer and support First Time Home Buyer loans, Below Market Rate Homeownership, Mortgage Credit Certificates, and in which the City will conduct an evaluation of best practices for the development and implementation of a TOPA/COPA program. Also, through Program 1, the City will facilitate the development of ADUs that can be offered as affordable to lower- and moderate-income households, increasing opportunities for capturing new capacity in established single-family neighborhoods. Through **Program 20, Residential Tenant Protections**, the City will continue implementation of Residential Tenant Protection Program, which provides protections to tenants beyond what is required under State law, and strengthens the State relocation payment requirement by increasing the relocation amount for tenants due to no-fault eviction from a flat amount of \$1,000 to two times the monthly rent or \$5,000, whichever is greater, and requiring property owners to offer tenants a 12-month lease. To further address susceptibility to displacement, through Program 24, the City will also conduct an evaluation of best practices for the development of regulations to address displacement of residential tenants due to conversion of conventional dwelling units to short term rentals. Through Program 25, Advocacy for State Housing Legislation, Policies, and Funding, the City will continue to monitor pending State housing legislation, policies, and funding, and advocate for changes that will increase affordability, homeownership opportunities, and to reduce the risk of displacement and homelessness in the City. As an example of such advocacy, on May 9, 2022, the City Council sent a letter to the Assembly Appropriates Committee supporting AB 2170, a pending bill that would promote homeownership by giving owner-occupants and public entities a “First Look” at purchasing bank-owned properties and prohibiting “bulk sales” of foreclosed homes.

Summary of Fair Housing Issues and Prioritization of Contributing Factors

Concord has seen demographic shifts over the last 10 years. The population is becoming increasingly diverse, with an increase in the proportion of the population identifying as non-White. In addition, the share of those earning below Federal poverty levels has declined. Disparities in access to housing opportunity can be seen for non-White populations, as White households make up the largest proportion of homeowners and renter households see higher rates of cost burden. This indicates that non-White households are disproportionately burdened by the cost of housing.

Although the City has high access to environmental opportunity, overall access to opportunity is low to moderate in much of Concord, with the exception of those areas to the southeast, which are more affluent and less densely populated. Access to opportunity is a consideration for the allocation of tax

credits for the production of affordable housing. The lack of access to opportunity can create additional challenges in the availability of housing that can be made affordable for lower-income households. Challenges in housing production and affordability are not unique to Concord, as many cities and counties across the State lack a sufficient supply of affordable housing to meet their needs. The lack of access to opportunity as calculated by the TCAC methodology further constrains affordable housing opportunities in Concord, as attracting affordable housing development is difficult without strong access to TCAC resources.

The proportion of those with a disability has increased over time, with 2010–2014 Census data showing the highest concentrations at about 20%–30% of the population, and 2015–2019 data showing rates of 30%–40%. The highest concentration has remained in the Downtown core of Concord, where the population is most racially diverse, median incomes are low, many householders live alone, and approximately 50% of renters in the area are estimated to be cost burdened.

Displacement is an increasing concern for City residents. Local knowledge identified through public outreach and testimony (**Appendix G, Community Discussions and City Council Actions on Housing issues in Concord**) has confirmed that affordable housing is being converted to market-rate housing at a relatively high rate, although data is not available, and this may include those units that have never been subject to a deed restriction and are therefore not monitored. Those at risk of displacement are more likely to be non-White households, particularly those residing in the southwest where patterns of overcrowding and concentrated poverty exist. The area identified as vulnerable in Figure 37 correlates with the block groups identified as having 40% to 100% non-White populations (with more block groups in the 80% to 100% category) in Figure 7. Inversely, Figure 4 represents this area as having no dominance values associated with a majority White population. Non-White residents are vulnerable to displacement, and the intersection of the contributing factors mentioned earlier causes disproportionate housing needs and inequities, such as overcrowding and overpayment.

Prioritization of Fair Housing Issues and Contributing Factors

The following lists and prioritizes those factors that contribute to fair housing issues in Concord, and includes the City's priorities for addressing impediments to fair housing issues:

1. **Displacement Risk.** Local knowledge obtained through outreach reveals that displacement is perhaps one of the largest factors contributing to fair housing risk in Concord. The City has received considerable community input on this issue over the past several years through a variety of public meetings and other forums which is summarized in Appendix G. Findings in this analysis indicate that displacement risk of residents is due to economic pressures. Renter households make up 40.1% of all households in Concord and are the most vulnerable to displacement, as 54% of renter households experience cost burden and 16% of renter households experience overcrowding. The City is addressing fair housing issues as it relates to displacement risk. Through Program 17, the City will provide funds for the acquisition and/or rehabilitation of multifamily housing in exchange for affordability. Through Program 18, the City will monitor affordable units under a City Regulatory Agreement and affordable units identified as being at-risk of conversion to market-rate housing. This will include collaboration on the identification of financial resources and establishing cooperative partnerships with affordable housing developers and/or property owners willing to maintain units as affordable to lower-income households, including extremely low-income households. Through this program the City will also coordinate

with Compliance Services, LLC and property owners to work toward solutions for retaining affordability. **Program 19, Replacement Requirements**, will safeguard renter displacement as the City will provide education and technical assistance to tenants to ensure they are aware of their rights and available resources. Through Program 20, the City will implement the Rental Tenant Protection Program, which provides protections to tenants beyond what is required under State law (AB 1482, 2019). This program strengthens the State relocation payment requirement by increasing the relocation amount for tenants due to no-fault eviction and requiring property owners to offer tenants a 12-month lease. Other programs that address displacement issues are homeownership and inclusionary programs, as homeowners are less susceptible to displacement than renters. Through Program 10, the City will support the First-Time Homebuyer Program, Below Market Rate Homeownership Program, Mortgage Credit Certificate Program, which assist financially low- and moderate-income households in obtaining homeownership, and study best practices for the development and implementation of a TOPA/COPA program. Through Program 24, the City will also conduct an evaluation of best practices for the development of regulations to address displacement of residential tenants due to conversion of conventional dwelling units to short term rentals. Through **Program 25, Advocacy for State Housing Legislation, Policies, and Funding**, the City will continue to monitor pending State housing legislation, policies, and funding, and advocate for changes that will increase affordability, homeownership opportunities, and to reduce the risk of displacement and homelessness in the City. As an example of such advocacy, on May 9, 2022, the City Council sent a letter to the Assembly Appropriates Committee supporting AB 2170, a pending bill that would promote homeownership by giving owner-occupants and public entities a “First Look” at purchasing bank-owned properties and prohibiting “bulk sales” of foreclosed homes.

2. **Affordable Housing.** Renter-occupied households in Concord are disproportionately burdened by housing problems such as cost burdening (spending more than 30% of household income on housing cost) and overcrowding (more than 1 person per room). Approximately 54% of renters in Concord are cost burdened by their housing, compared to 29% of owner-occupied households, and approximately 16% of renter households are considered overcrowded, compared to 3% of owner households. The low availability of housing options to meet the needs of lower-income households is a key factor contributing to areas of Concord that are at risk of displacement or at risk of becoming exclusive. Because of this, the production of housing affordable to lower-income, especially extremely low-income, households to meet a range of housing needs is a priority for the City. Programs of the Housing Element that address the availability of affordable housing include Program 11, in which the City will continue to encourage the facilitation and development of affordable housing for lower-income households, particularly those with extremely low incomes, and special housing needs, including for large households, older adults, and households with persons who have disabilities or developmental disabilities through the provisions of financial and regulatory incentives. Additionally, City’s the Affordable Housing Incentive Program aims to accommodate a higher potential of affordable housing beyond what is provided by the Density Bonus Program. Through Program 17, the City will facilitate and maintain affordable housing through the preservation and rehabilitation of its existing housing stock. This program prioritizes housing for older adults, housing for those with special housing needs, and multifamily units. Additionally, funding for this program is available

through the Housing Loan and Grant Program made possible through the City's contract with Habitat for Humanity. As previously mentioned for Program 18, efforts to preserve and maintain affordable housing that is at risk of converting to market rate housing will be made. Affordable housing is also addressed in Program 3 and Program 5. Program 3 assists in the development of affordable housing for lower-income households and households with special housing needs by providing developers and interested parties with resources, such as sites identified in the Sites Analysis, and available funding sources for affordable housing development. Program 5 provides a streamlined approval process for affordable housing developments, which will help to facilitate housing for lower-income households.

3. **Accessible Housing.** In 2019, approximately 12% of the City's population had a disability, and approximately 36% of those with a disability were 65 years of age or older. The greatest type of disability represented for those 65 years of age or older is an ambulatory difficulty, where many older adults may face difficulties walking or climbing stairs. Because older adults make up the largest subgroup of those with a disability, as older adults continue to age, the need for housing to meet varying levels of ability will become increasingly vital. Through Program 21, the City will provide support for those requiring special housing needs, including older adults and those with disabilities, through Home Match Contra Costa, by promoting accessibility and ADA compliance in Concord, and connecting developers and resources and services focused on design features that are accessible and safe to all people regardless of age, size, ability, or disability. This can include guidance on home retrofits for increased accessibility that allow older adults to age in place, and referrals to independent living centers. Older adults and persons with special housing needs are often owners of older homes; therefore, it is essential that the housing in which they reside is adequate to meet their needs. As previously mentioned, through Program 17, the City will help preserve and rehabilitate housing for tenants and homeowners in extremely low-, very low-, and low-income households; households containing persons with disabilities; and older adults through the allocation of affordable housing funds for multifamily developments, provision of housing rehabilitation loans and grants. Additionally, through **Program 7, Code Enforcement**, the City will ensure the accessibility and safety of all residential buildings through the enforcement of current building codes, and that resources are available to all residents, including lower-income households.
4. **Access to Opportunity.** The City has strong environmental outcomes that represent access to healthy air, water, and other necessities, as well as ample access to public transportation, especially in the downtown core of Concord. However, poor educational and economic outcomes result in low scores on the TCAC Opportunity Maps. Those areas with low access to educational and economic opportunity overlap with those areas where households face the greatest challenges related to the burden of housing cost, household overcrowding, and earning lower incomes. This causes unique challenges for the City, in that the areas where there is the greatest need for the production of affordable housing have fewer qualifying households for tax credits that could result in new affordable housing. Increasing access to educational and economic opportunity, especially for lower-income households, is a priority for the City. The City is addressing this fair housing issue through several programs in the Housing Element, including Program 1, by facilitating the development of affordable ADUs, which would increase affordable housing opportunities in low-density areas that are typically located in areas of

Concord identified as “Highest Resource.” Through Program 6, the City will identify a location, process, and procedure by which residential and mixed-use development can be permitted by-right, especially in areas near amenities and resources such as transit, parks, childcare facilities, and within established commercial and near key areas of employment. Through Program 8 the City will coordinate with Bay Area Housing Finance Authority (BAHFA), established through Assembly Bill (AB) 1487, and with County staff and elected officials to determine potential funding that will be available to programs and/or projects within Concord through new affordable housing revenue streams available from AB 1487 and Measure X which includes funding (\$10 million in year one and an ongoing annual allocation of \$12 million) for the establishment of an affordable housing trust fund with a top priority of building permanent housing for households earning less than 50% of the Area Median Income.. The City will also support the formation of CLTs in Concord and will include the topic of CLTs as an agenda item for discussion with the Contra Costa County Consortium. Through this effort, the City can raise awareness of CLTs and work at the regional level to develop opportunities for the Contra Costa County Consortium to attract outside experts who can support communities in the formation of a CLT. Additionally, the City is also committing to increasing geographic equity and opportunities for residents by identify rezone areas appropriate for medium and high residential densities, specifically in areas with access to resources, amenities, and/or public transit through Program 8. Through **Program 9, Middle Density**, the City will facilitate the production of housing that may provide homeownership options and increase opportunities for an efficient use of land in single-family zones, which are typically designated as “Highest Resource” by creating a ministerial process by which single-family zoned lots can be subdivided to accommodate additional single-family units and duplexes, consistent with the requirements of SB 9. Through Program 21, the City will increase access to opportunity as it relates to education, as the Concord Child Care Program imposes development fees on new construction and tenant improvements that fund the MDUSD CARES afterschool program. The program services a majority of low-income students and provides professional development opportunities through an adult school program.

Table 3, Addressing Fair Housing Issues Through Meaningful Programs, summarizes the fair housing issues identified in this analysis, and includes the identification of the specific fair housing issues, contributing factors, meaningful programs by action type, and specific program metrics to address fair housing issues.

Table 3
Addressing Fair Housing Issues Through Meaningful Programs

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
1	Disproportionate Housing Needs, Including Displacement Risks	<ul style="list-style-type: none"> ▪ Displacement of residents due to economic pressures <p>Renter households make up 40.1% of all households in Concord and are the most vulnerable to displacement, as 54% of those renter households experience cost burden and are at risk of displacement due to financial issues and/or economic pressures.</p>	<ul style="list-style-type: none"> ▪ Action Type: Housing Mobility Strategies Program 9, Middle Density Program 10, Homeownership Assistance ▪ Action Type: Place-Based Strategies to Encourage Community Conservation and Revitalization Program 17, Preservation and Housing Rehabilitation ▪ Action Type: Protecting Existing Residents from Displacement Program 18, Preservation of At-Risk Affordable Housing Program 19, Replacement Requirements Program 20, Residential Tenant Protections 	<ul style="list-style-type: none"> ▪ Program 9 Metrics: <ul style="list-style-type: none"> ○ Facilitate housing production by ensuring 100% of qualifying single family zoned lots are eligible for a ministerial process to allow lot splits. ▪ Program 10 Metrics: <ul style="list-style-type: none"> ○ Amend Inclusionary Housing Program to increase opportunities for below market-rate units to increase affordable homeownership opportunities for those households earning less than 120% of the area median income. ○ Ensure 100% of households residing in the below market-rate units are eligible and meet the criteria, as detailed in the inclusionary housing agreement. ○ Conduct a study of tenant and community first right to purchase best practices. ▪ Program 17 Metrics: <ul style="list-style-type: none"> ○ Seek opportunities to allocate public funds to finance the rehabilitation and acquisition of affordable multifamily complexes in Concord. ▪ Program 18 Metrics: <ul style="list-style-type: none"> ○ Contact 100% of property owners of at-risk properties at least 2 years prior to funding expiration.

**Table 3
Addressing Fair Housing Issues Through Meaningful Programs**

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
				<ul style="list-style-type: none"> ▪ Program 19 Metrics: <ul style="list-style-type: none"> ○ Enforce replacement requirements for 100% of applicable projects to protect tenants from displacement risk and accommodate the housing needs of lower-income households. ▪ Program 20 Metrics: <ul style="list-style-type: none"> ○ Ensure 100% of tenant inquiries related to tenant protections are provided with educational and technical assistance to ensure they are aware of the protections in place for them and resources for reporting potential issues. ○ Conduct one tenant educational session every two years. ○ Conduct one in-person training session in Spanish (in or near the R/ECAP) by January 2024.
2	Disproportionate Housing Needs, Including Displacement Risks	<ul style="list-style-type: none"> ▪ The availability of affordable units in a range of sizes <p>The low availability of housing options to meet the needs of lower-income households is a key factor contributing to Concord’s risk of becoming exclusive.</p>	<ul style="list-style-type: none"> ▪ Action Type: Housing Mobility Strategies <p>Program 3, Affordable Housing Development Assistance</p> <ul style="list-style-type: none"> ▪ Action Type: New Housing Choices and Affordability in Areas of Opportunity <p>Program 5, Affordable Housing Streamlining Program 8, Fair Housing</p>	<ul style="list-style-type: none"> ▪ Program 3 Metrics: <ul style="list-style-type: none"> ○ Provide technical assistance and online resources with current and relevant information on availability sites, funding, and development process and incentives, as well as any additional resources that may be useful in assisting developers to increase affordable housing units. ▪ Program 5 Metrics:

**Table 3
Addressing Fair Housing Issues Through Meaningful Programs**

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
			<p>Program 11, Incentives to Assist in Development</p> <ul style="list-style-type: none"> ▪ Action Type: Place-Based Strategies to Encourage Community Conservation and Revitalization <p>Program 17, Preservation and Housing Rehabilitation</p> <p>Program 18, Preservation of At-Risk Affordable Housing Units</p> <ul style="list-style-type: none"> ▪ Action Type: Protecting Existing Residents from Displacement <p>Program 18, Preservation of At-Risk Affordable Housing Units</p> <p>Program 24, Short Term Rentals</p>	<ul style="list-style-type: none"> ○ Amend the Development Code to expand development permit streamlining consistent with State law. ○ Provide streamlined processing for 100% of qualifying Senate Bill 35 development projects. ▪ Program 8 Metrics: <ul style="list-style-type: none"> ○ Rezone sites to increase multifamily residential options in areas of opportunity by January 2027. ▪ Program 11 Metrics: <ul style="list-style-type: none"> ○ Amend the local Density Bonus Ordinance to allow for increased flexibility in development standards and provide programs and incentives to increase housing choices and affordability. ▪ Program 17 Metrics: <ul style="list-style-type: none"> ○ Require 100% of City funds for the acquisition and/or rehabilitation of multifamily housing are provided in exchange for affordability. ○ Ensure Notice of Funding Availability for acquisition and/or rehabilitation funds are released within 3 months of identification. ▪ Program 18 Metrics: <ul style="list-style-type: none"> ○ Require that property owners are provided at least 1 year notice prior to market rate conversion of

**Table 3
Addressing Fair Housing Issues Through Meaningful Programs**

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
				<p>units. Contact 100% of property owners of at-risk properties at least 2 years prior to funding expiration.</p> <ul style="list-style-type: none"> ▪ Program 24 Metrics: <ul style="list-style-type: none"> ○ Conduct a study of short-term rental conversion best practices.
3	<p>Disparities in Access to Opportunity for Persons with Disabilities</p>	<ul style="list-style-type: none"> ▪ Lack of assistance for housing accessibility modifications <p>Because older adults make up the largest subgroup of those with a disability, as older adults continue to age, the need for housing to meet varying levels of ability will become increasingly vital.</p>	<ul style="list-style-type: none"> ▪ Action Type: Place-Based Strategies to Encourage Community Conservation and Revitalization <p>Program 7, Code Enforcement Program 17, Preservation and Housing Rehabilitation</p> <ul style="list-style-type: none"> ▪ Action Type: New Housing Choices and Affordability in Areas of Opportunity <p>Program 21, Special Housing Needs</p>	<ul style="list-style-type: none"> ▪ Program 7 Metrics: <ul style="list-style-type: none"> ○ Ensure 100% of property owners who are subject to a complaint-driven inspection are provided access to current resources available to assist with the remediation of violations within 90 days of receipt of a complaint. ▪ Program 17 Metrics: <ul style="list-style-type: none"> ○ Seek opportunities to allocate public funds to finance the rehabilitation and acquisition of affordable multifamily complexes in Concord, including the Housing Rehabilitation Loan and Grant Program, throughout the planning period. ▪ Program 21 Metrics: <ul style="list-style-type: none"> ○ Ensure 100% of residents inquiring about the Home Match Contra Costa Program receive informational material and/or are added to the City of Concord's (City) interested parties list for annual notifications.

Table 3
Addressing Fair Housing Issues Through Meaningful Programs

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
				<ul style="list-style-type: none"> ○ Create a Housing for Persons with Disabilities webpage that connects residents to accessibility and service resources, such as home-retrofit grants and independent living services. ○ Update the Resources for Housing Developers webpage to connect developers to accessibility resources, including a link to the City's Building Division ADA Compliance webpage.
4	<p>Disparities in Access to Opportunity</p>	<ul style="list-style-type: none"> ▪ Location and type of affordable housing Areas with low access to educational and economic opportunity overlap with those areas where households face the greatest challenges related to the burden of housing cost, household overcrowding, and earning lower incomes. ▪ Access to financial services The supply and availability of affordable housing directly correlates to those at risk of or experiencing homelessness. Those experiencing homelessness require adequate access to shelter and supportive services to increase opportunities for access into permanent housing. 	<ul style="list-style-type: none"> ▪ Action Type: New Housing Choices and Affordability in Areas of Opportunity Program 1, Accessory Dwelling Units Program 6, By-Right Development Program 8, Fair Housing Program 9, Middle Density ▪ Action Type: Place-Based Strategies to Encourage Community Conservation and Revitalization Program 8, Fair Housing Program 21, Special Housing Needs ▪ Action Type: Housing Mobility Strategies 	<ul style="list-style-type: none"> ▪ Program 1 Metrics: <ul style="list-style-type: none"> ○ Monitor 100% of accessory dwelling unit (ADU) development and track affordability. ○ Develop ADU Toolkit. ○ Develop and adopt an affordable ADU incentive program. ▪ Program 6 Metrics: <ul style="list-style-type: none"> ○ Increase pathways by which residential and mixed-use development providing at least 20% affordable units can be permitted by-right. ▪ Program 8 Metrics: <ul style="list-style-type: none"> ○ Coordinate with Contra Costa County and BAHFA to increase funding for affordable housing activities in Concord, including allocating at least 5% of BAHFA funds for tenant protections.

Table 3
Addressing Fair Housing Issues Through Meaningful Programs

<i>Priority</i>	<i>Fair Housing Issue</i>	<i>Contributing Factors</i>	<i>Meaningful Programs</i>	<i>Program Metrics</i>
			<p>Program 8, Fair Housing Program 22, Support for People Experiencing Homelessness</p>	<ul style="list-style-type: none"> ○ Rezone sites to increase multifamily residential options to increase geographic equity and opportunities for residents. ○ Bring forward community land trusts as an item on the Contra Costa County Consortium. ▪ Program 9 Metrics: <ul style="list-style-type: none"> ○ Facilitate the production of housing that may provide homeownership options by adopting an ordinance to implement the provisions of Senate Bill 9 to establish ministerial review procedures for proposed lot splits of existing single-family residential lots. ▪ Program 21 Metrics: <ul style="list-style-type: none"> ○ Connect older adults through Home Match Contra Costa through notifications at least once a year to the City’s interested parties list. ○ Ensure 100% of persons seeking information on special needs housing and directed to the City’s website. ▪ Program 22 Metrics: <ul style="list-style-type: none"> ○ Appropriate \$2.4 million toward the development and implementation of a strategic plan to address homelessness.

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Appendix E: Sites Analysis

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Introduction

As provided under California State law (Government Code Sections 65583[a][3]), the Housing Element must include an inventory of land suitable and available for all types of residential development. Suitable land includes vacant sites and non-vacant sites, having realistic and demonstrated potential for redevelopment during the planning period to meet the local housing need at all income levels. As further detailed in the Regional Housing Needs Allocation (RHNA) discussion below, every local government is assigned a number of housing units representing its share of the State's housing needs for an 8-year period. The City of Concord's (City) housing need for the 6th Cycle Housing Element (6th Cycle) 8-year period (2023–2031) consists of 5,073 total units.

This appendix of the Housing Element contains an analysis and inventory of sites within the Concord city limits that are suitable for residential development during the planning period. The Sites Analysis identified capacity through several methods, including currently vacant sites available for housing development; identification of underutilized sites available for development at higher densities with realistic development potential; housing development projects that are underway and will have Certificates of Occupancy issued within the planning period; the potential for accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) based on recent production trends; and housing unit production that will be realized through the Concord Reuse Project (CRP) Area Plan. Through the Sites Analysis, the City has identified adequate capacity for 4,357 units through vacant sites, underutilized sites, and projected ADUs. Additionally, the City has identified 1,266 total units in the development permit pipeline to be credited toward the RHNA. Furthermore, 300 units have been identified as a conservative estimate of units to be delivered during the 6th Cycle on the former Concord Naval Weapons Station (CNWS) through the CRP Area Plan. These units will help provide a sufficient buffer to ensure that there is adequate remaining capacity throughout the planning period.

The sites identified in the Sites Inventory, coupled with the analysis of zoning standards and infrastructure capacity (see **Appendix C, Constraints and Zoning Analysis**), has informed the programs needed for the Housing Element. These programs will help ensure that the identified sites are developed at or above the realistic capacity established for each site. This Sites Analysis discusses the sites identified, development that is currently underway (which counts toward the City's housing need), the expected number of ADUs to be developed within the planning period, the methodology for determining realistic development capacity, and the approach used to select sites for the inventory.

State law requires a land inventory that relies largely on vacant sites, and if the inventory includes non-vacant sites, the City must make findings based on substantial evidence that the existing use does not constitute an impediment to additional residential development as presumed by State law (Government Code Section 65583.2). However, with the exception of the CRP site, vacant sites in Concord are nearly nonexistent. The vacant sites that are suitable for residential development are included in **Table A**, found at the end of this appendix as **Exhibit A**. Due to the shortage of vacant sites, the City's opportunities for residential development must largely rely on non-vacant sites. Furthermore, the lack of vacant land is not something that the City can directly control. The City can only incentivize and promote redevelopment, which is the intent of several programs in the Housing Element, as further detailed under the section "Programs to Support Development of Identified Sites," below.

Development of underutilized sites can be seen through recent development trends and current projects in the permitting and development pipeline for redevelopment of underutilized sites being developed at

a higher density or with greater intensity. Therefore, this Sites Analysis largely depends on those underutilized sites within Concord that are zoned to allow for residential development identified by their improvement-to-land-value ratio, age of buildings, evaluation of the existing use, proximity to resources and existing infrastructure, and local knowledge and known development interest indicating the presence of development opportunities and possible constraints to development feasibility.

Regional Housing Needs Allocation

Pursuant to State law, each local government in California has a responsibility to accommodate a share of the projected housing needs in its region. The process of allocating regional housing needs to local governments is called the Regional Housing Needs Allocation (RHNA). The Association of Bay Area Governments approved a methodology to distribute each jurisdiction’s RHNA, or fair share of housing, for the 6th Cycle Housing Element, and the City has been assigned an RHNA of 5,073 total units, divided into income categories as shown in **Table 1, City of Concord Regional Housing Needs Allocation 2023-2031**.

**Table 1
City of Concord Regional Housing Needs Allocation 2023–2031**

<i>Income Category</i>	<i>Units</i>	<i>Percent of Total</i>
Extremely Low-Income	646	12.7%
Very Low-Income	646	12.7%
Low-Income	744	14.7%
Moderate-Income	847	16.7%
Above Moderate-Income	2,190	43.2%
Total	5,073	100%

Those units allocated to the extremely low-, very low-, and low-income categories are collectively referred to as the lower-income need. The need for extremely low-income units is projected to be approximately one-half of the 1,292 very low-income units assigned to the City. To ensure that the City maintains adequate capacity to meet its housing needs throughout the entire 6th Cycle, the City has identified additional capacity above and beyond its RHNA. In accordance with State requirements, the City will monitor development activity throughout the planning period to maintain sufficient capacity for the remaining RHNA at all income levels, as described in **Program 14, No Net Loss**, of the Housing Element.

Vacant and Underutilized Sites – Capacity Analysis

A site’s maximum capacity refers to the number of housing units that can be adequately accommodated on the site. The number is based on the maximum residential density permitted by a zoning designation’s development standards. However, the actual number of units that a development may propose could be less than the maximum density permitted by the zoning designation. Although there may be developer interest in achieving the maximum permitted density, site-specific limitations, including physical constraints (e.g., shape, topography, infrastructure), and regulatory requirements (e.g., setbacks, parking) can make this difficult for some developments. Therefore, it is more feasible to calculate a site’s potential number of units using “realistic capacity” for the Sites Inventory. Realistic capacity is assessed based on trends for the number of units achieved by existing and approved residential developments rather than the base zone maximum density.

The capacity identified in this analysis considers each site's zoning designation, the realistic capacity of the site, applicable development standards, and the total area of the site, which can consist of one or more parcels.

Lower-Income Site Criteria

Sites that can feasibly accommodate affordable housing developments for lower-income households meeting less than 80% of the area median income are identified to be lower-income sites in this analysis. Lower-income sites shall meet the following criteria to ensure the best conditions for affordable housing construction. In accordance with Housing Element law (Government Code Section 65583.2[c][3]), sites that meet the default density of 30 units per acre and have an acreage between 0.5 and 10 acres offer an economy of scale for the development of affordable housing due to the lower per-unit construction costs. The default density of 30 dwelling units per acre is predetermined for cities with a population greater than 25,000 in the Bay Area. To meet the 0.5-acre threshold, contiguous parcels that share certain qualities, such as proximity to one another, similar zoning designations, opportunity for parcel consolidation, and other site characteristics, may be grouped within the Sites Inventory to form a site of at least 0.5 acres. In addition to these characteristics, the City will further facilitate the consolidation of sites through **Program 13** of the Housing Element, which will establish financial or regulatory incentives in exchange for lot consolidation such as priority processing, fee deferment and waivers, and the modifications of site development standards.

Small-Site Analysis

Sites that are too small or large may not be ideal for facilitating development affordable for lower-income households. For sites that do not fall between 0.5 and 10 acres (deemed adequate to accommodate lower-income housing), evidence on recent trends must be provided to show that sites can otherwise reasonably accommodate the lower-income housing need. Although a site can consist of just one parcel, a site can also consist of two or more smaller parcels that have realistic potential to be consolidated into one development site.

The average parcel size in Concord is 0.46 acres, just below the 0.5-acre minimum, and only 6% of the City's total parcels are greater than 0.5 acres. Many of the larger parcels contain existing facilities, including public buildings, schools, parks, mobile home parks, and affordable housing developments, which cannot reasonably be assumed to be redeveloped into new housing. If the Sites Inventory were to exclude all parcels smaller than 0.5 acres, without considering the possibility of lot consolidation of smaller parcels, it would exclude more than 94% of the City's total parcels. Parcels are not considered for the lower-income RHNA unless they can reasonably be consolidated to form sites adequate in size for a lower-income housing development. Therefore, of the sites identified for the Sites Inventory, approximately 75% of parcels can be consolidated to form larger sites adequate for accommodating the lower-income RHNA. These sites consist of contiguous parcels that are vacant or underutilized, sharing features such as common ownership, adjacency, and high-density zoning.

In addition to the research conducted to confirm adjoining parcels, common ownership, and densities that could reasonably facilitate the creation of housing sites through lot consolidation, development trends in Concord indicate that lot consolidation is a common tool used for facilitating residential development.

Lot consolidation was used for the 26-unit Willow Terrace development, which originally consisted of two approximately 0.5-acre parcels. Additionally, three projects currently planned or under construction

that involve lot consolidation are Clayton Road Townhomes, Galindo Terrace, and The Grant (North and South). The Clayton Road Townhomes project used multiple vacant parcels to create an approximately 4-acre site for the development of 70 dwelling units. Galindo Terrace merged two parcels less than 0.5 acres to create a 0.53-acre site, which accommodates 62 dwelling units, all of which are affordable to lower-income households, with the exception of one manager’s unit. The Grant North and The Grant South consolidated nine smaller parcels in Downtown Concord to create sites that are roughly 1.4 acres and 0.6 acres, respectively, and collectively accommodate 228 dwelling units. Galindo Terrace and The Grant (North and South) are both located within the Transit Station Overlay, which permits additional density above the base zoning that allowed these projects to achieve their planned number of dwelling units.

The above projects are listed in detail in **Table 2, Recent Development Permit Activity**. Due to the smaller size of many parcels in Concord, it can be assumed that developers will continue to consolidate lots, as demonstrated by recent development trends and site-specific research identifying sites with potential for lot consolidation. The City also provides programs to facilitate the development of lower-income housing, and will implement regulatory and financial incentives to facilitate lot consolidation, as detailed in **Program 13, Lot Consolidation Incentive**, which aims to facilitate development on smaller parcels through incentives in exchange for lot consolidation. All sites identified in the Sites Inventory with the potential of being consolidated are denoted by a letter in **Exhibit A**, on Table A of the Sites Inventory Form.

Development Permit Activity

The City’s recent residential development permit activity was used to determine residential development trends in the area and to assist in the analysis of realistic development capacity. Projects listed in Table 2 varied in stages of the development permit process, including application completion, entitlement, issuance of a building permit, and obtaining a certificate of occupancy. Since 2014, more than 20 residential developments were permitted (some of which may or may not have received a building permit or certificate of occupancy), with nearly three-quarters of these developments being in multifamily and mixed-use zones. The unit counts for each of these respective developments were as low as two dwelling units and as high as 313 dwelling units. Developments in higher-density zones were more likely to be approved at or near the maximum density compared to projects in lower-density zones. The average density achieved across all developments is 70% of the maximum density. It should be noted that this number includes a variety of zoning designations. Site size does not seem to be a significant factor in how much density is achieved relative to the maximum density permitted in the designated zoning district.

**Table 2
Recent Development Permit Activity**

<i>Parcel Number</i>	<i>Name</i>	<i>Zone</i>	<i>Units Permitted</i>	<i>Max Capacity (units) Under Zone</i>	<i>Percent Density Achieved</i>	<i>Parcel Size (acres)</i>	<i>Year Approved/Last Activity*</i>
117050008	Myrtle Creek Estates	RR-20	7	9	78%	3.76	2020
132020060	Villa De La Vista	PD	12	27	44%	0.85	2019
113370001	Willow Terrace	RM	26	38	68%	1.21	2021

**Table 2
Recent Development Permit Activity**

<i>Parcel Number</i>	<i>Name</i>	<i>Zone</i>	<i>Units Permitted</i>	<i>Max Capacity (units) Under Zone</i>	<i>Percent Density Achieved</i>	<i>Parcel Size (acres)</i>	<i>Year Approved/Last Activity*</i>
126210045	Oak Terrace	RM	28	46	61%	1.44	2018
126300052	Oakmont of Concord	DMX	51	240	21%	2.40	2016
126062013	Renaissance Phase 2	DMX	180	234	77%	2.34	2020
126093017	The Grant (North)	DMX	139	138	100%	1.38	2018
126093017	The Grant (South)	DMX	89	57	156%	0.57	2018
126083011	Concord Village	DMX	230	234	98%	2.34	2019
126082008	The Argent	DMX	181	164	110%	1.64	2019
126133009	Avesta Assisted Living	DMX	117	109	107%	1.09	2021
126164047	RMG Affordable Housing	DMX	75	55	136%	0.55	2021
105092008	Clayton Road Townhomes	RM	70	138	51%	4.33	2020
126164051	Galindo Terrace	DMX	62	53	117%	0.53	2019
126104008	Salmon Run Apartments	DMX	32	47	68%	0.47	2020
126042034	Six-Plex at 2150 Fremont Street	RH	6	22	27%	0.22	2021
126132005	The Ashbury	DMX	313	184	170%	1.84	2021
114300014	Farm Bureau Two-Lot Subdivision	RS-8	2	5	40%	0.56	2021
147180002	Heckmann Subdivision	RS-7.5	15	21	71%	2.19	2021
147251015	Walnut Grove Subdivision	RS-7	14	14	100%	1.41	N/A

* Approval includes completed applications, entitlements, the issuance of building permits, or certificates of occupancy, depending on the most recent stage of development.

Residential Development in Mixed-Use Zones

Mixed-use zoning can help create cohesive, yet diverse neighborhoods by providing opportunities for people to live, work, shop, and recreate. This is achieved by combining residential, open space, institutional, commercial, and other uses into a single district that encourages well-rounded lifestyles, stimulates the economy, and promotes sustainable transportation options such as walking, biking, or using public transit. Mixed-use development is often successful in high-density areas near transit, as demonstrated in the City’s Downtown and commercial corridors. Recent mixed-use developments have primarily occurred in the Downtown Mixed Use (DMX) zone, but are also permitted in the Community Office (CO), Commercial Mixed Use (CMX), Neighborhood Commercial (NC), and Downtown

Pedestrian (DP) zones with provisions and regulations set forth by the City's Development Code (see **Appendix C, Constraints and Zoning Analysis**).

The City's regulations facilitate high-density residential developments in zoning districts that permit residential and mixed uses. The City will further incentivize high-density development through programs of the Housing Element, such as **Program 11, Incentives to Assist in Development**, where the City provides density bonuses through the State Density Bonus Program and increases in allowable density through the City's Transit Station Overlay District. Additionally, through the Affordable Housing Incentive Program, as detailed in Program 11, the City provides regulatory incentives and additional density above and beyond those provided under State's density bonus law for developments exceeding the City's affordable housing inclusionary requirement. The Affordable Housing Incentive Program is available for projects with affordable housing units in a variety of different districts, including mixed use. As detailed in Table 2, the City has seen an abundance of development activity in mixed-use zoning districts, including high-density multifamily developments near transit rich areas; developments include Concord Village, The Grant, Argent, The Ashbury, Galindo Terrace, and Renaissance. The Grant is a 228-unit development that includes ground-level retail, residential units on the upper floors, and amenities. The Sites Inventory includes sites with a mixed-use zoning designation, many of which qualify to meet the lower-income housing need.

Redevelopment Activity

Every development has a limited lifespan and is subject to physical, social, and economic changes. As buildings near the end of their lifespan, repairs and maintenance become more costly, and buildings may become unsuitable for use if neglected for a long period of time. Zoning and land use regulations may change, often increasing opportunity for redevelopment. As a result, developments become underutilized, undervalued, and underbuilt when they are not being used to their fullest potential, often based on market trends or zoning changes. Growing neighborhoods tend to densify to accommodate an increasing population. This is when redevelopment becomes necessary to accommodate change.

Many of the projects listed in Table 2 involve redevelopment and are located in Downtown or commercial districts where the potential for achieving greater densities and revitalization is the highest. Some notable examples include the Argent, Avesta Assisted Living, The Ashbury, RMG Affordable Housing, Galindo Terrace, and The Grant projects. The Argent is a 181-unit apartment complex that replaces a strip mall in east Downtown. The Ashbury is a 313-unit affordable housing project that is replacing a religious facility and parking lot. The adjacent Avesta and RMG sites are combining and redeveloping vacant residential and retail spaces to create 192 units for senior housing. Galindo Terrace is a 62-unit development replacing an auto shop and other retail uses. The Grant is replacing vacant and underutilized retail and office buildings with 228 apartments and new ground-floor retail and office space.

Developers are likely to redevelop a site as long as it is feasible. Redevelopment is also more likely to occur on underutilized consolidated parcels where the combined acreage will yield a higher capacity than if each parcel were to be redeveloped individually. The Sites Inventory includes many underutilized sites that have the potential to be redeveloped, excluding mobile home parks, which are protected by the Mobile Home Conversion Ordinance (CMC Chapter 15.105). Mobile home parks are an important part of the City's affordable housing stock, and the redevelopment of these parks would be costly and timely

for developers. Additional details on mobile home parks as a constraint to redevelopment can be found in **Appendix C, Constraints and Zoning Analysis**.

Realistic Capacity

Housing Element law (Government Code Section 65583.2[c]) requires cities to demonstrate that the projected residential development capacity can realistically be achieved as part of their analysis of available sites. Therefore, realistic capacity refers to the number of units likely to be achieved on a site. Table 2 details recent development activity in Concord, demonstrating the capacity achieved for each example. Recent trends demonstrate that many developments not only achieve the maximum permitted density, but in districts that permit a mix of uses and are located near transit, developments often far exceed the permitted density using the many incentives offered by the City that allow an increase in permitted density. Multifamily developments in high-density residential districts achieved a higher proportion of the maximum density than similar projects in medium-density residential districts, or than single-family developments in low-density residential districts. The realistic capacity used to calculate the estimated number of units that can be achieved on each site in the Sites Inventory is based on a percentage of the maximum densities achieved, recent market trends, and existing regulations. This estimate was then further refined to conservatively calculate the number of units that can be achieved to calculate realistic capacity in a manner that will ensure no net loss of units.

Realistic capacity was calculated for each zoning district using recent development trends and existing regulations. Districts were then grouped into high-, medium-, and low-density categories, where the percent capacity was then averaged, as shown in **Table 3, Realistic Capacity per Zone**.

**Table 3
Realistic Capacity per Zone**

<i>Zoning Category</i>	<i>Zones</i>	<i>Percent of Maximum Density Achieved</i>	<i>Realistic Capacity</i>
Low Density	Low Density Residential (RL) Single-Family Residential (RS) Rural Residential (RR)	72%	62%
Medium Density	Commercial Mixed-Use (CMX) Community Office (CO) Neighborhood Commercial (NC) North Todos Santos (NTS) Medium Density Residential (RM)	60%	58%
High Density	Downtown Mixed-Use (DMX) Downtown Pedestrian (DP) High Density Residential (RH)	99%	80%

The realistic capacity has been conservatively analyzed due to the wide range of capacities achieved when compared to maximum densities, and to accommodate development standards such as setbacks and height limitations. Therefore, the capacities shown in Table 3 are not only realistic for development projections, but are also more likely to be exceeded when combined with the programs of the Housing Element.

As detailed in the programs of the Housing Element, the City will provide a process by which maximum permitted densities can be achieved, and even be exceeded, through such programs as **Program 11, Incentives to Assist in Development**, which provides density bonuses through the State Density Bonus Program, increases in allowable density through the City’s Transit Station Overlay District, and the

Affordable Housing Incentive Program to provide development and process incentives in exchange for affordable units beyond what is permitted under the State Density Bonus. Additional programs that will ensure the realistic capacity can be achieved include Program 6, which will allow development by-right on previously identified sites when 20% or more of the units are offered as affordable; Program 9, which will facilitate small-lot and medium density development consistent with the provisions of Government Code 66411.7; Program 13, which will provide financial and regulatory incentives for lot consolidation; Program 16, which will reduce parking requirements for religious institutions in exchange for housing development; and Program 19, which will ensure that any units lost through redevelopment will be replaced and subject to certain affordability restrictions.

Transit Station Overlay District

Sites that are located near Bay Area Rapid Transit (BART) stations have the greatest potential for accommodating the 6th Cycle RHNA, especially for lower-income housing, because the yield of potential units is maximized by the Transit Station (TS) Overlay District, reduced parking requirements, and increased proximity to transit. Chapter 18.105 of the City’s Development Code establishes an overlay district that may be combined with any base district within 0.5 miles of the perimeter of a BART station. The Transit Station Overlay District is intended to create, preserve, and enhance the surrounding areas by increasing development and activity that is pedestrian-oriented and ensuring there is access to amenities. Through this overlay, the maximum density allowed by the base district may be increased by 25% for residential and mixed-use projects. Further, for mixed-use developments, the maximum permitted floor-area ratio (FAR) for non-residential uses may be increased by an additional 25% above the FAR permitted by the base zone. The additional density provided by the Transit Station Overlay District has been considered in the calculations for realistic capacity on sites within the Transit Station Overlay District. The permitted density and FAR, including bonuses provided by the Transit Station Overlay District, where applicable, are shown in **Table 4, Residential Density and FAR in the Transit Station Overlay District.**

**Table 4
Residential Density and FAR in the Transit Station Overlay District**

<i>Zone</i>	<i>Density of Base Zone (du/net acre)</i>	<i>Max. Density in TS District (du/net acre)</i>	<i>FAR of Base Zone*</i>	<i>Max. FAR in TS District</i>
Single-Family Residential (RS)	2.5–10	12.5	N/A	N/A
Low Density Residential (RL)	2.5–10	12.5	N/A	N/A
Medium Density Residential (RM)	11–32	40	N/A	N/A
High Density Residential (RH)	33–100	125	N/A	N/A
North Todos Santos (NTS)	2.5–32	40	0.3–0.5	0.625
Community Office (CO)	11–40	50	1.0	1.25
Commercial Mixed-Use (CMX)	11–40	50	1.0	1.25
Neighborhood Commercial (NC)	11–24	30	0.35	0.4375
Downtown Pedestrian (DP)	33–100	125	4.0	5

Downtown Mixed-Use (DMX)	33-100	125	1.0 -6.0	7.5
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FAR = floor-to-area ratio; TS = Transit Station; du/ = dwelling units per; N/A = not applicable

* FAR only applies to commercial portions of mixed-use developments. However, these commercial portions can support project feasibility and provide services to residents.

The permitted increase in density will help facilitate more robust developments that can accommodate affordable units, especially near the Concord (Downtown) BART Station and Downtown area. The area surrounding the North Concord/Martinez BART Station is mostly zoned for lower-density residential development, and the increased density provided by the overlay in this area increases opportunities for more-dense homeownership development types such as townhomes and small-lot developments. The North Concord/Martinez Station is also adjacent to the future CRP, which will provide high-quality, transit-oriented development and affordable housing opportunities through conversion of the existing CNWS.

The provisions of the Transit Station Overlay District increase the density that can be achieved, as demonstrated through the analysis of recent development activity. Those sites that fall within the Transit Station Overlay District have an increased likelihood for achieving densities above the realistic capacities identified, further solidifying that the realistic capacity identified through this Sites Analysis is a conservative estimate. Recent developments that took advantage of the additional density granted by the Transit Station Overlay District include the Argent and the Grant, which are detailed in Table 2.

Environmental Concerns and Infrastructure Capacity

Environmental and infrastructure constraints cover a broad range of issues affecting the feasibility of residential development. Environmental issues include the suitability of land for development, and the provision of adequate infrastructure relates to sewer capacity, water capacity, and access to dry utilities. All sites at all income levels in the Sites Inventory have been determined to have sufficient existing or planned dry utilities, as well as adequate sewer and water capacity. The CRP area is the only site in the Sites Inventory that does not have existing utilities; however, the utilities have been planned for at a conceptual level. Further, the CRP area has been included only to provide an additional buffer of sites beyond what has been identified, as further detailed below. All parcels in the Sites Inventory were reviewed for any known environmental constraints, and the sites in the Sites Inventory have all been designated for residential development and have no known site-specific constraints that would limit development.

Accessory Dwelling Units

Pursuant to Government Code Section 65583.1, the Housing Element may satisfy the RHNA requirement through methods other than the identification of sites. One such method is to calculate the projected number of ADUs and JADUs to be developed within the planning period. Per Housing Element law, this number must be based on the following factors:

- Development trends since January 2018
- Community need and demand
- Resources and incentives available to encourage development
- Availability of units for occupancy
- Anticipated affordability

Recent changes to legislation governing the development and provision of ADUs and JADUs have sparked growth in these units across California, including in Concord. Because Concord is mostly built

out and urbanized, ADU and JADU production is an ideal strategy for producing needed housing in all areas of Concord while also capitalizing on existing infrastructure, such as water and sewer. Additionally, ADU/JADU development is generally a more palatable strategy for increasing density in established lower-density areas.

Table 5, Recent ADU/JADU Activity, lists the number of ADUs and JADUs produced in Concord by year since 2018. From 2018 to 2021, the City averaged 38 new ADU/JADUs per year. While it is likely that many of these units are offered at rates affordable to lower- or moderate-income households, future ADUs and JADUs have been conservatively assumed to be affordable only to above moderate-income households for the purposes of this analysis. This is due to the lack of a comprehensive analysis of ADU/JADU rents in the area, and the lack of deed-restrictive affordability covenants tied to the properties.

Table 5. Recent ADU/JADU Activity

<i>Year</i>	<i>Number of ADUs/JADUs Produced</i>
2018	35
2019	47
2020	32
2021	40
Total	154

ADU = accessory dwelling unit; JADU = junior ADU

Numerous changes to ADU and JADU legislation since 2017 has increased opportunities for development of this housing type, and it is expected that development trends will continue upward. The City has included Program 1 to maintain and increase overall ADU/JADU production and to incentivize ADUs that are affordable to lower-income households. This analysis does not project anticipated affordability levels, but instead conservatively assumes that all new ADU/JADUs will be offered at market rate.

Based on the data in Table 5, the projected number of ADU/JADUs to be credited toward the City’s RHNA is 304 units. This calculation multiplies the annual average of 38 ADUs/JADUs by the 8-year RHNA period.

Vacant Sites

Concord is a relatively large city with areas of urban and suburban development. Analysis of assessor and local data and ground-level inspections show that 135 of the 148 vacant parcels in Concord were zoned for residential uses. Furthermore, 98 of those 135 parcels were developable. This number encompasses about 56 acres of vacant land, which primarily exists in the form of infill opportunities. Vacant sites are sites without any buildings or other significant improvements. Furthermore, many vacant sites are unsuitable for development due to their irregular shapes or steep slopes, are designated as a right-of-way, or lack street access. Sites not defined as vacant include open space and parking lots. Some vacant sites that are zoned for residential uses and available for development are still not eligible for lower-income housing, because they either do not meet the City’s default density of 30 dwelling units per acre, or they do not meet the State’s minimum size of 0.5 acres for this income level. Sites that do not meet the above-stated criteria are used to accommodate the moderate- and above moderate-income RHNA. Vacant parcels that meet the default density but are smaller than 0.5 acres can sometimes be

consolidated with adjacent parcels to create a larger site to qualify for accommodating the lower-income RHNA. The potential for lot consolidation is important, as only 6% of the City’s total developable parcels are zoned for residential uses, and only 27% of the 98 vacant parcels meet the minimum size criteria for the lower-income RHNA. Therefore, in this analysis, many vacant parcels are shown to be consolidated with adjacent underutilized or vacant parcels.

Some recent development examples on vacant sites include 2150 Fremont Street, Avesta Assisted Living, The Grant, Myrtle Creek Estates, Oak Terrace, Villa De La Vista, and Willow Terrace. Myrtle Creek Estates, Oak Terrace, Villa De La Vista, and Willow Terrace were subdivided into smaller parcels for single-family homes or townhomes. Avesta Assisted Living and The Grant consolidated vacant and underutilized lots. This highlights the value of the ability to redevelop vacant parcels along with underutilized parcels. These developments are further detailed in Table 2. **Table 6, Vacant Site Capacity**, provides a breakdown of vacant site capacity that has been identified to accommodate a portion of the RHNA by income level. These sites are further detailed in Exhibit A, Table A of the Sites Inventory Form.

**Table 6
Vacant Site Capacity**

<i>Total Dwelling Units</i>	<i>Lower-Income Units</i>	<i>Moderate-Income Units</i>	<i>Above Moderate-Income Units</i>
1,101	807	146	148

Note: These numbers are based on the realistic capacity under the designated zones, as described in Table 3.

Underutilized Sites

The non-vacant sites identified to accommodate a portion of the RHNA have strong potential for redevelopment and do not have any existing uses that would impede new residential development. Strong opportunities for redevelopment on underutilized sites in Concord are due in part to the high densities permitted in many areas of Concord. Opportunities for redevelopment exist primarily where the Transit Station Overlay District intersects the already high densities of multifamily and mixed-use zoning districts, allowing a 25% increase above the base density. This increase permits a significant number of net new dwelling units, resulting in densities as high as 125 dwelling units per acre. Redevelopment is also more likely to occur when parcels are consolidated with adjacent vacant sites, or when there is a large grouping of underutilized sites in areas with high development interest, such as the Transit Station Overlay District.

Underutilized sites are identified using thorough and selective criteria to determine which existing uses are likely to redevelop when paired with the right zoning designation, regulations, and policies. Underutilized sites were analyzed using Geographic Information Systems (GIS) software with multiple datasets to identify potential sites based on certain criteria indicating a high potential for redevelopment. Local datasets and tools were used to aid in the analysis, including the Association of Bay Area Governments’ Housing Element Site Selection tool, County of Contra Costa assessor parcel data, and the City’s zoning and land use data. The following factors helped to narrow down sites with redevelopment potential:

- **Building Age** – This is often an indicator of structure condition because buildings that are more than 50 years old (built prior to 1971) often require costly repairs and are more likely to be replaced with newer, more efficient buildings that are easier to maintain.

- **Existing Use** – When there are no existing structures, or the existing structure is a vacant building, development is more likely. On-the-ground research and knowledge of existing long-term leases and known vacancies are considered in site selection.
- **Under Valued** – This is a common indicator for developers. An assessed improvement-to-land-value ratio less than 1 indicates that the value of the improvements (e.g., buildings, facilities) on the site is less than the value of the land, and therefore the site is not being used to its fullest potential and could be redeveloped.
- **Underbuilt** – When the existing FAR and/or density on a site is less than the maximum permitted, this indicates that there is unrealized capacity for more dwelling units. When a site is substantially underbuilt, it is more likely to be redeveloped to near full capacity.

The above factors were used to allow for a more informed approach to site selection. Sites that satisfied these criteria were more likely to be chosen for candidacy in fulfilling the 6th Cycle RHNA. Furthermore, on-the-ground research and discussion with City staff due to their local knowledge aided in predicting and identifying potential for a positive yield count of net new units. This included meetings with the City’s Economic Development Department to identify sites with known potential for development; the use of Google Maps to identify current uses and vacancies; knowledge of past and current pipeline projects; and developer interest in particular zoning districts, neighborhoods, and sites. The Economic Development Department has firsthand knowledge of development interest of specific sites because it works closely with local businesses, community groups, and potential developers to identify opportunities in Concord.

Furthermore, the City has a pattern of redevelopment trends for underutilized sites. Recent redevelopment trends of underutilized sites include the Heckmann Subdivision, The Ashbury, RMG Affordable Housing, The Argent, Galindo Terrace, The Grant (North and South), Clayton Townhomes, Farm Bureau Subdivision, Concord Village, Avesta Assisted Living, Salmon Run Apartments, Oakmont of Concord, and Renaissance, all of which are further detailed in Table 2. Additionally, redevelopment projects that are in the application stages of the permitting process include Clayton Way Subdivision and Walnut Grove Subdivision Amendment. These projects are redeveloping sites in built-out areas of Concord that are expected to see more redevelopment due to an abundance of older buildings, underutilized strip malls, and other retail-type spaces lacking long-term leases, coupled with zoning regulations that are much more permissive than what is built. **Table 7, Identified Capacity for Underutilized Sites**, provides a breakdown of identified capacity for underutilized sites by income category.

Table 7
Identified Capacity for Underutilized Sites

<i>Total Dwelling Units</i>	<i>Lower-Income Units</i>	<i>Moderate-Income Units</i>	<i>Above Moderate-Income Units</i>
2,831	1,317	766	748

Note: These numbers are based on the realistic capacity under the designated zoning districts, as described in Table 3.

Additionally, the following programs of the Housing Element will further facilitate and incentivize redevelopment of underutilized sites. **Program 9, Middle Density**, will ensure an efficient use of land by facilitating medium-density development and redevelopment on small lots. **Program 11, Incentives to Assist in Development**, provides density bonuses through the State’s Density Bonus Program and the

City's Transit Station Overlay District, which will allow underutilized sites to achieve a higher density through redevelopment.

Sites Identified in Previous Housing Elements

Per Government Code Section 65583.2(c), a non-vacant parcel included in a previous planning period, and a vacant parcel included in two or more previous consecutive planning periods, cannot be used to accommodate the lower-income RHNA unless the Housing Element contains a program to allow by-right developments on such parcels in which at least 20% of the units are affordable to lower-income households. Sites identified to accommodate the 6th Cycle RHNA that meet the above criteria for previous planning periods are labeled as "previously identified" in Exhibit A, Table A of the Sites Inventory Form. Through **Program 6, By-Right Development**, the City will ensure that previously identified sites will allow residential uses by-right where at least 20% of the units are offered as affordable.

Concord Reuse Project Area Plan

Overview

Located in Concord, California, and part of the San Francisco Bay Area, the Concord Naval Weapons Station (CNWS) was created by the Navy in the 1940s during World War II. The site was a weapons storage and maintenance facility, established following the Port Chicago disaster in 1944. It is located entirely within the limits of the City of Concord. The 5,028-acre Inland Area¹ of the CNWS was approved for closure by the Base Realignment and Closure Commission in November 2005, and was declared surplus by the Navy in March 2007. Munitions are no longer stored on the site. This area is the focus of the Concord Reuse Project (CRP) Area Plan. Closure of the Inland Area spurred the City and community to envision a new future for the former weapons station.

The planned reuse of the Inland Area of the CNWS represents a significant opportunity for Concord and for the region to grow and provide long-lasting benefits. From 2006 to 2012, the City led a planning process with substantial input from the local and regional community, culminating in the CRP Area Plan.

Concord Reuse Project Area Plan

Starting with the Concord Community Reuse Plan, and succeeded by the CRP Area Plan, the City and its stakeholders have envisioned a future for the Inland Area that would improve the quality of life for residents of Concord and the region through the creation of new jobs, construction of a variety of housing types, significant open space, preservation of natural resources, active parks, pedestrian and bike trails, and community facilities. The CRP Area Plan represents a balanced approach to development that is economically feasible, environmentally sensitive, and sustainable. The original Reuse Plan established the vision, goals, and a preferred development concept for the Inland Area, the CRP Area Plan further refined and translated the Reuse Plan into a regulatory document suitable for incorporation into the City's General Plan. The City is now negotiating with a master developer on implementing the CRP Area Plan.

In accordance with the CRP Area Plan, more than 60% of the site, approximately 2,715 acres, will be preserved as open space. The remaining area will be transformed into the neighborhoods, business areas, institutions, and community facilities as described in the CRP Area Plan, accommodating as many as

¹ The former Concord Naval Weapons Station is comprised of two main areas: the Inland Area, which lies within Concord's city limits on the east side, and the non-contiguous Tidal area, which lies outside of the city limits to the north, on Suisun Bay.

28,800 people and 26,530 jobs. As many as 12,200 housing units (including 25% affordable units) will be built in the project area pursuant to the plan's policies, complemented by as much as 6.1 million square feet of commercial building space.

The CRP Area Plan calls for a variety of housing types to meet the needs of Concord's diverse population. The range of housing types will complement and add to the housing options available in Concord. The site will include housing opportunities for persons of varied socioeconomic backgrounds, ages, and physical abilities.

Reuse Area Authority

The Department of Defense selected the Concord City Council to act as the Local Reuse Authority for the CNWS in 2006. The City Council, acting as the Local Reuse Authority, approved the CRP Area Plan and amended the City's General Plan to be consistent with the CRP Area Plan in 2012.

Three land conveyances are agreed to under the CRP Area Plan:

- A Public Benefit Conveyance of 2,600 acres to the National Park Service, which, in turn, will convey the property to the East Bay Regional Park District for the Thurgood Marshall Regional Park – Home of the Port Chicago 50.
- A second Public Benefit Conveyance of 78 acres to the County of Contra Costa (Sheriff's Department/Contra Costa County Fire Protection District).
- An Economic Development Conveyance of approximately 2,350 acres to the City, to be developed consistent with the CRP Area Plan. The City is currently negotiating the terms of this conveyance with the master developer, as discussed further below.

As of April 2021, the Navy had transferred approximately 2,300 acres to the National Park Service, which has given constructive possession of that property to the East Bay Regional Park District (July 2019). The Navy continues to own the balance of the property. Initial land transfer to the City and/or the County of Contra Costa is anticipated in the 2023/2024 timeframe.

Since adoption of the CRP Area Plan, the City has been working to secure a master developer and to obtain property transfer from the United States Navy. On April 6, 2021, the City Council decided on a master developer selection process and authorized the release of a Request for Qualifications to retain a new master developer for the project. On June 24, 2021, the City received three submittals from potential developers, and on August 21, 2021, the City Council selected Concord First Partners LLC (CFP) as the master developer to engage in the negotiation of an Exclusive Negotiating Agreement. On October 26, 2021, the City Council approved an Exclusive Negotiating Agreement with CFP. The City's team is currently negotiating a Term Sheet with CFP, and City staff anticipates bringing the Term Sheet to the City Council for review by May 2022.

Specific Plan and Infrastructure Master Plan

CFP is currently negotiating a Term Sheet with the City for development of the site. Following approval of the Term Sheet by the City Council, CFP will prepare a Specific Plan, including an Infrastructure Master Plan, to guide development of the City's 2,300 acres. The Specific Plan will provide more detailed guidance on site development. The City, in coordination with the preparation of the Specific Plan, will prepare and Environmental Impact Report to analyze the environmental impacts of development of the site through the California Environmental Quality Act process. The Specific Plan will also include an

Infrastructure Master Plan, which will ensure that infrastructure is designed to meet sitewide needs at full buildout.

Concord Reuse Project Area Plan Implementation

Because substantial planning work has already been approved, the City has already made significant progress toward the final stages of the planning process. Following completion of the Specific Plan and Infrastructure Master Plan, the developer will then begin the permitting process to subdivide the land. This will include a series of Tentative Maps consistent with the Subdivision Map Act, the continuation of associated permitting with the regulatory agencies, and implementation of mitigation measures. Once these activities are complete, site development can begin. The planning permit process for individual development projects on the former CNWS will be determined once the Specific Plan and implementing zoning ordinance are adopted. Based on the City's current Development Code, major housing developments on existing parcels could require a Use Permit and Design and Site Review (if not in conformance with the City's Objective Design Standards). A Tentative Map or Parcel Map would be required if the project requires the creation of new parcels, and a Tree Removal Permit may be required for removal of protected trees. However, the final permitting process will be influenced by the implementation of **Program 6, By-Right Development** and **Program 15, Objective Design Standards** to allow further opportunities to allow residential and mixed-use development with at least 20% affordable housing by right and to remove Design and Site Review from discretionary review if a project is in conformance with all Objective Design Standards, respectively. Further, the development of the CNWS will be subject to a Disposition and Development Agreement, and in accordance with SB330, the City will be obligated to approve these permits if the projects conform with applicable development standards. It is anticipated that the Specific Plan and Infrastructure Master Plan will be adopted by the end of 2024 and that the permitting process will begin soon after. It is anticipated that horizontal construction will begin in 2025/2026 with vertical construction following that, with approximately 400 units built per year. Phase 1 units (in part) are anticipated to be complete between 2027 and 2031, depending on market conditions.

Concord Naval Weapons Station Capacity Identified

Although the City, without relying on the CNWS site, has adequate capacity to accommodate the RHNA at all income levels, the CRP Area Plan provides an additional buffer in the form of capacity that will realistically be achieved within the 6th Cycle planning period. Therefore, the City is identifying a conservative amount of capacity to act as a buffer to ensure that the City has adequate remaining capacity throughout the planning period to bolster assurances and flexibility. While the developer anticipates that approximately 400 units will be built per year for the 5 years from 2027 to 2031, the City is identifying 300 total units of capacity during the 6th Cycle to act as a portion of the buffer for the RHNA. The 300 units identified is a conservative estimate compared to what is realistically anticipated to be achieved for this site during the 6th Cycle.

Fair Housing

As detailed in **Appendix D, Affirmatively Further Fair Housing Analysis**, most of Concord (86% of the land) falls within the "Low Resource" and "Moderate Resource" designations, as designated by the Tax Credit Allocation Committee (TCAC) mapping methodology composite score (see **Figure 18, Appendix D**). However, the TCAC methodology does not comprehensively reflect the full range of resources offered in Concord. Through the lens of housing affordability and access, housing and transportation costs offer

a more complete measure of affordability. Increased access to transit and resources such as shopping, employment, education, food, recreation, and civic uses can increase affordability and opportunity for households. This is especially true in cities such as Concord, where the average annual cost of transportation is more than \$14,000.²

As further detailed in Appendix D, Affirmatively Further Fair Housing Analysis, Concord is well-served by public transit, especially within its Downtown, connecting Concord to the greater Bay Area, and connecting residents to greater economic and educational opportunity. Further, Concord offers opportunity through access to food, shopping, recreation, schools, and proximity to employment.

The analysis of sites available to accommodate the RHNA consists of an exhaustive analysis of all sites within Concord. This includes an analysis of all vacant and underutilized sites to identify opportunities for development at all income levels. Because most of Concord falls within “Low and Moderate Resource” areas on the TCAC composite scoring map, most of the identified sites, including those eligible for lower-income housing, fall under the “Low Resource” and “Moderate Resource” TCAC designations. While a portion of Concord (approximately 14%) is designated as “High Resource” east of Ygnacio Valley Road, this area is primarily designated as open space. Of those developable areas in the “High Resource” designation, they are primarily designated and built out as single-family uses, with the exception of a state university, a commercial shopping complex, religious institutions, and some sporadic vacant and underutilized parcels. The areas in the “High Resource” designation provide little opportunity for new development, especially for sites to assist in the development for lower-income households, because many of the buildings are newer construction, provide limited access to transit and jobs, and are not economically feasible to redevelop. Therefore, those sites identified in the “High Resource” area provide opportunity on limited vacant and underutilized sites for accommodating the moderate- and above moderate-income RHNA.

Despite their TCAC designation, the City’s “Low and Moderate Resource” areas do present significant economic opportunity through strong access to transit and jobs. There are sites identified, including those identified to accommodate the lower-income RHNA, located in the central and western portions of Concord, which are close to transit and freeways that provide strong access to shopping, food, recreation, employment, higher education, social services, and cultural amenities, both locally and throughout the Bay Area. This proximity to transit also affords residents increased opportunity to reduce or eliminate reliance on single-occupancy vehicles, freeing up income for other expenses. Identified sites that are within a 0.5-mile radius of Concord’s BART stations can adequately accommodate lower-income units, whose residents may benefit from reduced overall households costs due to lesser reliance on vehicles.

Through the programs of the Housing Element, the City will address fair housing issues, including the City’s “Low and Moderate Resource” designation through actions that will increase access to opportunity. This includes **Program 8, Fair Housing**, in which the City will establish or join a housing trust fund, raising funds for affordable housing activities. Additionally, through Program 8, the City will rezone sites [appropriate for medium and high residential densities, specifically in areas with access to resources](#) as identified on the Tax Credit Allocation Committee’s most recent Opportunity Maps, to create new capacity in a manner that increases equitable opportunity for a variety of housing types. Through Program 1, the City will facilitate the development of ADUs that can be offered as affordable to lower- and moderate-income households, increasing opportunities for capturing new capacity in established single-family neighborhoods. Through **Program 9, Middle Density**, the City will increase capacity within single-family zoned districts and further facilitate the production of housing that may provide homeownership

² <https://htaindex.cnt.org/>. Accessed April 2022.

options by providing ministerial lot splits. Further, the City will continue to provide assistance for homeownership, as detailed in **Program 10, Homeownership Assistance**, through the First Time Homebuyer Program, the Below Market Rate Homeownership Program, the Mortgage Credit Certificate Program, and Tenant/Community Opportunity to Purchase Act.

Current Development Credited Toward RHNA

Although the 6th Cycle Housing Element planning period is January 31, 2023 through January 31, 2031, the RHNA projection period began June 30, 2022, and ends December 15, 2030. Projects that are approved or permitted and will receive a certificate of occupancy during the RHNA projection period may be credited toward meeting the RHNA.

The City has 14 developments that are currently at various stages of the development process and are anticipated to receive building permits and/or certificates of occupancy during the 6th Cycle RHNA projection period. Projects that have completed all necessary reviews and have received any needed entitlements will be eligible to receive a building permit, which allows for construction to begin. Projects that have been constructed, have passed all building inspections, and are approved for occupation will receive a certificate of occupancy.

From 2019 through 2021, the City approved permits for the entitlement and construction of 1,266 units, 101 of which will be deed-restricted as affordable to lower-income households. The following details those projects that are currently underway, which will receive building permits and certificates of occupancy during the 6th Cycle (see **Table 8, Identified Capacity for Projects in the Permit Pipeline**).

1. Heckmann Subdivision

The Heckman Subdivision is a redevelopment project consisting of 15 single-family residential units on a 2.19-acre site located at 1881 Whitman Road. Of the 15 total units, one will be deed-restricted as a low-income dwelling unit and the other 14 will be above moderate-income units. This small-lot development will achieve a density of 7 dwelling units per 1 acre in the Residential Single-Family zone. This project received approval on November 3, 2021.

2. The Ashbury

The Ashbury, located at 1650 Ashbury Drive, consists of 313 total units, all of which will be affordable to households earning 80% or less than the area median income. The applicant committed to providing 100% deed-restricted low-income units, and the City included this as a condition of the project permit (see Exhibit A). This project was approved on October 6, 2021, and received project streamlining through SB 35. This project is in the Downtown Mixed Use zoning district, and will achieve a density of 170 dwelling units per 1 acre on a 1.84-acre site.

3. Galindo Terrace

Galindo Terrace consists of two consolidated parcels for a total of 0.53 acres in the Downtown Mixed Use zoning district located at 1313–1321 Galindo Street. This project consists of 53 very low-income deed-restricted units, eight low-income deed-restricted units, and one manager's unit. The City allocated \$7.8 million to the developer, Resources for Community Development, to aid in the construction of this project. This project was approved on December 4, 2019, and will achieve a density of 117 dwelling units per acre.

4. RMG Housing

The RMG Affordable Housing project consists of 15 very low-income and 15 low-income deed-restricted units, as well as 45 market-rate units located at 1335 Galindo Street. This 75-unit redevelopment project was reviewed ministerially through the City's Affordable Housing Incentive Program and approved on June 14, 2021, to redevelop a 0.55-acre site in the Downtown Mixed Use zoning designation. Once complete, this project will achieve a total density of 136 dwelling units per acre.

5. Abdelnor Family Duplexes

The Abdelnor Family Duplexes project consists of four market rate units on a 0.17-acre site with a Commercial Mixed Use zoning designation. This project is located at 1985 North Third Street and was approved by the Planning Commission on April 1, 2020, and received an amended approval on May 5, 2021. This project will achieve a density of 23 units per acre.

6. The Argent

The Argent, located at 2400 Willow Pass Road, is a 181-unit redevelopment project that will consist of 20 very low-income deed-restricted units and 161 market-rate units. This project received approval on July 3, 2019. This project is in the Downtown Mixed Use zoning district and will achieve a density of 110 dwelling units per 1 acre on a 1.64-acre site.

7. Clayton Road Townhomes

Clayton Road Townhomes is a 70-unit project located at 3512 Clayton Road. All units within this development are projected to be offered at market rate. This redevelopment project is located within the Residential Medium zone and received approval on February 19, 2020. This project will achieve a density of 16 dwelling units per 1 acre on a 4.33-acre site.

8. Farm Bureau

Farm Bureau consists of the rehabilitation and conversion of an existing structure for the production of two new residential units. This project was approved on April 28, 2021. It is located on a 0.56-acre site in the RS-8 zone and will achieve a density of 4 dwelling units per acre.

9. 6-Plex at Fremont

The 6-Plex at Fremont is located at 2150 Fremont Street and consists of six market-rate units. It was approved on May 19, 2021. This project is in the High Density Residential zoning district and will achieve a density of 27 dwelling units per 1 acre on a 0.22-acre site.

10. Concord Village

Concord Village is a redevelopment project located at 2400 Salvio Street. This project will consist of 230 units in the Downtown Mixed Use zoning district. This project was approved on April 2, 2019, and all units are anticipated to be offered at market rate. This project will achieve a density of 98 dwelling units per 1 acre on a 2.34-acre site.

11. Avesta Assisted Living

Avesta Assisted Living, located at 1385 Galindo Street, received approval on July 16, 2021. This redevelopment project is located in the Downtown Mixed Use zoning district and consists of 117 market-rate units. This project will achieve a density of 107 dwelling units per 1 acre on a 1.09-acre site.

12. Salmon Run Apartments

Salmon Run Apartments is an office building conversion project consisting of 32 market-rate units located in the Downtown Mixed Use zoning district. This project is located at 2325 Clayton Road and received approval on May 20, 2020. This project will achieve a density of 68 dwelling units per 1 acre on a 0.47-acre site.

13. The Grant

The Grant North, located at 1776 Grant Street, and The Grant South, located at 1676 Grant Street, have been issued building permits for the construction of 228 units to be offered at market rate. This is a mixed-use development consisting of 4,600 square feet of commercial space located in the Downtown Mixed Use zoning district. The site consists of 1.95 acres and the project will achieve a density of 117 dwelling units per acre. The project received approval by the Planning Commission on September 19, 2018, and building permits were issued on May 5, 2020. Construction is currently underway, with anticipated completion in 2022. It is anticipated that 139 of these units will receive a Certificate of Occupancy during the RHNA projection period, and therefore has been credited toward the 6th Cycle RHNA.

14. Wren Avenue 4-Lot Subdivision

The Wren Avenue 4-Lot Subdivision, located at 3543 Wren Avenue, has received approvals for three market-rate units, and will receive its certificate of occupancy during the 6th Cycle RHNA projection period. This project is in the Single-Family Residential zoning district and will achieve a density of 5 dwelling units per 1 acre on a 0.72-acre site.

15. Villas at Walter's Place

Villas at Walter's place, located at 1200 Detroit Avenue, will consist of 17 units. Of these units, one will be deed-restricted as a lower-income dwelling unit. This project is in the Medium Density Residential zoning district and will achieve a density of 22 dwelling units per 1 acre on a 0.74-acre site.

Table 8
Identified Capacity for Projects in the Permit Pipeline

<i>Total Units</i>	<i>Lower-Income Units</i>	<i>Moderate-Income Units</i>	<i>Above Moderate-Income Units</i>
1,266	426	0	840

Summary of Capacity to Accommodate the RHNA

The City's housing need for the 6th Cycle 8-year planning period (2023–2031) consists of 5,073 total units. Concord is primarily built-out and largely consists of small parcel sizes. Development opportunities in Concord primarily exist in the form of redevelopment of underutilized sites. Through the programs of the Housing Element, the City will facilitate the redevelopment of underutilized sites to ensure that the City can realistically meet the 6th Cycle RHNA targets (see the section "Programs to Support Development of Underutilized Sites," below). Much of the identified capacity relies on parcel consolidation and sites within the Transit Station Overlay District, which can provide a significant number of units dedicated to meet the lower-income RHNA. The number of sites identified that qualify toward the lower-income RHNA is more than adequate to accommodate the lower-income RHNA and provide a sufficient buffer to ensure no net loss of capacity.

Table 9, Capacity Identified, shows the breakdown of all capacity identified and units to be credited toward the RHNA, as detailed throughout this analysis. The capacity identified reflects a conservative estimate based on the realistic capacity shown in Table 3. As demonstrated in Table 9, the City has adequate capacity and credits to accommodate the RHNA at all income levels, and has a buffer of 717 units that qualify to meet the lower- and moderate-income RHNA. This amounts to a 25% buffer for the lower- and moderate-income RHNA. Unit capacity identified for the lower-income RHNA may be used for the moderate-income category, and moderate-income RHNA can be used for the above-moderate income category, but not vice-versa. This is because of the density and size requirements qualifying sites for lower-income housing capacity, which are more restrictive than higher-income categories.

Along with the units credited toward the RHNA through those developments in the permitting pipeline, credit has been identified for the projected number of ADUs expected to be produced during the 6th Cycle. Additionally, capacity has been identified on both vacant and underutilized sites, as well as within the CRP Area Plan area. Of the sites identified, approximately 66% of those parcels have been used in previous Housing Element cycles. Additionally, about 44% of parcels that make up the 6th Cycle Sites Inventory are identified for lower-income units. With this identified capacity, the City does not need a rezone to accommodate the RHNA. However, as detailed in Program 6 of the Housing Element, the City will allow developments by-right when 20% or more of the units are affordable to lower-income households on vacant or underutilized sites identified in the Sites Inventory Form (Exhibit A) to accommodate the lower-income RHNA that were identified in past Housing Elements.

**Table 9
Capacity Identified**

<i>Category</i>	<i>Lower-Income Units</i>	<i>Moderate- and Above Moderate-Income Units</i>	<i>Total Units</i>
RHNA	2,036	3,037	5,073
Vacant Site Capacity	807	294	1,101
Underutilized Capacity	1,305	1,514	2,819
ADU Projection	0	304	304
Permit Pipeline Projects	426	840	1,266
Concord Reuse Project	0	300	300
Total	2,538	3,252	5,790
Buffer Units		717	

RHNA = Regional Housing Needs Allocation; ADU = accessory dwelling unit.

Conclusion

Concord is a primarily built-out city without large parcels available for development, with the exception of the CNWS. To the north, Concord is bounded by the CNWS, which comprises nearly one-third of the City’s land. Much of Concord’s unbuilt land is preserved for open space or conservation, while much potential lies within underutilized sites. New housing capacity is found on only a limited number of vacant sites. However, robust programs, incentives for ADUs, and lot consolidation maximizes the potential for new units for the 6th Cycle RHNA. The City benefits from the BART system and includes two stations, one of which is located in proximity to high-density residentially designated zones. Additionally, sites within a 0.5-mile radius of these stations can maximize capacity with an automatic 25% density increase under the City’s Transit Station Overlay District. The City can realistically meet its RHNA target based on recent development trends; identification of suitable, developable, and

redevelopable sites; and programs supporting lower-income households and affordable housing development during the Housing Element planning period.

Programs to Support Development of Identified Sites

The City will implement the following programs to facilitate and incentivize the development of identified sites to accommodate the City's RHNA:

- Through **Program 1, Accessory Dwelling Unit**, the City will ensure its ADU ordinance is compliant with State law through future and necessary amendments, and will develop a program to incentivize the development of ADUs affordable to lower-income households or households with special housing needs, such as households with older adults or those with disabilities, through regulatory and financial incentives. To further support development of sites, the City will develop and release a comprehensive web-based "ADU Toolkit" which provides permit-ready ADU plans, as well as information for developers and land owners.
- Through **Program 2, Addressing Constraints to Development**, the City will address constraints to the development of housing as identified in Appendix C, including housing for extremely low-income households and housing for persons with disabilities, by amending the Development Code to permit a variety of housing types and improving permitting processes.
- Through **Program 3, Affordable Housing Development Assistance**, the City will actively work with the development community to assist in the development of affordable housing, especially housing for extremely low-income households and households with special housing needs. The City will develop an Affordable Housing Development Toolkit, providing resources that will guide developers through the permitting process, affordable housing incentives, and notices of available funding for financial assistance in affordable housing development. The City will also continue to provide a centralized virtual and/or in-person, one-stop counter for permit processing to streamline the development process to provide preliminary application reviews to assist applicants with the filing process.
- Through **Program 5, Affordable Housing Streamlining**, the City will provide an affordable housing streamlined approval process in conformance with SB 35, which include amendments to the Development Code to be consistent with State law and implementation of SB 35 procedures, to assist in the development of housing for extremely low-, very low-, low-, and moderate-income households consistent with State law.
- Through **Program 6, By-Right Development**, the City will allow developments by-right pursuant to Government Code Section 65583.2(i) when 20% or more of the units are affordable to lower-income households on vacant or underutilized sites identified in the Sites Inventory to accommodate the lower-income RHNA that were previously identified in past Housing Elements. Additionally, through the adoption of objective development standards, further described in Program 15, the City will create new opportunities for residential and mixed-use developments to be permitted by-right.
- Through **Program 9, Middle Density**, the City will reduce development standards in exchange for small-lot, medium-density residential development throughout the planning period, and adopt an ordinance to implement the provisions of SB 9 to establish ministerial review procedures for proposed lot splits of existing single-family residential lots, accommodating additional units available for homeownership.

- Through **Program 11, Incentives to Assist in Development**, the City will continue to facilitate the development of affordable housing for lower-income households, particularly those with extremely low incomes and special housing needs, including large households, older adults, and households with physical or developmental disabilities, through the provisions of financial and regulatory incentives. Incentives include density bonuses provided through the State Density Bonus Program, increases in allowable density through the City's Transit Station Overlay District, and the Affordable Housing Incentive Program to provide development and process incentives in exchange for affordable units beyond what is permitted under the State Density Bonus.
- Through **Program 13, Lot Consolidation Incentive**, the City will facilitate housing development on smaller parcels by offering technical assistance in the parcel merge process. Further, the City will provide and promote financial and regulatory incentives in exchange for lot consolidation for developments providing affordable housing through this adopted program. Regulatory incentives for consolidating lots may include reductions in setbacks or increased maximum allowed height and density.
- Through **Program 14, No Net Loss**, the City will track remaining capacity of sites identified in the Sites Inventory, pursuant to Government Code Section 65863. Through this, the City will ensure development opportunities remain available throughout the planning period to accommodate the RHNA, especially for lower- and moderate-income households.
- Through **Program 16, Parking Reduction**, the City will amend the Development Code, as required by State law, to identify a process by which parking requirements can be reduced for religious institutions in exchange for housing development.
- Through **Program 19, Replacement Requirements**, the City requires that housing development projects provide at least the same number of dwelling units as any units demolished to build the project, including any units existing on the site within the past 5 years. The City will work with tenants of units that could be redeveloped, and provide them with linguistically appropriate educational materials regarding tenant rights and resources. Applicants of proposed development projects involving demolition or removal of existing dwelling units are required to provide an affidavit signed by the property owner demonstrating compliance with the provisions of SB 330 and SB 8 for current or recent tenants and replacement units.

Sites Identified for the 6th Cycle

The City has identified enough credits and capacity to accommodate the 5,073 RHNA for the 6th Cycle. The site capacity identified consists of vacant and underutilized land within Concord and are illustrated in the figures below (see **Figures 1–7**). A list of parcel-level data for the identified sites is provided in Table A of the Sites Inventory Form (provided in Exhibit A), and calculates the realistic capacity as identified in Table 3.

Figure 1: Sites Identified

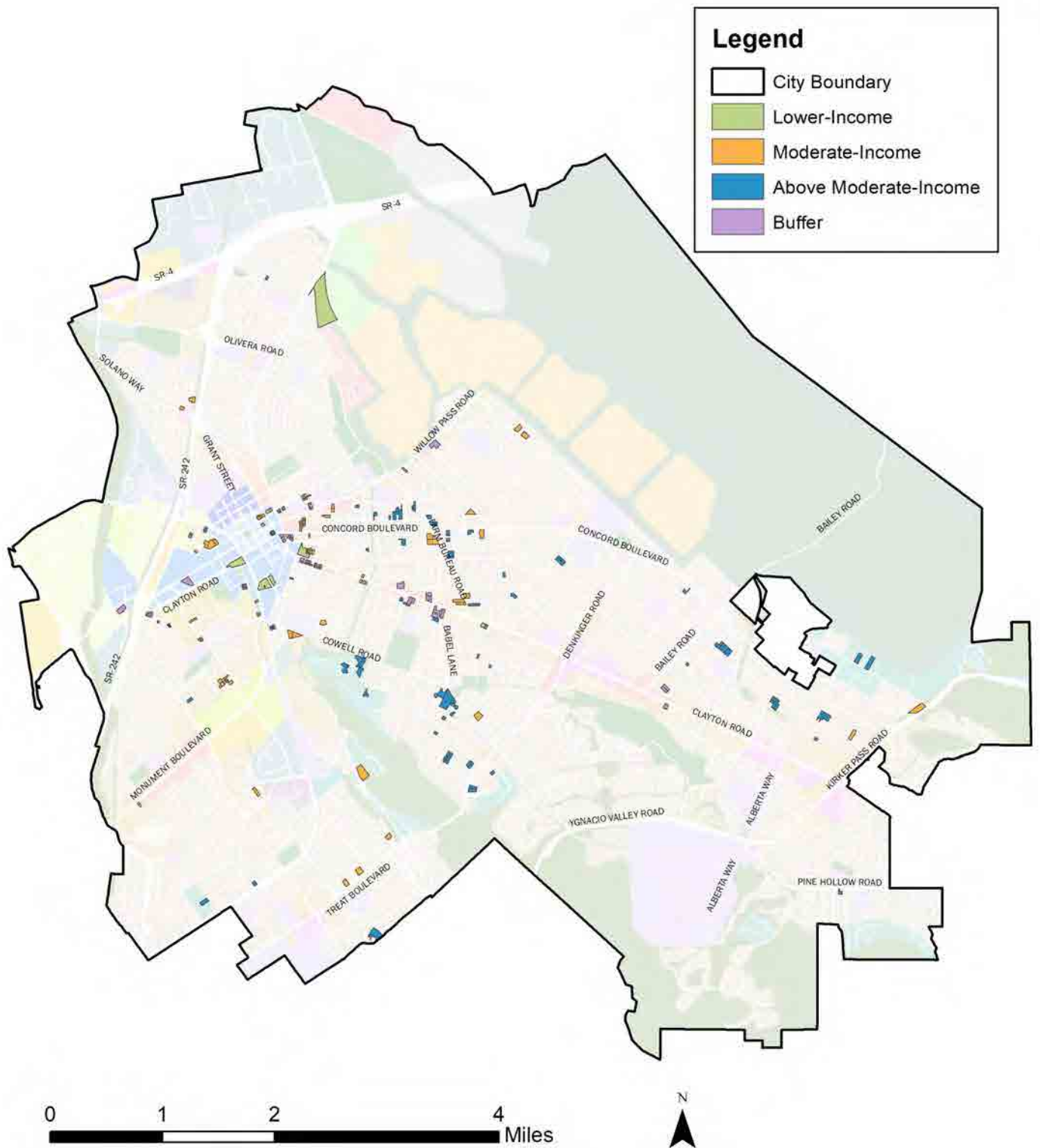


Figure 2: Downtown

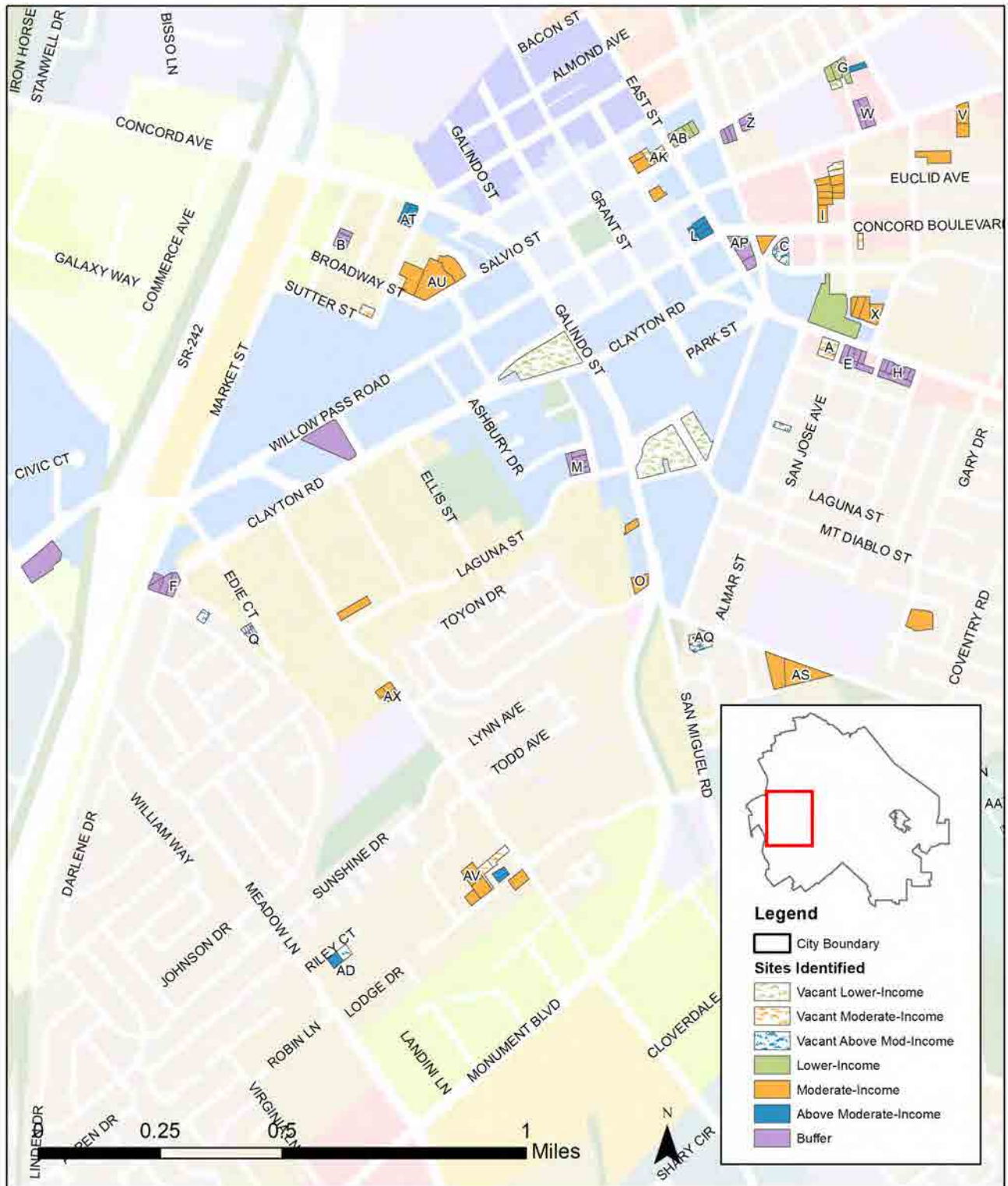


Figure 3: Clayton Valley (West)

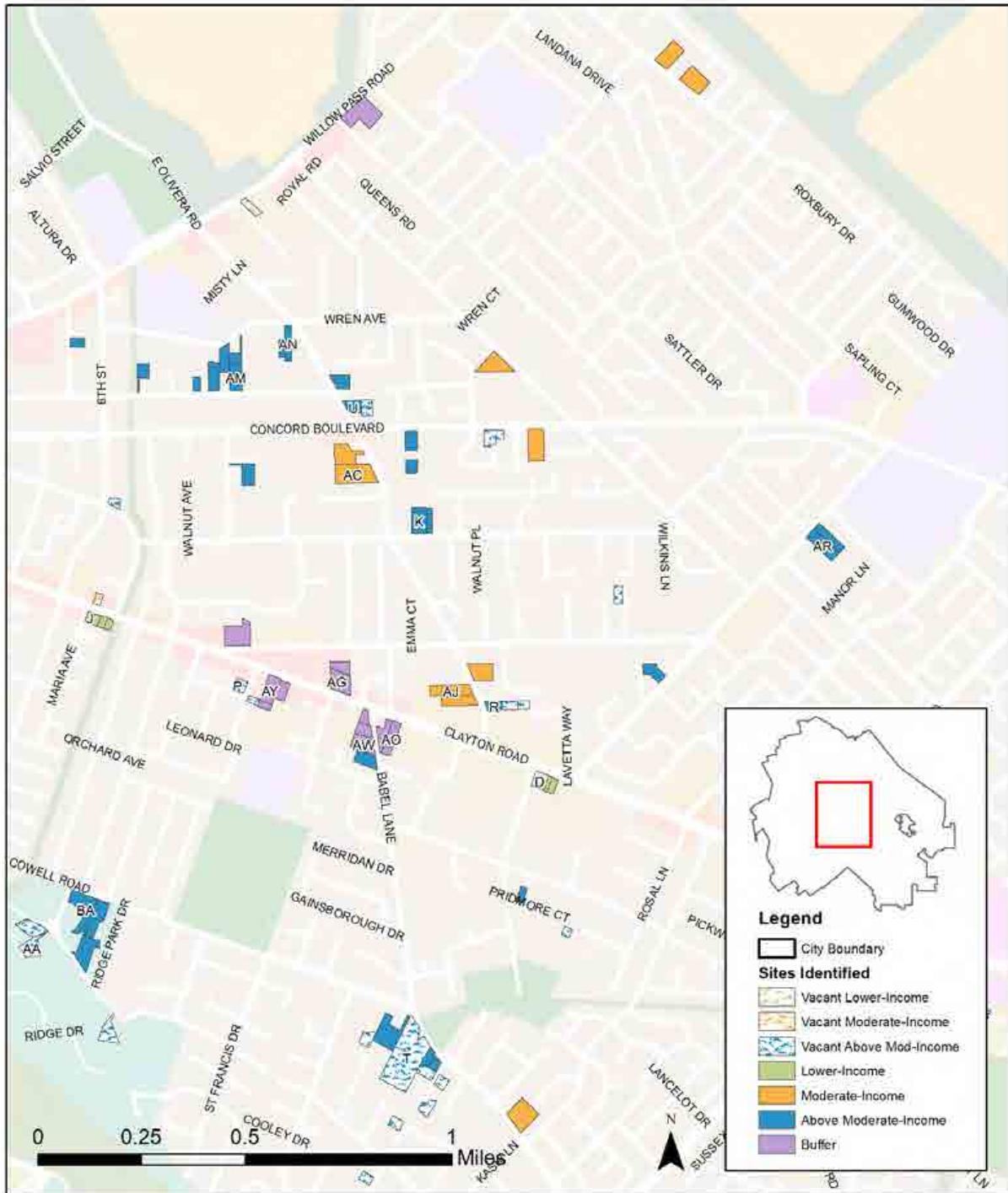


Figure 4: Clayton Valley (East)

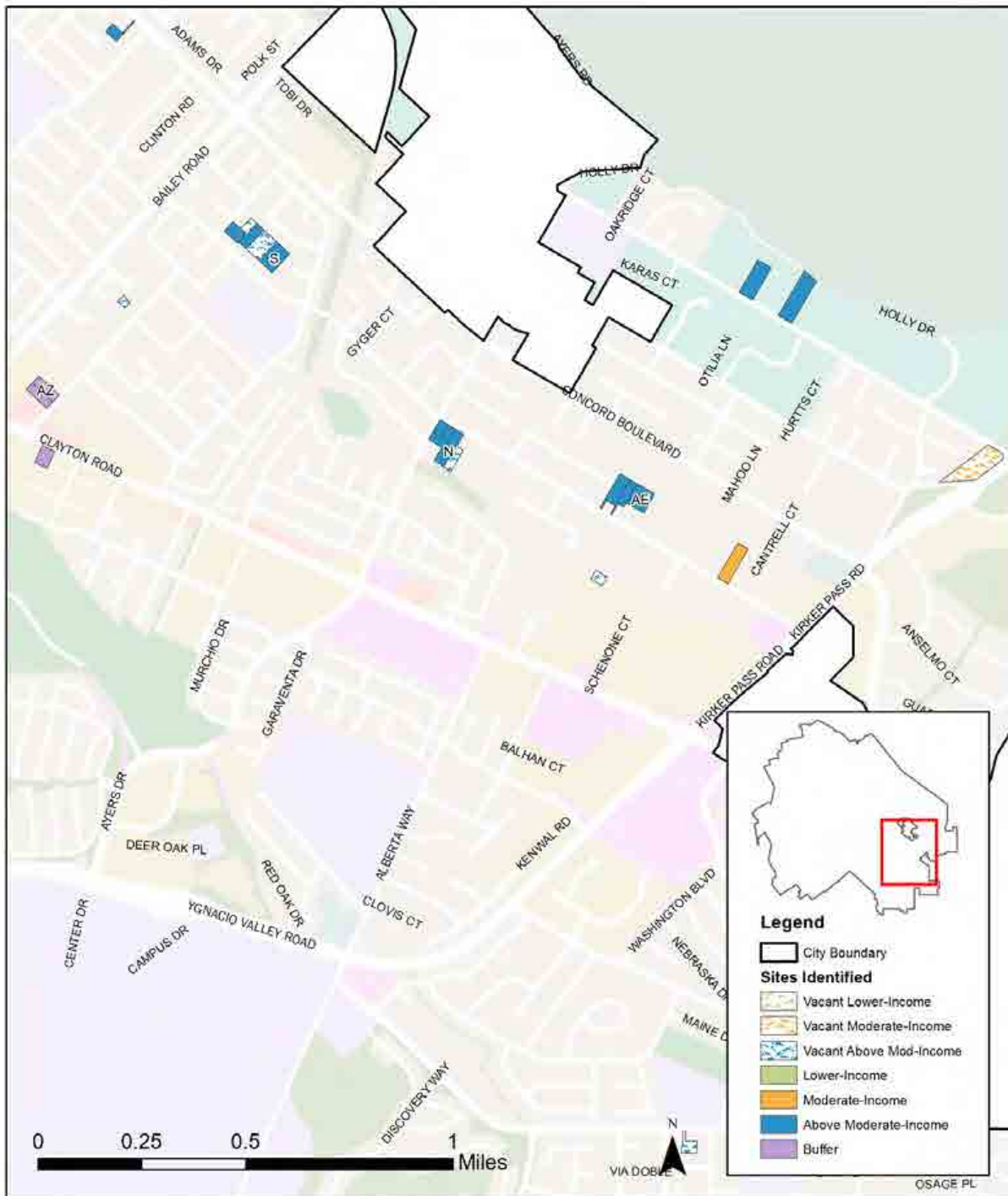


Figure 5: Ygnacio Valley

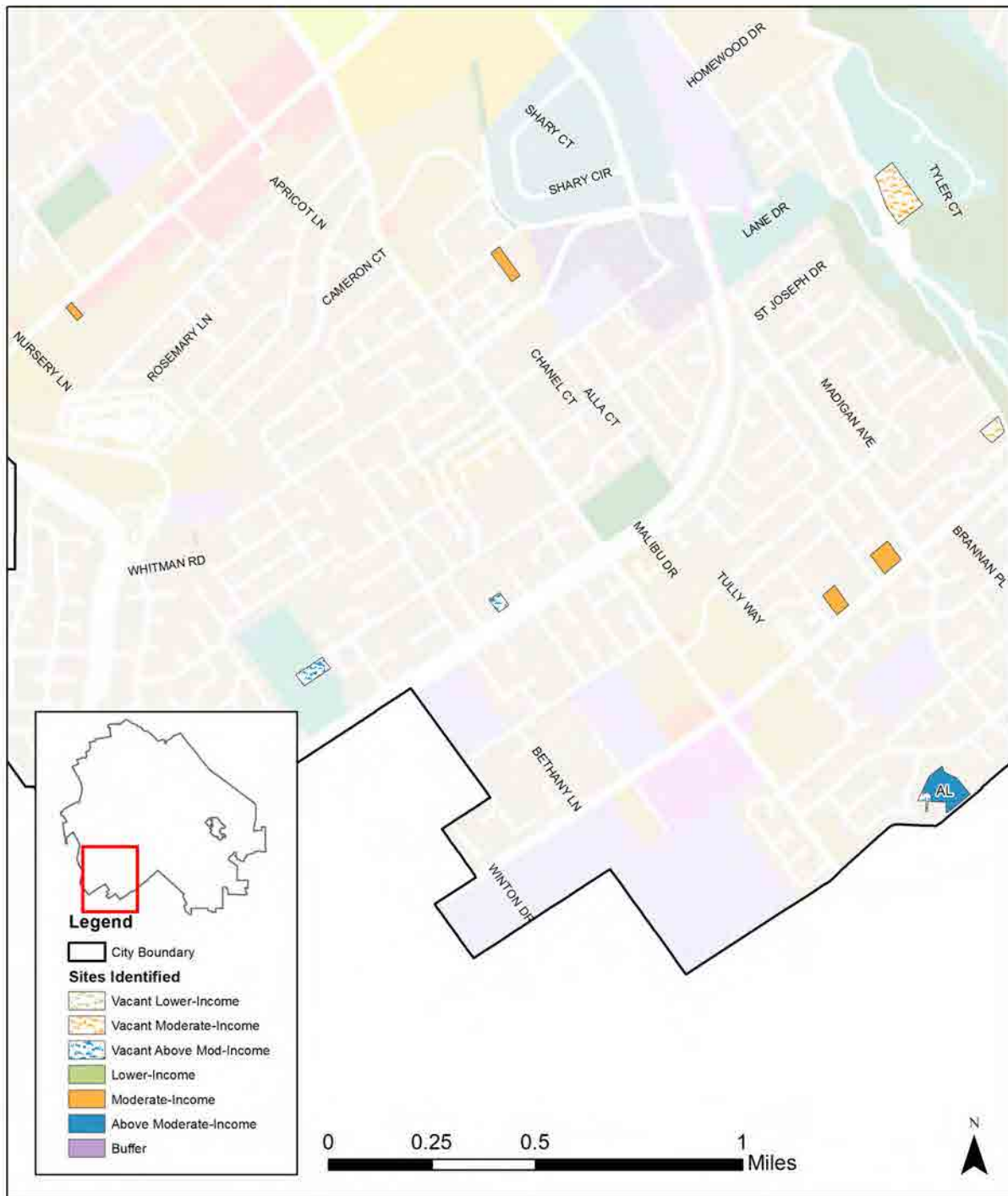


Figure 7: Olivera/Port Chicago

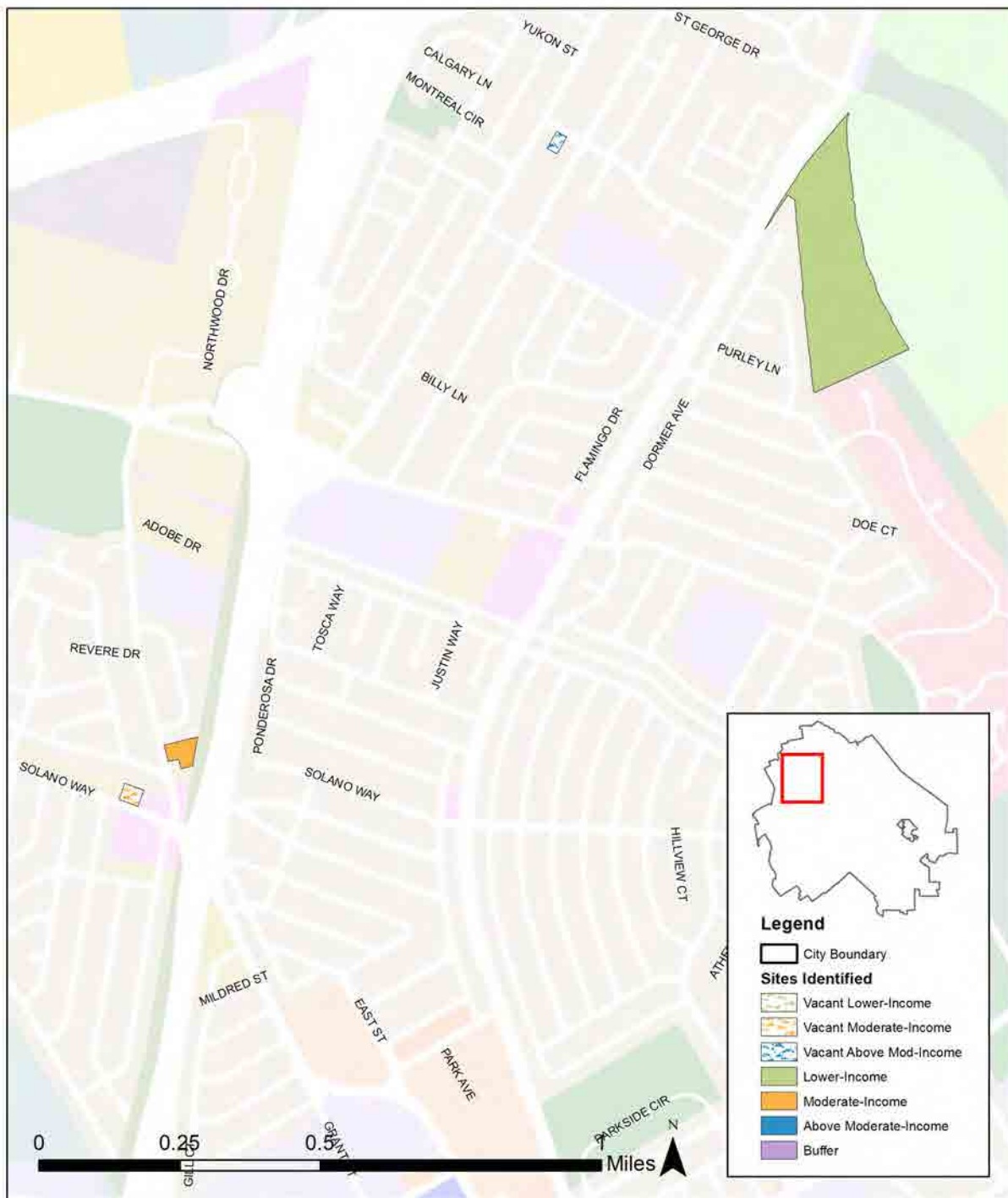


Exhibit A

Sites Inventory Form

[Form]

EXHIBIT A

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
CONCORD	2780 Clayton Rd	94519	105012015	A	CMU	CMX	11	50	0.38	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant			11.02	16		IL Ratio: 0; Year Built: N/A	Buffer
CONCORD	1471 San Jose Ave	94518	105012003	A	CMU	CMX	11	50	0.18	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant		5.22		See capacity above	IL Ratio: 0; Year Built: N/A	Buffer	
CONCORD	28 Ridge Park Ln	94518	130031025	AA	RR	RR40	0	2.5	0.71	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant			1.1005	2		IL Ratio: 0; Year Built: N/A	Buffer
CONCORD	16 Ridge Park Ln	94518	130031023	AA	RR	RR40	0	2.5	0.74	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant			1.147	2		IL Ratio: 0; Year Built: N/A	Buffer
CONCORD	2465 Salvio St	94520	112154003	AB	DTMU	DMX	33	125	0.14	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				66		IL Ratio: 0.93; Year Built: 1964	
CONCORD	2485 Salvio St	94520	112154002	AB	DTMU	DMX	33	125	0.14	Office	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		13.2		See capacity above	IL Ratio: 1.25; Year Built: 1915		
CONCORD	2435 Salvio St	94520	112154013	AB	DTMU	DMX	33	125	0.42	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		41.2		See capacity above	IL Ratio: 0.12; Year Built: 1968		
CONCORD	1785 Farm Bureau Rd	94519	113111046	AC	LDR	RS10	0	10	0.98	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			5.456	16		IL Ratio: 0.68; Year Built: 1934	
CONCORD	1777 Farm Bureau Rd	94519	113111064	AC	LDR	RS10	0	10	1.75	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			10.85	16		IL Ratio: 0.67; Year Built: N/A	
CONCORD	2030 Riley Ct	94520	128200010	AD	MDR	RM	11	32	0.23	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant				8		IL Ratio: 0; Year Built: N/A	
CONCORD	2020 Riley Ct	94520	128200056	AD	MDR	RM	11	32	0.24	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				3,874		IL Ratio: 0.29; Year Built: 1950	
CONCORD	Heritage Dr	94521	117260012	AE	LDR	RS10	0	10	1.02	Residential, 0	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				14		IL Ratio: 0; Year Built: N/A	
CONCORD	5249 Olive Dr	94521	117270011	AE	LDR	RS10	0	10	0.89	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				4,898		IL Ratio: 0.96; Year Built: 1950	
CONCORD	Heritage Dr	94521	117260015	AE	LDR	RS10	0	10	0.56	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				2,852		IL Ratio: 2.37; Year Built: 1962	
CONCORD	4090 Browning Dr	94518	130410021	AF	LDR	RS12	0	10	0.28	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant				4		IL Ratio: 0; Year Built: N/A	
CONCORD	1089 Kaski Ln	94518	130410023	AF	LDR	RS12	0	10	0.41	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				1,922		IL Ratio: 0.37; Year Built: 1954	
CONCORD	1093 Kaski Ln	94518	130410022	AF	LDR	RS12	0	10	0.28	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				1,116		IL Ratio: 0.43; Year Built: 1954	
CONCORD	Clayton Rd	94519	113181014	AG	CMU	CMX	11	40	0.47	Shopping Center	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		10.904		31		IL Ratio: 0; Year Built: N/A	Buffer
CONCORD	3569 Clayton Rd	94519	113181016	AG	CMU	CMX	11	40	0.32	Store Building	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		6.844				IL Ratio: 0.82; Year Built: 1967	Buffer
CONCORD	3565 Clayton Rd	94519	113181021	AG	CMU	CMX	11	40	0.62	Office	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		13.804				IL Ratio: 1.52; Year Built: 1967	Buffer
CONCORD	4058 Treat Blvd	94518	134032008	AH	LDR	RS12	0	10	0.82	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				8		IL Ratio: 0.42; Year Built: 1954	
CONCORD	Treat Blvd/Kingswood Dr	94518	134032009	AH	LDR	RS12	0	10	0.71	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant				8		IL Ratio: 0; Year Built: N/A	
CONCORD	1109 Kaski Ln	94518	130410019	AI	LDR	RS12	0	10	0.51	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				4		IL Ratio: 0.56; Year Built: 1954	
CONCORD	1111 Kaski Ln	94518	130410006	AI	LDR	RS12	0	10	0.39	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				1,798		IL Ratio: 0.81; Year Built: 1954	
CONCORD	1561 Farm Bureau Rd	94519	113171008	AJ	LDR	RS7	0	10	1.02	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				10		IL Ratio: 0.82; Year Built: 1939	
CONCORD	1549 Farm Bureau Rd	94519	113171009	AJ	LDR	RS7	0	10	0.83	Multifamily Residenc	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			4.526		See capacity above	IL Ratio: 1.03; Year Built: 1948	
CONCORD	Salvio St/Collax St	94520	112135002	AK	DTDP	DP	33	125	0.14	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				89		IL Ratio: 0; Year Built: N/A	
CONCORD	Salvio St/Collax St	94520	112135001	AK	DTDP	DP	33	125	0.29	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				29		IL Ratio: 0; Year Built: N/A	
CONCORD	2309-2311 Salvio St	94520	112135012	AK	DTDP	DP	33	125	0.17	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant				17		IL Ratio: 0; Year Built: N/A	
CONCORD	2383 Salvio St	94520	112135011	AK	DTMU	DMX	33	125	0.29	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant				29		IL Ratio: 0; Year Built: N/A	
CONCORD	3121 Santa Maria Dr	94518	134530007	AL	LDR	RS8	0	10	0.25	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				16		IL Ratio: 0; Year Built: N/A	
CONCORD	3155 Santa Maria Dr	94518	134530017	AL	LDR	RS8	0	10	2.57	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			15.314		See capacity above	IL Ratio: 0.58; Year Built: 1947	
CONCORD	3381 Euclid Ave	94519	113071029	AM	LDR	RS7.5	0	10	0.82	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				12		IL Ratio: 0.30; Year Built: 1947	
CONCORD	3393 Euclid Ave	94519	113082058	AM	LDR	RS7.5	0	10	0.74	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				12		IL Ratio: 0.43; Year Built: 1944	
CONCORD	3398 Wren Ave	94519	113082054	AM	LDR	RS7.5	0	10	0.61	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				12		IL Ratio: 0.38; Year Built: 1880	
CONCORD	3406 1/2 Wren Ave	94519	113071039	AM	LDR	RS7.5	0	10	0.32	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				4		IL Ratio: 0.45; Year Built: 1955	
CONCORD	Farm Bureau Rd/Wren Ave	94519	113071040	AN	LDR	RS7.5	0	10	0.26	Residential, 0	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				4		IL Ratio: 0; Year Built: N/A	
CONCORD	3466 Wren Ave	94519	113071010	AN	LDR	RS6	0	10	0.53	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			2.666		See capacity above	IL Ratio: 0.32; Year Built: 1940	
CONCORD	3606 Clayton Rd	94521	132010023	AO	CMU	CMX	11	40	0.56	Motel	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		11.832		27		IL Ratio: 2.29; Year Built: 1958	Buffer
CONCORD	3610 Clayton Rd	94521	132010028	AO	CMU	CMX	11	40	0.73	Motel	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		15.776				IL Ratio: 2.60; Year Built: 1969	Buffer
CONCORD	1700 East St	94520	126081001	AP	DTMU	DMX	33	125	0.22	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				85		IL Ratio: 1.08; Year Built: 1955	Buffer
CONCORD	1772 East St	94520	126081003	AP	DTMU	DMX	33	125	0.33	Auto Repair	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				32		IL Ratio: 0.66; Year Built: 1950	Buffer
CONCORD	1750 East St	94520	126081002	AP	DTMU	DMX	33	125	0.32	Parking Lot	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				32		IL Ratio: 0; Year Built: N/A	Buffer
CONCORD	Cowell Rd/San Miguel Rd	94518	126182056	AQ	LDR	RS6	0	12.5	0.16	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				4		IL Ratio: 0; Year Built: N/A	
CONCORD	Cowell Rd/San Miguel Rd	94518	126182054	AQ	LDR	RS6	0	12.5	0.15	Vacant	YES - Current	YES - City-Owned	Available					4		IL Ratio: 0; Year Built: N/A	
CONCORD	Cowell Rd/San Miguel Rd	94518	126182053	AQ	LDR	RS6	0	12.5	0.15	Vacant	YES - Current	YES - City-Owned	Available					4		IL Ratio: 0; Year Built: N/A	
CONCORD	Cowell Rd/San Miguel Rd	94518	126182055	AQ	LDR	RS6	0	12.5	0.15	Vacant	YES - Current	NO - Privately-Owned	Available					4		IL Ratio: 0; Year Built: N/A	
CONCORD	1698 West St	94521	115020079	AR	LDR	RS7	0	10	0.92	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				8		IL Ratio: 0.36; Year Built: 1933	
CONCORD	1704 West St	94521	115020080	AR	LDR	RS7	0	10	0.65	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				8		IL Ratio: 1.33; Year Built: 1950	
CONCORD	2936 Cowell Rd	94518	126183007	AS	LDR	RS6	0	12.5	1.15	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			8.2925	14		IL Ratio: 0.19; Year Built: 1903	
CONCORD	2900 Cowell Rd	94518	126183006	AS	LDR	RS6	0	12.5	0.85	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			5.9675		See capacity above	IL Ratio: 0.42; Year Built: 1940	
CONCORD	1758 Concord Ave	94520	126041041	AT	HDR	RH	33	100	0.12	Commercial	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				38		IL Ratio: 1.87; Year Built: 1962	
CONCORD	1790 Concord Ave	94520	126041040	AT	HDR	RH	33	100	0.39	Office	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				30		IL Ratio: 0.33; Year Built: 1936	
CONCORD	1825 Salvio St	94520	126051045	AU	DTMU	DMX	33	100	1.54	Store Building	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			122.4	249		IL Ratio: 0.10; Year Built: 1956	
CONCORD	1811 Broadway St	94520	126051026	AU	HDR	RH	33	100	0.82	Store Building	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant				64.8		IL Ratio: 0.34; Year Built: 1962	
CONCORD	1870 Adobe St	94520	126051046	AU	DTMU	DMX	33	125	0.63	Office	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element				29		IL Ratio: 0.33; Year Built: 1853	
CONCORD	2481 Walters Way	94520	128190245	AV	MDR	RM	11	32	0.39	Single Family Reside	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant			6.6584	29		IL Ratio: 0.10; Year Built: 1945	
CONCORD	1211 Detroit Ave	94520	128190009	AV	MDR	RM	11	32	0.3	Vacant	YES - Current										

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
CONCORD	2834 Salvio St	94519	111230002	G	CMU	CMX	11	40	0.2	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.06			19		IL Ratio: 0.14; Year Built: 1931	
CONCORD	1980 N 3rd St	94519	111230020	G	CMU	CMX	11	40	0.12	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2.204				See capacity above	IL Ratio: 0.34; Year Built: 1948	
CONCORD	2838 Salvio St	94519	111230003	G	CMU	CMX	11	40	0.21	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.292				See capacity above	IL Ratio: 0.25; Year Built: 1937	
CONCORD	2830 Salvio St	94519	111230001	G	CMU	CMX	11	50	0.19	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.93				See capacity above	IL Ratio: 0.83; Year Built: 1931	
CONCORD	1985 N 3rd St	94519	111230021	G	CMU	CMX	11	50	0.15	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.35				See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	2900 Clayton Rd	94519	105014017	H	CMU	CMX	11	50	0.12	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		2.9		25	See capacity above	IL Ratio: 0.93; Year Built: 1942	Buffer
CONCORD	2924 Clayton Rd	94519	105014021	H	CMU	CMX	11	50	0.21	Office	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		5.51			See capacity above	IL Ratio: 1.33; Year Built: 1935	Buffer
CONCORD	1471 San Carlos Ave	94518	105014007	H	CMU	CMX	11	50	0.17	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.35				See capacity above	IL Ratio: 0.68; Year Built: 1942	Buffer
CONCORD	2930 Clayton Rd	94519	105014018	H	CMU	CMX	11	50	0.12	Store Building	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	2.9				See capacity above	IL Ratio: 0.45; Year Built: 1942	Buffer
CONCORD	1491 San Carlos Ave	94518	105014015	H	CMU	CMX	11	50	0.09	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	2.03				See capacity above	IL Ratio: 0.58; Year Built: 1942	Buffer
CONCORD	2912 Clayton Rd	94519	105014020	H	CMU	CMX	11	50	0.12	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	2.9				See capacity above	IL Ratio: 0.22; Year Built: 1942	Buffer
CONCORD	1470 Santa Clara Ave	94518	105014008	H	CMU	CMX	11	50	0.18	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.64				See capacity above	IL Ratio: 0.10; Year Built: 1942	Buffer
CONCORD	1890 2nd St	94519	113012019	I	CMU	CMX	11	50	0.17	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.35			40	See capacity above	IL Ratio: 0.80; Year Built: 1935	
CONCORD	1838 2nd St	94519	113012016	I	MDR	RM	11	40	0.17	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.364				See capacity above	IL Ratio: 0.39; Year Built: 1942	
CONCORD	1835 3rd St	94519	113012009	I	MDR	RM	11	40	0.12	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	2.204				See capacity above	IL Ratio: 0.69; Year Built: 1930	
CONCORD	1850 2nd St	94519	113012018	I	MDR	RM	11	40	0.17	School	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.364				See capacity above	IL Ratio: 0.62; Year Built: 1950	
CONCORD	1863 3rd St	94519	113012007	I	CMU	CMX	11	50	0.22	Multifamily Residential	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.64				See capacity above	IL Ratio: 0.86; Year Built: 1938	
CONCORD	1842 2nd St	94519	113012017	I	MDR	RM	11	40	0.17	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.364				See capacity above	IL Ratio: 0.88; Year Built: 1941	
CONCORD	1849 3rd St	94519	113012008	I	MDR	RM	11	40	0.16	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.132				See capacity above	IL Ratio: 0.66; Year Built: 1930	
CONCORD	1865 3rd St	94519	113012006	I	CMU	CMX	11	50	0.14	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.06				See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	1869 3rd St	94519	113012005	I	CMU	CMX	11	50	0.17	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.93				See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	1820 2nd St	94519	113012015	I	CMU	CMX	11	50	0.27	Multifamily Residential	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	6.67				See capacity above	IL Ratio: 0.35; Year Built: 1941	
CONCORD	1490 Maria Ave	94518	105051028	J	CO	CO	11	40	0.18	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.596			14	See capacity above	IL Ratio: 0.46; Year Built: 1953	
CONCORD	3236 Clayton Rd	94519	105051025	J	CO	CO	11	40	0.18	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.596				See capacity above	IL Ratio: 0.13; Year Built: 1954	
CONCORD	3230 Clayton Rd	94519	105051026	J	CO	CO	11	40	0.18	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.596				See capacity above	IL Ratio: 0.25; Year Built: 1954	
CONCORD	3224 Clayton Rd	94519	105051027	J	CO	CO	11	40	0.17	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.364				See capacity above	IL Ratio: 0.26; Year Built: 1954	
CONCORD	3623 Walnut Ave	94519	114330001	K	LDR	RS8	0	10	0.9	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		4.96		6	See capacity above	IL Ratio: 0.07; Year Built: 1931	
CONCORD	3631 Walnut Ave	94519	114341022	K	LDR	RS8	0	10	0.32	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		1.364			See capacity above	IL Ratio: 0.53; Year Built: 1938	
CONCORD	1821 East St	94520	126075004	L	DTMU	DMX	33	125	0.14	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		13.2		57	See capacity above	IL Ratio: 0.21; Year Built: 1930	
CONCORD	2355 Concord Blvd	94520	126075006	L	DTPD	DP	33	125	0.16	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		15.2			See capacity above	IL Ratio: 0.58; Year Built: 1960	
CONCORD	2361 Concord Blvd	94520	126075005	L	DTMU	DMX	33	125	0.15	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		14.2			See capacity above	IL Ratio: 0.43; Year Built: 1947	
CONCORD	1839 East St	94520	126075023	L	DTMU	DMX	33	125	0.16	Store Building	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element		15.2			See capacity above	IL Ratio: 0.93; Year Built: 1955	
CONCORD	1531 Amador Ave	94520	126137002	M	DTMU	DMX	33	125	0.14	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant		13.2		72	See capacity above	IL Ratio: 0.55; Year Built: 1940	Buffer
CONCORD	1527 Amador Ave	94520	126137007	M	DTMU	DMX	33	125	0.25	Multifamily Residential	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	23.4				See capacity above	IL Ratio: 0.83; Year Built: 1965	Buffer
CONCORD	1641 Ashbury Dr	94520	126151024	M	DTMU	DMX	33	125	0.11	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	10.2				See capacity above	IL Ratio: 0.63; Year Built: 1959	Buffer
CONCORD	1507 Amador Ave	94520	126137006	M	DTMU	DMX	33	125	0.14	Multifamily Residential	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	13.2				See capacity above	IL Ratio: 0.75; Year Built: 1951	Buffer
CONCORD	1541 Amador Ave	94520	126137001	M	DTMU	DMX	33	125	0.14	Multifamily Residential	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	12.4				See capacity above	IL Ratio: 0.91; Year Built: 1936	Buffer
CONCORD	5112 Olive Dr	94521	117010032	N	LDR	RS10	0	10	0.85	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	4.65			12	See capacity above	IL Ratio: 0.33; Year Built: 1963	
CONCORD	5116 Olive Dr	94521	117010052	N	LDR	RS10	0	10	0.54	Vacant	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	3.348				See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	1628 Ayers Rd	94521	117010017	N	LDR	RS10	0	10	0.38	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1.736				See capacity above	IL Ratio: 0.70; Year Built: 1956	
CONCORD	5106 Olive Dr	94521	117010016	N	LDR	RS10	0	10	0.3	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1.24				See capacity above	IL Ratio: 0.72; Year Built: 1957	
CONCORD	5110 Olive Dr	94521	117010015	N	LDR	RS10	0	10	0.29	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1.178				See capacity above	IL Ratio: 0.62; Year Built: 1957	
CONCORD	1303 Galindo St	94520	126164053	O	DTMU	DMX	33	125	0.19	Auto Repair	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	17.4			33	See capacity above	IL Ratio: 0.43; Year Built: 1954	
CONCORD	1301 Galindo St	94520	126164049	O	DTMU	DMX	33	125	0.18	Store Building	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	16.4				See capacity above	IL Ratio: 0.53; Year Built: 1951	
CONCORD	Dal Chiaro Way/Roslyn Dr	94518	105071007	P	MDR	RM	11	32	0.17	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant		3.1552		6	See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	Dal Chiaro Way/Roslyn Dr	94518	105071006	P	MDR	RM	11	32	0.17	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	3.1552				See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350036	Q	HDR	RH	33	100	0.08	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	6.4			22	See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350038	Q	HDR	RH	33	100	0.03	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	2.4				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350041	Q	HDR	RH	33	100	0.02	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	1.6				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350039	Q	HDR	RH	33	100	0.03	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	2.4				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350037	Q	HDR	RH	33	100	0.04	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	3.2				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350040	Q	HDR	RH	33	100	0.03	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	2.4				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350042	Q	HDR	RH	33	100	0.02	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	1.6				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1561 Pine St	94520	128350043	Q	HDR	RH	33	100	0.03	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	2.4				See capacity above	IL Ratio: N/A; Year Built: N/A	
CONCORD	1538 Farm Bureau Rd	94519	114280048	R	LDR	RS10	0	10	0.29	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	1.798			4	See capacity above	IL Ratio: 0; Year Built: N/A	
CONCORD	1540 Farm Bureau Rd	94519	114280047	R	LDR	RS10	0	10	0.32	Single Family Residence	YES - Current	NO - Privately-Owned	Available	Not Used in Prior Housing Element	1.364				See capacity above	IL Ratio: 0.16; Year Built: 1955	
CONCORD	1536 Farm Bureau Rd	94519	114280049	R	LDR	RS10	0	10	0.23	Vacant	YES - Current	NO - Privately-Owned	Available	Used in Two Consecutive Prior Housing Elements - Vacant	1.426				See capacity above	IL Ratio: 0; Year Built: N/A	



CONCORD 2023 – 2031 HOUSING ELEMENT UPDATE

Appendix F: Community Engagement Summary

PHASE I

PHASE II

PHASE III

COMMUNITY SURVEY SUMMARY



CONCORD 2023 – 2031 HOUSING ELEMENT UPDATE
Phase I Engagement Summary

Prepared by Kearns & West

March 2021



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I. Introduction

Summary and Purpose

The City's General Plan, which serves to strategically guide the City's growth and development, includes seven state-mandated elements, one of which is the Housing Element. The Housing Element is a plan for meeting the current and future housing needs of all income levels in a community. The Housing Element planning cycle runs every eight years, with the current cycle ending in January 2023. This update applies to the following eight-year planning cycle from 2023-2031 and must be adopted and submitted to the California Department of Housing and Community Development (HCD) by January 15, 2023.

Phase 1 engagement was comprised of the following activities and this document is sectioned off into each type of activity followed by supporting appendices

- I. Introduction
- II. Pop-Up Events
- III. Town Hall #1
- IV. Survey Launch
- V. Appendices

Pop-Up Events share information and progress on the Housing Element Update and provide opportunities for the input.

Town Halls share information and solicit feedback from the public at each milestone of the update process. The first Town Hall was introductory.

The Survey adds to the multi-pronged approach for receiving input and help cast a wider net for outreach. Using this tool provides live results and analytics on the demographics about who is participating, allowing space to adjust gaps in outreach as appropriate. The survey was launched in December 2022.

II. Pop-Up Events

The City held three Pop-up events in the Fall of 2021 to promote awareness about the Housing Element Update process and the different opportunities to engage. These were held in the following locations and times:

- Music and Market, Todos Santos Plaza, 9/30/21
- Todos Santos Farmer's Market, Todos Santos Plaza, 10/12/21
- The Veranda shopping center, 12/11/21



At the pop-up events, City staff hosted a booth with signs, maps, and informational flyers about the Housing Element Update process. They spoke to members of the public about the Housing Element Update and distributed about 90-100 flyers advertising the Housing Element Town Hall and about the survey.

III. Town Hall #1

A. Town Hall Purpose

Town Hall #1 is a part of the Concord Housing Element Update’s Community Engagement and Outreach Plan adopted by City Council on August 24, 2021. The purpose of the first Town Hall was to share information about the Housing Element Update, the process and framework for the Housing Element, and engage and educate participants in the discussion of Regional Housing Needs Allocation (RHNA) compliant alternatives and the challenges presented by California state mandates. The City continues to be committed to conducting a process that engages all stakeholders in the community and includes equitable public engagement.

Town Hall #1 was split into two events to allow for engagement with a diverse set of people and in consideration of COVID-19 safety measures.

The **In-person** Town Hall was held on Saturday, October 16, 2021, from 12:00 p.m. to 3:00 p.m. at the Concord Senior Community Center (2727 Parkside Circle). There were 17 participants who participated in the event. Along with the three input activities, 19 individual comments were received throughout the course of the three-hour exhibit.

The **Virtual** Town Hall was held on Tuesday, October 19, 2021, from 6:00 p.m. to 8:00 p.m. via the Zoom platform. A recording of the meeting is accessible at this [link](#)¹. There were 65 registrants 36 questions comments were received throughout the discussion and polling activities. This summary provides the findings from the input gathered.

This section is separated into the following sub-sections:

- Purpose
- Format
- In-Person Town Hall Activities
- In-Person Town Hall Major Themes
- Virtual Town Hall Discussion & Major Themes
- Appendices A-D

B. Town Hall Format – In-Person and Virtual

¹ The full URL is: <https://kearnswest.zoom.us/rec/share/PtccXKJarD1bpwIBshMD-FhpcLeSh6NWP15AB6ut7P3ySr7nQN7-a8S8Vvwj2ROR.tSKs4YzWaGW72LY9>.



In-Person Town Hall #1 Format

The first in-person Town Hall for the Concord Housing Element Update engagement process was held on Saturday, October 16, 2021, from 12:00 p.m. to 3:00 p.m. at the Concord Senior Community Center (2727 Parkside Circle). There were 17 participants that came to the event and 19 individual comments were received apart from the input received from the three main activities throughout the course of the three-hour exhibit.

City and project team staff greeted participants at a sign-in table with project and activity information. The City exhibited a series of nine boards in English and Spanish to present information and gather input on their visions for Concord's Housing Element Update. The boards informed community members and stakeholders about the Housing Element Update process and how to be involved and invited them to participate in activities that gathered information on participant priorities and concerns regarding housing in Concord.

There were three activities: a fill-in comment and questions boxes, a mapping exercise, and a three-question survey regarding housing priorities in Concord. The activities are described in the next section. There was a children's coloring station with coloring sheets of different types of housing. Lunch was provided for participants as well as masks and hand sanitizer for COVID-19 safety measures.

A Note on COVID-19

Outreach efforts provide the flexibility needed to accommodate public health requirements due to COVID-19. This includes the format of activities to ensure high-quality engagement through virtual methods and socially distanced activities as necessary. In-person workshops will be in conformance with the requirements of existing health orders.

Virtual Town Hall #1 Format

The virtual Town Hall introduced the Housing Element Update process with a PowerPoint presentation that provided community members information on what is a housing element, how it fits into a city's general plan, and explain the RHNA allocations for the City of Concord. Participants were invited to share about their relationship to Concord, whether they live, work, or own property in Concord and invited to pose questions about the presentation.

There were three discussion prompts regarding a) the **priorities** for housing that the City should focus on; b) what the **barriers** to affordable housing are; and c) what **strategies** the City could use to accommodate the 5,073 housing units that need to be planned for in the 6th cycle Housing Element. Polls initiated the discussion, and the facilitator, Jenna Tourjé (subconsultant Kearns & West) led the discussions, with City staff, Aaron Sage, and Housing Element consultants Asha Bleier and Elizabeth Dickson (Dudek) answered questions from the public. The chat was open for community members to inquire about the topic or address technical issues.



There was simultaneous interpretation in Spanish, and the PowerPoint presentation was translated into Spanish for viewers.

C. **In-Person** Town Hall - Activities

[Comment Box and Card Activities – Questions and Comments](#)

The City gathered questions or comments that participants had about the Housing Element and the engagement process from prompts on the boards and general comment cards. These were gathered on the boards in sticky-note format, and the raw answers are in Appendix A.

[Housing Survey Questions Activity – What are your priorities, concerns, and strategies for Concord?](#)

The survey questions activity asked participants to select answers related to their priorities for housing in Concord, barriers to affordable housing, and strategies for accommodating the 5,073 housing units assigned to Concord. The results are shown in Appendix B.

[Mapping Activity – What is your relationship to Concord?](#)

The mapping activity asked participants to indicate where they live, work, play, and what are special places for them in Concord by applying sticky dots to a map of Concord. Participants went further and added sticky notes with suggestions of where potential development areas are and additional comments for the Housing Element to consider. The map is in Appendix C.

D. **In-Person** Town Hall - Major Themes

[Priorities](#)

Participants identified the top three priorities for housing in Concord should concentrate on senior housing (low-income, too), ensuring that new housing fits in with the community's physical character, and preventing people from losing their homes. For some participants, building more housing near community amenities such as public transit, groceries, health care, and other resources is a close priority. Some participants provided their recommendations for areas that could benefit from housing development, such as the former Naval Weapons Station Site, the area adjacent to Diablo Creek Park, and Diamond area. Several participants also commented favoring mixed-use development, however, one participant was opposed to density.

[Barriers](#)

Participants expressed that the top barriers for housing in Concord are high development costs (including land and construction), the shortage of adequate sites for development, and the cumbersome permitting process. Some participants raised concerns about the challenge of limited water supply especially as we face climate change and concerns about housing prices being dependent on market prices.



Strategies

Regarding strategies for Concord to accommodate the 5,073 housing units in the next Housing Element cycle, participants identified the top four strategies to be to encourage backyard units (i.e. granny flats or Accessory Dwelling Units), for the City to focus growth in Downtown and along commercial corridors, for the City to encourage mixed-use development and maximize housing on the former Naval Weapons Station Site.

E. Virtual Town Hall Major Themes & Discussions

A. Priorities – What are your top priorities for new housing in Concord?

The City, project team, and participants discussed top priorities regarding housing for Concord and community members expressed that the City should especially prioritize **affordable rental units** and **housing for unsheltered persons, persons with disabilities, and seniors, and keeping people in their homes**. Of the options discussed in the poll, creating housing near transit and services and protecting the community’s aesthetic character ranked lowest in the poll.

The discussion that followed emphasized affordable rental and homeownership especially for low-income and individuals with no income who are the most vulnerable to displacement. Some participants shared that some of the priorities overlap in terms of addressing solutions to keep people in their homes and for different populations such as seniors, persons with disabilities, and unsheltered persons. The discussion prompted ideas for strategies such as:

- Low-fee ADU developments
- Integrating housing near major educational institutions, student housing
- Prioritizing public land for affordable housing.
- *Rentas asequibles o facilidad para poder comprar.* [Accessible rental prices or feasibility to buy.]
- Work force housing should be a priority.

Answers were gathered via a Zoom poll, and the poll results and additional comments are in Appendix A.

B. Barriers – What do you feel are the greatest barriers to affordable housing in Concord?

Participants expressed that the top barriers for housing in Concord are **high development costs** (including land and construction), the **shortage of adequate sites for development**, and the **cumbersome permitting process**. Some participants raised concerns about the challenge of limited water supply especially as we face climate change and concerns about housing prices being dependent on market prices.

The discussion brought forth additional barriers that address the current context of affordability in Concord:

- Lack of abundant financing/funding for affordable homes.



- Lack of out of the box thinking from city leadership, lack of willingness to work aggressively and collaboratively with affordable housing developers. No concrete plans to work with the county to develop on land to meet the needs for house low-income and zero-income individual and families.

Some participants introduced strategies to address affordability in Concord by suggesting references to case studies in cities like Oakland where the affordable housing developer Mid-Pen has built, for example. They expressed that there are existing housing developers and programs that can be tapped into.

Answers were gathered via a Zoom poll, and the poll results and additional comments are in Appendix A.

C. Strategies – What are your preferred strategies for accommodating these homes?

Regarding strategies for Concord to accommodate the 5,073 housing units in the 6th Housing Element cycle, community members identified that top strategies should focus on **growth in Downtown and along commercial corridors**, encourage **mixed-use development**, and to **increase density** (e.g., allow buildings with more housing units). Participants also expressed that allowing 2–4-unit projects in single-family neighborhoods (e.g., duplexes, triplexes) and encouraging backyard units (i.e., granny flats or Accessory Dwelling Units) would be beneficial strategies as well.

Some participants emphasized that all of the strategies mentioned are important, and others expressed interest over the following strategies:

- Bringing in affordable housing developers to Concord
- Using renewable energy and sustainability for development
- Strategic re-zoning

Answers were gathered via a Zoom poll, and the poll results and additional comments are in Appendix A.

IV. Survey Launch

To contribute to a multi-pronged approach for receiving input and help cast a wider net for outreach, the City launched a survey to accommodate different work schedules and diverse abilities and needs and obtain provide live results and analytics on the demographics about who is participating, allowing space to adjust gaps in outreach as appropriate. The survey was launched in December 2022 in both [English](#) and [Spanish](#).



Appendices

Appendix A – In-Person Town Hall Input from Board Comment Boxes and Cards Activities

The information below is a record of the input received via the board comment boxes and comment cards.

Responses to Board Comment Boxes

Board 4: What is the housing element?

Prompt: *Add a sticky note with your questions in this box.*

A: Affordable senior housing for single residents of Concord who are seeking housing.

Board 6: How Do I participate in the update process of the Housing Element?

Prompt: *Add a sticky note with your ideas for community engagement opportunities in your neighborhood or in Concord in this box.*

A: Find a reason to come to Concord to live; things to do.

A: Put housing at the malls – Sun Valley, Willow, Veranda; Put retail in residential areas.

A: Senior housing is needed!

A: Housing & services for transition-aged youth (TAY); Aging out of foster care

A: Affordable & market rate senior housing with services: transportation, nutrition, exercise & activities.

Board 7: How is the City taking into account equity?

Prompt: *Are there communities we should be reaching out to?*

A: Without authentic Latinx leadership from The Monument, this will be a farce.

Comment Cards

Comment Cards & Other Comments

Comment: What percent of the budget is Housing Element Update in comparison to police?

Comment: Housing prices must be de-coupled from market forces/prices.

Comment: My concerns about additional housing in Concord revolve around the lack of water for all communities in this state. We have climate change and very limited water supply. I feel this additional housing is going to be detrimental to our quality of life. We need open space in addition that we can partake in as residents. Not a density of housing. I oppose!

Comment: I would like to thank the City of Concord for hosting this event. I am a senior who is looking for low-income/affordable housing here in conquered. The people of conquered are very friendly and family-oriented qualities I am looking for in a community!



Appendix B – In-Person Town Hall Input from Board Survey Questions

Tables 1-3 show the results of the survey questions that identify the top priorities for participants, what they believe to be the greatest barriers to affordable housing in Concord, and the best strategies they recommend for accommodating Concord’s RHNA allocation.

Input from Board Survey Questions

Table 1. Priorities

Q1: What are your top priorities for new housing? (choose up to three)

<i>Answer</i>	<i>No. Responses</i>
Provide more/better housing for seniors	8
Ensuring that new housing fits in with the community’s physical character	5
Preventing people from losing their homes	4
Building more housing near public transit, groceries, health care, and other resources	3
Finding or keeping an affordable rental unit	2
Providing transitional housing for unsheltered (homeless) persons	2
Providing more/better housing for persons with disabilities	2
Other	1
Purchasing an affordable home or condo	0

Table 2. Barriers

Q2: What do you feel are the three greatest barriers to affordable housing in Concord?

<i>Answer</i>	<i>No. Responses</i>
High development costs (including land and construction)	6
Shortage of adequate sites for development	4
Cumbersome permitting process	3
Lack of variety in housing types	2
Other	2
Community opposition to new development	1

Table 3. Strategies

Q3: Concord is required to plan for 5,073 additional housing units. What are your three most preferred strategies for accommodating these units (choose up to three)?

<i>Answer</i>	<i>No. Responses</i>
Encourage backyard units (i.e. granny flats or Accessory Dwelling Units)	6
Focus growth Downtown and along commercial corridors	4
Encourage mixed use development	3
Maximize housing on the former naval weapons station site	3
Increased density (e.g., allow taller buildings with more housing units)	2
Other	2
Allow 2-4 unit projects in single family neighborhoods	1



Appendix C – In-Person Town Hall Input from Mapping Activity

The input below includes a table of different comments received regarding notable or special places, or places that are recommended for different types of housing development and the image of the mapping activity board. The image displays how participants marked where they live, work, play, and places that are special to them.

Table 1. Mapping Activity Comments Table

This table gathers general comments or comments pertaining to specific suggested areas for housing development.

<i>Place</i>	<i>Comment</i>
<i>Diamond Area</i>	Housing needed here – right now not accessible except by car
<i>Area demarcated by Bates Avenue and Arnold Industrial Way, adjacent to Diablo Creek Golf Course</i>	Underutilized opportunity for housing
<i>Concord Naval Weapons Station</i>	Mixed: <ul style="list-style-type: none"> - Commercial, office & housing - Walkable - Senior housing
<i>N/A</i>	Low-income senior housing
<i>N/A</i>	Restaurants, shopping, cultural museums, libraries, theater, festival events, education
<i>N/A</i>	Variance in SFO to allow duplex, triplex
<i>N/A</i>	City/Community needed to buy land – developers won't on their own



Image 1. Mapping Activity Map

The image below demonstrates the places where community members live, work, and play, and places they consider to be special to them.

Tell us about your community.

Instructions: Place a colored sticker on the map to show where you live, work, play and visit places that are special to you.

- Yellow sticker:** Where do you live?
- Red sticker:** Where do you work? (if you work outside of Concord, place your dot outside of the city boundary.)
- Green sticker:** Where do you play? (e.g. recreation, entertainment, exercise, etc.)
- Blue sticker:** What are special places for you? (or use a sticky note to write out your special place)

City of Concord
City of Concord: Housing Element Update



Appendix D – Virtual Town Hall Input from Polls

Tables 1-3 show the results of the poll questions that identify the top priorities for participants, what they believe to be the greatest barriers to affordable housing in Concord, and the best strategies they recommend for accommodating Concord’s RHNA allocation.

Input from Polls

Table 1. Priorities

Q1: What are your top priorities for new housing? (choose up to three)

Priority	No. Responses
Affordable rental units	16
Unsheltered (homeless) persons	13
Persons with disabilities	8
Affordable for sale units	7
Seniors	6
Keeping people in their homes	6
Housing near transit and services	4
Protecting community’s aesthetic character	3

Comments from the Discussion on Priorities:

- Agree... that rental housing is more accessible than home ownership right now.
- Allow individuals to do low fee ADU developments so they can provide housing for individuals.
- Although many of these priorities can also overlap. Affordable rental and homeownership housing can serve persons with disabilities, seniors, and prevent homelessness/ help keep people in their homes.
- Affordable rental housing is important for working professionals that support our local economy. Rental housing provides increased density that supports urban infill and reduces sprawl.
- Higher density housing along our major boulevards (typically with good bus infrastructure) should also be a priority. This would also help preserve existing neighborhood character.
- Housing for low income and individuals with no income, who are the most vulnerable to be displaced should be a priority.
- Integrating housing near major educational institutions, student housing
- Prioritizing public land for affordable housing.
- *Rentas asequibles o facilidad para poder comprar.* [Accessible rental prices or feasibility to buy.]
- Work force housing should be a priority.



Table 2. Barriers to Affordable Housing

Q2: What do you feel are the three greatest barriers to affordable housing in Concord?

<i>Answer</i>	<i>No. Responses</i>
High development costs (including land and construction)	13
Community opposition to new development	12
Lack of variety in housing types	10
Shortage of adequate sites for development	3
Cumbersome permitting process	2

Comments from the Discussion on Barriers to Affordable Housing:

- Lack of abundant financing/funding for affordable homes.
- Lack of out of the box thinking from city leadership, lack of willingness to work aggressively and collaboratively with affordable housing developers. No concrete plans to work with the county to develop on land to meet the needs for house low income and zero income individual and families.
- 60% think people don't want affordable housing. We need to look at some of the housing in Oakland that Mid-Pen has built. Not just housing but a concierge of programs to help people exists.

Table 3. Strategies

Q3: Concord is required to plan for 5,073 additional housing units. What are your three most preferred strategies for accommodating these units (choose up to three)?

<i>Strategy</i>	<i>No. Responses</i>
Focus growth Downtown and along commercial corridors	12
Encourage mixed-use development	12
Increase density (e.g., allow buildings with more housing units)	11
Allow 2-4 unit projects in single-family neighborhoods (e.g. duplexes, triplexes)	8
Encourage backyard units (i.e. granny flats or Accessory Dwelling Units)	7

Comments from the Discussion on Strategies:

- I would also support an expanded area downtown!
- I have been researching Mid-Pen Housing. They have a strategy to build 3,000 affordable housing units. They provide a full service - property management, resident services and property manage not. What role does the city have in luring a company like Mid-Penn or EAH housing to build here?
- Is there the hope that development on the Concord Naval Weapons Station will help us meet the RHNA goals? It seems that there's a big push to break ground and we haven't acknowledged



if the ground is safe to build on, and also the current developer team that's involved in exclusive negotiations is under intense community scrutiny.

- Perhaps a strategic rezoning to provide greater incentive for new development... low energy developers, seems like little new building developments are happening.
- Many pockets of the City feel very outdated and unchanged since the 80's. There are also many lots that have remained vacant for years, perhaps create penalties for owners that simply sit on vacant/undeveloped lots that become eyesores.
- Mixed-use should be strategically focused along more major boulevards and def in the downtown rather than throughout the City. This would help preserve existing neighborhood character.
- No matter what strategy or combination thereof, they need to be sustainable and use renewable energy.
- The City, especially the City Council, needs to help in getting rentals on the market. An example is the Coast Guard housing. The buyer of that property wanted to get the apartments on the market as soon as possible and ran up against some roadblocks, in my mind, when in front of the City.
- We need all of the above.

Questions Regarding RHNA

- *Question:* Can anyone share what has been met in terms of the 5th cycle RHNA?
Answer: Approximately 15%
- *Question:* What happens if the County's is not building these houses?
Answer: ABAG has new consequences for not building: State can sue, developers can sue, third parties can sue, individuals can sue the City.

Other questions or comments

Comment: I also want the public to have more information on BART land that Concord is allowed to build on, create temporary micro/tiny homes for the unhoused.

Comment: I would like to see a bilingual mailer go out to renters and homeowners.

Comment: Our Annual Report data for homelessness showed that in 2020, 6,955 people experiencing literal homelessness connected with our homeless system of care. Annual Report data:

<https://cchealth.org/h3/coc/reports.php#Annual>.

Comment: My organization works closely with MidPen, EAH and other nonprofit developers (like RCD and SAHA and Hope Solutions who already have affordable properties in Concord). Feel free to look me up at www.ebho.org if you would like to learn more about how these groups are involved in Concord housing work.

Question/Comment: Is there a transit official in the meeting that can speak to planned major transit improvements? I feel this could help inform our ideas as to where new housing could/should be located.

Question/Comment: I did not see single family homes even being mentioned. Are these now not in the plan? The town currently has a large percentage of SFH.



Question: Can the city use eminent domain on empty lots, buy them out, to then work with affordable housing developers?

Question: Another question for when it is appropriate: How will the planning process for the Naval Weapons Station reuse project and its thousands of units intersect with this housing element process?

Question: Will the housing element inform an eventual rezoning to accommodate the updated housing element? If so, when is the rezoning anticipated to happen?

Question: What level is market rate? Also, what does the City consider low income individual or household range.



CONCORD 2023 – 2031 HOUSING ELEMENT UPDATE

Engagement Phase II Engagement Summary

Prepared by Kearns & West

April 15, 2022



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I. Introduction

Summary and Purpose

The City's General Plan, which serves to strategically guide the City's growth and development, includes seven state-mandated elements, one of which is the Housing Element. The Housing Element is a plan for meeting the current and future housing needs of all income levels in a community. The Housing Element planning cycle runs every eight years, with the current cycle ending in January 2023. This update applies to the following eight-year planning cycle from 2023-2031 and must be adopted and submitted to the California Department of Housing and Community Development (HCD) by January 15, 2023.

This summary covers the format, structure, and input received during the virtual and in-person Town Hall #2 meetings. The purpose of the second Town Hall was to provide a brief overview of the Housing Element Update, share major themes from the previous Town Hall, and engage and educate participants in the discussion of the preliminary site analysis and inventory, Affirmatively Furthering Fair Housing (AFFH), and programs to address displacement risk. The City continues to be committed to conducting a process that engages all stakeholders in the community and includes equitable public engagement.

Town Hall #2 was split into two events, a virtual and in-person meeting, to allow for engagement with a diverse set of people and in consideration of COVID-19 safety measures.

This summary provides the findings from the input gathered from both events.

This summary is separated into the following sections:

- I. Introduction
- II. Format
- III. Virtual Town Hall Sites, Programs & Discussions
- IV. In-Person Town Hall Activities
- V. In-Person Town Hall Major Themes
- VI. Appendices



II. Format

a. Virtual Town Hall #2 Format

The **Virtual** Town Hall was held on March 15, 2022, from 6:00 PM to 7:30 PM via the Zoom platform. A recording of the meeting is accessible at this link¹. 42 individuals attended the Zoom meeting, and 252 questions and comments were received throughout the discussion and polling activities.

During the Virtual Town Hall, the project team introduced the Housing Element Update process with a PowerPoint presentation. The presentation provided community members with information on the outreach process that had been conducted thus far, a summary of the preliminary sites inventory, and an overview of fair housing requirements. Participants were invited to share about their relationship to Concord, whether they live, work, or own property and were invited to pose questions about the presentation.

The facilitator led two discussion sessions regarding a) site analysis and b) affirmatively furthering fair housing programs. Under the discussion prompt about affirmatively furthering fair housing programs, there were four sub-topics: housing preservation and rehabilitation, pathways to homeownership, renter assistance, and regulations for development. Polls initiated the discussion, and the facilitator, Jenna Tourjé (Kearns & West) led the discussions while Aaron Sage (City of Concord staff), and Asha Bleier and Elizabeth Dickson, (Dudek) answered questions from the public alongside Mindy Gentry and Brenda Kain (City of Concord staff) who were present as well. The chat was open for community members to inquire about the topic or address technical issues.

There was simultaneous interpretation in Spanish, and the PowerPoint presentation was in English and Spanish for viewers.

b. In-Person Town Hall #2 Format

The **In-person** Town Hall was held on Sunday, March 27, 2022, from 12:00 p.m. to 2:00 p.m. at Todos Santos Plaza (2175 Willow Pass Rd). Facilitators and City staff engaged with the community members through a “pop-up” style format with tables, banners, and activities explaining aspects of the Housing Element Update. A total of 68 participants attended the event and 26 individual comment cards were received apart from the input gathered from the two main activities throughout the course of the two-hour exhibit.

¹ The full URL is: <https://kearnswest.zoom.us/rec/share/PtccXKJarD1bpwIBshMD-FhpcLeSh6NWP15AB6ut7P3ySr7nQN7-a8S8Vvwj2ROR.tSKs4YzWaGW72LY9>.



The City exhibited a series of two banners and additional posters in English and Spanish to present information and gather input on Concord’s Housing Element Update. The banners informed community members and stakeholders about the Housing Element, fair housing, Regional Housing Needs Allocation (RHNA), and a preliminary RHNA site analysis and inventory. Participants were provided information on programs to address displacement risk as outlined in the Housing Element Update and were invited to share input on what else could be done. City staff and the outreach team were available to answer questions and engage in dialogue.

The in-person Town Hall included the following activities:

- Input activity on programs to address displacement risk and fair housing
- Mapping activity to identify areas of opportunity in the City
- Mapping activity to identify where people live, work, recreate, and own business or property in the City
- General comment cards
- Housing coloring activity for children

Snacks and water were provided for participants. Additionally, masks and hand sanitizer bottles were placed throughout tables for COVID-19 safety measures.

III. Virtual Town Hall Sites, Programs & Discussions

A. Site Analysis and Inventory & Discussion

The consultant team along with City staff explained to virtual Town Hall participants what a site analysis and inventory is and the need for it. Participants were encouraged to ask questions about the site analysis and inventory. Community members asked questions about why there is a projected increase in housing units in higher-density, lower-income areas versus lower-density, higher-income areas, why there is more moderate than low-income housing being built, and what pre-defined terms like moderate-income or low-income mean.

In the discussion that followed, participants emphasized affordable rental housing and homeownership especially for low-income and zero-income individuals who are the most vulnerable to displacement.

The discussion included the following themes, questions, or topics from participants:

- Participants expressed the desire to build more affordable housing units.
- Some participants expressed interest in exploring opportunities for more affordable housing area that are currently low-density and high income.
- Participants asked about how the site and inventory analysis were informed by the Affirmatively Furthering Fair Housing analyses.
- Some participants inquired if the land of former redevelopment sites could be discounted for nonprofit developers and community land trusts.



- Some participants inquired about how the City accounts for residential zones that are not filling the density needed to meet housing demand.

Participants were encouraged to share questions or comments verbally or in the Zoom chat during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix B.

B. Affirmatively Furthering Fair Housing & Discussion

The consultant team and City staff explained the background of the Affirmatively Furthering Fair Housing requirements, general demographic and household data of the City, and how the sites and inventory analysis connects to areas of opportunity for housing development in the City. Some participants raised concerns about access to transportation mobility in relation to newly developed low-income housing, building low-income housing in low-resource areas, and encouraged identifying other types of properties for development.

Participants were asked a series of questions including: Does any of this information surprise you? Is there anything missing in these topics? What topics interest you the most and why? The activity prompted further discussion from the participants. The major discussion points from participants are listed below:

- Lack of adequate financing/funding for affordable homes.
- Lack of “out of the box” thinking from City leadership and unwillingness to work collaboratively with affordable housing developers.
- No concrete plans to work with the county to develop on land to meet the needs for housing low-income and zero-income individuals and families.
- Lack of building housing near transit areas for low-income and zero-income individuals who cannot afford a car.

Participants were encouraged to share questions or comments verbally or in the Zoom chat during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix C.

C. Anti-Displacement Programs & Discussion

The consultant team and City staff introduced the topic of anti-displacement programs. They explained that the anti-displacement strategies were broken down into four subgroups. Participants were encouraged to ask questions and engage on the subtopics below.

[Housing Preservation and Rehabilitation](#)

The consultant team and City staff explained housing and rehabilitation strategies as one program to reduce displacement in the City. Participants raised concerns about rehabilitation of



units causing increased unaffordability. The facilitation team asked participants what else can be done to preserve existing housing. Some participants emphasized that all of the strategies mentioned are important, and others expressed interest in the following strategies:

- Prevention of house “flipping” (purchasing for renovation and resale) to increase rent.
- Promoting programs for rent control, just cause eviction protection, and tenant anti-harassment protection.
- Creation of community land trusts.
- Promoting Tenants Opportunity to Purchase Act (TOPA) and Community Opportunity to Purchase Act (COPA).

Participants were encouraged to ask questions or leave comments in the Zoom chat or ask verbally during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix C.

[Pathways to Homeownership](#)

The consultant team and City staff explained to participants how homeownership is one key strategy that is important to anti-displacement strategies while recognizing that homeownership is not possible for everyone. The team explained existing programs that generate pathways to homeownership and posed the question to participants: what else can be done to help households attain homeownership? Participants responded with the following recommendations:

- Encouraging rent control to lead to homeownership.
- Exploring naturally occurring affordable housing and its relationship to rent control.
- Not allowing developers to avoid building affordable housing units by paying an in-lieu fee.
- Increased funding for voucher homeownership programs.

Participants were encouraged to ask questions or leave comments in the Zoom chat or ask verbally during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix C.

[Renter Assistance](#)

The consultant team and City staff covered existing renter assistance programs in the City. The facilitation team posed the question to participants: What else can be done to better protect renters?

Participants responded via the comments section as well as through verbal comments. Participants expressed the need to focus on stronger tenant protections and inquired about rental caps in the City, while other respondents expressed the immediate and ongoing need for promoting rent control and just cause evictions in relation to tenant protections.



- Some participants raised the concern around the growing unhoused population and recommended a community-involved solution.
- Some participants recommended bringing together City staff, agencies, and the community to assist with removing unhoused individuals off the housing waitlist and moving them into accessory dwelling units that private property owners can be incentivized by way of waiving building permitting processes.

Participants were encouraged to ask questions or leave comments in the Zoom chat or ask verbally during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix C.

[Regulations for Development](#)

The consultant team and City staff explained the fourth category of programs, regulations for development, as strategies for anti-displacement which include increasing opportunities for accessory dwelling units, faster processing, flexible regulations for affordable development, higher density near transit sites, and increased funding for affordable housing for multi-family properties. The facilitation team posed the question to participants: what else can be done to encourage development that prevents displacement? Participants responded with the following recommendations:

- Identify methods to hold landlords who engage in malpractice with tenants accountable.
- Continue to build high density apartments.

Participants were encouraged to ask questions or leave comments in the Zoom chat or ask verbally during indicated segments of the Town Hall. Questions and comments were gathered via the Zoom chat as well as the recording and are included in Appendix C.

IV. In-Person Town Hall - Activities

A. Comment Box and Card Activities

[Questions and Comments](#)

The City gathered questions or comments that participants had about the Housing Element and the engagement process. These were gathered on comment cards and sticky-notes that were available at multiple tables and stations at the Town Hall. The raw answers are in Appendix D.

B. Programs to Address Displacement Risk

[What Else Could Be Done?](#)

A banner provided an overview on programs to address displacement risk in four areas: housing preservation & rehabilitation; pathways to homeownership; renter assistance; and development regulations. For each area, with the banner provided a list of what is currently being done, and



participants were asked to share input on what else can be done on sticky-notes. The raw answers are in Appendix E.

C. Mapping Activities

[Tell Us About Your Community & Give Us Your Input On Fair Housing](#)

One mapping activity asked participants to indicate where they live, work, play or recreate, and where they own business or property in Concord by applying colored sticky dots to a map of Concord.

The second mapping activity asked participants to place sticky dots on a map of Concord to indicate areas that have the greatest access to resources for residents, as a way to get familiar with the term fair housing.

The maps are in Appendix F.

V. In-Person Town Hall - Major Themes

A. Anti-Displacement Programs

During the Town Hall, a significant amount of engagement was focused on receiving input on the programs to address displacement risk, specifically asking participants what else can be done. Below are some major themes. To see the full list of input received, refer to Appendix E.

[Housing Preservation & Rehabilitation](#)

The majority of participants highlighted the Monument Corridor area (a.k.a. “the Monument”). Within those comments regarding the Monument, some participants expressed a desire that no new housing be built, and the need for infrastructure improvements. Participants also expressed that lowering or preventing the County from raising taxes for landlords or property owners should be considered.

[Pathways to Homeownership](#)

Many participants highlighted the need for affordable housing. Additionally, participants expressed loans for families, programs for first-time home buyers, and assistance for down payments would be helpful. Other suggestions included that inclusive housing, incentives for veterans, and life skills training for those experiencing homelessness are important steps that can be taken.

[Renter Assistance](#)

The following were overwhelmingly expressed by participants about renter assistance: housing for seniors and persons with disabilities, rent control, just cause evictions, anti-harassment of tenants, and other tenant protections.



Regulations for Development

When asked what else can be done for development regulations, most participants addressed the Naval Weapons Station, with several participants specifying that affordable or moderate-income housing should be built in the Naval Weapons Station. Many participants also expressed that access to freeways, access to public transit, walkability, and housing options accessible by public transit should be considered.

Appendix A – Virtual Town Hall Input from Poll

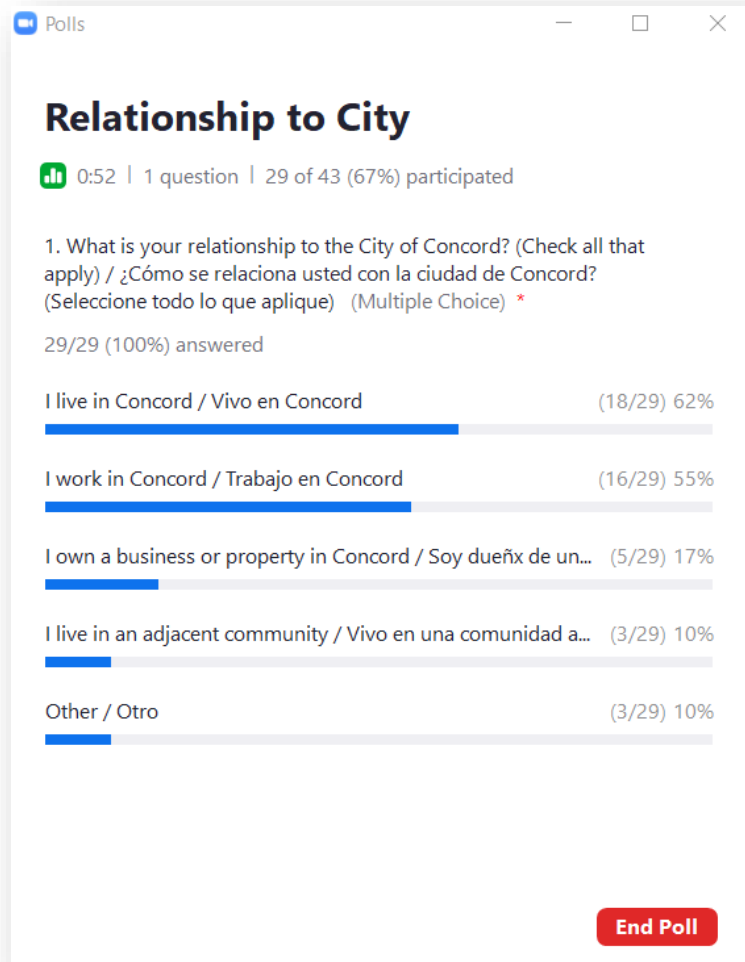
Table 1. Virtual Town Hall participant’s relationships to the City of Concord.

Participants were asked if they live, work, or own a business or property in Concord, or if they live adjacent to Concord. Below are the results from the poll taken.



Table 1. Relationship to City

Q1: What is your relationship to the City?





Appendix B – Virtual Town Hall Input: Comments and Questions on Site Analysis and Inventory

Comments and Questions on Site Analysis and Inventory:

The following comments were received during the virtual Town Hall. These are intended for reference only and not to be verbatim.

- Isn't the site's analysis supposed to be informed by the Affirming Furthering Fair Housing analysis?
- I have the same question as Debra regarding the Fair Housing analysis. Will those data be shared this evening?
- For the accessory dwelling unit (ADU) I am building on my property for the business we own, does it get utilized to affordable housing at some later time or does it still belong to me?
- Beyond access to opportunity, there are many other requirements for fair housing analysis, including analysis by race/ethniCity and other factors. I hope you will cover that as well.
- What if the site is an EPA site? Who pays for the cleanup?
- Can the land of former redevelopment sites be discounted for nonprofit developers and community land trusts?
- Why is the proportion of lower income units for underutilized vs. vacant sites so much more than for higher income?
- What is the criteria for lower-income individuals?
- As a community, are we going to be able to vote on any of these proposals or are they already decided upon?
- What is the criteria for the moderate-income and above-income units?
- What happened to the City's commitment to build low-income housing on the Concord Naval Weapons Station (CNWS) site? Where is that reflected?
 - Response by City staff: The City hopes to be as conservative as possible about our assumptions regarding housing production. If a site identified in the Housing Element is developed at a lower density than we assumed, the City may have to rezone other properties to make up the difference, so the City is taking a conservative approach. The CNWS site will be subject to a requirement for low-income housing, but it is not clear whether that component will be built during the upcoming housing element planning period (2023-2031).
- If the City does not rezone, doesn't that keep more exclusive neighborhoods exclusive?
- Does the City account for sites with General Plan land use of residential land but not zoned for the desired density? Can sites be rezoned to a higher density?
 - Response: The City only rezones when they can if they need capacity. So long as they have adequate capacity they do not need to rezone. The City is reidentifying sites that have already been identified. This is not a rezone for higher densities, but more of a regulatory change that requires processing.
- Why can't more affordable housing be built in more exclusive neighborhoods where the orange sites have been identified?
- Building on the previous question, would rezoning sites in wealthier neighborhoods make them feasible for lower income affordable units?



- Response: The City is identifying sites and income categories based on realistic capacity and conformance with State law. The orange (moderate income) sites on the map do not meet the criteria of State law accommodating the lower-income RHNA because they are either not zoned at the City’s default density or do not meet the site size requirement. The City does not have a lot of vacant land so we have analyzed all sites within the City.
- Did you identify private unused/underutilized/abandoned property the City could purchase for housing for affordable housing, including for unhoused zero-income individuals?
- How did you come to the conclusion that we need more moderate-housing than lower-income? We are definitely in a housing crisis, and we need more lower-income houses.
- Does our planning include mini houses on unused sites? Especially on East Street. They have been vacant for many years and look terrible. Mini houses would be a great idea.
- How will this process incorporate the local knowledge that has been built over the past 5+ years from hundreds of low-income tenants who provided input at numerous City Council and Housing and Economic Development Committee meetings, on issues such as rent registry, the need for just cause and rent control, tenant anti-harassment ordinance, etc.? It is very difficult for tenants to take time off work or family obligations to yet again courageously share their stories of the harms they are experiencing due to inadequate tenant protection policies.
- Rezoning would create “capacity” on those sites that you just mentioned don’t have them right now. Part of what makes exclusionary neighborhoods exclusionary is low density zoning.
 - Response: The City identifies all capacity that is available under the City’s existing regulations. Development is still likely to occur on sites that have not been identified. Having adequate capacity does not prevent the Housing Element from including a program to rezone to create more capacity.

Appendix C – Virtual Town Hall Input: Comments and Questions on Affirmatively Furthering Fair Housing and Programs

Comments and Questions on Affirmatively Furthering Fair Housing:

The following comments were received during the virtual Town Hall. These are intended for reference only and not to be verbatim.

- Is gross or net income used to calculate the housing cost burden?
- Highest access to transit doesn’t take into account low-income community that doesn’t own cars and may take multiple buses to get to La Clinica or the WIC office.
- What’s an example of a program that would promote mobility/opportunity that would supposedly offset concentrating low-income housing in low-resource areas?
 - Response: When there are opportunities for home ownership for low-income and moderate-income families there are opportunities for building wealth. We want to support programs that invest in those opportunities.
- These maps are very hard to read. Why didn’t you provide an advance copy so we could all review and analyze in preparation for this meeting? Not very inclusive.



- Response: The maps are for discussion and dissemination so we will be sharing them afterwards. We will be at Todos Santos Plaza on March 27th gathering feedback as well.
- If you mentioned that you are taking into consideration access to transportation and access to jobs, where does the Concord Naval Weapons Station fit in this plan? Any ideas for Transit Oriented Developments at the station?

Comments and Questions on Programs – Housing Preservation and Rehabilitation:

The following comments were received during the virtual Town Hall. These are intended for reference and are not intended to be verbatim.

- Did not see on the maps that there was “failing retail” or private property or other types of properties to create community villages for unhoused individuals like a tiny home community for unhoused persons.
 - Response: The City has not determined whether current funding can support these types of projects. The City does have some affordable housing funds left in the budget which will be released for either new construction or acquisition and rehab of existing units. The City is in the process of identify certain lands that it owns as surplus sites and this process allows negotiations for affordable housing developers to potentially build on those sites.
- How does the rehabilitation of units and renting them at high rents help those who need affordable housing? It seems that more affordable units are being taken off the market and there is nothing replacing them. How is the City committing to preservation of affordable housing?

Comments and Questions on Programs – Pathways to Homeownership:

No comments were made during this segment of the virtual Town Hall.

Comments and Questions on Programs – Renter Assistance:

The following comments were received during the virtual Town Hall. These are intended for reference only and not to be verbatim.

- There is a need for higher renter protections. Monument Impact is seeing 20-25 people a week who are being evicted.
- Being displaced has caused us to travel from Antioch to Concord and the gas is costing us a lot. How can you introduce in this housing arrangement/element people like me who can work here but cannot live in Concord?
- Can you please tell us about the annual rent caps for apartments older than 15 years (State regulation)?
 - Response: There are rent caps for apartments over 15 years old, the max is 10% annual increase, and it may be lower depending on inflation rates. Link for more information: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB1482



- Waiving permit fees so people can build ADUs for affordable housing. How do we support the unhoused so that there is better coordination?

Comments and Questions on Programs – Regulations for Development:

The following comments were received during the virtual Town Hall. These are intended for reference only and not to be verbatim.

Question asked: What else can be done to discourage displacement?

- Need to find ways to punish our landlords who mistreat tenants – who are not making units livable. Landlords who engage in malpractice should not be landowners. We need accountability for landowners to maintain adequate housing.
- ADUs are an invasion of residential housing. Homeowners pay for separation.
- Build high density apartments.



Appendix D – In-Person Town Hall Input from Comment Cards

The information below is a record of the input received via the board comment boxes and comment cards at the in-person Town Hall.

Comment Cards

Comment Cards & Other Comments

- An apartment building was built without talking to the community
- No market construction
- Where is developer money going?
- Low income housing affects the quality of housing and the community
- Open space
- There is good open space
- Consider open space when developing naval station
- Accessible infrastructure
- Traffic due to people from SF
- Safety concerns at Landana and Willow Pass and Concord Blvd. – put up signs
- Want to see higher City Council involvement
- Get more people out here [at Town Hall event]
- Home selling restraints
- Housing prices increasing
- Emergency services and crime
- Safety
- Those experiencing homelessness are taking space
- Want missing middle (housing affordability range)
- Small upzoning is a compromise
- The maps should have street names labels
- The City should address drug and mental health issues before housing
- Develop all the empty lots first. More housing for low-income elderly. Do not allow tents (tent cities in Concord)
- It's important that the City ensure and plan for resources and support for ELI Housing. The City shouldn't create a concentration of poverty. Bring in partners and take a leadership role in the coordination of services (safety net)
- Development needs to be accompanied by improvements. Why is new housing concentrated in Monument and other places?
- Include special-needs housing i.e., mentally ill – facilities for people with substance problems. Distinguish that from other lower-income housing to provide safe affordable housing for lower-income people without having it unsafe because of too many mentally ill.
- Build more owner-occupied housing on available spaces for all income levels (i.e., owner-occupied multiple unit or co-op style multi-family) to discourage absentee landlords.



- Rezone to allow housing in industrial areas i.e., North Concord industrial areas, Diamond Corridor – poor land use, large parking lots, and walkability to retail and commercial.
- There should be more mixing of different housing income types throughout City, instead of concentrating lower-income or upper-income in one place. A few lower-income housing (i.e. one per block throughout City. Let more low-income people live in “better” neighborhoods without destabilizing the neighborhood.



Appendix E – In-Person Town Hall Input from Informative Banner and Input Activity

Image 1. Informative Banner and Input Activity

The image below demonstrates how information was shared, and input was received for anti-displacement programs.



Below is the raw input received from participants when asked to identify what else can be done with programs to address displacement risk.

Input from informative banners – Programs to address displacement risk

Housing Preservation and Rehabilitation

Topic	Frequency
Monument Area (no new housing and infrastructure improvements)	3
Lower or keep county from raising taxes for landlords	2



Loopholes – substantial renovations	1
-------------------------------------	---

Pathways to Homeownership

Topic	Frequency
Affordable housing	5
Assistance (loans or down payment)	2
Programs for first time home buyers	2
Incentives for veterans	1
Inclusive housing	1
Life skills training for those experiencing homelessness	1
Lower taxes	1

Renter Assistance

Topic	Frequency
Disability	3
Senior housing	3
Rent control	3
Anti-harassment	2
Just cause evictions	2
Tenant protection	2
Disabled senior housing	1
Mental health assessments for houseless	1
Help for undocumented people	1
Clear requirements for receiving assistance	1
Higher wages	1

Development Regulations

Topic	Frequency
Naval weapons station	4
Naval weapons station for affordable or moderate-income housing	3
More freeways and more freeway access	3
Access to public transit and open space	2
Access to housing options and resources by walking or public transit	2
Accessible infrastructure	1
Keep mom and pop landlords	1
High density housing	1
Health in all policies	1



Development on empty lots	1
Build inclusionary zoning	1
Balance housing types (single family, duplex, etc.)	1
ADU	1



Appendix F – In-Person Town Hall Input from Mapping Activity

Image 1. Tell us more about your community

The image below demonstrates the places where community members live, work, play or recreate, and places where they own property or a business. Each colored sticker represents a category as described in the instructions.

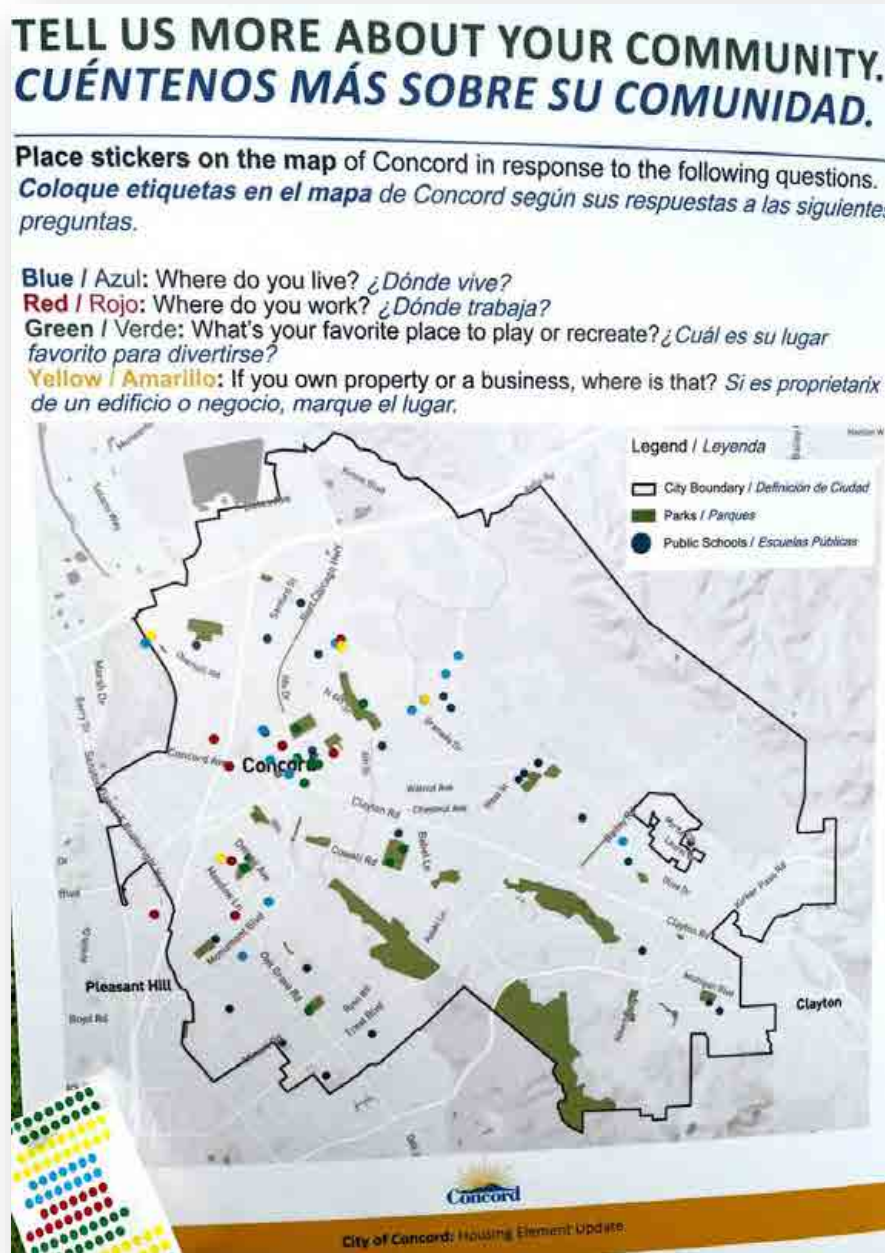
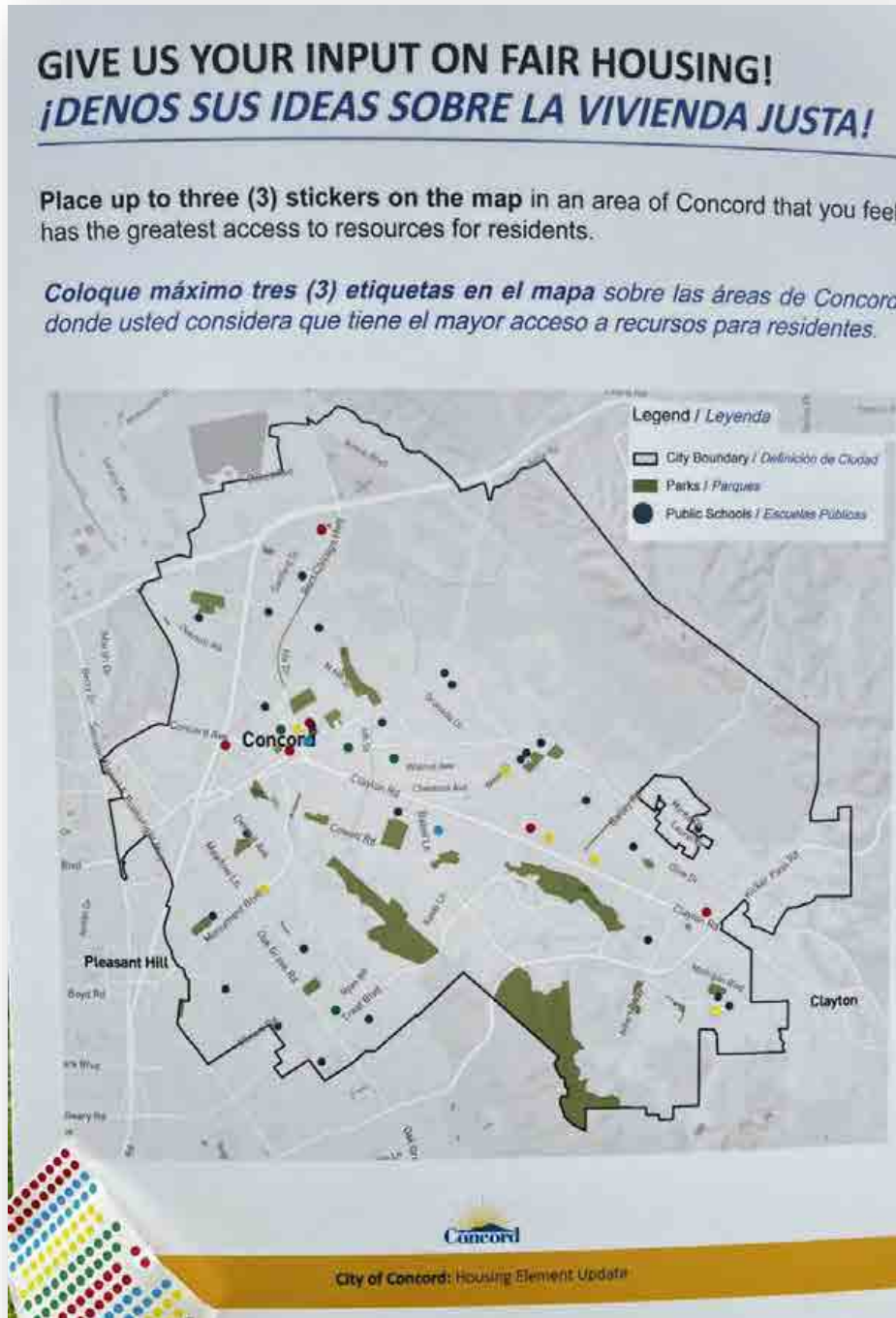




Image 2. Give us your input on fair housing

The image below demonstrates areas participants feel had the greatest access to resources. Participants were asked to place up to three stickers. The colors of the stickers do not have any significance.





CONCORD 2023 – 2031 HOUSING ELEMENT UPDATE
Phase III Engagement Summary
Town Hall #3 and Pop-Ups

Prepared by Kearns & West

July 22, 2022



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I. Introduction

Summary and Purpose

The City's General Plan, which serves to strategically guide the City's growth and development, includes seven state-mandated elements, one of which is the Housing Element. The Housing Element is a plan for meeting the current and future housing needs of all income levels in a community. The Housing Element planning cycle runs every eight years, with the current cycle ending in January 2023. This update applies to the following eight-year planning cycle from 2023-2031 and must be adopted and submitted to the California Department of Housing and Community Development (HCD) by January 15, 2023.

This summary covers the format, structure, and input received during the virtual and in-person Town Hall #3 and pop-up events. Town Hall 3 included one virtual meeting and one in-person meeting to allow for engagement with a diverse set of people while providing COVID-19 safety measures. The purpose of the third Town Hall was to provide a brief overview of the Housing Element Update (HEU) and share how to provide public comment on the Housing Element Draft Programs. Information was also shared on how previous public comments have been incorporated into the Housing Element Draft and next steps in the process.

Alongside the planned virtual and in-person Town Halls, the City-hosted smaller "pop-up" events in Concord that increased awareness about the Housing Element Update and were intended to broaden engagement in the process. An additional Spanish language pop-up focused engagement with Spanish speaking community members. The City-led pop-ups took place at the two Concord BART stations and the Spanish-language pop-up was held at Las Montañas supermarket.

This summary provides the findings from the input gathered at the events and is separated into the following sections:

- I. Introduction
- II. Format
- III. Overall Themes
- IV. In-Person Town Hall Activities
- V. Virtual Town Hall Themes
- VI. In-Community Pop-Ups
- VII. Appendices



II. Format

A. In-Person Town Hall #3 Format

The **in-person** Town Hall was held on Saturday, June 4, 2022, from 12:00 PM to 2:00 PM at Todos Santos Plaza (2175 Willow Pass Rd). Facilitators and City staff engaged with the community members through an open house format with tables, banners, and activities explaining aspects of the Housing Element Update. A total of 44 participants attended the event and provided input on the Housing Element Update over the course of the two-hour exhibit.

The City exhibited two banners in both English and Spanish with information on Concord's Draft Housing Element. The banners informed community members and stakeholders about the Draft Housing Element including how to read the document, points of interest, and how to submit feedback. They also provided an overview of the five goals of the Housing Element, Programs, and Fair Housing. City staff and the outreach team were available to answer questions and engage in dialogue.

The in-person Town Hall included the following activities and materials:

- Interactive spinning wheel to learn about the programs;
- General comment cards;
- Postcards from the future;
- Housing coloring activity for children;
- Draft HEU print copies in English and Spanish; and
- Sites Inventory map for participants to view the updated sites.

Snacks and water were provided for participants. Additionally, masks and hand sanitizer bottles were placed throughout tables as COVID-19 safety measures.

B. Virtual Town Hall #3 Format

The **virtual** Town Hall was hosted on June 8, 2022, on the Zoom platform. In all, 16 members of the public attended. The Town Hall began with opening remarks by the City's Mayor, followed by a welcome from City staff and community introductions.

The Virtual Town Hall ran for two hours, and the project team captured the discussion and chat comments on a Miro Board throughout. The Miro Board was organized into five sections whereby all comments and questions were recorded and categorized into appropriate sections. The first four box sections reflected the presentation topics: Housing Element components, programs implementation, community outreach, and how to provide input on the Housing Element. The fifth section captured participants' thoughts, suggestions, and feedback. If a comment, or series of comments or questions, fell outside of the five general categories, a new box was formed that grouped those comments and questions together. Images of the full Miro board can be found in Appendix D.



C. Spanish Language Focused In-Person Pop-Up #3 Format

Based on community feedback, the City included an event accessible to Spanish-speaking community members. The **Spanish language-focused** Pop-Up was held on Thursday, June 16, 2022, from 4:00 PM to 6:00 PM, Las Montañas Market (1725 Willow Pass Rd, Concord CA). Facilitators and City staff engaged with the community members with tables, banners, flyers and a pin-wheel activity to explain aspects of the Housing Element Update. The purpose of this event was to provide an opportunity for Spanish-speaking community members to learn about the Draft Housing Element Update, engage with the project team, and encourage to provide comment on the Draft. The project team engaged with a total of 25 participants.

The City exhibited one banner in English and Spanish to present information and gather input on Concord's Draft Housing Element. The banner provided an overview of the five goals of the Housing Element, Programs, and Fair Housing. City staff and the outreach team were available to answer questions and engage in dialogue. Snacks and water were provided for participants. Additionally, masks and hand sanitizer bottles were placed throughout tables as COVID-19 safety measures.

III. Themes

This section describes the overall themes that participants discussed throughout the various events and that were consistently highlighted.

A. Affordability & Homeownership

Affordability and homeownership were top discussion topics for community members. Members of the public commented on the lack of affordability for ownership and rental housing in Concord. They named the need for housing rehabilitation to develop new homeownership opportunities and increasing fair housing programs particularly for under-resourced communities. Participants expressed that homeowners have increased leverage in Concord affairs. They also named that corporate all-cash offers over the listing price create a disproportionate housing market that prevents local residents and non-corporate individuals from purchasing homes.

B. Unhoused Populations and Displacement

Concerns about the unhoused population and increasing displacement in Concord was a central topic for participants. Conversations centered on four main areas: how increased migration to the city has increased displacement, how building accessory dwelling units (ADUs) is not an adequate anti-displacement solution, the need to analyze displacement trends to appropriately respond to them, and the need to build safe homes for the increasing unhoused population. Participants also named just cause evictions and rent control as desired programs of the HEU.

C. Supporting At-Risk Communities

Participants voiced that housing for older adults and lower-income people are important issues. Suggestions they provided include small homes, creating new homeownership opportunities



and building fair housing for under-resourced populations, and establishing a Community Fund for affordable housing in Concord.

D. [Feedback on the Housing Element Draft](#)

Members of the public provided feedback on the Draft Housing Element Update’s language, timeline, and organization. Participants expressed the need for clarity in areas of the HEU, and one person recommended organizing the HEU by themes and including stronger language. Participants identified concern that rezoning high-resource areas should be done before 2027.

E. [City Infrastructure](#)

Participants shared concerns on whether the City is able to accommodate new housing with adequate utilities and infrastructure. Community members also shared concerns around increased congestion and traffic due to the development of more housing.

IV. In-Person Town Hall - Activities & Themes

A. [Interactive Learning: Programs](#)

[Spin Wheel](#)

A spin wheel with the Housing Element Programs listed on it provided an engaging way to present the programs to members of the public. Participants could spin the wheel and learn about the program the pointer landed on with the paper print-out of the Draft HEU. Refer to Appendix A to refer to the activity.

B. [General Comment Cards & Themes](#)

[Questions and Comments](#)

The project team gathered the following questions or comments about the Housing Element:

- Affordability in Concord for rentals and homeownership is a challenge.
- Concern on how the City plans to accommodate new housing with adequate utilities and infrastructure, and potential traffic or congestion from new housing.
- Concern for increased displacement risk for current residents from new people moving to Concord.
- Small homes can be as a solution for housing older adults.
- Homeowners should have more leverage in Concord affairs.
- Address the situation with people experiencing houselessness; the emergency hotline, 211, is not helpful.

C. [C. Visioning Activity](#)

[Postcards from the Future](#)

Younger participants were asked to draw or write a postcard envisioning what they would like to see in the City of Concord in the future. Refer to Appendix B for the images.

“In the future for Concord [there] should be more housing so that less homeless and more jobs available for the people.”



“Dear future Concord. There should be more housing for the people that don’t have houses. [They] should be able to get stuff for their profit instead of it being used against them. Free busses for the people that need it.”

V. Virtual Town Hall Activity & Themes

During the opening of the virtual Town Hall, facilitator Jenna Tourjé-Maldonado polled participants about their relationship to the City of Concord. Participants responded as follows: 73% said they live in Concord, 18% said they work in the city, and 9% said they own a business or property in the city. The raw results of the poll can be found in Appendix C.

The following describes the main themes from the virtual Town Hall discussion. Raw comments and feedback can be found in Appendix D.

A. Displacement & Houselessness

Participants noted concerns about displacement and the need to identify strategies to reduce houselessness. Participants asked for the inclusion of more actionable items in the Housing Element around rent control, just cause evictions, and strategies to reduce houselessness that include working with people experiencing houselessness. Participants stated they did not see displacement addressed in the Draft Housing Element solutions in a way that reflects the community’s needs. The City was asked to look at community-driven data that proves where displacement is taking place in the city. Participants mentioned that unhoused populations need legal and safe places to live. Commenters specifically pointed out high displacement in the Monument area and recommended regulating rent and evictions rather than building more affordable housing in the area. It was stated that accessory dwelling units (ADUs) are not built at the speed or scale needed to meet housing demands.

B. Homeownership Opportunities

Participants requested the Housing Element include programs to keep people housed and increase opportunities for homeownership for low-income families, families of color, and first-time homebuyers. Attendees recommended the City identify vacant properties to convert into home-buying opportunities. Fair housing was a central topic of the discussion.

C. Housing Element Update Process

Participants gave feedback on the timeline, themes, and language of the Draft Housing Element. Regarding timeline, participants stated that 2027 is too late for the rezoning program and recommended making that earlier. Members of the public asked the City to organize the Housing Element by themes to make the Housing Element easier to understand. The importance of including strong language in the Housing Element was discussed, specifically for low-income and zero-income persons.

D. Strong City Collaboration

Participants requested the City build strong partnerships with nonprofit organizations and community groups to collaborate on housing solutions. Participants proposed the idea of



creating a Community Land Trust, operated by a local nonprofit to build other housing solutions such as tenant protections.

E. [Supporting Communities](#)

Participants raised concerns on whether the Housing Element is supporting under-resourced communities, specifically, undocumented individuals. Attendees asked to incorporate workforce development into the Housing Element to support undocumented individuals. Other participants raised concerns about the impacts of restrictive parking within affordable housing which can create difficult conditions for individuals who rely on cars to drive to work.

VII. Pop-Ups

The City held two pop-up events at the local BART stations in June 2022 to promote awareness about the Housing Element Update process and the different opportunities to engage. They were held at the following locations and dates.

[Concord BART Station, Monday, June 13, 4:00 PM – 6:00 PM](#)

Planning staff handed out approximately 60 flyers to commuters at the Concord BART station. Staff spoke to commuters about the Draft Housing Element and how to leave comments.

[North Concord BART Station, Wednesday, June 15, 4:00 PM – 6:00 PM](#)

Planning staff handed out approximately 30 flyers to commuters at the North Concord BART station. Staff spoke to commuters about the Draft Housing Element and how to leave comments.



Appendix A – In-Person Town Hall Interactive Learning: Programs

This Town Hall featured a spin wheel activity for folks to learn about specific programs in the Draft HEU. The image below demonstrates the activity.



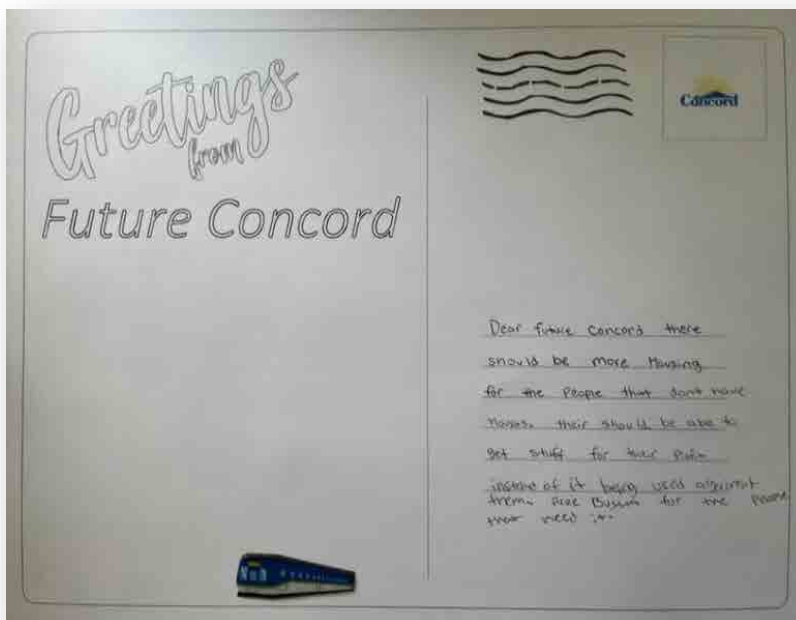


Appendix B – In-Person Town Hall Visioning Activity

The visioning activity provides youth with the opportunity to speak to what they would like future Concord to look like. Below are images of postcards to the future from participants.



“In the future for Concord [there] should be more housing so that less homeless and more jobs available for the people.”



“Dear future Concord. There should be more housing for the people that don’t have houses. [They] should be able to get stuff for their profit instead of it being used against them. Free busses for the people that need it.”



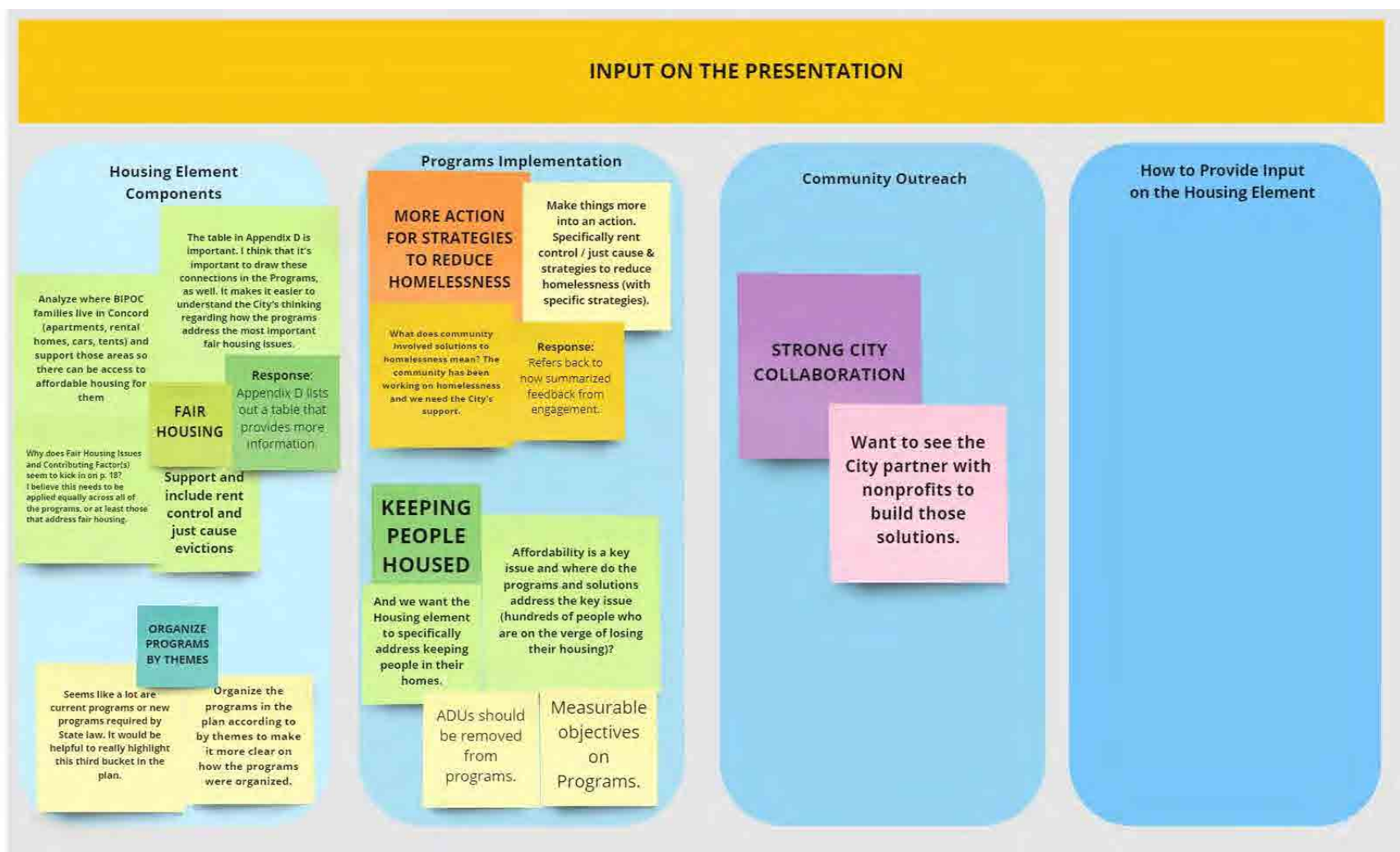
Appendix C – Virtual Town Hall Poll Results

The image below displays the Town Hall Poll results from the question, "What is your relationship to the City of Concord?"



Appendix D – Virtual Town Hall Miro Board

The following set of pictures are images from the Miro Board used in the virtual Town Hall. The top half of the Miro Board solicited input on the presentation from participants.



Below are images of boards one and two from the previous image, enlarged for clarity.

Housing Element Components

Analyze where BIPOC families live in Concord (apartments, rental homes, cars, tents) and support those areas so there can be access to affordable housing for them

The table in Appendix D is important. I think that it's important to draw these connections in the Programs, as well. It makes it easier to understand the City's thinking regarding how the programs address the most important fair housing issues.

Response: Appendix D lists out a table that provides more information.

FAIR HOUSING

Why does Fair Housing Issues and Contributing Factor(s) seem to kick in on p. 18? I believe this needs to be applied equally across all of the programs, or at least those that address fair housing.

Support and include rent control and just cause evictions

ORGANIZE PROGRAMS BY THEMES.

Seems like a lot are current programs or new programs required by State law. It would be helpful to really highlight this third bucket in the plan.

Organize the programs in the plan according to by themes to make it more clear on how the programs were organized.

Programs Implementation

MORE ACTION FOR STRATEGIES TO REDUCE HOMELESSNESS

Make things more into an action. Specifically rent control / just cause & strategies to reduce homelessness (with specific strategies).

What does community involved solutions to homelessness mean? The community has been working on homelessness and we need the City's support.

Response: Refers back to how summarized feedback from engagement.

KEEPING PEOPLE HOUSED

Affordability is a key issue and where do the programs and solutions address the key issue (hundreds of people who are on the verge of losing their housing)?

And we want the Housing element to specifically address keeping people in their homes.

ADUs should be removed from programs.

Measurable objectives on Programs.

Community Outreach

STRONG CITY COLLABORATION

Want to see the City partner with nonprofits to build those solutions.



The second half of the Miro Board consisted of a section that solicited thoughts, suggestions, and feedback from participants.





Below are enlarged photos of each area of this section. The board is split into three photos for clarity.

LOOKING AT LAST HOUSING ELEMENT

What happened in the last 8 years of the Housing Element Cycle?

Response: Evaluating the housing element is in the appendix of the Housing Element online

Rent and mortgage would be the same or less, but loans are hard to get, and/or they are outbid by people paying over market.

HOMEOWNERSHIP OPPORTUNITIES

Nothing supports BIPOC families who want to own their own home. How do we ensure these affordable units, homes get our families stability; and allow them to buy their own home in Concord.

Need to focus on home ownership opportunities for lower and middle income families.

City should identify empty housing and contact encouraging owners to sell or rent homes. We have 1,000-2,000 houses and apartments empty in Concord.

SUPPORT COMMUNITIES

Where is Concord addressing jobs for undocumented individuals to help with their incomes?

UNDOCUMENTED INDIVIDUALS

Is workforce development part of the Housing Element?

PARKING

Cutting parking requirements for affordable units is not helpful to the working poor, who need their cars to drive to jobs, child care, etc.

Affluent single people can get by with one car better than poor families, who can't afford Uber and don't ride BART to their jobs.



Below are enlarged photos of each area of this section. The board is split into three photos for clarity.

YOUR THOUGHTS, SUGGESTIONS, AND FEEDBACK

COMMUNITY FUND FOR AFFORDABLE HOUSING

Has the City considered a community fund for affordable housing?

Response:
Great idea to look into.

A Community Land Trust would need to be operated by a nonprofit, not the City.

In the HE there is a regional housing trust fund.

Monument Impact as been exploring CLTs and it would take several years to build the infrastructure and funding base even if we use an already existing CLT. So it would be so helpful to see a more staged version of the plan. Tenant protections nw, moving into community ownership (CLTs) as well as the other recommendations like ADUs and affordable homes

LANGUAGE USED IN DRAFT HE

The word "promote" rent control does not reflect what the the community has been saying. Community wants rent control and just cause evictions.

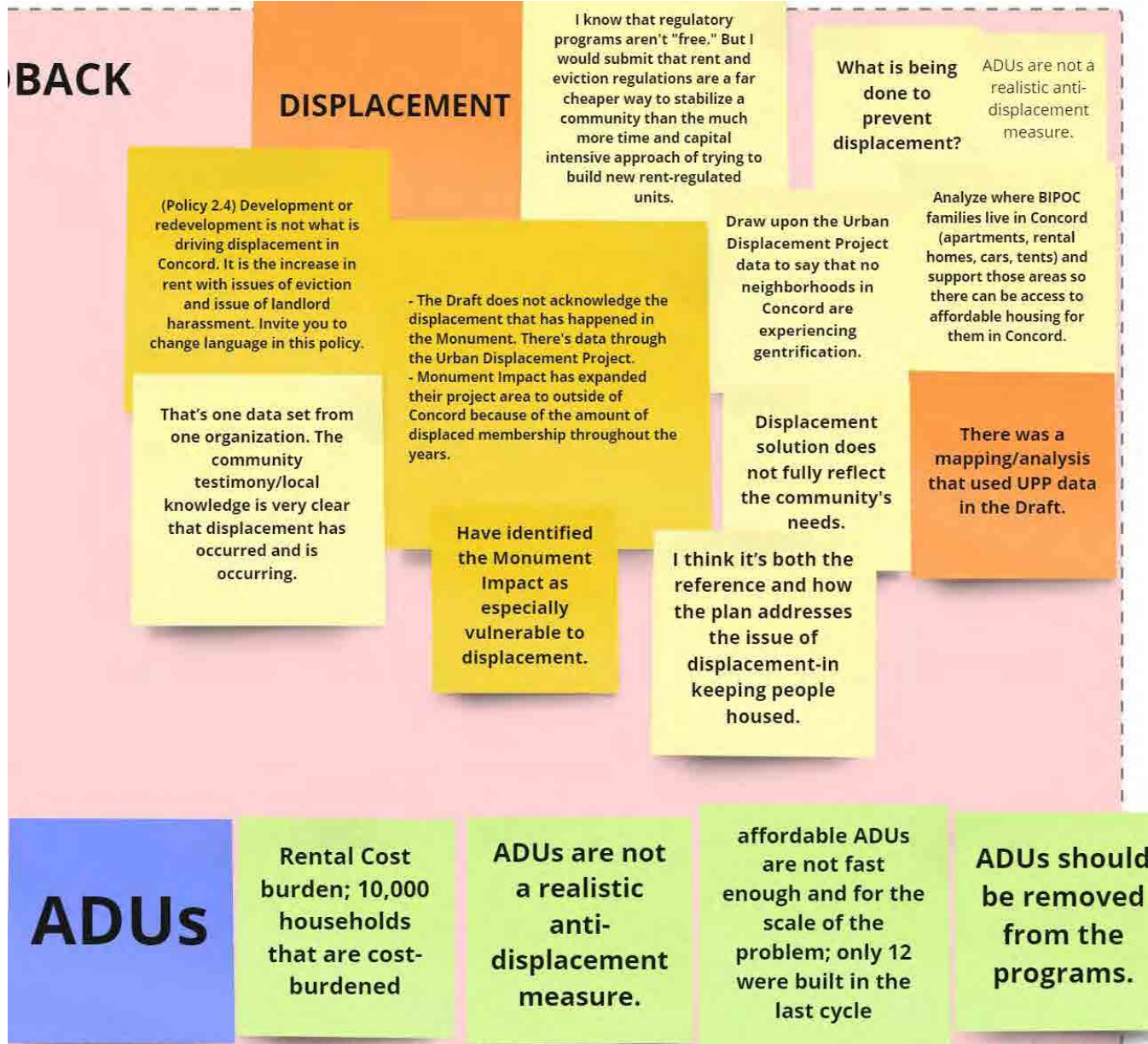
Language. "Displacement" is only mentioned in one section (Policy 2.4).

Stronger language for housing for zero and low income individuals and families.

Language is very important

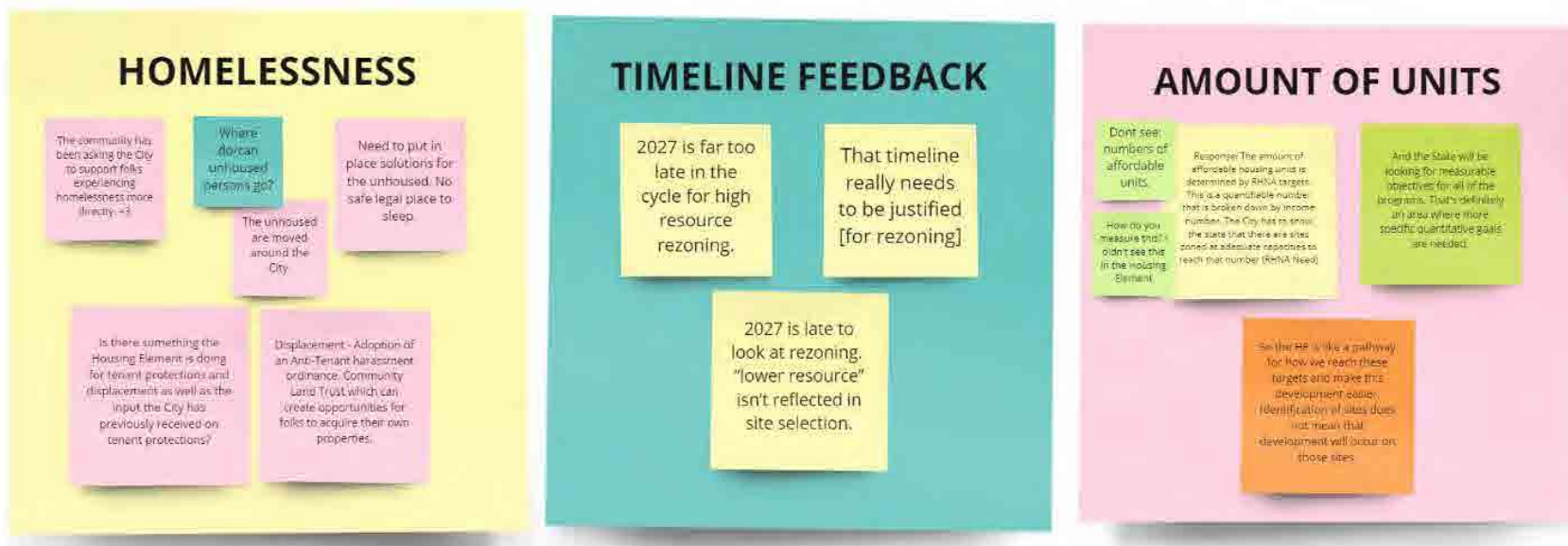


Below are enlarged photos of each area of this section. The board is split into three photos for clarity.





The third section of the Miro Board is shown below. This section captured other types of discussions that were brought up by participants.





Below are enlarged photos of each sticky note in the third section.

HOMELESSNESS

The community has been asking the City to support folks experiencing homelessness more directly. +3

Where do/can unhoused persons go?

The unhoused are moved around the City.

Need to put in place solutions for the unhoused. No safe legal place to sleep.

Is there something the Housing Element is doing for tenant protections and displacement as well as the input the City has previously received on tenant protections?

Displacement - Adoption of an Anti-Tenant harassment ordinance. Community Land Trust which can create opportunities for folks to acquire their own properties.

TIMELINE FEEDBACK

2027 is far too late in the cycle for high resource rezoning.

That timeline really needs to be justified [for rezoning]

2027 is late to look at rezoning. "lower resource" isn't reflected in site selection.



Below is an enlarged photo of one area of the third section.

AMOUNT OF UNITS

Don't see: numbers of affordable units.

Response: The amount of affordable housing units is determined by RHNA targets. This is a quantifiable number that is broken down by income number. The City has to show the state that there are sites zoned at adequate capacities to reach that number (RHNA Need)

And the State will be looking for measurable objectives for all of the programs. That's definitely an area where more specific quantitative goals are needed.

How do you measure this? I didn't see this in the Housing Element

So the HE is like a pathway for how we reach these targets and make this development easier. Identification of sites does not mean that development will occur on those sites.



CONCORD 2023 – 2031 HOUSING ELEMENT UPDATE
Community Survey Summary

*Prepared by Kearns & West
April 18, 2022*

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I. Introduction

Housing Element Overview

The Concord Housing Element is a plan for meeting the current and future housing needs of all income levels in the Concord community. The Housing Element planning cycle runs every eight years, with the current cycle ending in January 2023. This update applies to the following eight-year planning cycle from 2023-2031 and must be adopted and submitted to the California Department of Housing and Community Development (HCD) by January 15, 2023.

The City of Concord has conducted different forms of community engagement including in-town pop-ups, Town Halls, and an online survey. This document summarizes the survey results. The survey was open from December 15, 2021, through March 31, 2022.

There were a total of 846 participants took the survey. Among the participants, 821 participants took the survey in English, and 25 in Spanish.

Survey purpose

The community survey helps capture the perspectives of community members that are otherwise not able to attend other events in the engagement process and provides a different point of access for people's different schedules, social preferences, and abilities.

The community survey collected information from community members that will inform the Housing Element Draft, including policies and programs. The topics addressed were the priorities that community members have about housing as well as the concerns or barriers to housing in Concord. There was a focus on addressing support and housing for seniors and unhoused people. The City collected optional demographic information about the respondents in order to get a sense of whose voices were captured through this method of engagement.

The City also offered the chance to win one of six (6) \$40 gift cards for shopping in Concord. Survey participants opted-in to the drawing.

II. Participant Demographics & Relationship to Housing in Concord

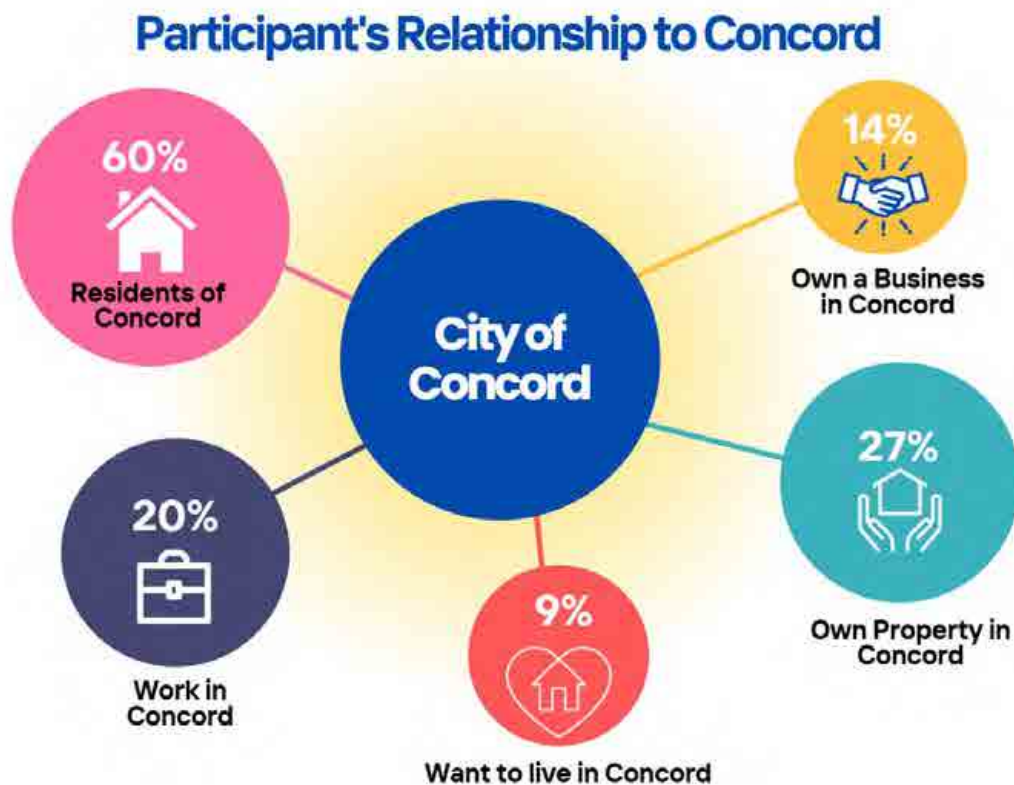
Overview

The community survey requested demographic information from participants in order for the City to understand whose perspectives from the community the survey captured. The survey asked optionally for participants' age, gender, and income. The survey also asked what relation participants have to the City of Concord, whether they were current residents, developers, work in Concord, own property (a business or property), or live outside of Concord. Below are the results of the demographics from the survey.

Relationships to Concord

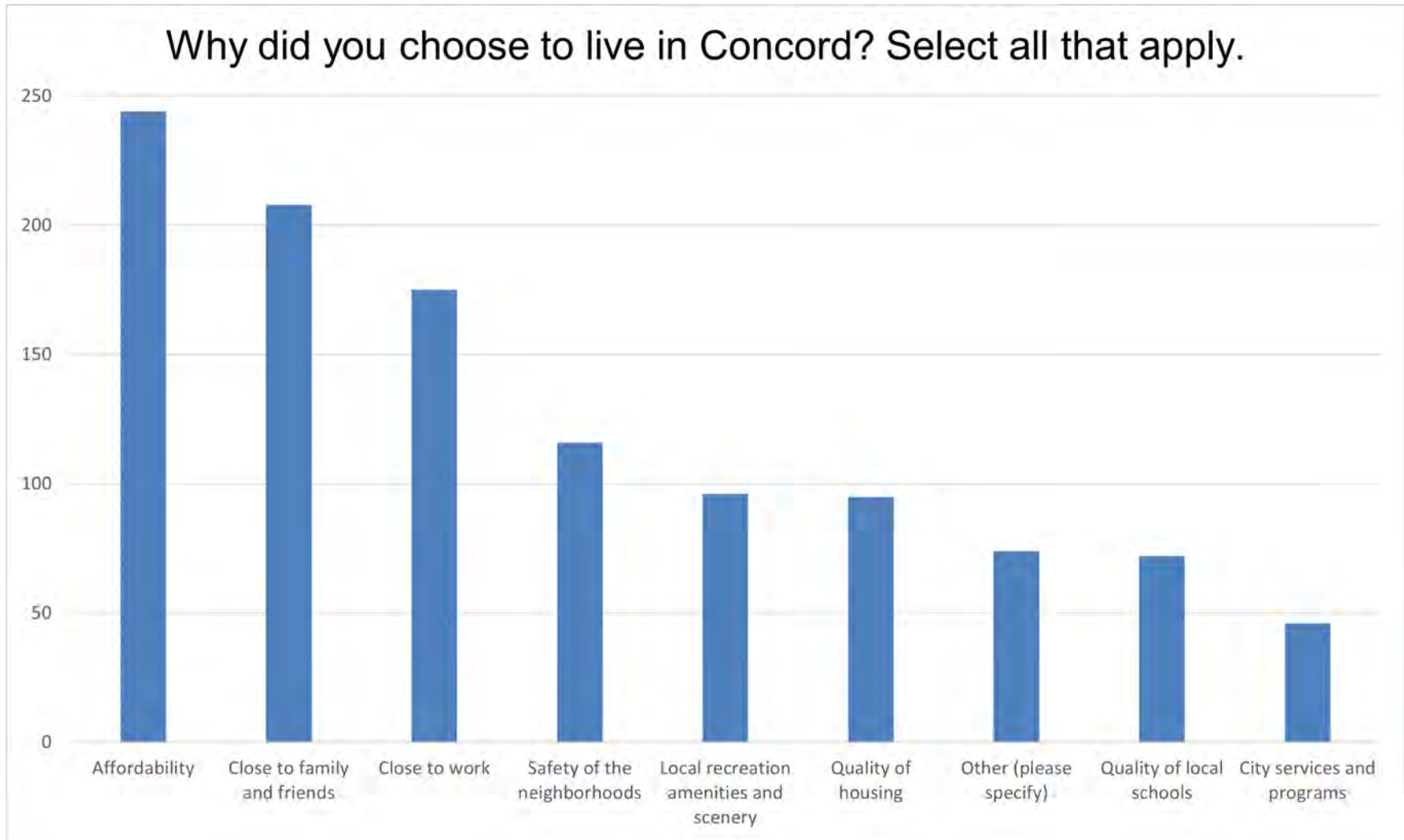
The survey asked participants about their relationship to Concord, this question was required to be answered, thus 846 responses were received. Approximately 60% of participants are current residents of Concord. Some survey participants are local developers (9%), own a business in Concord (14%), own property in Concord (27%), or work in Concord (20%). Additionally, 8% of participants that responded selected that they are not residents and wish to become residents of Concord.

Additionally, of the participants who identified as current residents, the majority (60%) indicated they have lived in Concord for 10+ years, 17% between 3-5 years, 17% between 6-10 years. Just under 7% of participants have lived in Concord for 0-2 years. Interestingly, most participants have lived in Concord for at least ten years and many of them have grown up in the City and have families that have lived in the city for decades.



When it comes to why respondents like to live in Concord (Graph 1), the responses showed some trends. Of the 469 participants who responded, about 50% selected affordability as their main reason for staying in Concord. Choosing to live close to family and friends was the second most selected response by 208 participants, while the third was proximity to work by 175 respondents.

Graph 1. Participant Relationships to the City of Concord Responses



Homeownership Status

Participants were asked if they own, rent, or have other housing arrangements. A total of 469 responses were received. About 75% of participants noted that they currently own housing while about 24% of participants rent housing and about 1% of participants said they have other housing arrangements.

Experience of Homelessness

The survey asked whether the participants are experiencing or have ever experienced homelessness. About 30% of participants responded that they are or have experienced homelessness.

Conditions of Home



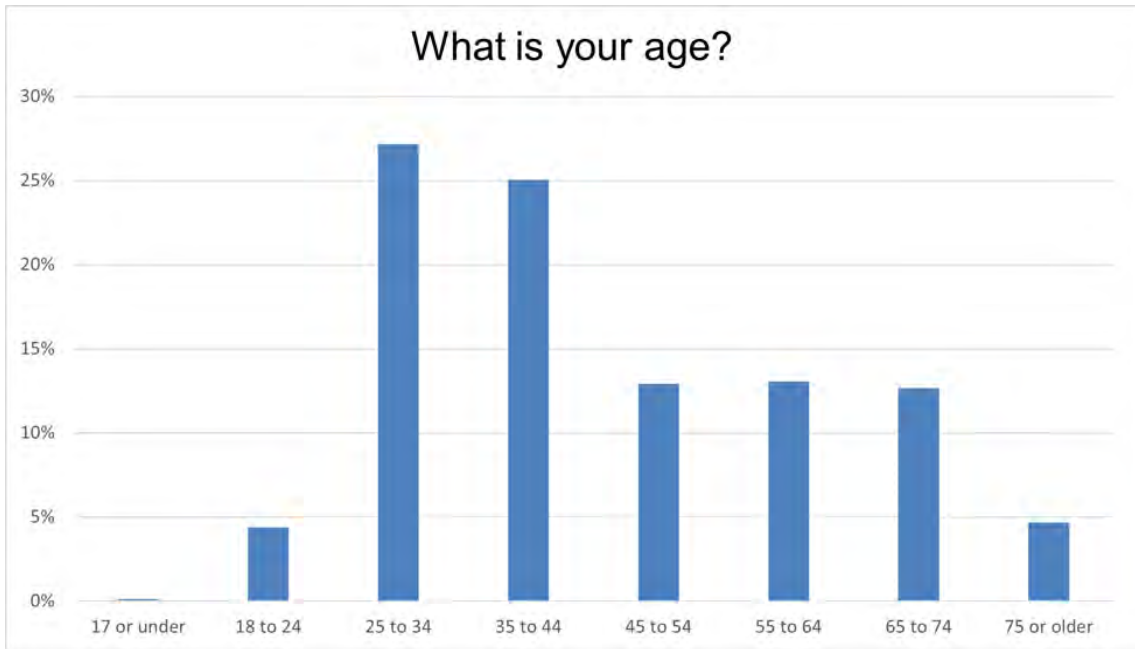
The 469 Concord residents that participated were asked to rate the physical condition of the home they live in. Many participants (36%) indicated that the physical condition of the home they live in is in excellent condition and (33%) shows signs of minor deferred maintenance. Some participants (15%) expressed their home needs modest rehabilitation improvements and other participants (11%) expressed their homes need major upgrades.

In addition to those responses, 21 participants wrote in a response. Most participants noted that the physical condition of their homes was in good condition for its age and kept up with maintenance. For the full list of responses, refer to Appendix A, Table E-1.

Age and Gender

Participants were asked their age range, and 751 participants provided responses. Graph 2. shows the breakdown across the age categories.

Graph 2. Participant Ages



The question on gender identity was in an open-ended format. There were 676 participants that responded. Of those respondents, 378 identified as female, 264 as male, 5 as cisgender man, and 5 as cisgender woman.

Participant Income

Participants were asked about their household income level. There were 722 responses to this question. The highest number of participants (22%) make between \$100,000-\$150,000. About 21% of participants have an income of \$75,000-\$99,000, 43% of participants make between \$0 and \$75,000 and about 15% make above \$150,000.

Graph 3. Participant Household Income



III. Priorities for Housing in Concord

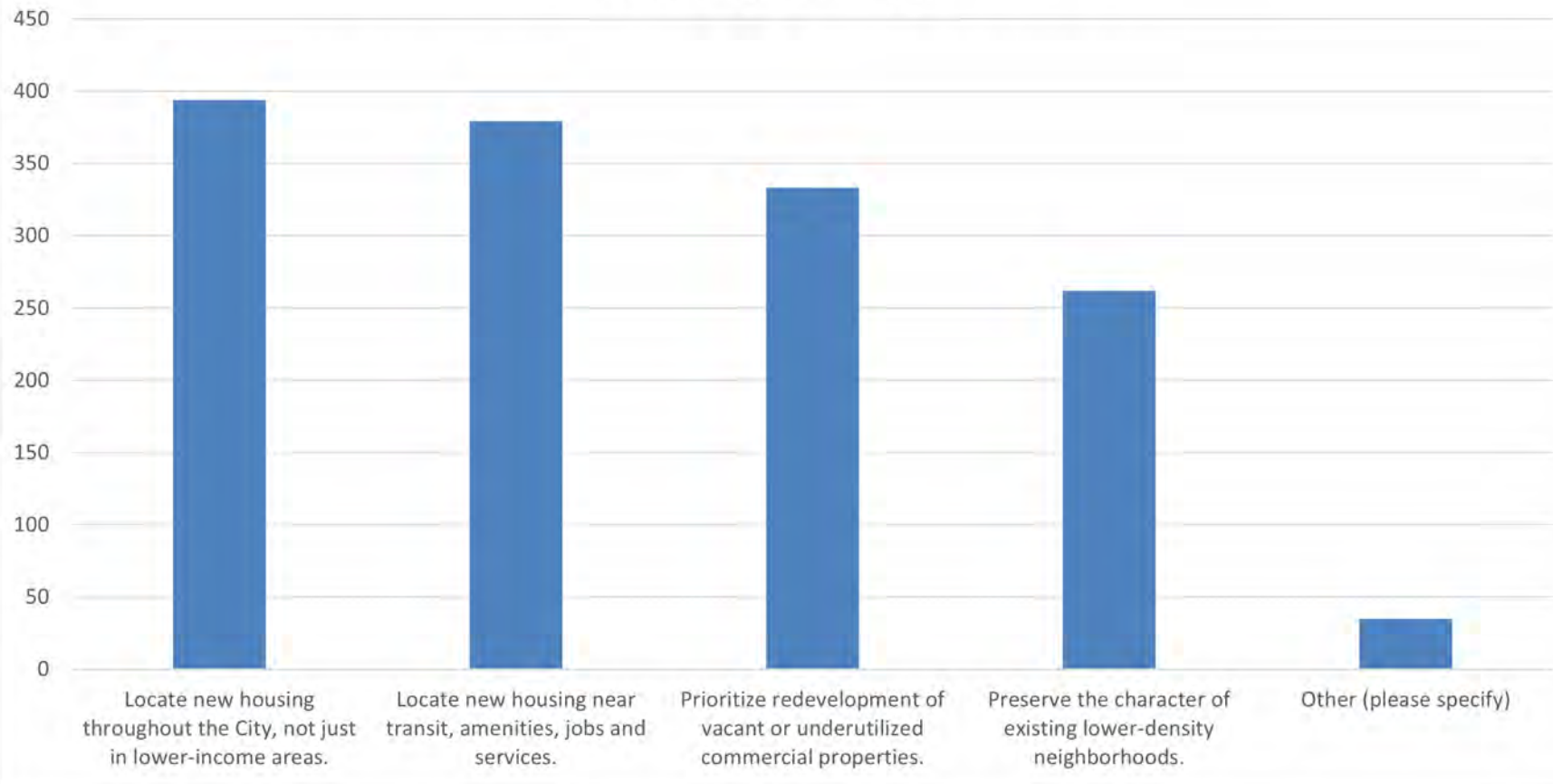
An important part of the Housing Element includes policies and programs that support the development of housing in Concord over the next eight (8) years. The survey asked community members about their priorities for housing in Concord.

A total of 766 responses were received for this question. Of the choices, participants expressed a significant preference for the two choices relating to locating new housing in specific areas:

- Locate new housing throughout the City, not just in lower-income areas.
- Locate new housing near transit, amenities, jobs and services.
- Prioritize redevelopment of vacant or underutilized commercial properties.

Graph 4. Top Participant Selections for Site Prioritization

The City is required to plan for approximately 5,100 new housing units by 2031. This may require changing the City’s zoning regulations to allow more units in certain areas. If zoning changes are necessary, what are your top two priorities in deciding where these additional units should be located? Choose up to two (2).



In addition to the multiple-choice responses, 35 written responses were received. Below are key themes of the responses:

- Build affordable housing at the Naval Weapons Station (5)
- Improve infrastructure to accommodate growth (4)
- Build or develop empty lots (3)

IV. Strategies for Housing in Concord

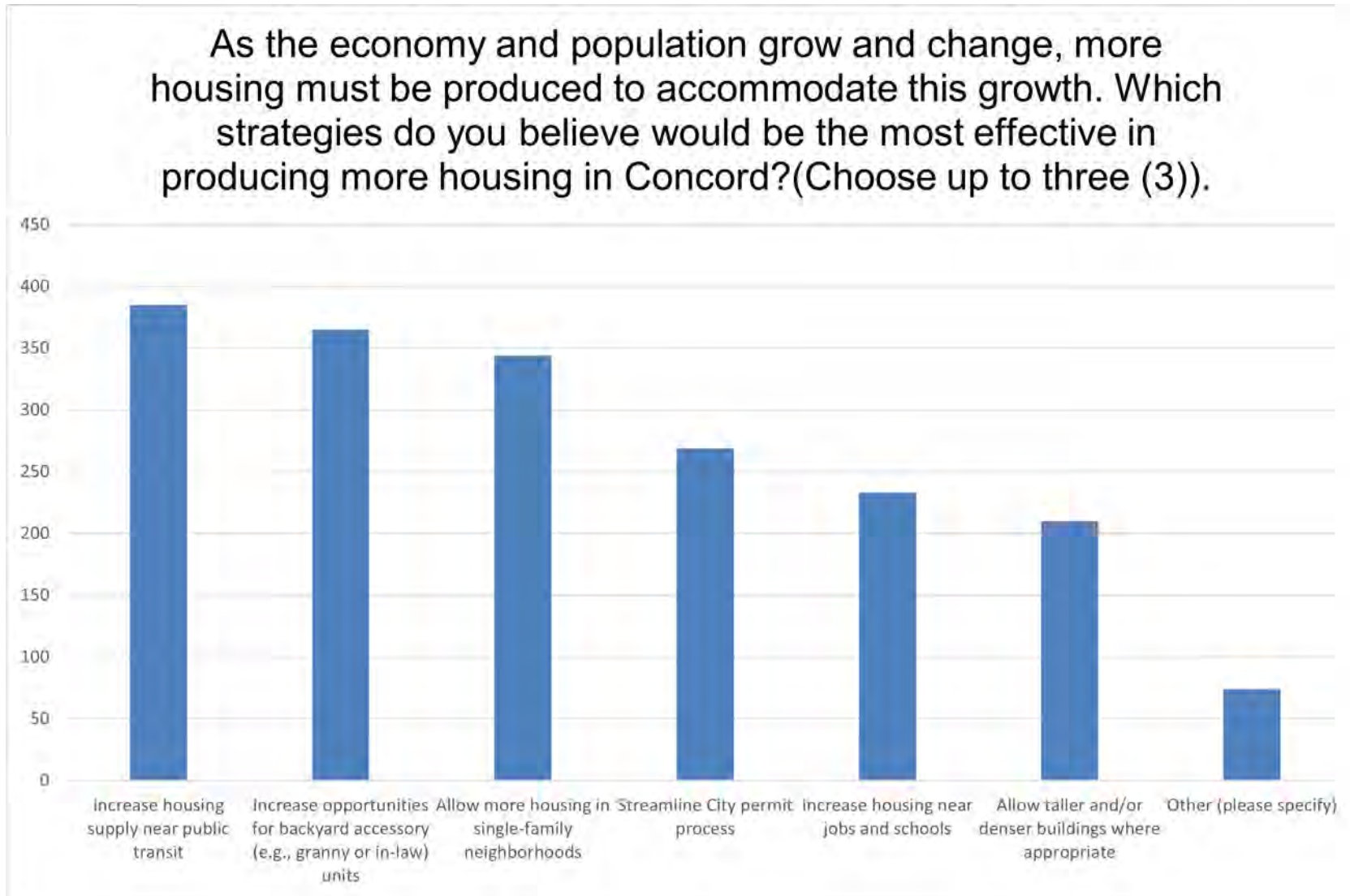
An important part of the Housing Element includes policies and programs that support the development of housing in Concord over the next eight (8) years. The survey asked community members about their perspectives on strategies that could support housing development in Concord.

Participants were asked to identify strategies that would be effective in producing more housing in Concord to accommodate economic and population growth. A total of 766 participants answered this question. Responses varied with an emphasis on increasing housing supply near public transit (50%). Graph 5 shows the responses.

In addition to the multiple-choice responses, 74 written responses were received. The most common themes are listed below:

- Improve infrastructure to accommodate growth
- Need more affordable, low-cost housing
- Renovate abandoned buildings to affordable housing
- Build housing at the Naval Weapons Station

Graph 5. Top Strategies for Effective Housing Production



V. Barriers to Housing in Concord

As important as it is to understand the priorities for housing, it is also important to understand the challenges or barriers that the community identifies for the development of housing in the City of Concord. Therefore, through the community survey, the City of Concord gathered input to identify barriers to building affordable housing in Concord. Participants were asked to identify what they believe are the top three barriers to buying a home in Concord and the top three barriers to affordable housing in the city.

Homeownership

Regarding buying a home in Concord, participants were asked what they believe are the top three barriers to purchasing a home in Concord. A total of 783 responses were received. Of the choices, the top three barriers' participants selected the most often were as follows and the data can be found in Graph 6 below:

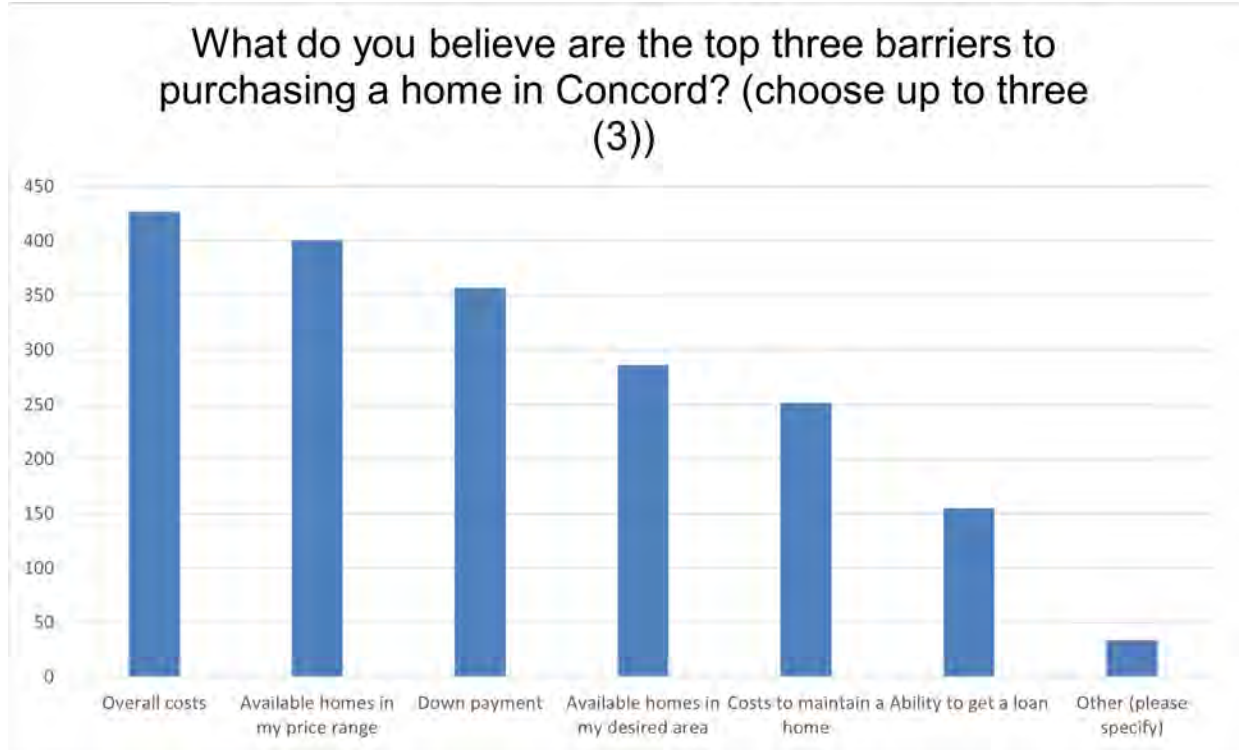
- Overall Costs
- Available Homes in my price range
- Down Payment

In addition to the multiple-choice responses, 34 written responses were received. Below are key themes of the responses:

- Affordability of housing
- Lack of fairness in market competition (first time home-buyers vs investors)
- School ratings

A common theme throughout the open-ended responses was the lack of fairness in the housing market. Many respondents stated that the market did not provide opportunities for first time homebuyers to purchase a home when competing against investors who were able to provide cash offers for properties. Additionally, respondents mentioned the lack of affordability coupled with the inability to compete fairly in the housing market were some of the top reasons for why buying a home in Concord is difficult.

GRAPH 6. Top Barriers for Purchasing a Home



Affordable Housing

Additionally, regarding the barriers to affordable housing in the city, a total of 783 responses were received, and of the choices, the top three barriers participants selected the most often were as follows and in Appendix D, Graph L.:

- Cost of housing is too high
- Not enough cost-restricted affordable units
- Low supply of housing

In addition to the multiple-choice responses, 50 written responses were received. Below are key themes of the responses:

- No barriers to building affordable housing
- Overall issue in the Bay Area
- NIMBY (Not in My Backyard)
- City regulations, unions, and environmental groups slowing down supply

VI. Special Topic: Displacement

Displacement is a great concern throughout the Bay Area, and the City of Concord shares that concern. The Housing Element aims to address the topic by providing strategies, programs, and policies that will prevent displacement. Therefore, it is important for the City to understand what community members' top concerns are about displacement in order to help inform what the proposed programs and policies will be included in the Housing Element.

Participants were given the following question and responses choices relating to displacement and displacement concerns. A total of 783 participants responded to this question. Participants could choose as many responses as they liked. The most common themes from the responses are the following and can be referred to in Appendix E, Figures M-M2:

- Long-term residents cannot afford to stay in the community
- Sudden rent increase

In addition to the multiple-choice responses, 60 participants wrote in responses. Themes that were mentioned commonly are as follows:

- Change in life situation (i.e. Divorce, job loss, income loss, etc.)
- Cost of living increase
- Increase in crime in an area
- Lack of tenant protections
- Harassment from landlords and lack of tenant protection
- Unhoused population increases

VII. Special Topic: Special Populations

The City of Concord wanted to learn from its community members their perspectives in supporting older adults and unhoused populations in their communities. Within the survey, participants were asked to respond to questions regarding these special populations.

People Experiencing Homelessness

The participants were asked if they had ever been unhoused or are currently unhoused. From both surveys combined, 782 participants responded, 31% stating yes, they had been or are currently unhoused and 69% stating they had not and are not unhoused. The survey went on to ask those who stated yes to having experienced or are currently experiencing homelessness what are the best strategies to support people experiencing homelessness.

The results from the question, demonstrate the top priorities that people believe would support those experiencing homelessness are:

- Increase the overall affordable housing supply
- Better connect people to assistance and services
- Provide transitional housing with supportive services

Older Adults

Due to the increasing needs to support the growing elder population, older adults were the second population that was highlighted in the survey. Participants were asked the following question: *What do you believe is the best way to address the living and housing needs of older adults?* A total of 766 responses were received. Of the choices, the top three strategies participants selected the most were:

- Offer more rent-restricted, affordable senior housing
- Locate senior housing where services are within walking distance
- Support the construction of more retirement communities

In addition to the multiple-choice responses, 37 written responses were received. The primary theme that was identified through the open-ended response was to build affordable, planned, senior communities near transit and walkable areas. Amongst respondents, there was a focus on the developments being centrally located, next to downtown Concord, to ensure the area is walkable and that older adults have access to transit.

VIII. Additional Comments Received

The community survey included an open-ended question in order to provide space for additional thoughts or comments that were related to the survey questions. There were 403 such comments received.

Housing Element General Comments

Below are the most commonly referenced themes about the Housing Element generally. Refer to Appendix H for the table of all themes referenced in comments.

- Improve affordable housing inventory
- Improve services and programs for unhoused communities
- Improve infrastructure to accommodate growth
- More diversity of housing options
- Build housing at the Naval Weapon Station
- Build housing near public transit
- Build or develop affordable housing on empty lots
- Increase communication, engagement, and involvement with residents

Outreach Recommendations

Outreach recommendations from participants include the following:

- Conduct additional or different forms of outreach
 - o Hold focus groups with diverse residents will lead to better answers
 - o Must include People of Color (POC) and low-income residents

Survey Comments

Some participants provided feedback related to the survey and survey engagement. Below are the key themes.

- The survey should be inclusive and reach a broader audience: unhoused people and People of Color (POC)
- The survey scope is narrow and:
 - o Does not include questions on fair housing problems such as discrimination, nor historical patterns of racial and economic segregation
 - o Does not provide alternate answers such as expansion in the Naval Weapons Station or BART stations
 - o Is biased towards low-income and dense housing options
 - o Makes assumptions that everyone wants affordable housing

Appendix A. Participant Demographics & Relationship to Housing in Concord

Appendix A includes graphs, tables, and raw responses for the demographic data collected from participants.

Graph A. What is your interest in housing in Concord?

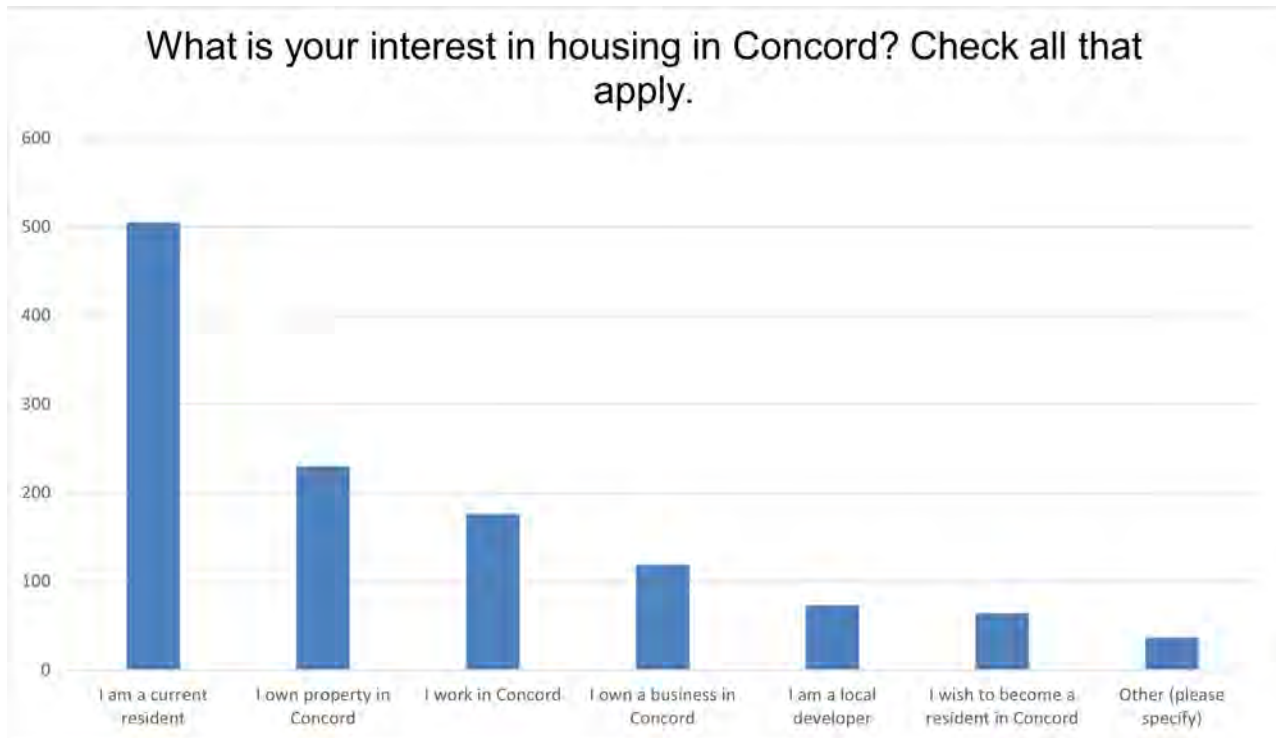


Table A. What is your interest in housing in Concord?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>I am a current resident</i>	59.69%	505
<i>I am a local developer</i>	8.63%	73
<i>I own a business in Concord</i>	14.07%	119
<i>I own property in Concord</i>	27.19%	230
<i>I work in Concord</i>	20.80%	176
<i>I wish to become a resident in Concord</i>	7.67%	64
<i>Other (please specify)</i>	4.26%	37
Answered		846
Skipped		0

Graph B. How long have you lived in Concord?



Table B. How long have you lived in Concord?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
0-2 years	6.61%	31
3-5 years	16.42%	77
6-10 years	16.84%	79
10+ years	60.13%	282
Answered		469
Skipped		377

Graph C. Why did you choose to live in Concord? Select all that apply.

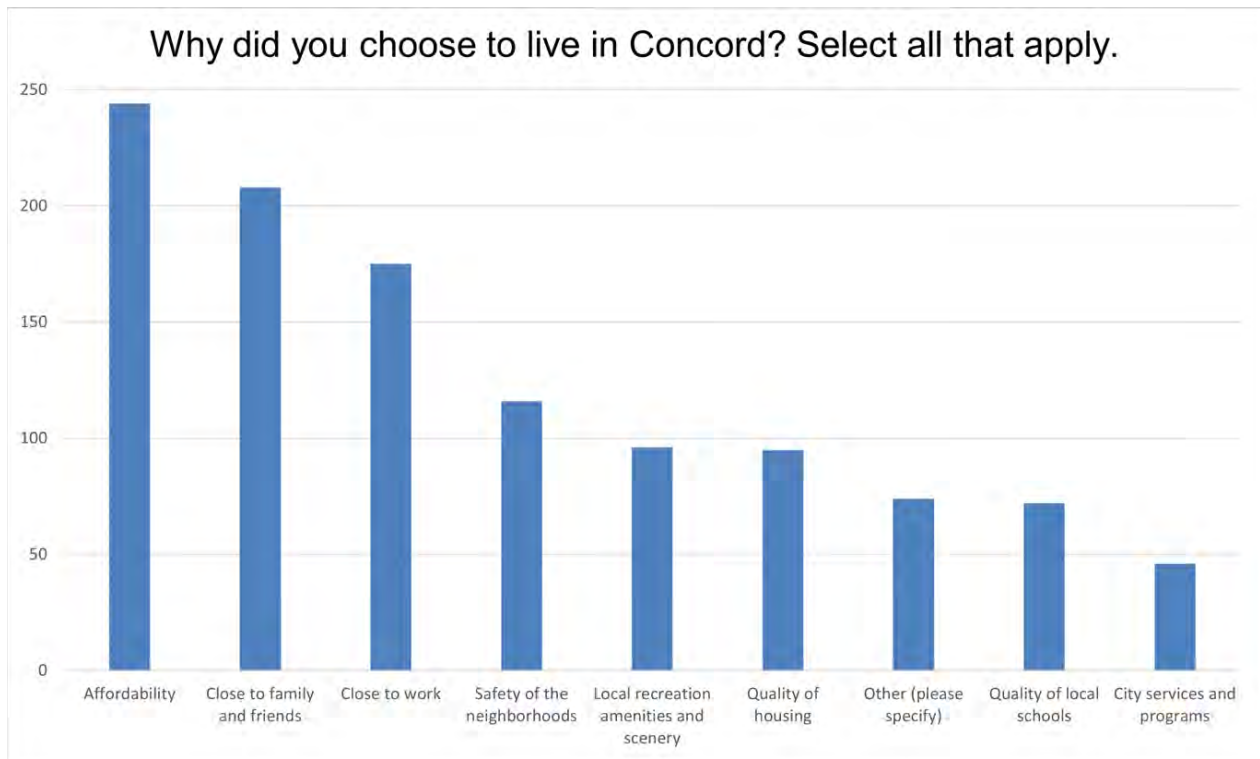


Table C-1. Why did you choose to live in Concord? Select all that apply.

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Close to work</i>	37.31%	175
<i>Close to family and friends</i>	44.35%	208
<i>Quality of housing</i>	20.26%	95
<i>Local recreation amenities and scenery</i>	20.47%	96
<i>Affordability</i>	52.03%	244
<i>Quality of local schools</i>	15.35%	72
<i>Safety of the neighborhoods</i>	24.73%	116
<i>City services and programs</i>	9.81%	46
<i>Other (please specify)</i>	16.08%	74
Answered		469
Skipped		377

Table C -2. Why did you choose to live in Concord? - “Other” Responses

Themes	Count
Grew up in Concord or have family living in Concord	28
Proximity to Transit and Centrally Located	24
Type of Housing in Suburban Neighborhoods and Amenities	22
City Character	2
Diversity	1
Nature (Hiking and parks)	2
Walkability	3
Work	2
Weather	2
Affordability	2
Proximity to Medical Care	1
Private Schools	1
Close to Japanese American Religious and Cultural Center	1
All of the Above	1

Table D. Do you currently rent or own or have other arrangements in Concord?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Own</i>	74.63%	350
<i>Rent</i>	23.67%	111
<i>Other (please specify)</i>	1.71%	8
Answered		469
Skipped		377

Graph E. How would you rate the physical condition of the home you live in?

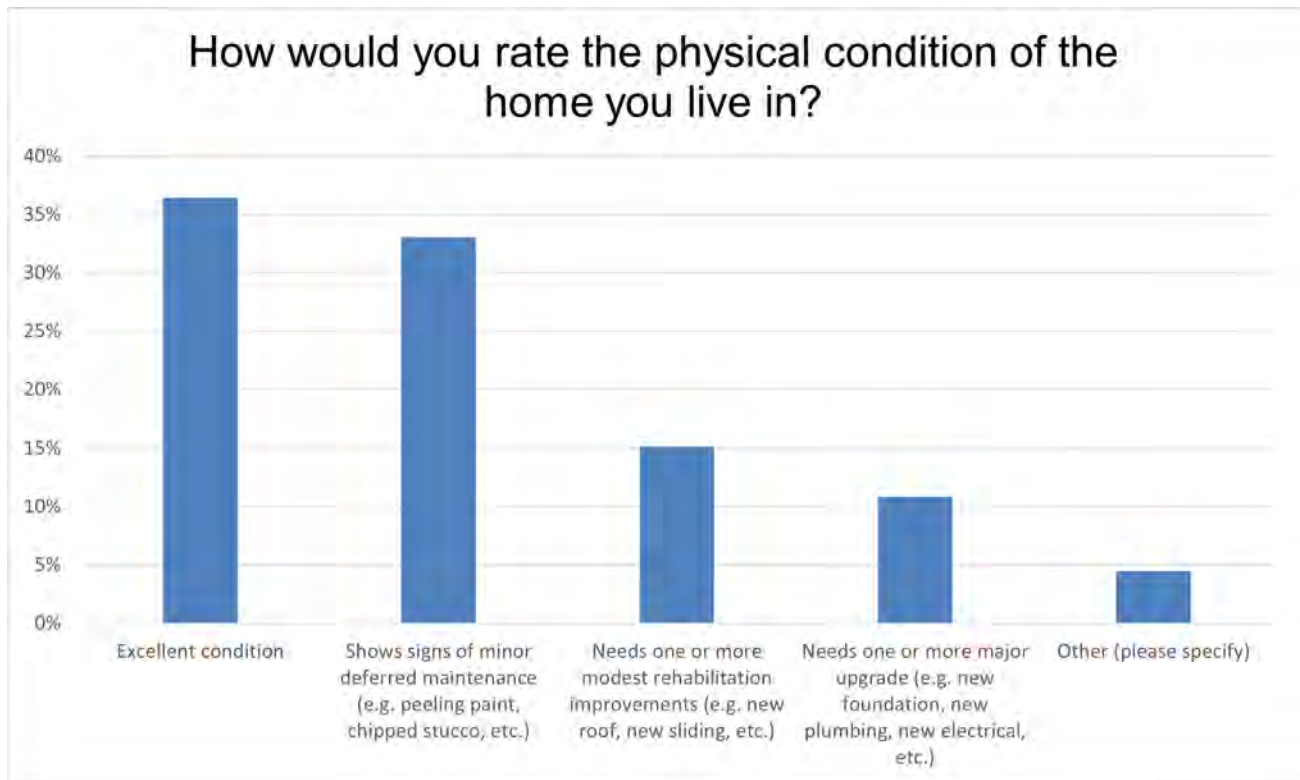


Table E -1. How would you rate the physical condition of the home you live in?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Excellent condition</i>	36.46%	171
<i>Shows signs of minor deferred maintenance (e.g. peeling paint, chipped stucco, etc.)</i>	33.05%	155
<i>Needs one or more modest rehabilitation improvements (e.g. new roof, new sliding, etc.)</i>	15.14%	71
<i>Needs one or more major upgrade (e.g. new foundation, new plumbing, new electrical, etc.)</i>	10.87%	51
<i>Other (please specify)</i>	4.48%	21
Answered		469
Skipped		377

Table E-2. How would you rate the physical condition of the home you live in? - “Other” Responses grouped by theme.

Theme	Count
Good condition	7
Just old in age	1
Needs a little paint	1
Needs new landscaping	1

Needs to update windows	1
New elevators	1
HVAC	3
Has foundation issues	1
Plumbing	1
Carpet and kitchen are in bad state	1

Graph F. What is your age?

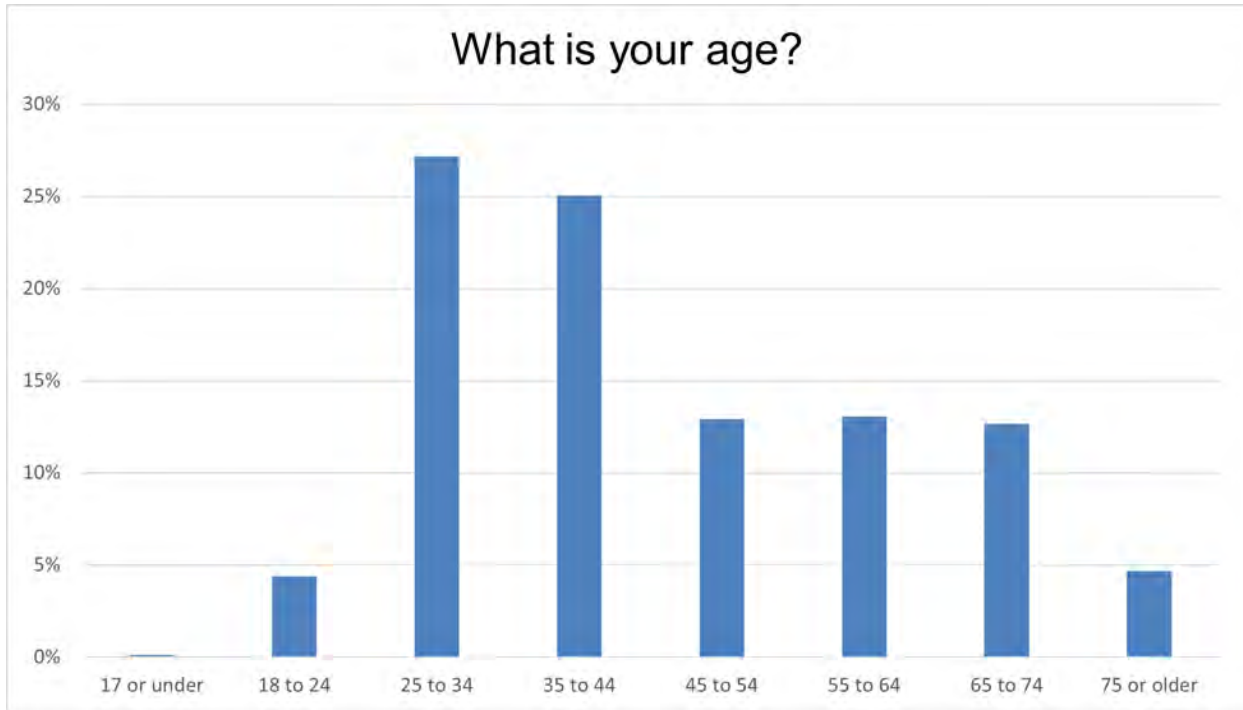


Table G. What is your gender?

Response	Count
Female	378
Male	264
Cisgender Man	5
Cisgender Woman	5
Other responses	12

Table G-1. What is your gender? "Other" Responses

Other Responses	Count
Decline to comment	1
N/A	1
not your business	1

That's my business	1
Unknown	1
Why?	1
No	6

Graph H. What is your household income level?

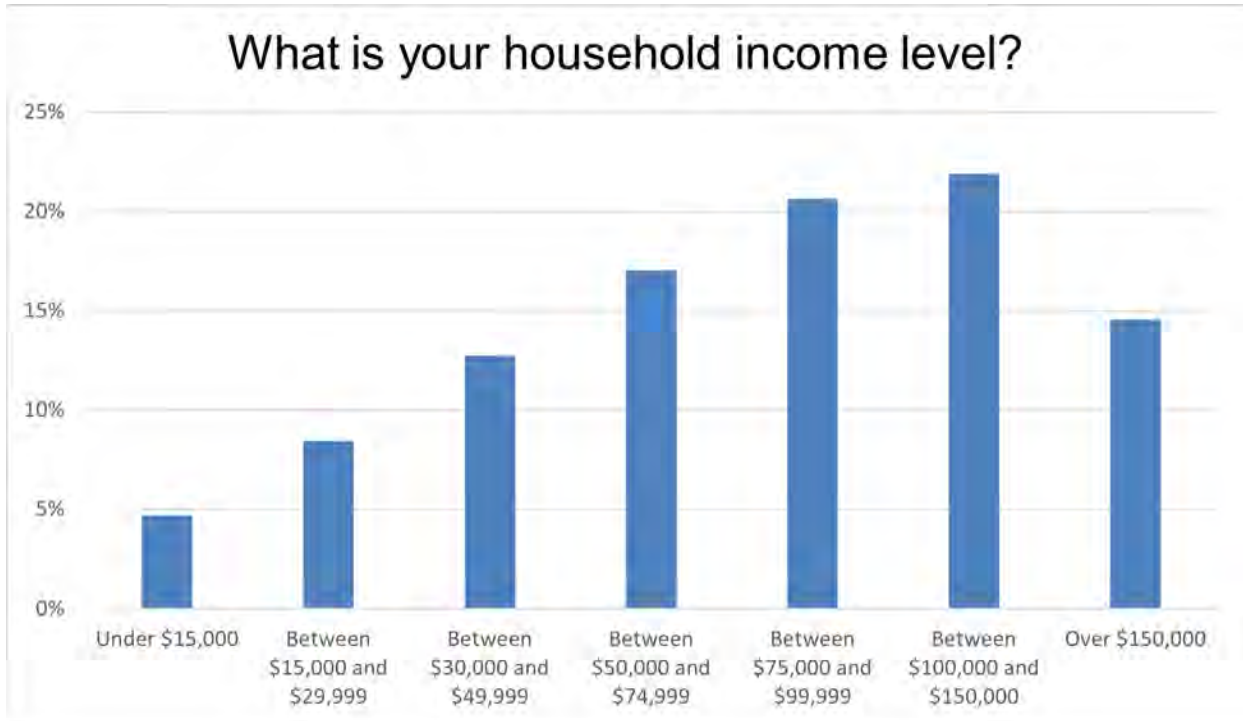


Table H. What is your household income level?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Under \$15,000</i>	4.71%	34
<i>Between \$15,000 and \$29,999</i>	8.45%	61
<i>Between \$30,000 and \$49,999</i>	12.74%	92
<i>Between \$50,000 and \$74,999</i>	17.04%	123
<i>Between \$75,000 and \$99,999</i>	20.64%	149
<i>Between \$100,000 and \$150,000</i>	21.88%	158
<i>Over \$150,000</i>	14.54%	105
Answered		722
Skipped		124

Appendix B. Priorities for Housing in Concord

Appendix B shows graphs, tables, and data collected on questions regarding priorities participants were asked to identify for building new housing in Concord.

Graph I. If zoning changes are necessary, what are your top two priorities in deciding where these additional units should be located?

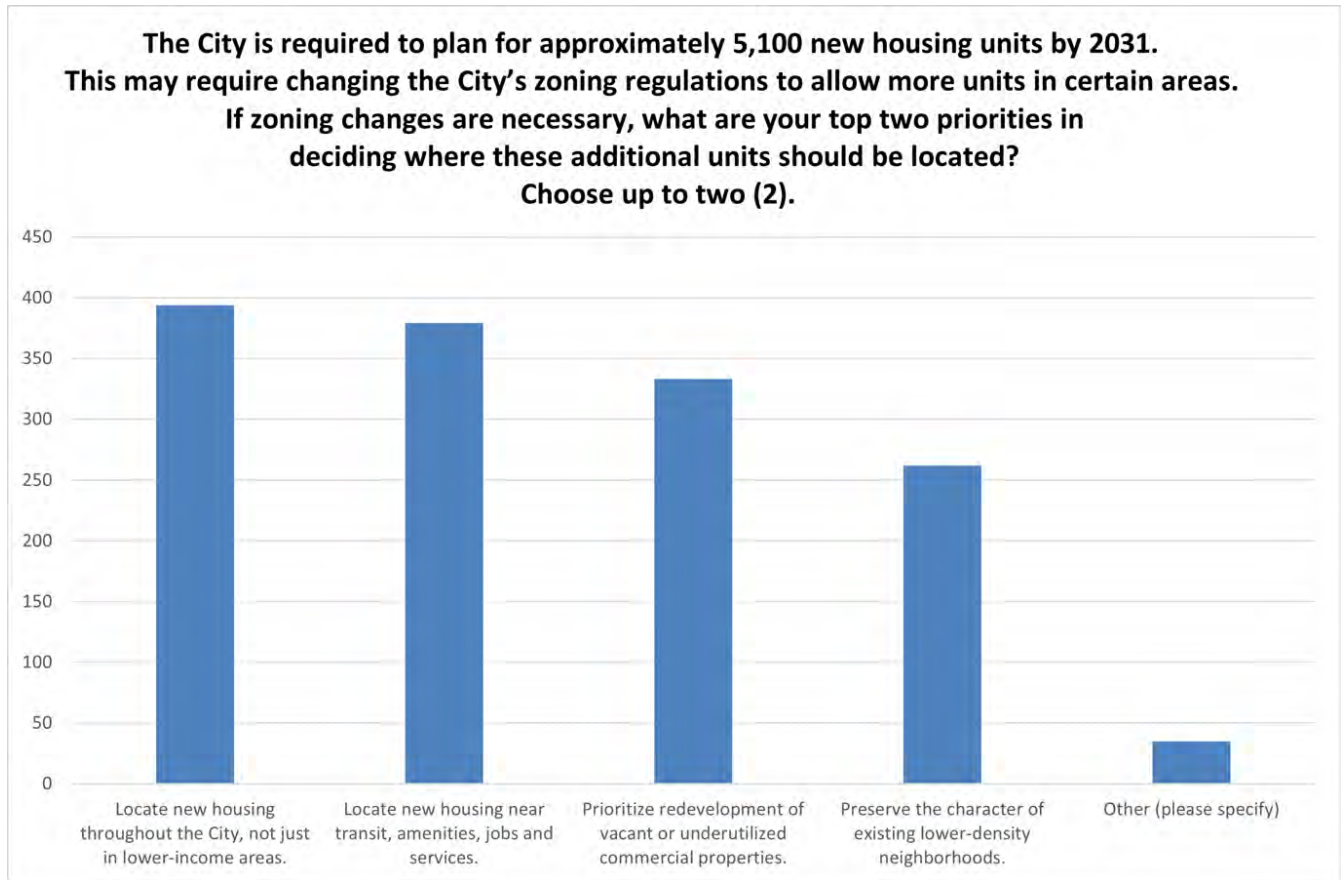


Table I-1. If zoning changes are necessary, what are your top two priorities in deciding where these additional units should be located?

<i>Answer Choices</i>	<i>Responses Percent</i>	<i>and Count</i>
<i>Preserve the character of existing lower-density neighborhoods.</i>	34.20%	262
<i>Locate new housing near transit, amenities, jobs and services.</i>	49.48%	379
<i>Locate new housing throughout the City, not just in lower-income areas.</i>	51.44%	394
<i>Prioritize redevelopment of vacant or underutilized commercial properties.</i>	43.47%	333
<i>Other (please specify)</i>	4.57%	35
Answered		766
Skipped		80

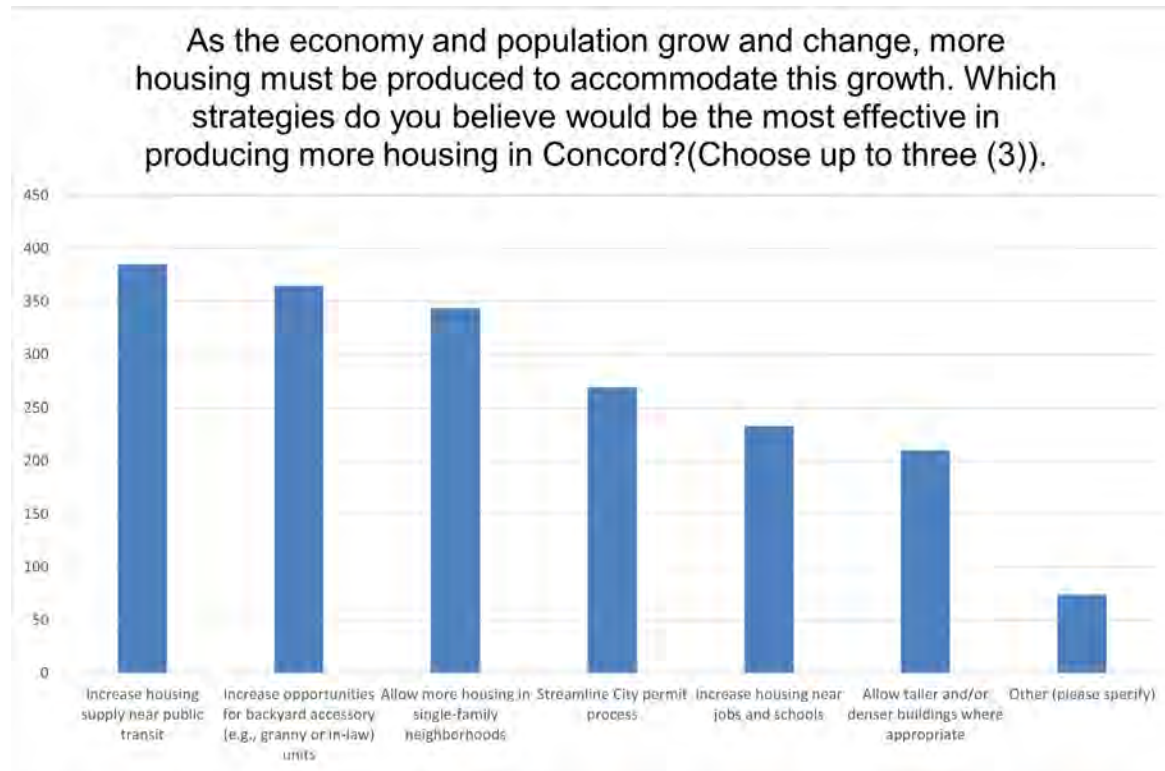
Table I-2. If zoning changes are necessary, what are your top two priorities in deciding where these additional units should be located? “Other” Responses grouped by theme.

Theme	Count
Build affordable housing at the Naval Weapons Station	5
Improve infrastructure to accommodate growth	4
Build or develop empty lots	3
Build small units on existing properties	2
Preserve the current neighborhood look	2
Build high density housing near public transit	2
Avoid segregation	2
Stop building	2
Preserve Open Space	1
Building additional Granny units disrupts existing services	1
Avoid sprawling	1
Improve safety	1
High density housing pushes up market costs	1
Change Zoning and Land Use requirements	1
Accommodate seniors	1
Accommodate teachers	1
Remove exclusionary zoning	1
Promote fair housing	1

Appendix C. Strategies for Housing in Concord

Appendix C includes graphs, tables, and raw responses collected from participants on strategies for housing development growth in the City.

Graph J. As the economy and population grow and change, more housing must be produced to accommodate this growth. Which strategies do you believe would be most effective in producing more housing in Concord?



Graph J. As the economy and population grow and change, more housing must be produced to accommodate this growth. Which strategies do you believe would be most effective in producing more housing in Concord?

Answer Choices	Responses Percent and Count
<i>Streamline City permit process</i>	35.12% 269
<i>Increase housing supply near public transit</i>	50.26% 385
<i>Allow more housing in single-family neighborhoods</i>	44.91% 344
<i>Increase opportunities for backyard accessory (e.g., granny or in-law) units</i>	47.65% 365
<i>Increase housing near jobs and schools</i>	30.42% 233
<i>Allow taller and/or denser buildings where appropriate</i>	27.42% 210
<i>Other (please specify)</i>	9.66% 74
Answered	766
Skipped	80

Table J-1. Which strategies do you believe would be most effective in producing more housing in Concord? “Other” Responses grouped by theme.

Theme	Count
Improve infrastructure to accommodate growth	10
Need more affordable, low-cost housing	6
Renovate abandoned buildings to affordable housing	5
Build housing at the Naval Weapons Station	5
Concord is already built out	4
Smaller and starter homes that are more affordable	4
Do not build more	2
Build more Single-Family Homes	2
Build more High-Density Housing	2
Subsidized or affordable Senior housing that is safe and accessible	2
Change Zoning and Land Use requirements and streamline the permit process	2
Building additional Granny units disrupt existing services	2
Increase subsidies	2
Improve safety	2
Decrease property tax	2
Housing and subsidized housing for unhoused	1
Multi-use homes/businesses	1
Do not build taller/denser units	1
Build or develop empty lots	2
Preserve open space	1
Avoid high-density housing in single-family neighborhoods	1
Rent Control	1
Bring in businesses, restaurants, stores	1
Contain sprawl	1
Expand and urbanize areas surrounding Concord	1
Avoid segregation	1
Build high density housing near public transit	1
Financing programs for ADUs	1

Appendix D. Barriers

Appendix D includes graphs, tables, and raw responses collected from participants on barriers for housing development growth in the City.

Graph K. What do you believe are the top three barriers to purchasing a home in Concord?

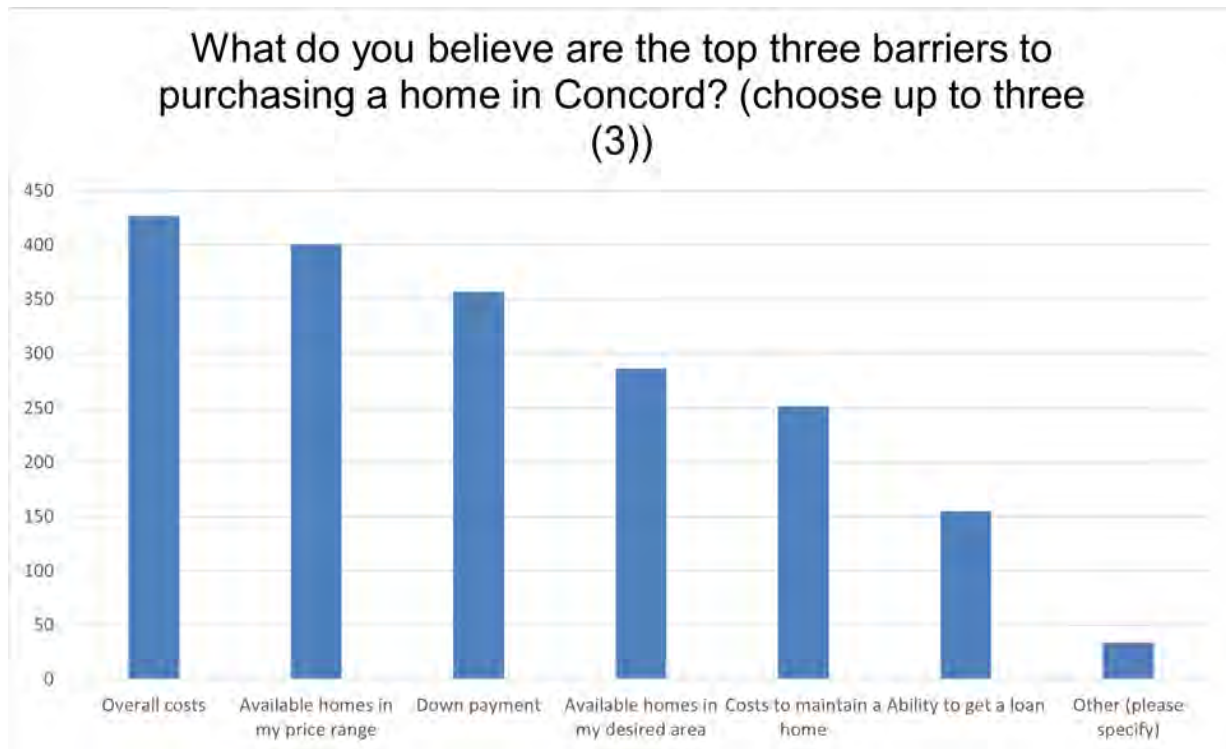


Table K-1. What do you believe are the top three barriers to purchasing a home in Concord?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Down payment</i>	45.59%	357
<i>Overall costs</i>	54.53%	427
<i>Costs to maintain a home</i>	32.18%	252
<i>Available homes in my desired area</i>	36.53%	286
<i>Available homes in my price range</i>	51.21%	401
<i>Ability to get a loan</i>	19.80%	155
<i>Other (please specify)</i>	4.34%	34
Answered		783
Skipped		63

Table K-2. What do you believe are the top three barriers to purchasing a home in Concord? “Other” Responses grouped by theme.

Themes	Count
Affordability of Housing	6
Lack of fairness in market competition (first time home-buyers vs investors)	6
School ratings	3
First Time Home-Buyer Program needs	2
High property taxes and other taxes	2
All of the above	2
Knowledge of housing options	2
Lack of infrastructure	1
HOA Fees	1
Commute time to work	1
Flipping houses for profit	1
Few community amenities	1
Neighborhood Quality	1

Graph L. What do you believe are the top three barriers to affordable housing in the City of Concord?

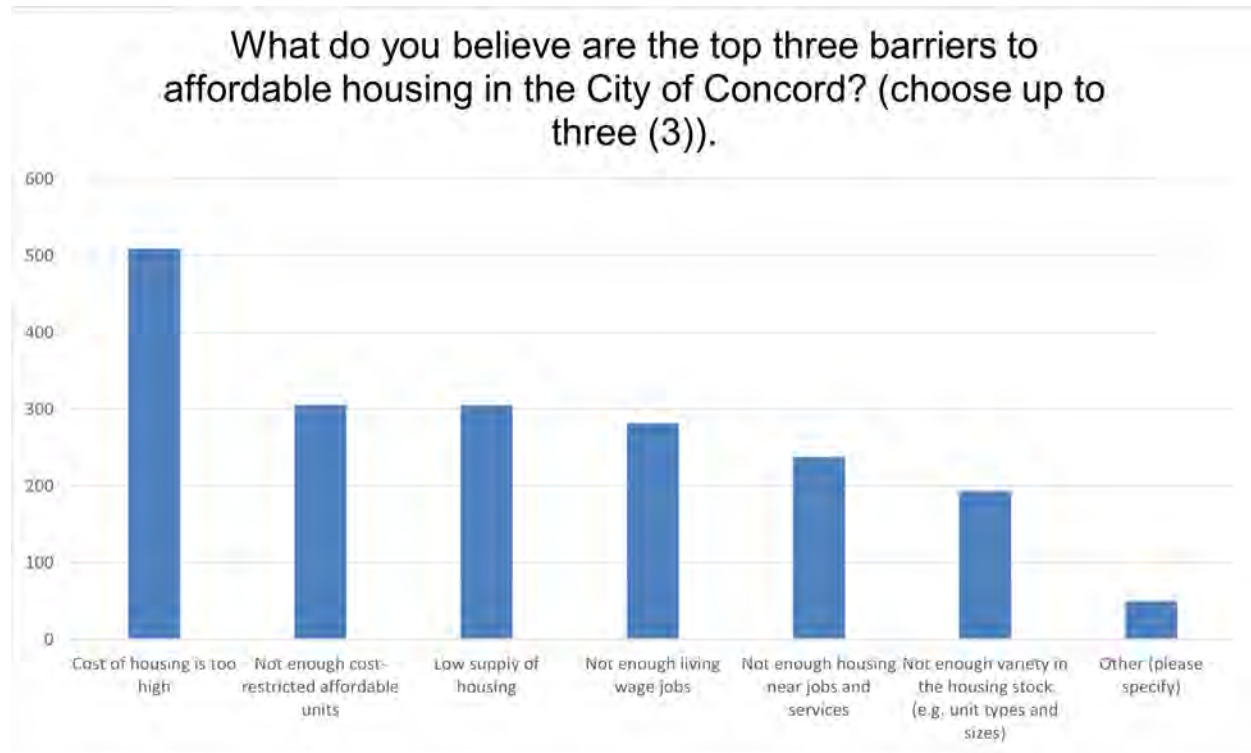


Table L-1. What do you believe are the top three barriers to affordable housing in the City of Concord?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Not enough living wage jobs</i>	36.02%	282
<i>Not enough cost-restricted affordable units</i>	39.08%	306
<i>Cost of housing is too high</i>	65.13%	510
<i>Not enough housing near jobs and services</i>	30.40%	238
<i>Low supply of housing</i>	38.95%	305
<i>Not enough variety in the housing stock (e.g. unit types and sizes)</i>	24.78%	194
<i>Other (please specify)</i>	6.39%	50
Answered	783	
Skipped	63	

Table L-2. What do you believe are the top three barriers to affordable housing in the City of Concord? “Other” responses grouped by theme.

Themes	Count
No barriers	6
Overall issue in the Bay area	5
NIMBY	4
City regulations, unions, and environmental groups slowing down supply	4
Lack of affordable housing development	3
Investors buying out more affordable housing	2
Lack of tenant protections	2
Lack of funding or political will for affordable housing units	2
Diverse affordable housing types (affordable condos, townhomes, ect.)	2
Burdensome tenant laws	2
Greed	2
Overpopulation	1
Renting out units in lieu of living in them	1
Safety	1
People outside of Concord buying homes in the city	1
Gentrification	1
Need for more market value housing	1
The city not prioritizing new homeownership for residents	1
All of the above	1

Appendix E. Special Topic: Displacement

Below is the data, graphs, and tables that show the data collected on the responses from participants about displacement concerns.

Graph M. Sometimes changes in living conditions or a neighborhood may threaten to displace people from their home. What are the greatest displacement concerns?

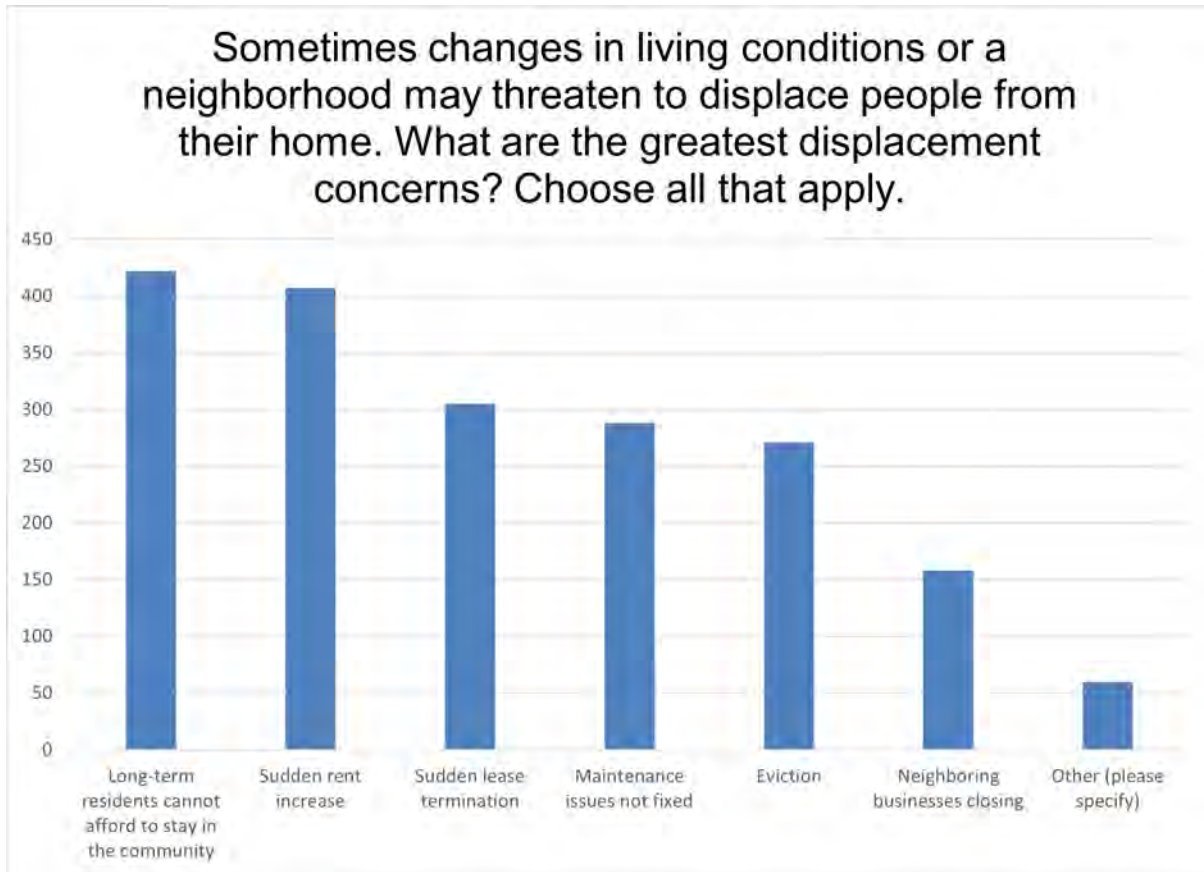


Table M-1. Sometimes changes in living conditions or a neighborhood may threaten to displace people from their home. What are the greatest displacement concerns?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>
<i>Sudden rent increase</i>	51.98% 407
<i>Sudden lease termination</i>	38.95% 305
<i>Eviction</i>	34.61% 271
<i>Maintenance issues not fixed</i>	36.78% 288
<i>Long-term residents cannot afford to stay in the community</i>	53.90% 422
<i>Neighboring businesses closing</i>	20.18% 158
<i>Other (please specify)</i>	7.66% 60
Answered	783
Skipped	63

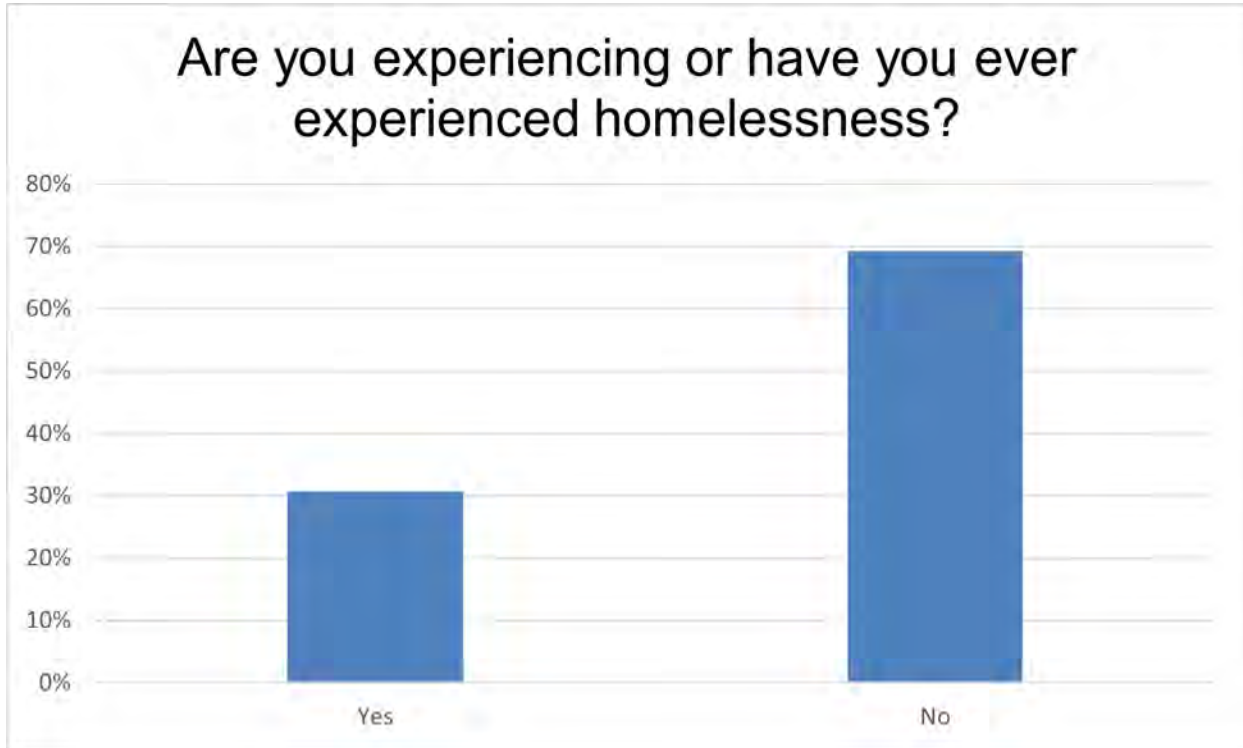
Table M-2. What are the greatest displacement concerns? “Other” Responses grouped by theme.

Theme	Count
Area becomes unsafe (increase in crime)	10
Unhoused population increases	6
Change in life situation (i.e. Divorce, job loss, income loss, etc.)	4
Cost of living increase	4
Harassment from landlords and lack of tenant protection	3
Lack of tenant protections	3
Commute times	2
Sprawling and encroachment	2
Cost of housing increase	2
Unmaintained infrastructure	2
Property upgrades increases rent	2
Gentrification	1
Government reliance	1
Unemployment	1
Lack of rent control	1
Decline of local economy	1
City prevents residents from building multiple units on property	1

Appendix F. Special Populations: Unhoused Populations

Below are the bar graphs, responses, and tables for the questions regarding homelessness within the City.

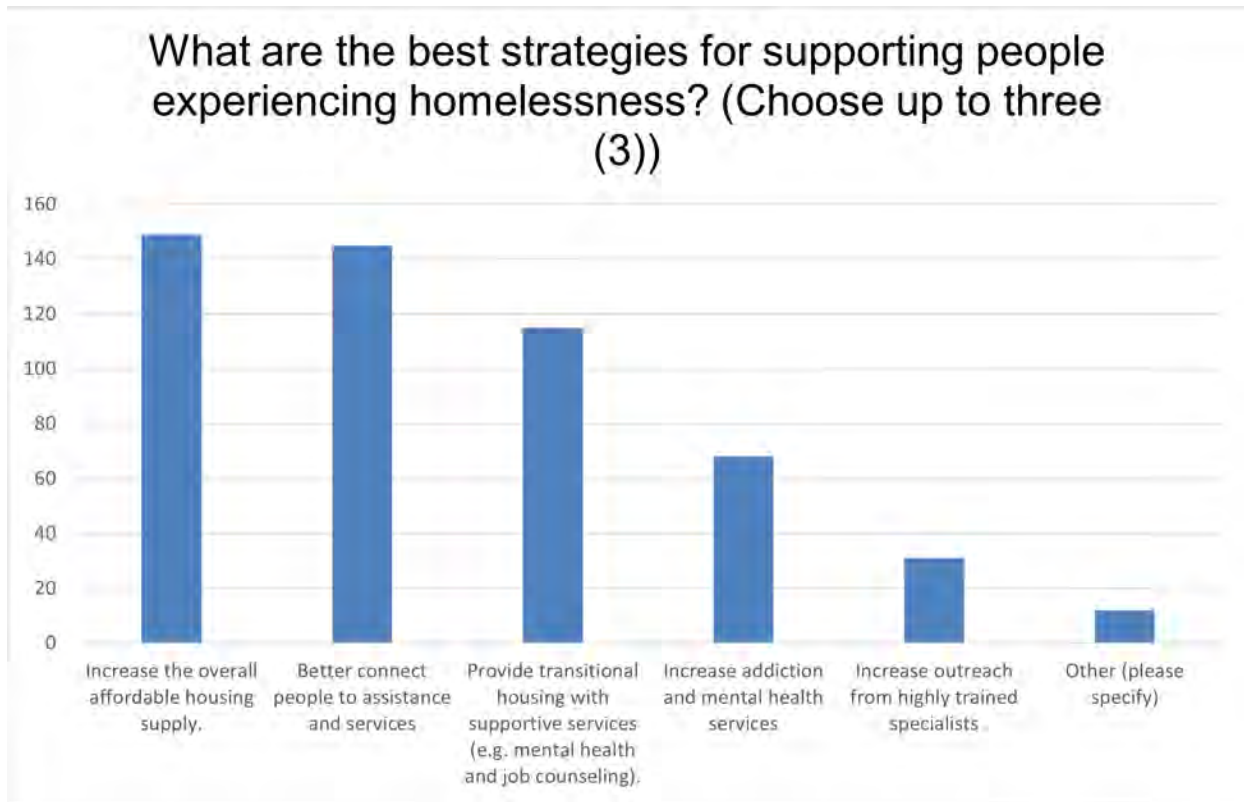
Graph N. Are you experiencing, or have you ever experienced homelessness?



Graph N. Are you experiencing, or have you ever experienced homelessness?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
Yes	30.69%	240
No	69.31%	542
	Answered	782
	Skipped	64

Graph O. What are the best strategies for supporting people experiencing homelessness?*



* Only respondents who responded that they have experienced or are experiencing homelessness had the option to answer this question.

Table O-1. What are the best strategies for supporting people experiencing homelessness?

<i>Answer Choices</i>	<i>Responses Percent and Count</i>	
<i>Provide transitional housing with supportive services (e.g. mental health and job counseling).</i>	48.12%	115
<i>Increase the overall affordable housing supply.</i>	62.34%	149
<i>Better connect people to assistance and services</i>	60.67%	145
<i>Increase addiction and mental health services</i>	28.45%	68
<i>Increase outreach from highly trained specialists</i>	12.97%	31
<i>Other (please specify)</i>	5.02%	12
Answered		239
Skipped		607

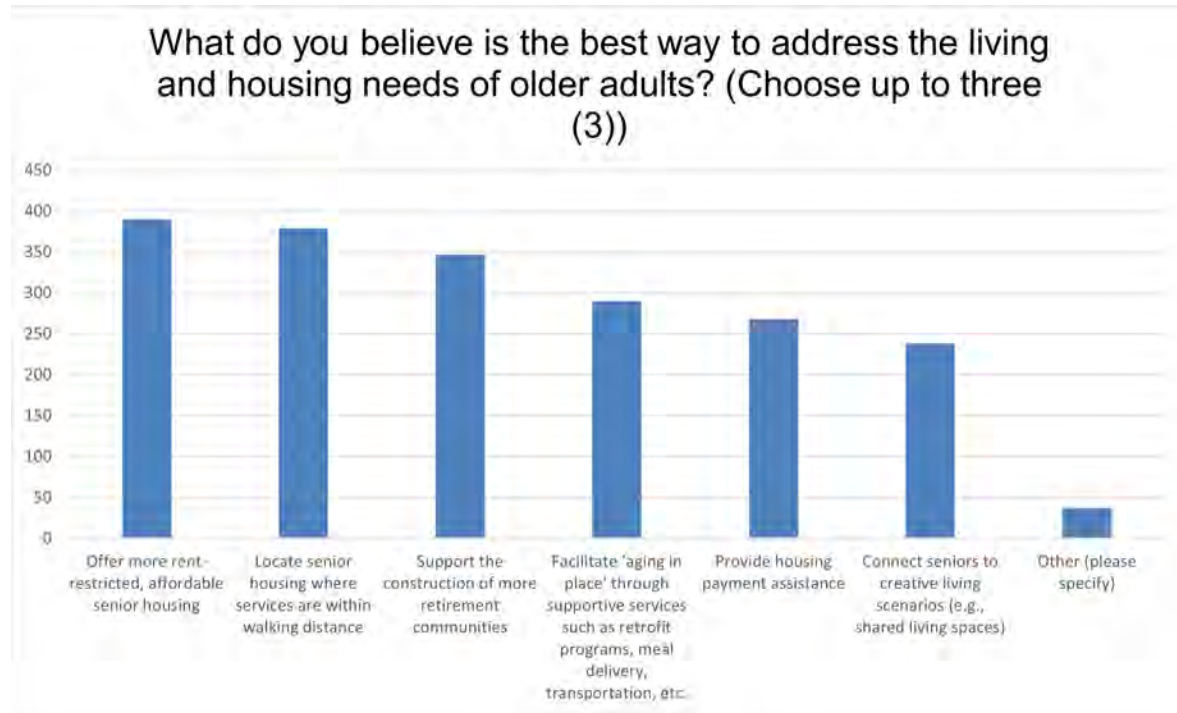
Table O-2. What are the best strategies for supporting people experiencing homelessness? “Other” Responses grouped by theme.

Themes	Count
Building affordable senior housing	2
Using underutilized land to build affordable housing	2
Creating areas for unhoused populations to live in safety	2
Incentivizing building affordable housing	1
Building housing for extremely low-income individuals	1
Job training	1
Changing the narrative around homelessness	1
All of the above	1

Appendix G. Special Populations: Older Adults

Appendix G includes the bar graphs, response tables, and open-ended data collected on the questions that were asked regarding older adults.

Graph P. What do you believe is the best way to address the living and housing needs of older adults?



Graph P-1. What do you believe is the best way to address the living and housing needs of older adults?

<i>Answer Choices</i>	<i>Responses Percent</i>	<i>and Count</i>
<i>Provide housing payment assistance</i>	34.99%	268
<i>Support the construction of more retirement communities</i>	45.30%	347
<i>Locate senior housing where services are within walking distance</i>	49.48%	379
<i>Offer more rent-restricted, affordable senior housing</i>	50.91%	390
<i>Connect seniors to creative living scenarios (e.g., shared living spaces)</i>	31.07%	238
<i>Facilitate 'aging in place' through supportive services such as retrofit programs, meal delivery, transportation, etc.</i>	37.86%	290
<i>Other (please specify)</i>	4.83%	37
Answered		766
Skipped		80

Table P-2. What do you believe is the best way to address the living and housing needs of older adults? “Other” Responses grouped by theme.

Themes	Count
Build planned senior housing near transit, that is centrally located, and walkable	10
Build ADU's or tiny homes for older adults	2
Rent control for people on fixed incomes	2
Increase funding to cover basic needs	2
All of the above	2
Enact a land trust model	1
Financial assistance for property maintenance	1
Reallocate taxes	1
Promote free and safe housing for older adults	1
Limit aging in place and provide community for older adults	1
Support aging in place through supportive services	1
Educate middle aged adults on how to plan for retirement	1

Appendix H. Suggestions or Comments Related to the Survey

Appendix H includes the raw responses collected from participants about additional comments and suggestions they may have. This section also includes the raw responses from the question that asked what the nearest intersection is to the respondent.

Table Q. Do you have additional suggestions or comments related to the questions in this survey? Please share with us here.

Theme	Count
Improve affordable housing inventory	20
Improve services and programs for unhoused communities	20
Improve infrastructure to accommodate growth	15
More diversity of housing options	12
Build housing at the Naval Weapon Station	9
Build housing near public transit	7
Build or develop affordable housing on empty lots	7
Increase communication, engagement, and involvement with residents	7
Build ADUs	6
Cost of living in Concord is too expensive	6
Focus on housing for seniors	6
Improve safety and decrease crime	6
Build more moderate-income housing	5
Lack of parking near housing	5
Make public transit more accessible and inclusive	5
More high-density housing	5
Preserve open space and environment	5
Provide more support to increase homeownership	5
Better housing policies	4
Better housing subsidies and loan options	4
Improve housing quality	4
Prevent encroachment of high density homes into single family home neighborhood	4
Improve tenant rights and tenant protections	4
Allow landlords to build on their property	3
Create more commercial areas and improve existing ones	3
Avoiding segregation	3
Improve Affirmatively Furthering Fair Housing	3
Implement rent control	3
Stop building and expanding in Concord	3
More jobs and employment opportunities	3
Concerns on water supply	2
Improve urban planning	2
Increase community policing	2
Investigate reasons disparities in housing exist from past programs	2

Make buying a house friendly	2
Need good community	2
Need good housing environment	2
Programs for people who don't qualify for low-income housing	2
Raise wages and income	2
Streamline the permit process for ADUs	2
Support teachers	2
Build more schools	1
Change concept of zoning: apartments on top of shopping malls	1
City is segmented	1
Do not allow ADUs	1
Excellent housing conditions	1
Excellent location	1
Focus on housing for disabled people	1
Focus on housing for military/veterans	1
Improve City council	1
Preserve single-family neighborhoods	1
Upgrade old neighborhoods	1

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Appendix G

Community Discussions and Council Actions on Housing Issues

As a supplement to the Community Outreach summary in Appendix F, this document summarizes community input and City Council actions since 2016 on the topic of tenant protections and displacement in Concord. Since July 2016, the City Council has held at least 13 meetings at which items related to this topic were on the agenda. At these meetings, the Council heard testimony from over 400 individuals.¹ Exhibit A provides detailed minutes for these meetings, including testimony received and discussion and actions taken by the Council. In addition, there was further testimony and discussion at the Council's Ad Hoc Committee on Rental Housing, which met 10 times during 2019 (see Exhibit B for further details), and at numerous meetings by the Council's Housing and Economic Development (HED) Committee (HED Committee recommendations are discussed below and in Exhibit A). This summary is not intended to be exhaustive, and there may be additional meetings at which testimony and/or discussion of tenant protections and displacement occurred, such as during Council public comment periods.

Beginning in 2016, due to continued rent increases spurred by the strong economic recovery, the City Council began to receive increased input from renters and advocates on the need for new tenant protections and anti-displacement programs. On July 26, 2016, the Council held a Rental Housing Workshop to consider the issues being raised by the community. The Council received testimony from over 40 individuals and directed staff to research enhancing the City's Multi-Family Inspection Program (MFIP; see below for further details), increasing public education and communication, comparing rents in Concord to other cities in Contra Costa County, and a hypothetical rent control program model. Council also directed the HED Committee to consider these issues and report back.

On November 29, 2016, the Council considered the HED Committee's recommendations to consider creating a rental housing "hotline", a non-binding tenant-landlord mediation program, and an urgency ordinance imposing a 45-day moratorium on rent increases over three percent. After hearing testimony from approximately 60 individuals, the Council considered motions for several tenant protection measures. The Council adopted the proposal for a rental housing hotline and directed the HED Committee to bring back detailed recommendations for the non-binding mediation program. Motions regarding the following measures failed:

- 45-day moratorium on rent increases (failed by 3-2 vote)
- Rent registry program (failed by 2-2 vote, with one abstention)
- Prohibiting more than one rent increase per year or more than a 10 percent increase for complexes with over 28 units (failed for lack of a second)
- Prohibiting rent increases in complexes over 28 units with outstanding code violations (failed for lack of a second)
- Just cause for eviction for complexes with over 28 units (failed for lack of a second)
- Minimum one-year lease requirement (failed for lack of a second)

At the same meeting, the Council unanimously adopted significant enhancements to the MFIP, one of the only programs of its kind in the Bay Area. This program requires all rental buildings with 4 or more units to be inspected every 2 years for conformance with basic safety and habitability standards; the 2016 enhancements included increasing the frequency of inspection from three years to two, and transferring enforcement of the bed bug program from the Police Department's Code Enforcement Unit

¹ This does not include staff and consultants. Individuals who spoke at multiple Council meetings or agenda items are counted once for each meeting or item; therefore, the actual number of distinct individuals is lower.

to the Community Development Department. At the same meeting, the Council also unanimously increased the in-lieu fee for inclusionary ownership units, and adopted an impact fee for development of affordable rental units.

On May 2, 2017, the Council considered the HED Committee's recommendations regarding the non-binding mediation program, heard testimony from approximately 20 individuals, and voted unanimously to introduce an ordinance establishing the Residential Rent Review Program (RRRP), the only program of its kind in the County. This program provided tenant counseling and tenant/landlord mediation services through ECHO Housing, and it required a non-binding three-step conciliation, mediation and arbitration review process by a three-person Rent Review Panel for any rent increase over 10 percent. The ordinance was adopted on May 23, and the program became effective on June 23. On July 25, the Council unanimously adopted a resolution establishing additional parameters for the Rent Review Panel.

In 2018, there was significant discussion in Concord around Proposition 10, a Statewide ballot initiative that would increase local governments' authority to implement rent control policies. On November 6, 2018, a majority of voters in City Council District 3 voted in favor of this initiative, while a majority of Concord voters voted against it.

On November 27, 2018, the Council considered a review of the newly established RRRP and the updates to the MFIP. After hearing testimony from approximately 55 individuals, the Council discussed additional tenant protections, including some of the measures discussed at the November 29, 2016 meeting, and then continued the item to December 11, 2018 to allow participation by newly elected Council member Dominic Aliano. On December 11, 2018, the Council directed staff to agendize formation of an ad hoc committee to address rental issues for January 8, 2019. On January 8, 2019, after hearing testimony from approximately 20 individuals, the Council created the Rental Housing Ad Hoc Committee and appointed Council members Aliano and Obringer to this Committee.

Over the next 6 months, the Rental Housing Ad Hoc Committee met 10 times, received additional community input (including requests for rent control and just cause eviction measures), and brought its recommendations (see Exhibit B) to the Council on June 19, 2019. At that meeting, after hearing testimony from over 90 individuals, the Council provided the following guidance:

- Modify Residential Rent Review Program – there was a consensus to move forward with studying this item with discussion focused on a rent increase threshold of 7% +CPI.
- Extend Property Owner Notice Requirement for Rent Increases – consensus supported the extended notice period.
- Relocation Assistance for Tenants – no consensus in support for the recommendation, however, there is a majority of the Council interested in learning more about the recommendation.
- Just Cause Eviction Ordinance – no consensus in support for the recommendation.
- Property Owner Requirement to offer Minimum Lease Term – consensus supported the recommendation.
- Enhance Support for Land Trust/Non-Profit Acquisition of Properties to Preserve Long-Term Affordability – consensus supported the recommendation.
- Support State Legislation that requires State-Wide Rent Registration and Evaluate Feasibility of Gathering Rent Information through the Business License Application/Renewal Process – consensus supported the recommendation.
- Enhance City Communication Regarding Affordable Housing Programs, Existing Tenant Protections under California State Law, and Resources for Tenant Access to Counseling/Legal Representation – consensus supported the recommendation.
- Sunset Provision of three years – there was majority support for a sunset provision.

On February 11, 2020, the City Council heard testimony from over 20 individuals and provided the following guidance to staff:

1. Rent Cap – It was the consensus of the Council to eliminate the Rent Review Program as of June 30, 2020, and obtain a third party to support tenants in landlord/tenant disputes.
2. Relocation Assistance Amount – It was the consensus of the Council to implement the relocation assistance of \$5,000 or two times the monthly current rent, whichever is greater.
3. Relocation Assistance Criteria – It was the consensus of the Council to use the State (AB1482) criteria.
4. Relocation Assistance Applicability – It was the consensus of the Council to require that all units, regardless of age, be covered by AB1482 and direct staff to research unit age.
5. Offer of Initial Minimum 12-Month Lease Term – It was the consensus of the Council to use the AB1482 criteria for unit size, require all units be covered by the new regulation, regardless of age, and direct staff to research the opportunity for a tenant, at their discretion, to elect to sign a lease for less than 12-months.
6. State Legislation Regarding a Rent Registry – It was the consensus of the Council to support state legislation regarding collection of rent information.
7. Additional Business License Data – It was the consensus of Council to direct staff to look into the most cost effective solution to develop a general database for a rental registry and collect the data on an annual basis.
8. Sunset Provision – A majority of the Council supported the establishment of a sunset provision in the ordinance consistent with AB1482 (January 1, 2030).

On June 23, 2020, the Council allocated approximately \$380,000 from the first round of Coronavirus Aid, Relief, and Economic Security (CARES) Act funding for Emergency Rental Assistance to be distributed by Shelter, Inc.

On July 7, 2020, after hearing testimony from approximately 40 individuals, the Council unanimously adopted the Residential Tenant Protection Program, or RTPP, to replace the Rent Review Program. The main components of the RTPP are: (1) tenants must be offered a 12-month lease; (2) in the event of a no-fault eviction, landlords must provide relocation assistance of at least two times the monthly rent or \$5,000, whichever is greater, which exceeds State requirements; and (3) funding for counseling and mediation services through ECHO Housing. During the Council discussion leading up to this action, the consensus of the Council was not to include new rent control or just cause eviction measures, but to rely on State law (AB1482) for these.

On August 4, 2020, the Council allocated approximately \$375,000 from the second round of CARES funding for the Residential Rent Relief Program.

On November 10, 2020, after hearing testimony from approximately 10 individuals, the Council unanimously introduced an ordinance to adopt a Residential Rent Registry Ordinance, which collects tenant and rent data on all multifamily complexes of four or more units. The ordinance took effect in December 2020, and data collection began in July 2021. This data will be used to generate an annual report that can identify potential fair housing issues or inform decision making on additional City housing policies and programs. As of March 2022, 73.6% of landlords had completed their registration and 18.7% are in the process of registering their units.

On December 1, 2020, after hearing testimony from approximately 16 individuals, the Council allocated approximately \$540,000 from the third round of CARES funding to be used for Emergency Rental Assistance.

On January 12, 2021, the Council heard testimony from approximately 16 individuals and discussed data to be collected through the Rent Registry Program and what information should be made available to the public on the City's website. The Council directed staff to keep unit numbers from being publicly available, but allow all other collected information to be publicly available.

On February 2, 2021, the Council considered authorizing a grant application for improvements to Ellis Lake Park, which is located in an area with a high concentration of lower-income renters. Approximately 26 individuals spoke regarding concerns that these improvements would lead to displacement of residents in the vicinity of the park, and many requested the Council establish an anti-displacement task force to consider this issue further. The Council unanimously voted to authorize the grant application, and the consensus of the Council was to have the Committee on Policy Development and Internal Operations (PDIO Committee) discuss this issue further.

On May 20, 2021, the PDIO Committee discussed the creation of an Anti-Displacement Task Force. After a presentation by the Community Development Director and public testimony, it was the consensus of the Committee not to recommend the creation of a task force, but instead to allow the issue to be considered as part of the Housing Element Update.

On June 1, 2021, a consensus of the Council expressed its desire to discuss the following items at future meetings:

- Extension of the moratorium on residential rent increases and evictions through the end of September 2021;
- Anti-tenant harassment ordinances (following research and a report back by the HED Committee); and
- Defining next steps toward addressing the needs of people experiencing homelessness.

On December 14, 2021, the Council received testimony from approximately 34 individuals on a draft Residential Tenant Anti-Harassment Protection Ordinance, and referred the item to the HED Committee for further discussion and recommendations. As of May 2022, City staff is incorporating input from the HED Committee and the community into a revised draft ordinance, and presentation of a final draft to Council is scheduled for June 14, 2022. This ordinance will aim to deter harassment, as defined in State law, by residential property owners, to encourage such owners to follow the law and uphold their responsibility to provide habitable rental properties, and to give tenants legal recourse when they are subjected to harassment. Based on prior Council direction, staff anticipates that Council will ultimately adopt an ordinance, and the Housing Element Update includes such an ordinance in Program 20.

In addition to the community discussions and Council actions on tenant protections and anti-displacement programs, the City has also done the following to address housing needs within the community,

- 1) \$7.8 million for the 62-unit RCD affordable apartment building on Galindo Street,
- 2) required at least 3,000 affordable units to be constructed on the former Naval Weapons Station,
- 3) allocated over \$620K in emergency rental assistance during the pandemic.
- 4) allocating about \$425K per year to help low-income seniors remain in their homes, and \$90K per year to help first-time home buyers purchase their first home.
- 5) maintaining a rent stabilization program for mobile homes.

Through a multilayered approach, all of these efforts help to address the issue and reduce the risk of displacement by creating more deed restricted affordable housing units and helping lower-income residents to stay in their current homes.

Exhibits:

- A. Minutes of City Council agenda items on topics related to tenant protections, 2016 to 2021
- B. Report of City Council Ad Hoc Committee on Rental Housing, June 12, 2019

EXHIBIT A

MINUTES OF CITY COUNCIL AGENDA ITEMS ON TOPICS RELATED TO TENANT PROTECTIONS, 2016 TO 2021

Minutes of City Council Meeting – July 26, 2016

CITY OF CONCORD RENTAL HOUSING WORKSHOP

John Montag, Economic Development and Housing Manager, provided a brief overview of Concord's housing market followed by an overview of Concord's programs and policies supporting affordable housing in the City. After clarifying questions from the Council, he introduced Kenneth Baar who provided information on background issues with rent regulations.

Following questions by the Council, Mr. Montag introduced Leah Simon-Weisberg, Legal Director, Tenants Together, who provided an overview on rent control and just cause protection policies.

Following questions by the Council, Mr. Montag then introduced Joshua Howard, Senior Vice President, Local Public Affairs, California Apartment Association, who provided an overview on balanced solutions for today's rental market.

Mayor Hoffmeister called a five minute recess. Following questions by the Council, Mayor Hoffmeister opened a public comment period.

Linda Golden, Berkeley, spoke of declining rents and her inability to meet expenses as an owner/landlord.

Father Ismael Gutierrez, Concord, read into the record a letter signed by 2,500 members of the Catholic community urging Council to implement housing policies in Concord to end unjust evictions.

Rex Mattson, owner of 2180 Galindo Street, spoke of loving each other.

Alicia Sandoval, Concord, spoke of harassment, intimidation, and lack of repairs/maintenance by landlords, but consistent rent increases. She spoke in support of rent control.

Larry Ribarich, Lafayette, spoke of a 4 percent increase in costs per year as a landlord. He spoke in opposition to rent control.

John Nunes, Concord, spoke in opposition to rent control.

George Fulmore, Concord, spoke in support of rent control.

Janet Marshall Wilson, Concord, spoke of poor conditions in rentals and in support of rent control.

Colleen Garrity, Concord, spoke in support of rent control.

Maurice Heley, Concord, spoke in opposition to rent control.

Dennis Gremer, Concord, spoke of alternatives to rent control.

Theresa Brophy, Concord, spoke in support of rent control.

Brian Brophy, Oakland, spoke in support of rent control.

Margaret Hanlon-Gradie, Contra Costa AFL-CIO, spoke in support of rent control.

Arthur Weil, Piedmont, spoke in opposition to rent control.

Judy Weil, Danville, spoke of a fixed percentage if rent control is adopted.

Greg Colley, Concord, spoke in favor of rent control and just cause ordinance.

Janet Kinney, Pittsburg, spoke in favor of rent control.

Eduardo Torres, Tenants Together, spoke in favor of rent control and just cause ordinance.

Bill Cotton, Concord, spoke in opposition to rent control.

Daryl Bergman, Concord, spoke of low income housing in the Monument corridor and need of code enforcement.

Theresa Karr, California Apartment Association, spoke in opposition to rent control and urged the Council to consider all options.

Christos Movlis, Concord, spoke in opposition to rent control.

Isabel Lara, Concord, spoke of compassion and support for people in need.

Greg Brumley, Concord, spoke in opposition to rent control.

Carlos Espinoza, Concord, spoke in support of rent control.

Jovana Fajardo, spoke in favor of rent control.

Joe Lawton, San Ramon, spoke of mediation and other options to rent control.

Mohammad Mahyari, Concord, spoke in opposition to rent control and additional inspections.

Sreenivas Ramireddy, Broadmoor Properties, spoke of other options to rent control.

Olga Chan, Concord, urged Council to come up with solutions to help renters.

Reed Robertson, Concord, spoke of lack of housing in Concord.

Corina Lopez, Concord, spoke of several rent increases in the past three years and how her landlord retaliated against her.

Rony Joseph, Walnut Creek, spoke in opposition to rent control.

James Dye, Concord, spoke in opposition to rent control.

John DeSousa, Danville, owner of Carlton Drive Apartments, spoke in opposition to rent control.

Guy Golvingly, Concord, spoke in opposition to rent control.

Kathy Wells, Concord, spoke in support of rent control.

Mariana Moore, Ensuring Opportunity Campaign, spoke of structured public policy.

Glen Zamanian, Lafayette, spoke in opposition to rent control.

Jeff Koertzen, Concord, spoke in support of rent control.

Ralph Ache, Concord, spoke of the difficulties being a landlord and the already established laws addressing tenants and landlords.

Bob Lane, Pleasanton, Faith Alliance for a Moral Economy, spoke in favor of rent control with a just cause provision.

Maria Vasquez, Concord, spoke in opposition to rent control.

Mayor Hoffmeister closed the public comment period.

Council provided comments and requested staff to research enhancing the multi-family inspection program, educating the public, increasing/enhancing communication, rent comparison with other Contra Costa cities, a regional approach to the issue, who are the bad apple apartment owners, and hypothetical rent control program model.

A motion was made by Birsan and seconded by Leone to return the item to the Committee on Housing and Economic Development for further consideration.

RENT STABILIZATION AND TENANT PROTECTION

Economic Development and Housing Manager John Montagh introduced Project Planner Barry Miller who presented a PowerPoint on the outcomes of several workshops held on rent stabilization and tenant protection. He reported that the Committee on Housing and Economic Development (HED) recommended that the Council consider creating a rental housing telephone and web site "hotline" and implementation of a non-binding mediation program for tenants and landlords. The HED also recommended that the Council discuss a 45-day moratorium (urgency ordinance) on rent increases over three percent. Mr. Miller recommended that the Council discuss the HED Committee recommendations, accept public comment, and provide staff with input and direction on next steps.

Following questions by the City Council, Mayor Hoffmeister opened a public comment period.

Nancy Sansom, Concord, spoke in support of a rent moratorium.

Brad Vaughan spoke in opposition to rent control.

Cindy Molander, Concord, spoke in support of a rent moratorium.

Joe Lawton, California Apartment Association, spoke in opposition to rent control.

Gwen Watson, Lafayette, spoke in support of a rent moratorium.

Jeff Weil, Alamo, spoke in opposition to rent control.

Nati Flores, Concord, spoke of apartments on Robin Lane and the inequality of rent increases in the apartments on Robin Lane.

Rev. Dr. Barbara Barkley, Concord, spoke in favor of a rent moratorium.

Bambi Marien, Concord, spoke in favor of a rent moratorium.

Delores Loague, Concord, spoke in favor of a rent moratorium.

Zuleika Godinez spoke on behalf of Monica Lazo, who was in favor of a rent moratorium.

Janet Kinney, Pittsburg, spoke in favor of a rent moratorium.

Amy Scott-Slovic, Martinez, spoke in favor of a rent moratorium.

Jima Monson, Concord, spoke in favor of a rent moratorium.

Evangelina Mimila, Concord, spoke in favor of a rent moratorium.

Peruinka Kabaivanova spoke in favor of a rent moratorium.

Martha Potts, Concord, spoke in favor of a rent moratorium.

Rhea Laughlin, First 5 Contra Costa, spoke in favor of a rent moratorium.

David Kreutzinger, Concord, spoke in opposition to rent control.

Avelina Brown-Nunez, Concord, spoke in favor of a rent moratorium.

David Brazil, Oakland, spoke in favor of a rent moratorium.

Bob Lane, Pleasanton, Faith Alliance for a Moral Economy, spoke in favor of a rent moratorium

Eduardo Torres, Bay Point, Tenants Together, spoke in favor of a rent moratorium.

Greg Colley, Concord, spoke in favor of a rent moratorium.

Larry Sly, Concord, asked the Council to consider the people the Food Bank of Contra Costa & Solano serves when making a decision.

Theresa Carr, spoke in support of a hot line and mediation and opposition of a rent moratorium.

Mayor Hoffmeister called a recess at 8:50 p.m. The meeting resumed at 9:07 p.m.

Motion was made by Helix and seconded by Grayson to hold the agendaized public hearings after 10 p.m. Motion passed by unanimous vote of the Council.

Natalie spoke in support of a rent moratorium.

Mariana Moore, Richmond, Ensuring Opportunity Campaign, encouraged the Council to have no exemptions and no loop holes if a moratorium is adopted.

Ajit Kaushal, Concord, stated that he could see both sides of the issue.

Betty Gabadon, Concord, spoke in support of a rent moratorium.

Justin McRoberts, Concord, spoke in support of a rent moratorium.

Marta Gonzales, Concord, spoke in support of a rent moratorium.

Jovana Fajardo, Bay Point, spoke of not being able to afford to live in Concord and in support of a rent moratorium.

John DeSousa, Concord, spoke in opposition of a rent moratorium.

Kathy Wells, Concord, spoke in support of a rent moratorium.

Mike Van Hofwegen, Concord, Monument Impact, spoke in support of a rent moratorium.

Hugo Rameriz, Concord, spoke in support of a rent moratorium.

Yolanda Negrete, Concord, spoke in support of a rent moratorium.

Dan Reynolds, Martinez, spoke in support of a rent moratorium.

Brian Brophy, Oakland, spoke in support of a rent moratorium.

Brenton, Concord, spoke in opposition of rent control and a rent moratorium.

Jeff Hawkins, Concord, spoke in support of a rent moratorium.

John Sullivan, Concord, spoke in opposition of rent control.

Julian Rogers spoke in opposition of rent control.

Sreenivas Ramireddy, Concord, spoke in opposition of rent control.

Jean Claude Malhem, Jr., Danville, spoke in opposition of rent control.

Elena Liberman, CCRM, Concord, spoke in opposition of rent control.

John Walton, Concord, spoke in support of a rent moratorium.

Stephan Mann, Concord, spoke in support of a rent moratorium.

Chuck Bowen spoke in opposition of rent control.

Teresa Brophy, Concord, stated that a rent increase of 10 percent per year is too high and in support of a rent moratorium.

Bob Tesh, Concord, spoke in opposition of rent control.

Mayor Hoffmeister closed the public comment period.

A motion was made by Birsan and seconded by Helix to adopt as an Urgency Measure a moratorium of 45 days with no greater increase in rent than 3 percent. The motion failed by the following vote of the Council:

AYES: Birsan, Helix NOES: Leone, Grayson, Hoffmeister ABSENT: None

A motion was made by Helix and seconded by Leone to create a confidential rental housing telephone and website "hotline" for both tenants and landlords in both English and Spanish for the City's information only for units greater than 12. The motion passed by unanimous vote of the Council.

A motion was made by Leone and seconded by Helix to bring the implementation of a non-binding mediation program for tenants and landlords back to the Committee on Housing and Economic Development for consideration. The motion passed by the following vote of the Council:

AYES: Grayson, Helix, Leone, Hoffmeister NOES: Birsan ABSENT: None

A motion was made by Birsan to have staff explore a registry program and bring to the City Council for consideration. Motion failed for lack of a second.

A motion was made by Birsan and seconded by Leone to have staff explore a registry program and have the Committee on Housing and Economic Development Committee for consideration. The motion failed by the following vote of the Council:

AYES: Birsan, Leone NOES: Grayson, Hoffmeister ABSTAIN: Helix

A motion was made by Birsan to direct staff to come back to the Council for action soonest, an ordinance that states that all initial renters must be given the opportunity for a one year lease by the landlord. At the expiration of the one year lease, unless notice is received otherwise, the lease shall be extended by one year increments, applicable for all rental units that are greater than 28 in single management as they exist as of November 29, 2016. Motion failed for lack of a second.

A motion was made by Birsan to direct staff to come back to the Council for action soonest that all rental complexes that are managed by a same management company/owner where there is a default on a code enforcement or a housing inspection order for repair may not raise rents on units in that complex, to apply to all rental units that are greater than 28 in single management as they exist as of November 29, 2016. Motion failed for lack of a second.

A motion was made by Birsan to direct staff to come back to Council for action soonest an ordinance that calls for just cause eviction only, to apply to all rental units that are greater than 28 in single management as they exist as of November 29, 2016. Motion failed for lack of a second.

A motion was made by Birsan to direct staff to come back to the Council for action soonest a limit of one raise of rent for a 12 month period from the last rental increase and not more than 10 percent of the then current rental rate for units greater than 28 in single management as they exist as of November 29, 2016. Motion failed for lack of a second.

REVISIONS TO POLICY AND PROCEDURE NO. 2, CITY COUNCIL MEETING PROCEDURES

Vice Mayor Leone removed his support of a two-year Vice Mayor, stating that he no longer requested the revision to Policy and Procedure No. 2. However, other changes were proposed to Policy and Procedure No. 2, so the item still needed consideration. Due to the late hour, Council determined it was best to continue the item to the December 13, 2016 meeting.

Mayor Hoffmeister opened a public comment period, and upon receiving no public comment, closed the public comment period.

A motion was made by Birsan and seconded by Hoffmeister to continue the balance of the revisions of Policy and Procedure No. 2 to the December 13, 2016 City Council meeting. Motion passed by unanimous vote of the Council.

Mayor Hoffmeister called a recess at 11:40 p.m. The meeting resumed at 11:50 p.m.

MULTI-FAMILY INSPECTION PROGRAM

Chief Building Official Robert Woods presented a report on proposed Multi-Family Inspection Program Changes, including changing the rate for inspections, providing improvements to program services, staffing and program administration changes to manage the new inspection rates, and changes to the program fees and billing cycles. He noted that the Committee on Housing and Economic Development recommended the proposed changes to the City Council for adoption.

Mr. Woods reported that the Committee on Housing and Economic Development recommend that the Council introduce Ordinance No. 16-8 amending Concord Municipal Code Title 15, Chapter 15.20 Multi-Family Housing Inspection Program by reading of the title only and waiving further reading, adopt Resolution No. 16-6042.7 approving amendments to Table 3b, Multi-Family Rental Inspection Program Fee Schedule of Master Fees and Charges, and adopt Resolution No. 16-3493.5 approving and authorizing new staffing positions and approving Policy and Procedure No. 172 entitled "Multi-Family Rental Dwelling Inspection and Maintenance Program."

Following questions by the Council, Mayor Hoffmeister opened a public comment period.

John Sullivan, Concord, requested two items – reward good landlords and keep the self-certification program to three years.

Theresa Carr, California Apartment Owners Association, requested the data that shows that three-year self-certification is not working and requested that they be given the opportunity to work with staff before Council makes a decision on changing the Program.

Melanie Howe Weintraub, Lafayette, Multi-Faith Action Coalition, spoke in favor of amending the Multi-Family Housing Inspection Program.

John DeSousa, Danville, spoke in favor of amending the Multi-Family Housing Inspection Program.

Chuck Bowen, spoke of apartment building owners having other inspections in addition to the inspections by the City.

Sreenivas Ramireddy, Concord, spoke of adding flexibility to the Program.

Mayor Hoffmeister closed the public comment period.

Motion was made by Helix and seconded by Birsan to introduce Ordinance No. 16-8, entitled "AN ORDINANCE AMENDING CONCORD MUNICIPAL CODE TITLE 16 (BUILDINGS AND BUILDING REGULATIONS), CHAPTER 15.20 (MULTIPLE FAMILY RENTAL DWELLING UNIT INSPECTION AND MAINTENANCE CODE), SECTIONS 15.50.010 THROUGH 15.50.180" by reading of the title only and waiving further reading, adopt Resolution No. 16-6042.7 entitled, "A RESOLUTION APPROVING AND ADOPTING AN AMENDMENT TO EXHIBIT A TO RESOLUTION NO. 78-6042 (FEES AND CHARGES FOR VARIOUS MUNICIPAL SERVICES) RE: TABLE 3B (MULTI-FAMILY RENTAL INSPECTION PROGRAM FEE SCHEDULE), adopt Resolution No. 16-3493.5 entitled "A RESOLUTION APPROVING AND AUTHORIZING NEW STAFFING POSITIONS AND ADOPTION OF POLICY AND PROCEDURE NO. 172, MULTI-FAMILY RENTAL DWELLING INSPECTION AND MAINTENANCE PROGRAM."

Motion passed by unanimous vote of the Council.

AFFORDABLE HOUSING ORDINANCE

Senior Planner Joan Ryan presented a report on the consideration of the Introduction of Ordinance No. 16-3 amending the Concord Municipal Code by adopting a text amendment to the Development Code to Sections 18.185.020 and 18.185.040 to reduce the minimum applicable project size, subject to the Affordable Housing Ordinance, from five units to two units, consideration of adoption of Resolution No. 16-6042.4 amending the City's Fees and Charges Resolution to increase in-lieu fees for ownership units within the City's Inclusionary Housing program, effective January 1, 2017, and consideration of adoption of Resolution No. 16-6042.5 amending the City's Fees and Charges Resolution to adopt Affordable Housing Impact Fees for development of rental units within the City's Affordable Housing Program, effective July 1, 2018.

Following questions by the City Council, Mayor Hoffmeister opened a public comment period, and upon receiving no public comment, closed the public comment period.

Motion by Helix to Introduce Ordinance No. 16-3, revising the Ordinance to keep the minimum applicable project size to five units. The motion failed due to lack of a second.

Motion by Helix and seconded by Birsan to adopt Resolution No. 16-6042.4 entitled, "A RESOLUTION TO AMEND EXHIBIT A TO RESOLUTION NO. 78-6042 ESTABLISHING FEES AND CHARGES FOR VARIOUS MUNICIPAL SERVICES IN THE CITY OF CONCORD TO INCREASE IN-LIEU FEES FOR OWNERSHIP UNITS WITHIN THE CITY'S INCLUSIONARY HOUSING PROGRAM EFFECTIVE JULY 1, 2018" and adopt Resolution No. 16-6042.5 entitled, "A RESOLUTION TO AMEND EXHIBIT A TO RESOLUTION NO. 78-6042 ESTABLISHING FEES AND CHARGES FOR VARIOUS MUNICIPAL SERVICES IN THE CITY OF CONCORD TO ADOPT AFFORDABLE HOUSING IMPACT FEES FOR DEVELOPMENT OF RENTAL UNITS WITHIN THE CITY'S AFFORDABLE HOUSING PROGRAM, EFFECTIVE JULY 1, 2018." Motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – May 2, 2017

INTRODUCTION OF ORDINANCE NO. 17-7 – Residential Rent Review Program

Planning and Housing Manager Laura Simpson reported that between June 2016 and March 2017, the City Council and its Committee on Housing and Economic Development (HED) held seven meetings on the issue of rent stabilization and tenant protection in Concord, and that at the last meeting held on March 8, 2017, the HED outlined a Residential Rent Review Program to be drafted as an ordinance and requested that staff forward it to Council with recommendation for adoption. She reported that staff has been working throughout the process with consultant Barry Miller, who she introduced to present an overview of the draft ordinance.

Barry Miller reviewed the ordinance establishing a Residential Rent Review Program in response to City Council and HED study sessions and public testimony regarding the issue of rising rents in the City. He reported that in 2016 the City Council and HED convened five study sessions on rising rents, and more than 10 hours of public testimony was taken, including testimony from many displaced tenants or tenants facing displacement. Mr. Miller relayed that at the end of November 2016, staff was directed to create a Rental Housing Reporting Line and return to the HED with a mediation-based Rent Review Program, and that in March 2017, the HED recommended the Residential Rent Review Program (Program) for Council Consideration.

Mr. Miller reviewed the number of calls received during the reporting period of January 24, 2017 – April 5, 2017, recorded by rent increase percentage. He went over rent "control" vs. rent "review", explained that all properties with three or more rental units will be affected by the Program, reviewed the noticing requirements for the Program, noted that Program includes a 10 percent threshold for rent review eligibility, and explained the three step rent review process of conciliation, mediation, and non-binding hearing.

Mr. Miller presented an overview of the factors to be considered by the Rent Review Panel, the payment of rent during rent review, other Program elements, Program costs, and next steps.

Following questions by the Council, Mayor Hoffmeister opened a public comment period.

Vince Nims, spoke in support of rent control.

Sherry Davis, stated that the 10 percent limit is very high, the ordinance before the Council does not help her, and she can no longer afford to live in Concord.

Debra Burnstein, Concord, stated that the 10 percent threshold is too high for renters and does not benefit the tenant.

Eduardo Torres, Tenants Together, stated that the ordinance before the Council does not benefit tenants and the 10 percent threshold is too high.

John Sullivan, Concord, stated that the 10 percent threshold is appropriate, and that the ordinance before the Council is a fair proposal.

Blaine Carter, Concord, stated that the 10 percent threshold is appropriate, rent control is not a viable option, and there should be an application fee.

Joseph Lawton, Castle Management, urged the Council to remember that the drive is supply and demand.

Judy Weil, Danville, spoke in support of the ordinance before the Council.

Jeffrey Weil, Alamo, spoke in support of the ordinance before the Council.

Guadalupe Alaniz, Concord, stated that the 10 percent threshold is too high and does not benefit the tenant, and spoke in support of just cause evictions.

Diane Sprouse, Concord, spoke in opposition to the Rent Review Ordinance.

Carlos Alorcon, Mt. View, spoke of binding vs. non-binding mediation.

John Sousa, Concord, spoke of his concern with the Rent Review Ordinance.

Sverinas Ramiraeddi, spoke of lack of housing in general and the high costs associated with owning rental properties.

JJ Mallein, Danville, spoke of lack of housing in general and the costs associated with owning rental properties.

Theresa Carr, California Apartment Association, spoke in support of the 10 percent threshold

Karina Acosta, Concord, stated that the 10 percent threshold is too high and spoke in support of a just cause policy.

Bill Cotton, Cotton Properties, spoke of the costs associated with owning rental properties and stated that the 10 percent is fair.

Tim Carr, Concord, spoke of the rate of inflation.

Mayor Hoffmeister closed the public comment period.

Following questions and comments by the Council, a motion was made by Leone and seconded by Obringer to introduce Ordinance No. 17-7 entitled, "AN ORDINANCE AMENDING THE CONCORD MUNICIPAL CODE BY ADOPTING NEW CHAPTER 19.40 'RESIDENTIAL RENT REVIEW PROGRAM'," by reading of the title only and waiving further reading. The motion passed by unanimous vote of the Council.

ADOPTION OF RESOLUTION NO. 17-6042.3 – Residential Review Program

A motion was made by Leone and seconded by Birsan to adopt Resolution No. 17-6042.3 entitled, "A RESOLUTION AMENDING EXHIBIT A TO RESOLUTION NO. 78-6042 (ESTABLISHING FEES AND CHARGES TO ESTABLISH A RESIDENTIAL RENT REVIEW PROGRAM IN THE CITY OF CONCORD.)" The motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – July 25, 2017

RESOLUTION NO. 17-61 – Residential Rent Review Panel

Laura Simpson, Planning Manager, reported that the Residential Rent Review Panel was approved by Council on May 23, 2017 and became effective on June 23. She explained that the program allows tenants that receive a greater than 10 percent increase in rent in a 12-month period to request reconciliation and mediation through the City's service provider, ECHO Housing, and if the rent dispute is not resolved through the mediation, tenants have the option to seek a non-binding decision by a Rent Review Panel. Ms. Simpson reported the City Council was being requested to adopt Resolution No. 17-61 to approve the three-member Rent Review Panel and authorize the City Clerk to initiate the recruitment process. All members of the panel must be residents of the City of Concord, one member must be a landlord of a multi-family complex of three or more units, one a tenant of a multi-family complex and one a neutral party. Members would serve a term of four years. Ms. Simpson added that staff was requesting an amendment to the resolution to allow for an alternate landlord and an alternate tenant in the event of a conflict of interest. Ms. Simpson noted the recruitment deadline for the receipt of applications to the City Clerk's Office would be Friday, August 25, 2017, at 5 p.m.

Councilmember Leone suggested adding an alternate for the neutral party. The Council discussed the requirement of the landlord to own property within the City of Concord or if the landlord could own property outside of the City of Concord. Councilmember Leone suggested the preference be that the landlord own property within the City of Concord, and allow the appointment of a landlord owning property outside of the City if no applicants meet the preference of owning within the City.

Motion made by Birsan and seconded by McGallian to adopt Resolution No. 17-61 entitled, "A Resolution Establishing Additional Parameters for the Rent Review Panel (created by the Residential Rent Review Program Ordinance No. 17-7)," as amended to add one alternate for each position and set the priority, as discussed, for the landlord to own property within Concord and a second preference of a landlord that owns property outside of Concord. Motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – November 27, 2018

CITY COUNCIL CONSIDERATION ITEM

RESIDENTIAL RENT REVIEW AND MULTI-FAMILY PROGRAM UPDATES

Housing Program Analyst Sophia Sidhu presented a review of the Residential Rent Review Program, explaining affordable housing efforts, the background and summary of the Residential Rent Review Program, the program administration, landlord and tenant responsibilities, outreach for the program, and a summary of the program to date.

She introduced Chief Building Official Ryan Pursley, who presented a background, timeline, program enhancements, and outreach efforts on the Multi-Family Program. He reviewed the inspections conducted in FY 2017/18 and reported on the property conditions of inspected properties. Mr. Pursley described the next steps for the Rent Review and Multi-Family Program.

Following clarifying questions by the City Council, Mayor Birsan opened a public comment period.

Glen Zamania, Concord, spoke in opposition to the Rent Remediation Program.

Bob Lane, Raise the Roof, spoke in opposition to the Rent Remediation Program.

Eduardo Torres, Tenants Together, spoke in opposition to the Rent Remediation Program and in support of just cause eviction.

Zuleika Godinez, Ensuring Opportunity, spoke in opposition to the Rent Remediation Program and in support of rent control and just cause eviction.

Kevin Michael, spoke in opposition to the Rent Remediation Program and in support of rent control.

Blaine Carter, Concord, spoke in opposition to rent control.

Betty Galbadon, spoke in opposition to the Rent Remediation Program and in support of rent control.

Wali Fedaie, Concord, spoke in opposition to rent control.

Cindy Izquierdo, Concord, spoke of her experience with the Rent Remediation Program.

Rex Mattson, El Dorado Hills, spoke in opposition to rent control.

Andi Wise, Concord, spoke of her experience with the Rent Remediation Program and in support of rent control.

Patricia Aguiar, ACCE, spoke in support of rent control.

Dolores Ramos, Concord, spoke in support of rent control.

David Kreutzinger, Concord, spoke in opposition to rent control.

Azucena Torres, Concord, spoke of supporting children and families living in Concord.

Sreenivas Ramireddy, Concord, spoke in opposition to rent control.

Sherry Davis, Vallejo, as a former Concord resident, spoke in support of rent control.

Kenji Yamada, Concord, asked the Council if poor people should live in Concord.

Jima Monson, Concord, spoke in support of rent control and just cause eviction.

Neal Popp, Lafayette, spoke in opposition to rent control.

John Sullivan, Concord, spoke in opposition to rent control.

James Bouquin, Concord, spoke in support of rent control.

Obdulia Sanchez, Concord, spoke of healthy, safe, and equitable communities for children.

Blanca Colin, Concord, spoke in support of rent control and just cause eviction.

Rian Taylor, Concord, spoke in opposition to rent control.

Jessie Wen, Concord, spoke in opposition to rent control.

Vicky Davidson, CA Nurses Association, spoke in support of rent control.

George Fulmore, Concord, spoke in support of rent stabilization.

Reed Robertson, Concord, spoke in support of rent control.

Ali Uscilka, Healthy and Active Before 5, spoke of healthy, safe, and equitable communities for children.

Raz Moghbel, Concord, spoke of the importance of quality care for children and in support of rent stabilization.

Jeff Weil, Alamo, spoke in opposition to rent control.

David Mills, Martinez, spoke in opposition to rent control.

George Sun, Brentwood, spoke in opposition to rent control.

Will Dominic, Bay Area Regional Health Inequities Initiative, spoke of housing stability and family health.

Rebecca Auerbach, Concord, spoke in opposition to the Rent Review Program.

Susan Jeong, Contra Costa County Planning Advisory Council for Early Care and Education, spoke of preschool teachers spending over 60 percent of their income on rent.

William Colin, Monument Impact, spoke in support of rent control.

Laura Nakamura, Concord, spoke in support of just cause eviction.

Donna Walton, Concord, spoke of exploring and considering other solutions besides the Rent Review Program.

Jorge De Sousa, Danville, spoke in opposition to rent control.

Jim Yan, Concord, spoke in opposition to rent control.

Marianne Callahan, Concord, spoke in support of rent control.

Nicole Zapata, Concord, spoke in support of rent control and just cause evictions.

John De Sousa, Danville, spoke in opposition to rent control.

Noura Khouri, Concord, spoke in support of housing as a human right.

JJ Mallein, spoke in support of the Rent Review Program.

Debra Berstein, Monument Impact, spoke of the Rent Review Program not working.

Rhovy Lyn Antonio, California Apartment Association, spoke of the success of the Rent Review Program.

Kristi Laughlin, Concord, spoke of the Rent Review Program not working and in support of rent control and just cause eviction.

Zach Lou, spoke in support of rent control and just cause eviction.

Dave Thompson, Concord, spoke in support of rent control and just cause eviction.

Dennis Gremer, Concord, spoke of finding a balance between landlord and tenant.

Ajit Kaushal, Concord, spoke of finding a balanced solution.

Francisco Torres, Pittsburg, spoke in support of rent control.

Mayor Birsan closed the public comment period and called a recess at 9:27 p.m. The meeting resumed at 9:38 p.m.

The Councilmembers discussed the following Council suggestions:

- buildings with 20-28 units and built before 1996 be capped at a 10 percent rent increase per year and requiring up to 180-days notice of eviction, depending on how long tenant has lived in the unit;
- no increase in rent if the landlord is in default of repair required by the City;
- require at least one-year leases;
- make decisions by the Rent Review Panel binding;
- add just cause eviction;
- create a committee to explore this topic; and,
- explore a policy regarding relocation packages.

Motion made by McGallian and seconded by Obringer to continue this item until the December 11, 2018, Regular Council Meeting after Councilmember-elect Aliano is seated. Motion passed by the following vote of the Council:

AYES: Birsan, Hoffmeister, McGallian, Obringer NOES: None ABSTAIN: Leone

Minutes of City Council Meeting – December 11, 2018

RESIDENTIAL RENT REVIEW/MULTI-FAMILY INSPECTION PROGRAM REPORT TO CITY COUNCIL – Continued from November 27, 2018

Councilmember Aliano disclosed he had viewed the videos of past meetings, read the staff reports, minutes, and annotated agendas on this topic and is informed and could fully participate on this matter. He also disclosed that he met with Raise the Roof Coalition, Contra Costa First Five, and the California Apartment Association to discuss rent control and any information shared was the same information shared by these organization during the public comment period at the November 27 meeting.

The Council shared their thoughts on the idea of having an ad hoc committee to address the rent issue and requested the following items be reviewed by a committee:

- explore rental increase cap, one idea is to cap it at 10 percent;
- one rent increase per calendar year;

- annual lease agreements;
- noticing requirements for notice of termination;
- an ordinance for base line rent;
- notification to the City for rent increases over a certain threshold;
- just cause eviction policy;
- rent relocation policy;
- rent review panel – continue it or not, and binding or not;
- landlord retaliation policies;
- creation of a database;
- link Code Enforcement violations to ability to raise rent;
- explore the application to senior apartments; and
- report back to Council on results found and for decisions, even if disagreement on committee

Council directed staff to agendize the formation of an Ad Hoc committee and define the purpose of the Ad Hoc Committee at the January 8, 2019, City Council meeting.

Minutes of City Council meeting – January 8, 2019

ANNOUNCE THE APPOINTMENT OF TWO COUNCILMEMBERS TO A COUNCIL AD HOC COMMITTEE – Review of State and Local Requirements Regarding Tenant/Landlord Responsibilities, Existing Housing needs within the City, and Develop Proposed Rental Housing Objectives and Strategies for Consideration by the Full Council

Mayor Obringer opened a public comment period.

Natalie, spoke about having someone on the Committee that is open to using the United Nations report on housing as a guideline.

Ali Uscilka, Health and Active Before Five, spoke in support of appointing the District 3 representative to the Ad Hoc Committee.

Ana Martinez, Concord, spoke of being evicted from her apartment and asked for a solution by March 2019 and for Council to pass a moratorium on rent increases over three percent.

Linda Montes, Concord, spoke of being evicted from her apartment with only three months to look for another apartment and asked for a proposal by March 2019, Council to pass a moratorium on rent increases over 3 percent, and in support of having Councilmember Aliano on the Ad Hoc Committee.

Rosa Arce, Concord, spoke of being evicted from her apartment and asked for a proposal by March 2019, Council to pass a moratorium on rent increases over 3 percent, and in support of having Councilmember Aliano on the Ad Hoc Committee.

Elena Liberman, Concord, spoke as a Rent Review Panel member of its successes and asked that the Ad Hoc Committee be equitable for owners and renters.

Marianne Callahan, Concord, spoke in support of rent control and asked the Council Ad Hoc Committee to move swiftly.

Delores Ramos, Concord, spoke of being evicted from her apartment and now sharing a two-bedroom apartment with another family. She spoke in support of Councilmembers Aliano and McGallian serving on the Ad Hoc Committee and asked for a moratorium on rent increases over 3 percent.

Ivethe Garcia, Concord, spoke in favor of Councilmember Aliano serving on the Ad Hoc Committee and asked for a moratorium on rent increases over 3 percent.

David Brazil, FAME, spoke of the housing crisis being connected to the Ad Hoc Committee.

Sabir Locket, EBASE, spoke of a survey that supports just cause evictions and renter protections, in support of Councilmember Aliano serving on the Ad Hoc Committee, and asked for a moratorium on rent increases over 3 percent.

Bob Lane, Raise the Roof, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee and asked for a moratorium on rent increases over 3 percent.

Jaime Cader, Concord, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee.

Mariana Moore, Ensuring Opportunity Campaign, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee and asked for a moratorium on rent increases over 3 percent.

Ronald Flannedy, EBHO, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee.

Dave Thompson, Concord, asked that the Committee be representative, transparent, renter protections be put into place, and asked for a moratorium on rent increases and unjust evictions.

Eduardo Torres, Tenants Together, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee and asked for a moratorium on rent increases and unjust evictions.

Kenji Yamada, Concord, spoke of the irony of saying the Rent Review Panel was a success when a member of that panel was evicted.

William Colin, Concord, spoke in support of Councilmember Aliano serving on the Ad Hoc Committee.

Francisco Torres, ACCE, asked that the Council do the right thing.

Mayor Obringer closed the public comment period and appointed Councilmember Aliano and herself to the Ad Hoc Committee for a period of six months.

Minutes of City Council Meeting – June 19, 2019

AD-HOC COMMITTEE ON RENTAL HOUSING REPORT AND RECOMMENDATIONS

Housing/Community Services Manager Brenda Kain introduced Craig Whittom, Municipal Resources Group, who reviewed the purpose of the City Council Ad Hoc Committee on Rental Housing and the actions leading up to the creation of the Ad Hoc Committee. Mr. Whittom presented an overview of context for the Committee's work and explained the Ad Hoc Committee's process. He provided a synopsis of the policy recommendations by the Ad Hoc Committee.

Following questions by the City Council, Mayor Obringer opened a public comment period.

Kathy Green, Concord, spoke about the landlord's responsibility to respond to the condition of the units.

Jesse Hurtado, Concord, spoke in support of the 3% rent cap and just cause evictions.

Tracy Crosby, Concord, spoke in support of rent control.

Nicole Zapata, Concord, spoke in support of stronger just cause evictions.

Liliana Gonzalez, Concord, spoke in support of rent control.

Jesus Valdez, Concord, spoke in support of rent control.

Betty Galbadon, requested a moratorium on rent until a policy is approved.

Ronald Flannery, EBHO, spoke in support of Councilmember Aliano's proposed policies.

Debra Bernstein, Concord, spoke in support of just cause evictions and rent control.

Father Richard Mangini, Concord, spoke in support of just cause evictions and rent control.

Rev. Barbara Barkley, Concord, spoke of helping those in need.

Mariana Moore, Ensuring Opportunity, spoke in support of just cause, relocation assistance, and enacting a rent moratorium.

George Fulmore, Concord, spoke in support of tenant protections.

Fred Doster, Concord, spoke in opposition to rent control and just cause evictions.

Joyce Bohn, Concord, spoke in opposition to rent control and just cause evictions.

John Nunes, Concord, spoke in opposition to rent control and just cause evictions.

David Kreutzinger, Concord, spoke in opposition to rent control and just cause evictions.

Janet Kreutzinger, Concord, spoke in opposition to rent control and just cause evictions.

Adam Pitzler, Concord, spoke in opposition to rent control and just causes evictions.

Greg Colley, Concord, spoke in support of rent control and just cause evictions.

Mary Rae Lehman, Concord, spoke in opposition to rent control and just cause evictions.

Mary Arnold, Concord, spoke in opposition to rent control and just cause evictions.

Michael Marston, St. Helena, spoke in opposition to rent control and just cause evictions.

Karen Gremer, Concord, spoke in opposition to rent control and just cause evictions.

Dennis Gremer, Concord, spoke in opposition to rent control and just cause evictions.

Jessica Jollet, Lift Up Contra Costa, spoke in support of a rent moratorium, relocation assistance, rent control that responds to the market, and just cause evictions.

Eduardo Torres, Tenants Together, spoke in support of just cause for eviction with relocation assistance.

William Colin, Concord, spoke in support of just cause eviction with relocation assistance.

Divya Sundar, Concord, spoke in support of rent control.

Jennifer Morales, Monument Impact, spoke in support of stronger just cause eviction with only 3 reasons, a cap for rent increases, and a rent moratorium.

Azucena Torres, Monument Impact, spoke in support of relocation assistance, rent control, and just cause eviction removing reasons 4-8.

Rosaura Lopez, Concord, spoke in support of just cause eviction with relocation assistance and rent control with an annual limit of 3% or CPI.

Jima Monson, Concord, spoke in support of just cause eviction and rent control with a cap at 3% or CPI.

Alex Chavez, Concord, spoke in support of just cause eviction and relocation assistance.

Mayor Obringer called a recess at 8:09 p.m. Mayor Obringer resumed the meeting at 8:22 p.m.

Blanca Colin, Concord, spoke in support of rent control limited to 3% or CPI and a moratorium on rent increases until the policy is put into place.

Evangelina Mimila, Concord, spoke in support of rent control limited to 3% or CPI.

Julia Zermeno, Concord, spoke in support of rent control limited to 3% and relocation assistance.

Dolores Ramos, Concord, spoke in support of rent control limiting increases to 3% or CPI and just cause eviction with relocation assistance.

Alejandra Dominguez, Concord, spoke in support of rent control limiting increases to 3% or CPI and just cause eviction with relocation assistance.

Claudia Vazquez, Concord, spoke about the stress that moving causes children and in support of rent control limiting increases to 3% or CPI, just cause eviction, and relocation assistance.

Rhea Laughlin, Raise the Roof Coalition, spoke in support of rent control limiting increases to 3% or CPI, just cause eviction, and relocation assistance.

Kenji Yamada, Concord, spoke in support of rent control and just cause evictions.

Matt Regan, Bay Area Council, spoke in opposition to rent control.

Judi Herman, Concord, spoke of justice for all and encouraged the Council to move forward with the proposed policies.

Carol Meyer, Fremont, spoke in opposition to rent control.

Jim Trolan, Concord, spoke in opposition to rent control and just cause eviction.

Limmy Claxton, Concord, spoke of a solution that works for both sides.

Francisco Torres, Concord, encouraged Council to make the right decision.

Varinder Kumar, Concord, spoke in opposition to rent control and just cause eviction.

Sreenivas Ramireddy, Danville, spoke of a solution of a fund created by landlords' to subsidize renters that need immediate help.

Joe Stokley, Pleasant Hill, spoke in opposition to rent control.

Rex Mattson, Concord, spoke in opposition to rent control.

Contra Costa Taxpayers Association, spoke in opposition to rent control and in support of the City's current rent remediation program.

Chuck Boughan, Concord, spoke in support of the City's current rent remediation program.

Elena Lieberman, Concord, spoke in support of the Rent Review Panel and in opposition to rent control.

Dave Thompson, Monument Impact, spoke in support of rent cap at 3% and just cause evictions.

Blaine Carter, Concord, spoke in opposition to rent control and of supply and demand.

David Schubb, spoke of supply and demand.

Aeysha Corio, Concord, spoke of trading one problem for another.

Jorge deSousa, Concord, spoke in opposition to rent control and related policies.

John deSousa, Concord, spoke in opposition to rent control and related policies.

Reed Robertson, Concord, spoke of building more housing.

Susan Jeong, spoke in support of just cause eviction with relocation assistance.

Jo Sciarroni, Clayton, spoke of supply and demand and in opposition to rent control.

Ali Uscilka, Healthy and Active Before 5, spoke in support of just cause for evictions and requested a temporary moratorium on rent increases until a policy is put into place.

Bill Cotton, Concord, spoke in opposition to rent control.

Merle Hall, Concord, spoke in opposition to rent control.

Liz Froelich, Concord, spoke in opposition to relocation assistance.

Wali Fedaie, Concord, spoke in opposition to rent control and just cause evictions.

Debi Mackey, Concord, spoke in opposition to just cause eviction and rent control.

Nancy D'Onofrio, Concord, spoke in opposition to just cause eviction and relocation assistance.

Steven Edrington, spoke in opposition to just cause eviction and rent control.

Norman Johnson, Discovery Bay, spoke in opposition to just cause eviction and rent control.

Kristin Connolly, East Bay Leadership Council, spoke about the need to increase the housing supply and in opposition to proposed changes to the City's current rent remediation program.

John Brewster, Concord, spoke in opposition to rent control.

Erik Meyers, Pinole, spoke in opposition to just cause eviction and the need for more housing.

Glen Zamanian, Concord, spoke in opposition to just cause eviction and in support of the City's current rent remediation program.

Saabir Lockett, Concord, spoke in favor of a clear policy to protect tenants.

Mayor Obringer called a recess at 10:06 p.m. The meeting resumed at 10:17 p.m.

Rhovy Lyn Antonio, California Apartment Association, spoke of the need to increase the housing supply.

James Dye, Concord, spoke in opposition to rent control.

Casey McManus, spoke about protecting the tenants that will not call the police and having to decide how to handle difficult tenants.

Peggy Tweedie, Concord, spoke in opposition to rent control and suggested looking at program ideas to help with homeownership.

Nicholas Bruce, spoke in support of keeping non-renewable lease agreements as an option as a corrective action.

Kenneth Kent, Concord, spoke in support of policies that help the tenants.

Jaime Cader, Concord, spoke in support of a clear annual limit on rent increases.

Gwen Watson, Concord, spoke in support of the proposed policies and recommended moving forward.

Gareth Ashley, Concord, spoke in support of reasonable rent stabilization and reasonable just cause.

Natalie, spoke of Concord's eviction rate.

Noura Khouri, Faith Alliance for a Moral Economy, urged the Council to take care of the most vulnerable.

Bradford Zamanian, spoke in opposition to just cause eviction and rent control.

Chao Ruan, Concord, spoke in opposition to rent control.

JJ Mallein, spoke in support of the City's current rent remediation program.

Mayor Obringer closed the public comment period.

Councilmembers discussed the policies which staff was seeking direction and provided the following guidance:

- 4.1 Modify Residential Rent Review Program – there was a consensus to move forward with studying this item with discussion focused on an increase threshold of 7% +CPI.
- 4.2 Extend Property Owner Notice Requirement for Rent Increases – consensus supported the extended period of notice.
- 4.3 Relocation Assistance for Tenants – no consensus in support for the recommendation, however, there is a majority of the Council interested in learning more about the recommendation.
- 4.4 Just Cause Eviction Ordinance – no consensus in support for the recommendation.
- 4.5 Property Owner Requirement to offer Minimum Lease Term – consensus supported the recommendation.
- 4.6 Enhance Support for Land Trust/Non-Profit Acquisition of Properties to Preserve Long-Term Affordability – consensus supported the recommendation.
- 4.7 Support State Legislation that requires State-Wide Rent Registration and Evaluate Feasibility of Gathering Rent Information through the Business License Application/Renewal Process – consensus supported the recommendation.

- 4.8 Enhance City Communication Regarding Affordable Housing Programs, Existing Tenant Protections under California State Law, and Resources for Tenant Access to Counseling/Legal Representation – consensus support for the recommendation.
- Sunset Provision of three years – there was majority support for a sunset provision.

Minutes of City Council Meeting – February 11, 2020

CONSIDERING RENTAL HOUSING POLICIES

Housing Manager Brenda Kain introduced Craig Whittom, Municipal Resources Group, who reviewed the purpose of this item and presented an overview of AB1482, rental housing legislation enacted into law after City Council action on June 19, 2019. Mr. Whittom reviewed the City of Concord Ad Hoc Committee actions culminating in a final Committee Report presented to the City Council on June 19, 2019 and the current staff recommendations. He reported that direction from the Council will facilitate the creation of an ordinance, and that ordinance would be considered at a City Council meeting in May 2020.

Following questions by the City Council, Mayor McGallian opened a public comment period.

Dennis Gremer, Concord, requested that the Council not adopt an ordinance at this time and wait to see the results of AB1482.

Kristi Laughlin, Raise the Roof Coalition, spoke in favor of rent stabilization, rent control, and just cause evictions.

Mavro, Sun Terrace Tenant Union, talked about living conditions at the Sun Terrace Apartments, stated that they formed a tenants group, and spoke in favor of rent control and just cause evictions.

Jervon Graves, Contra Costa AFL-CIO, spoke in favor of just cause eviction and rent relocation assistance.

David Kreutzinger, Concord, spoke of property owners leaving Concord for cities with less restrictions.

Jackie Aldridge, Concord, stated that there are enough laws in place.

Jessica Jollett, Lift Up Contra Costa, spoke in favor of rent control and just cause eviction.

Debra Ballinger, Monument Impact, spoke in favor of just cause eviction, a rent registry, and legal assistance.

Bob Lane, Raise the Roof Coalition, spoke in favor of protections beyond AB 1482 for rent control and just cause eviction.

Blaine Carter, Concord, spoke in opposition to additional rent control beyond AB 1482.

Katie Martin Selcraig, Monument Impact, spoke of the Rent Review Program and in support of a rent registry.

George Fulmore, Concord, spoke in support of the Rent Review Program, an increase in relocation assistance, just cause evictions, and a requirement of landlords to have a business license.

Wali Fedaie, Concord, urged the Council to not adopt an ordinance at this time and wait to see the results of AB1482.

Jorge DeSousa, spoke in opposition to additional costs and rules for landlords.

Judith Herman, Concord, spoke in support of closing the loopholes in AB1482 and a rent registry.

David Schubb, Walnut Creek, asked that the City Council not enact an ordinance and wait to see the results of AB1482.

John DeSousa, Danville, spoke in opposition to relocation assistance.

Jo Sciarroni, Clayton, spoke of equal balance and in opposition to rental control and just cause eviction.

Chuck Boughan, Concord, spoke of offering a 6-month lease and in opposition to relocation assistance.

JJ Mallein, Danville, spoke of average rent vs. current rent and the costs for landlords.

Elena Leiberman, Concord, spoke of concern over minimum lease requirements and relocation assistance.

Sreenvas Ramireddy, Danville, asked that the City Council not enact an ordinance and wait to see the results of AB1482.

Rhovy Lyn Antonio, CA Apartment Association, asked that the City Council not enact an ordinance and focus on outreach and implementation of AB1482.

Mayor McGallian closed the public comment period.

Mayor McGallian recessed the meeting at 8:55 p.m. The meeting resumed at 9:05 p.m.

Following additional questions and comments by the Council, the Council considered staff recommendations one by one.

9. Rent Cap

It was the consensus of the Council to eliminate the Rent Review Program as of June 30, 2020, and obtain a third party to support tenants in landlord/tenant disputes.

3. Relocation Assistance Amount

It was the consensus of the Council to implement the relocation assistance of \$5,000 or two times the monthly current rent, whichever is greater.

4. Relocation Assistance Criteria

It was the consensus of the Council to use the AB1482 criteria.

8. Relocation Assistance Applicability

It was the consensus of the Council to require that all units be covered by AB1482 and direct staff to research unit age.

6. Offer of Initial Minimum 12-Month Lease Term

It was the consensus of the Council to use the AB1482 criteria for unit size, require all units be covered by the new regulation, regardless of age, and direct staff to research the opportunity for a tenant, at their discretion, to elect to sign a lease for less than 12-months.

6. State Legislation Regarding a Rent Registry

It was the consensus of the Council to support state legislation regarding collection of rent information.

7. Additional Business License Data

It was the consensus of Council to direct staff to look into the most cost effective solution to develop a general database for a rental registry and collect the data on an annual basis.

8. Sunset Provision

A majority of the Council supported the establishment of a sunset provision in the ordinance consistent with AB1482 (January 1, 2030).

Minutes of City Council Meeting – July 7, 2020

Introduction of Ordinance No. 20-7 Amending the Concord Municipal Code by Repealing Chapter 19.40 “Residential Rent Review Program” and Replacing it in its Entirety with Chapter 19.40 “Residential Tenant Protection Program

Mayor McGallian introduced Craig Whittom, Municipal Resources Group, who gave a presentation on the proposed Residential Tenant Protection Program Ordinance that includes a Residential Rent Registry.

Following questions by the Council, Mayor McGallian opened a public comment period. Emailed comments were read into the record by City Clerk Joelle Fockler and Executive Legal Secretary Lori Myers.

George Fulmore, Concord, spoke of the limitations on AB 1482 and rent control.

Dennis and Karen Gremer, Concord, emailed about putting legislation restricting landlords be put on hold until the state law effects can be assessed.

Elsie Mills spoke in support of a rental registry and requested a moratorium on evictions through COVID-19.

David Kreutzinger emailed in opposition to a rent registry.

Blaine Carter urged the Council to remember that they represent all Concord citizens and in opposition to a rent registry.

Hector Malvido, Ensuring Opportunity Campaign, emailed requesting an increase to the moratorium to 90 days beyond the state of emergency.

Elena Liberman spoke in opposition to a rent registry.

Blanca Colin, Concord, emailed requesting an extension of the moratorium by eliminating any threat of eviction for non-payment of rent related to COVID-19.

Ali Uscilka, emailed requesting an extension of the moratorium and banning evictions related to any COVID-19 hardship in the future.

Deena Levine, Jewish Family & Community Services, spoke of the importance of protection and support for the City's tenants by stopping the threat of mass evictions and approve an ordinance that includes extension of the moratorium and rent control.

Jima Monson, Concord, emailed requesting a moratorium that bans all evictions for non-payment of rent as a result of COVID-19.

Karen Hernandez, Concord, spoke of tenants being forced out of Concord unjustly.

Tiffany Concepcion, Youth Member with the Central County Regional Group, emailed requesting a ban on all evictions related to COVID-19.

Maria DeSousa, spoke of the need of support of landlords to address the challenges they are facing.

Maria Apaza, Concord, emailed requesting a ban on all evictions related to COVID-19.

Rhovy Lyn Antonio, California Apartment Association, spoke of AB 1482 being a new law and asked Council to pause on any more changes to see the effects of the law before they move forward with any changes including a rental registry.

Nicole Zapata, East Bay Alliance for a Sustainable Economy, emailed requesting a ban on all evictions related to COVID-19, just-cause evictions, and to bring back an ordinance for rent control to stabilize rents.

Sreenivas Ramireddy, spoke on behalf of Concord landlords requesting no additional legislation at this time, and commented that recent rents in Concord were actually decreasing.

Jennifer Morales, Monument Impact, emailed requesting an extension of eviction moratorium to 90 days beyond the end of the State of Emergency, a ban on evictions related to COVID-19, bring back an ordinance for rent control, enact rent and eviction registries, and increased rental assistance.

Evangelina Mimila, Concord, emailed requesting a ban on all evictions related to COVID-19 loss of income.

Alex Werth, East Bay Housing Organization, emailed requesting an extension of the eviction moratorium, rental assistance, renter protections, and rent stabilization.

Gabiola DeLaCruz, Concord, emailed requesting the Council take action and implement long-lasting real tenant protections.

Kristi Laughlin, EBASE and Raise the Roof, commented that the proposed Ordinance does nothing to provide permanent renter protections and requested that the Council bring back an ordinance with more protections.

Melissa Ferrer, emailed requesting an extension of eviction moratorium to 90 days beyond the end of the State of Emergency, a ban on evictions related to COVID-19, bring back an ordinance for rent control, enact rent and eviction registries, and increased rental assistance.

Efigenia Bravo, Concord, emailed requesting modification of the moratorium to include a ban on all evictions related to COVID-19 a just cause and rent control policy.

John DeSousa, commented that landlords have hearts and do what they can to help their tenants, but they cannot supply homes for free; they cannot survive if they don't receive rent.

Alyssa Kang, California Nurses Association/National Nurses United, emailed requesting the Council to show leadership by taking action for real tenant protections and to fight for a city that is inclusive, and racially and economically adverse.

Marisol Gullien, Central County Regional Group, emailed requesting the Council direct staff to draft a rent control and just cause ordinance with more protections than AB1482 and bans all evictions related to COVID-19.

Dalila Quirarte, Central County Regional Group, emailed requesting the Council direct staff to draft a local rent control and just cause ordinance that provides more protections than those enacted by the state.

Debra Ballinger, Monument Impact, emailed requesting an extension of eviction moratorium to 90 days beyond the end of the State of Emergency, a ban on evictions related to COVID-19, bring back an ordinance for rent control, enact rent and eviction registries, and increased rental assistance.

Veselka Ganchev, Concord, emailed requesting the Council modify the moratorium to include a ban on all evictions related to COVID-19 and pass rent control and just cause policies to protect tenants.

Delores Ramos, Concord, emailed requesting the Council ban all evictions related to COVID-19 and enact just cause and rent control policies.

Kumar, Concord, spoke of government assistance to tenants who cannot pay their rent and not placing the financial burden on landlords.

Francisco Gonzales, emailed reminding the Council that tenants are the people that make up and represent Concord.

Hermelinda Godinez, Concord, emailed requesting a ban on all evictions related to COVID-19 and adopt rent control and just cause policies.

Debi Mackey, emailed requesting that the Council not extend the rent moratorium and stating that landlords are not getting any breaks on paying their mortgage and taking a forbearance if allowed so far only government packed loans provide them.

Kenji Yamada, Concord, emailed responding to earlier comments stating that landlords do not provide housing, noting that if a landlord leaves, they cannot pick up and carry away a house or apartment complex with them and reminding the public that the RRRP heard actual specific cases of rent increases well over 10 percent which it was unable to stop due to its lack of binding power.

Ady Olvera, emailed requesting Council to plan for a future by building a fair renters program that assists and protects from unjust evictions and slumlords.

Rhea Elena, Raise the Roof, commented, requesting that the Council pass real tenant protection policies.

Anonymous, spoke of instances where tenants refuse to take advantage of resources and requested that the Council wait to enact further regulations. He noted that housing suppliers also need support.

Mayor McGallian closed the public comment period and recessed the meeting at 10:30 p.m. The meeting resumed at 10:40 p.m.

Following discussion by the Council, staff was directed to establish a rent registry program for all multi-family complexes with four (4) or more units in Concord for consideration and approval by the Council.

A motion was made by Hoffmeister and seconded by Obringer to introduce Ordinance No. 20-7 entitled, "An Ordinance Amending Concord Municipal Code by Repealing Chapter 19.40 'Residential Rent Review Program' and Replacing it in its entirety with Chapter 19.40 'Residential Tenant Protection Program' with the following text added to 19.40.020(b) Notice of Curable Lease Violations, "As provided in Civil Code Section 1946.2(c)," by reading of the title only and waiving further reading. The motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – November 10, 2020

INTRODUCTION OF ORDINANCE NO. 20-10 – Rent Registry

The Public Hearing Notice was published in the East Bay Times on October 27 and November 3, 2020, and posted in the Civic Center posting cabinet on October 27, 2020.

Housing Manager Brenda Kain introduced the item and Craig Whittom, MIG, who presented the report on the proposed amended Residential Tenant Protection Program Ordinance that includes a rent registry program. He stated that Council was also being requested to approve modifications to the City's Master Fees and Charges schedule and authorization to approve a Professional Services Agreement with

Hinderliter DeLlamas and Associates (HdL) to administer the rent registry. Mr. Whittom noted that Joshua Davis, HdL Companies, was in attendance and available to answer questions.

Following questions from the City Council, Mayor McGallian opened a public comment period. Emailed comments were read into the record by Executive Legal Secretary Lori Myers.

Anthony Freddie emailed in opposition to the rental registry.

Debra Ballinger, Monument Impact, spoke in support of the rental registry.

Rebecca Auerbach, Concord, emailed in support of the rental registry.

Kenji Yamada spoke in support of the rental registry.

Betty Gabaldon, Todos Santos Tenants' Union, spoke in support of the rental registry.

Hector Malvido spoke in support of the rental registry.

Carlos spoke of problems with his landlord.

Laura Nakamura spoke in support of the rental registry.

Kristi Laughlin spoke in support of the rental registry.

Mayor McGallian closed the public comment period.

Following comments by the City Council, a motion was made by Hoffmeister and seconded by Birsan to introduce Ordinance No. 20-10 entitled, "An Ordinance Amending Concord Municipal Code Chapter 19.40 'Residential Tenant Protection Program' to Establish a Rent Registry Program by Adding Section 19.40.110 'Rent Registry'," as amended to revise 19.40.110 Rent Registry (c) to read, "Late fees; Penalty for incomplete or false information. Should an owner fail to pay all or any portion of the Rent Registry Fees, or provide incomplete or false information, the City may recover the outstanding amounts, plus accrued interest and penalties, utilizing any remedies provided by law or in equity, including municipal tax lien procedures established by ordinance or state law. Applicable penalties shall be calculated as set forth in the Resolution Establishing Fees and Charges for Various Municipal Services, including Exhibit A, Section E (Police Fees) Section 5.6 and Exhibit A, Section A (Administrative Fees) Section 20 (Rent Registry Fees), and may be applied on a per-unit basis" by reading of the title only and waiving further reading. The motion passed by unanimous vote of the Council.

A motion was made by Hoffmeister and seconded by Birsan to adopt Resolution No. 20-6042.6 entitled, "A Resolution Amending Exhibit 'A' to Resolution No. 78-6042 Establishing Rent Registry Fees and Penalties in the City of Concord" as amended to include Penalties and Infractions per unit. The motion passed by unanimous vote of the Council.

A motion was made by Hoffmeister and seconded by Obringer to direct the Council Committee on Housing and Economic Development consider the details of the database of the public portal and return to the full City Council with recommendations. The motion passed by unanimous vote of the Council.

A motion was made by Aliano and seconded by Hoffmeister to approve a Professional Services Agreement with HdL Companies for a period of three years for administration of a Rent Registry not to

exceed \$42,000 per year, and authorize the City Manager to execute the agreement in a form acceptable to the City Attorney. The motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – December 1, 2020

ADOPTION OF RESOLUTION NO. 20-55 - A Substantial Amendment to the City's FY 2019/20 CDBG Annual Action Plan

Housing Manager Brenda Kain presented a report on a proposed substantial amendment to the FY 2019/20 Action Plan allocating an additional \$935,572 in Community Development Block Grant-Coronavirus (CDBG-CV3) funds and confirmed that the proposed funding recommendations were developed in conversation with the City's partner agencies including Monument Impact, Shelter, Inc., Raise the Roof, East Bay Housing Organizations, ECHO Housing, and Centro Legal da la Raza.

Following questions from the City Council, Mayor McGallian opened a public comment period. Emailed comments were read into the record by City Clerk Joelle Fockler, Executive Legal Secretary Lori Myers, and Human Resources Specialist Laura Alas.

George Fulmore, Concord, questioned the administration costs.

Reetu Moody, Centro Legal de la Raza, spoke in support of the amendment.

Efigenia Bravo, Concord; emailed in support of the amendment.

Betty Gabaldon, Central County Regional Group, spoke in support of the amendment.

Marisol Guillen, Central County Regional Group, emailed in support of the amendment.

Alex Werth, EBHO, spoke in support of the amendment.

Dave Thompson, Monument Impact, spoke in support of the amendment.

Mr. Romero, Concord, spoke of issues with his landlord and requested a rent moratorium.

Gabiola DeLaCruz, Concord, emailed in support of the amendment.

Kristi Laughlin, East Bay Alliance for a Sustainable Economy, spoke in support of the amendment.

Jennifer Morales, Monument Impact, emailed regarding adopting measures to protect renters and urging City Council to enact a rent freeze for 2021.

Hector Malvio, Concord, spoke in support of the amendment.

Julia Zermeno, Concord, emailed in support of the amendment.

Candace Hernandez, Concord, spoke in support of the amendment.

Dalila Quirarte, Concord, emailed in support of the amendment.

Blanca Colin, Concord, emailed in support of the amendment.

Mayor McGallian closed the public comment period and called a recess at 9:23 p.m. The meeting resumed at 9:33 p.m.

Following comments by the City Council, a motion was made by Hoffmeister and seconded by Obringer to adopt Resolution No. 20-55 entitled, "A Resolution Approving A substantial Amendment to the City's FY 20-19/20 CDBG Annual Action Plan to Allocate and Appropriate an Additional \$935,572 in Community Development Block Grant-Coronavirus (CDBG-CV3) Funds under the Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020." The motion passed by unanimous vote of the City Council.

Minutes of City Council Meeting – January 12, 2021

CITY COUNCIL CONSIDERATION ITEM

DATA TO BE COLLECTED THROUGH CITY OF CONCORD RENT REGISTRY PROGRAM AND WHAT INFORMATION IS TO BE MADE AVAILABLE TO THE PUBLIC ON THE CITY'S WEBSITE

Mayor McGallian introduced Housing Manager Brenda Kain who introduced Craig Whitton who presented a report on proposed data to be collected through the City of Concord Rent Registry Program. Josh Davis, HdL, presented on the webpage interaction.

Following questions by the City Council, Mayor McGallian opened a public comment period.

Denis Gremer, Concord, inquired about the benefits and purpose of making the information available through a public portal.

David Kreutzinger, Concord, was concerned about identify fraud, privacy issues, and opposed the information toto be available through a public portal.

Alex Werth, Concord, East Bay Housing Organization, proposed three issues which are not integrated in the revised questionnaire – 1) Attachment 1 – recommended language of the beneficial owner to identify the responsible party to secure the accurate information. 2) Section C – include question to enter the base rent when occupant moved in the unit. 3) Include the question to enter the frequency of a rent increase over the year.

Blaine Carter, Concord, questioned what the goal of collecting the information was and opposed the information to be available through public portal.

Hector Malvido, explained the importance of rent registry information accessible through a public portal.

Betty Gabaldon, Concord, spoke in favor of a rent registry and suggested to place security access in place to retrieve information.

Karen Hernandez, Concord, spoke in favor of a rent registry and requested the information to be accessible to the public for study reasons and to find solutions.

Nicole Zapata, Concord, spoke in favor of a rent registry and emphasized that tenants should have access to the information.

Kristi Laughlin, Concord, spoke in favor of a rent registry and suggested improvements in collecting data to diagnose housing affordability issue.

Lisa Gottlieb, Sycamore Green Apartments, opposed the rent registry due to privacy issues and suggested to start with small steps.

Rhovy Lyn Anto, California Apartment Association, opposed rent registry information to be accessible through a public portal due to privacy issues.

Blanca Colin, Central County Regional Group, emailed in favor of a rent registry.

Sarah Treuhaft, PolicyLink, emailed in appreciation for developing a rental registry program.

Julia Zermeño, Concord, emailed in favor of a rent registry and requested more advertising and that the information be published in different languages.

Jennifer Morales, Monument Impact, emailed in favor and commented that more information should be requested to have a complete database for an effective rent registry.

Charlito Bergante, Concord, opposed having the information available through a public portal.

JJ Mallein, Concord, opposed the rent registry and against having the information available through a public portal.

Mayor McGallian closed the public comment period.

A motion was made by Aliano and seconded by Hoffmeister to direct staff to use the wording from Attachment 1 with the addition of the question "Base rent as of move in date" for property owner information for the rental registry, that unit number not be available in the public portal but all other collected information would be, and that staff work with HdL to explore the feasibility of opening the portal for property owner submission more than two months in advance to make it as easy as possible for owners to submit information to the portal. The motion passed by unanimous vote of the Council.

Minutes of City Council Meeting – February 2, 2021

CITY COUNCIL CONSIDERATION ITEM

ADOPTION OF RESOLUTION NO. 21-6 – Statewide Park Development and Community Revitalization Program Grant Funds

Kevin Marstall, City Engineer, presented a report explaining the California Prop 68 Grant application usage, and thanked community partners Central County Regional Group (CCRG), First 5 Contra Costa, and Monument Impact and Concord residents for their valuable feedback on the Ellis Lake Park Improvement project.

Rhea Laughlin, First Five Contra Costa/CCRG, spoke of a common goal for every Concord child have a quality, safe, and accessible park and of the vision for Ellis Lake Park. She shared her concern over displacement of Ellis Lake Park neighbors if the project is completed.

Debra Ballinger, Monument Impact, applauded staff for its collaboration with the community and requested Council to establish a community-based task force to look into anti-displacement strategies and advocate for advancement without displacement.

Following questions by the Council, Mayor McGallian opened a public comment period. Emailed comments were read into the record by City Clerk Joelle Fockler and Deputy City Clerk Neetu Salwan.

Danny Espinoza, Lift Up Contra Costa, spoke in favor of forming a task force to discuss anti-displacement strategies before going further with the plan.

Will McGarvey, Interfaith Council of Contra Costa County, emailed concerns regarding displacement of residents around Ellis Lake Park due to the project.

Kenji Yamada, Concord, spoke in favor of forming a task force to discuss anti-displacement strategies.

Jessica González, Monument Impact, emailed in support of implementing anti-displacement strategies in the Ellis Lake Park renovation plan.

Rebecca Auerbach, Concord, requested to know the City Engineer's definition of "nonresident activity" that he wants to discourage and stated concern that it meant Concord's nonhoused residents.

George Fulmore, Concord, emailed requesting an amendment to the final plan for Ellis Lake Park improvements to include a new playground near Laguna Street as part of the improvements.

Laura Nakamura, Concord Communities Alliance, spoke of park improvements without an adverse impact on park neighbors and in favor of forming a task force to discuss anti-displacement strategies.

Dave Hughes, Concord, emailed in favor of the park improvements and in favor of a task force to discuss anti-displacement strategies.

Cora Mitchell, Concord, spoke in favor of forming a task force to discuss anti-displacement strategies.

Alex Hernandez, Concord, emailed requesting a playground in the grassy area near Laguna Street.

Ali Uscilka, Healthy and Active Before 5, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Wendy Hershey, Concord, emailed in favor of forming a task force to discuss anti-displacement strategies.

Jima Monson, Concord, spoke in favor of the park improvements and recommended to form Task Force to discuss Anti-Displacement Strategies.

Maritza Cardenas, Concord, emailed requesting a playground, benches, and tables added to the grassy area off Laguna Street.

Marisol Guillen, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Tim Carr, Concord, emailed suggesting that the out of bounds area for the basketball court be extended to at least four feet beyond the goal posts.

Julia, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Carla Gonzales, Monument Impact, emailed in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Dalila Quirarte, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Blanca Colin, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Hector Malvido, Ensuring Opportunity Campaign, spoke in favor of forming a task force to discuss anti-displacement strategies.

Betty Gabaldon, Concord, spoke in favor of forming a task force to discuss anti-displacement strategies due to potential rent increase in the future.

Dolores Ramos, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

VB Abraham, Concord, spoke in favor of the park improvements and forming a task force to discuss anti-displacement strategies.

Mayor McGallian closed the public comment period.

Following comments by the City Council, a motion was made by Aliano and seconded by Hoffmeister to adopt Resolution No. 21-6 entitled, "A Resolution Authorizing the City of Concord's Application for Statewide Park Development and Community Revitalization Program Grant Funds". The motion passed by unanimous vote of the Council.

It was the consensus of the City Council to have the Committee on Policy Development and Internal Operations explore the creation of an Anti-Displacement Task Force.

Minutes of City Council Meeting – June 1, 2021

COUNCIL REPORTS

It was the consensus of the City Council to schedule a City Council meeting for a discussion on the extension of the moratorium on residential rent increases and evictions through the end of September 2021.

It was the consensus of the City Council to have the Housing & Economic Committee learn more about anti-tenant harassment ordinances and to share its learnings with the full City Council.

It was the consensus of the City Council to have the Housing & Economic Development Committee consider the development of a process and approach to define appropriate next steps toward addressing the community's concerns and priorities related to our unhoused residents.

Minutes of City Council Meeting – December 14, 2021

INTRODUCTION OF AN ORDINANCE – Amending Concord Municipal Chapter 19.50 “Residential Tenant Anti-Harassment Protection”

Housing Manager Brenda Kain presented the staff report, explaining that the Council was being requested to consider a Residential Tenant Anti-Harassment Protection Ordinance. She reviewed the actions by the HED Committee regarding the proposed ordinance and the key provisions of the proposed ordinance,

Following questions from the City Council, Mayor Aliano opened a public comment period.

The following people spoke in opposition to the proposed ordinance:

Peretz Wolf-Prusan

Traci Young, Contra Costa Labor Council

Betty Gabaldon

Guadalupe

Juan

George Fulmore

Azucena Torres

Jima Monson, Central County Regional Group (CCRG)

Julia Zermeno, CCRG

Kate O’Hara, East Bay Action

Laura Nakamura

Debra Ballinger, Monument Impact

Efigenia Bravo, Concord

William Colin

Alex Hernandez, CCRG

Blanca Colin

Ilaf Esuf

Jan Warren, Social Justice Alliance of Contra Costa County

Rhovy Lyn Antonio, California Apartment Association

Delores Ramos, Concord

Karen Hernandez, Concord

Rhea Elena

Kristi Laughlin

The following people spoke in favor of sending the proposed Ordinance to the Housing and Economic Development Committee for review and revision:

Tony Bravo, Monument Impact

Rev. Sophia Dewitt, East Bay Housing Organization
Monique Doryland, Bay Area Legal Aid
Millie Phillips, Faith Alliance for a Moral Community
Karla, The Unity Council
Roxanne Carillo Garza
Jenny Morales, Monument Impact
Judith Herman – email
Ady
Cora Mitchell spoke of Council’s inefficiency.

Jackie Zaneri spoke of a privately enforceable law and suggested using ordinances from Berkeley and Oakland as examples.

Mayor Aliano closed the public comment period.

A motion was made by Birsan and seconded by McGallian to have the Housing and Economic Development Committee review and revise the ordinance. The motion passed by unanimous vote of the Council.

EXHIBIT B



Staff Report

Date: July 7, 2020

To: City Council

From: Valerie J. Barone, City Manager

Reviewed by: Andrea Ouse, Director of Community Development

Prepared by: Brenda Kain, Housing Manager
Brenda.kain@cityofconcord.org
(925) 671-3088

Subject: **Considering introduction of Ordinance amending the Concord Municipal Code by repealing Chapter 19.40 “Residential Rent Review Program” and replacing it in its entirety with Chapter 19.40 “Residential Tenant Protection Program” by reading of the title only and waiving further reading; and provide staff direction regarding a City of Concord rent registry.**

CEQA: Not a project/exempt under Public Resources Code Section 21065, CEQA Guidelines Sections 15060(c)(2), 15060(c)(3) or 15378 and/or 15061(b)(3).

Report in Brief

The proposed Residential Tenant Protection Program Ordinance implements policy direction provided by the City Council at its meeting on February 11, 2020. The report also provides information requested by the City Council regarding tenant assistance services and a proposal to gather rental information from Concord property owners (Rent Registry).

Recommended Action

1. Introduce the attached Ordinance (Attachment 1) by reading of the title only and waiving further reading.
2. Provide direction to staff regarding a City of Concord rent registry.

Background

Between June 2016 and May 2017, the City Council and the Housing and Economic Development (HED) Committee convened eight meetings on the issue of rent stabilization and tenant protections and heard more than 12 hours of public testimony. During these meetings, a wide range of measures addressing tenant protection policies were discussed. The City retained a consultant who produced the 2016 Rental Housing Data Book, which provided guidance to HED and Council during the review process. In 2016, the City Council approved significant enhancements to its Multi-Family Inspection Program (MFIP), by 1) increasing the frequency of inspection from three years to two years, 2) increasing City-inspection of self-certification properties from 20% to 25%, and 3) transferring enforcement of the bed bug program from the Police Department's Code Enforcement unit to the Community Development Department's Multi-family Inspection Program unit.

After much analysis and public discussion, the Council approved the Residential Rent Review Program as Municipal Code Chapter 19.40 in June 2017. Even after the program was "live," renters in the community continued to express concerns about the rental housing market; specifically, expressing concerns about affordability, availability, and tenant evictions. The City Council received significant input on these topics from renters, tenant advocates, landlords, property owners, and other stakeholders.

On January 8, 2019, the City Council established an Ad Hoc Committee ("Committee") on Rental Housing. The Committee was established for a period of up to six months to discuss and review state and local requirements regarding tenant/landlord responsibilities, existing housing needs within the City and the development of proposed rental housing objectives and strategies for consideration by the full Council.

Then-Mayor Obringer appointed herself and current Vice Mayor Aliano to the Ad-Hoc Committee as Districts 2 and 3 contain the largest number of multi-family units in the City.

The Committee met eight times between January 2019, and early May 2019. Initial Committee meetings focused on information gathering. The Committee:

- Reviewed the 2019 Concord Rental Housing Data Book, the CASA compact and other rental housing information.
- Conducted individual meetings with tenant advocates, property owners, technical experts, and with City staff engaged in rental housing issues.
- Focused, during the final three Committee meetings, on reviewing input received and developing the Draft Committee Report, which was released to the public on May 20, 2019.

The Draft Committee Report described the individual tenant protection policies the Committee recommended for consideration by the full City Council. Each

recommended policy included a short description of the policy/program components, desired outcome, implementation timeframe, budget impact and examples of other Bay Area cities that have implemented a similar policy.

A Community Meeting was conducted on May 29, 2019, during which the Committee received more than four hours of testimony from the public on the Draft Committee Report. The meeting was attended by approximately 130 people, with about 70 speakers.

On June 19, 2019, the Committee Report was presented to the City Council at a Special Meeting. The meeting was attended by approximately 150 people, with 92 speakers. Following deliberation, staff was directed to pursue seven of the eight Committee recommendations and to return to Council for further consideration.

On February 11, 2020, the City Council received a staff report which:

- Reviewed the impact of State Legislation subsequent to the City Council direction on June 19, 2019.
- Contained a summary of policy direction provided by the City Council on the five policy elements of the proposed ordinance.
- Reviewed four policies approved by the City Council on June 19, 2019, for which no further direction was needed.

On Friday, March 13, 2020, the Concord City Manager, acting as the Director of Emergency Services, proclaimed a local emergency in the City of Concord as a result of the COVID-19 pandemic. At a special meeting on March 19, 2020, the City Council ratified the proclamation of a local emergency and directed staff to move forward with an urgency ordinance imposing a moratorium on certain evictions for failure to pay rent, utilities, late fees or penalties for residential and commercial tenants in the City of Concord who are experiencing a documented substantial decrease in household or business income caused by the COVID-19 pandemic.

The urgency ordinance was adopted by the City Council at a special meeting on Wednesday, March 25, 2020, effective immediately, to run concurrently with the Governor's Executive Order N-28-20. On May 29, 2020, the Governor issued Executive Order N-66-20, extending the State's moratorium to July 28, 2020. On June 30, 2020, the Governor issued Executive Order N-71-20, which further extends the State's moratorium to September 30, 2020. The City's moratorium is automatically extended to the same date.

Currently, a number of bills are under consideration at the State level. These bills are reviewed briefly in Attachment 2, State of California Pending Housing Legislation.

Analysis

A proposed Ordinance has been drafted, consistent with State of California legislation, regarding tenant protection policies. The Ordinance is responsive to the City Council policy direction received on February 11, 2020 regarding the following policies from the Committee Report (Policy #s are from the Committee Report):

Policy 4.1 Modify the Residential Rent Review Program (City of Concord Municipal Code, Ordinance 17.7)

The attached Ordinance implements the following City Council policy direction:

In light of AB 1482, which established rent caps statewide, eliminate the Rent Review Program as of June 30, 2020.

The Residential Rent Review Program was an option for mediation if a tenant received a rent increase for ten percent or more, but since the passage of AB 1482, which limits rent increases to five percentage plus CPI with a maximum of ten percent, the program is no longer relevant.

Policy 4.3 Require Relocation Assistance for Tenants

The Ordinance implements the following City Council policy direction:

Using the criteria specified in AB 1482, implement the higher amount of relocation assistance recommended by the Committee of \$5,000 or two months of the tenant's rent that is in effect when the owner issues the notice of termination, whichever is greater.

Such relocation assistance for no-fault just cause evictions is more protective of tenants than the relocation assistance required by state law. The Ordinance also describes the timing and method of providing these payments.

AB 1482 covers all rental units other than the following :

- (1) Transient and tourist hotels.
- (2) Housing accommodations in a nonprofit hospital, religious facility, extended care facility, licensed residential care facility for the elderly
- (3) Dormitories
- (4) Single family homes if the property owner shares bathroom or kitchen facilities with the tenant.
- (5) Single-family homes where the owner rents no more than 2 bedrooms or units if the owner occupies the property.
- (6) A duplex if the owner continuously occupies one of the units during the tenancy.

(7) Housing that has been issued a certificate of occupancy within the previous 15 years.

(8) Single family homes or condominiums as long as the single family home or condominium is not owned by a corporate entity or a real estate trust.

(9) Affordable housing restricted by a regulatory agreement or deed covenant.

Additionally, tenants are eligible for the eviction protections of AB 1482 if the tenant has continuously occupied the unit for at least 12 months or if a new adult tenant has been added to the lease before the existing tenant has occupied the property for 12 months, the protections will apply once all tenants have occupied the property for 12 months or one or more tenants have occupied the property for 24 months.

Finally, AB 1482 does not apply to mobile homes or spaces within mobile home parks. The City's proposed ordinance would provide the tenants of mobile homes eviction protections in accordance with AB 1482.

Policy 4.5 Require Property Owners to Offer a Minimum Lease Term of 12 Months

During the February 11, 2020, meeting the City Council directed staff to include in the ordinance a requirement that tenants be offered written leases with one year or six-month lease terms. The attached Ordinance requires landlords to first offer prospective tenants a written lease with a minimum one year lease term. If the prospective tenant rejects the offer for a lease with a minimum one year term, and the tenant remains interested in renting the property, the landlord must offer a written lease with a minimum six month term. If the prospective tenant rejects the offer for a written lease which has a minimum term of six months, the landlord and tenant may then enter into a written lease that provides for a term of fewer than of six months. Staff opted not to include the option to provide oral leases for terms shorter than six months, as the Ordinance requires certain written notices, and oral lease arrangements and compliance with tenant protections would be difficult to verify without a written lease.

The attached Ordinance implements the following City Council direction:

Using AB 1482 criteria, require that specified units be covered by the new regulation, regardless of age.

Policy 4.7 The City Should Continue to Support State Legislation that Requires Statewide Rent Registry

The City Council direction included the following:

- Add "Support for state legislation regarding property owner provided rent information" to the City Council annual legislative priorities.

Staff will include this item in the City Council legislative priorities when it is next brought back for Council review. In the meantime, it is considered added.

- Return with concepts for collecting local rent data that would be reasonable.

Staff researched options for collecting local rent data and identified contracting with HdL as the most cost effective option. HdL is a California based company that provides a variety of financial services, including rent registry services, to more than 500 public agencies. HdL currently provides property tax review, audit services, and cannabis consultant services to the City of Concord.

HdL would administer the collection of data from landlords. The following information would be gathered for the rent registry:

- Name of property owner
- Property address
- Number of units
- Number of bedrooms in unit
- Lease start date
- Lease term
- Rent rate
- Reason for non-renewal/eviction

The data would be collected annually. Landlords with month-to-month tenants would be requested to report on all households that rented a particular unit within a given reporting year. All landlords subject to the program would be able to provide rent registry data through an online portal, paper forms or verbally to an HdL customer service representative.

Staff would have the ability to generate reports that would provide public information for the City Council and community through a management portal or through requests to HdL's customer service team.

The City of Culver City utilizes HdL's rent registry services. Their landlord portal can be accessed through the following link:

<https://culvercity.hdlgov.com/Home/Home/LandlordRegistration>

The estimated annual cost to a landlord to collect data is:

Properties with 25 or more units (7,385 total units) - \$24,000

Properties with 4 or more units (9,695 total units) - \$36,000

The cost of administration of the program by the City would be added to the final per unit cost of the program. The invoices generated by HdL would include the City's late fee schedule to encourage timely payment of the rent registration fee by property owners. HdL will make three attempts to collect any outstanding fees and if unsuccessful, HdL will transfer the property owner's debt to a third party debt collection agency.

If the City Council is interested in pursuing the rent registry, staff's next steps would be to negotiate a contract with HdL and return to the City Council with a proposed legislative action (e.g. modification to the Residential Tenant Protection Program Ordinance) to include cost recovery from landlords and an adjustment to the City's fee schedule to apply the fee.

General Provision – Should the Residential Tenant Protection Program have a Sunset Clause?

The attached Ordinance implements the following City Council policy direction:

Establish a sunset provision consistent with AB 1482 (January 1, 2030).

Alternatives

As an alternative to approving the proposed Rental Tenant Protection Program Ordinance the Council may direct staff to take no action and retain the City's existing housing policies and programs, or provide direction that modifies the attached Ordinance.

Financial Impact

The FY 2020/21 budget approved by the City Council accounted for the elimination of the City's Rent Review Program funding.

If a rent registry is pursued, any potential financial impact would be identified in a subsequent staff report regarding the necessary legislative action.

Public Contact

Notice of this City Council meeting was posted. Notice was sent by e-mail to all individuals on the interested party list on June 24, 2020.

Attachments

1. Residential Tenant Protection Program Ordinance
Exhibit A – Chapter 19.40 - "Residential Tenant Protection Program"
2. State of California Pending Housing Legislation

Appendix H: Public Review

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Public Review Period

In accordance with Government Code 65585(b)(1), the Housing Element 6th Cycle Draft was posted to the City’s Website on May 27, 2022, through June 27, 2022 and made available for public comment for at least 30 days. The City considered the public comments for at least 10 business days after the 30-day public comment period and responded to and incorporated public comments into a draft revision. Seven days before submitting the revised draft to the California Department of Housing and Community Development, the revised version was posted on the City’s website and all individuals and organizations that have previously requested notices relating to the City’s Housing Element Update were notified via email through the City’s listserv.

Responses to Public Comments

The City received 65 public comments, one of which was in Spanish, through various platforms including via email, letters, and through an online comment submittal platform, known as AirTable, which was available in English and Spanish. These comments, along with the City’s responses, are provided in Tables 1, 2 and 3, which are described further below. It should be noted that all comments are provided verbatim, and any typographical and grammatical errors have not been corrected.

A number of the comments received addressed the same or similar issues. Rather than repeat responses to recurring comments in each letter, the City has prepared “Master Responses” in **Table 1, Master Responses to Public Comments Received during the 30-Day Public Review Period**. These responses are regarding the following topics:

- Religious Institutions
- Supportive Housing
- Housing Development
- Displacement
- Sites Inventory Analysis
- Sites Inventory and Fair Housing
- Sites Inventory and Monument Boulevard/ R/ECAP
- Program Timing
- Funding
- Services for the Unhoused
- Emergency Shelters
- Safe Parking Sites

Additionally, some of the comments received from different submitters repeated the same content verbatim and therefore have been batched and Master Responses have been applied, accordingly. This resulted in two batches, each of which includes a repeat of the same comment letter, as shown in **Table 2, Batch Responses to Public Comments Received during the 30-Day Public Review Period**. Batch 1 includes 10 comment letters and Batch 2 includes 14 comment letters which have been attached as **Exhibit A** and **Exhibit B**, respectively, to this appendix.

The remaining letters, including letters with slight variations from the letters in Batch 1 and Batch 2, are responded to individually and incorporate Master Responses where appropriate. These comments and responses are available in **Table 3, Individual Responses to Public Comments Received during the 30-Day Public Review Period**, below, and these public comments have been attached as **Exhibit C** to this appendix.

Pursuant to Government Code 65583(c)(9) the City made a diligent effort to achieve public participation of all economic segments as it has for all outreach efforts throughout the duration of Housing Element Update process and as described in **Appendix F, Community Engagement Summary**.

Table 1: Master Responses to Public Comments Received during the 30-Day Public Review Period

Topic	Master Response No.	Master Response
Religious Institutions	1	<p>Program 16 will permit parking reductions for religious institutions in exchange for housing in accordance with AB 1851, 2020. This will allow no more than 50% of parking spaces to be eliminated for the purpose of housing development. Housing developments could include tiny homes or housing for vulnerable populations such as those experiencing homelessness, so long as these uses are consistent with the City’s development regulations and the Building Code. Further, through Program 2, the City will amend its Development Code to allow manufactured housing on a permanent foundation in the same manner as other single family uses in the same zone. There are no “green space” (or open space) requirements for religious institutions, although many religious uses are located in residential zoning districts where maximum lot standards apply. If a religious institution develops affordable housing, the applicant would have the option to utilize incentives or waivers provided by the Density Bonus program to reduce any “greenspace”, lot coverage or similar requirements.</p>
Supportive Housing	2	<p>“Supportive housing” is defined in Appendix C as housing with no limit on length of stay that is occupied by the target population (persons with disabilities and families that are experiencing homelessness) and is linked to on-site services that assist occupants in retaining housing; improving their health status; and maximizing their ability to live and, when possible, work in the community. Supportive housing can include tiny-homes, micro units, or housing for individuals or families earning zero to low income, as long as these structures are consistent with the City’s development regulations and the Building Code.</p>
Housing Development	3	<p>The City does not develop affordable housing. Rather, as the permitting agency in Concord, the City is responsible for creating the processes and regulatory environment by which housing of all types can be built. In any event, through the programs of the Draft Housing Element Update, the City will amend its regulations to increase opportunities for the development of a variety of housing types.</p>
Displacement	4	<p>Since 2016, the City Council has taken several actions to implement tenant protections but has chosen not to implement local regulations on rent control or evictions without a pre-defined "just cause". On June 21, 2022, the City Council considered public comments regarding these issues and opted not to include these as programs in the Draft Housing Element Update. The City Council has noted that the steps being taken to address tenant protections through the Multifamily Rental Housing Inspection Program (Program 7), Rent Registry, Rental Tenant Protection Program and the Residential Tenant Anti-Harassment Protection</p>

Topic	Master Response No.	Master Response
		Ordinance (Program 20) may be sufficient to address community needs and should be allowed to operate and have their effectiveness measured before further actions are taken.
Sites Inventory Analysis	5	<p>Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. The sites identified through Appendix E are those sites that have realistic development potential under the City’s currently adopted regulations. The identification of a site in the sites inventory does not ensure that the site will develop within the planning period, and the lack of identification of a site does not ensure that the site will not develop within the planning period. Furthermore, the identification of various income levels in the sites inventory merely demonstrates that the City has adequate capacity for each income level, and does not guarantee that housing developers will provide units at these levels. Actual project income levels are driven by factors other than the sites inventory, and the inventory should not be understood as “encouraging” any particular project type.</p> <p>Several commenters have expressed concern regarding language in Appendix D (page 36 of the initial public review draft) which indicated that “identification of moderate- and above moderate-income sites in [the central/western] area ... will reserve the patterns of segregation ... by promoting the area as a mixed-income neighborhood.” However, as noted above the sites inventory has little if any effect on actual project income levels. Therefore, this section of Appendix D has been revised as follows:</p> <p><i>The Sites Analysis’ identification of sites in this central/western area do not exacerbate patterns of segregation, because: (1) the Sites Analysis is merely an indicator of capacity for new development but does not itself influence or determine what income levels the market will ultimately provide; (2) the programs of the Housing Element will help to reverse and improve patterns of segregation throughout the community wide by strengthening tenant protections, incentivizing the production and preservation of deed-restricted affordable units, targeting investments grants funds and outreach to the R/ECAP, and leveraging and advocating for more affordable housing funds into for the City; and (3) the Housing Element Update will</i></p>

Topic	Master Response No.	Master Response
		<i>increase opportunities for medium and high residential densities in areas with access to resources, outside of lower-resource areas, through the rezoning program in Objective 8.6.</i>
Sites Inventory and Fair Housing	6	The purpose of the Housing Element’s sites inventory (Appendix E) is to identify sites that are available and suitable to accommodate the Regional Housing Needs Allocation (RHNA) at all income levels. The sites inventory and analysis determine whether program actions must be adopted to ensure that sites are available to accommodate the RHNA and if those sites are sufficient for replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. While the City has sufficient and adequate capacity to accommodate the RHNA at all income levels, the City has committed to a series of programs to Affirmatively Further Fair Housing through increased housing opportunities across the City.
Sites Inventory and Monument Boulevard/R/ECAP	7	The City has one area along Monument Boulevard that meets the criteria for a Racially or Ethnically Concentrated Area of Poverty (R/ECAP). One site in this area has been identified in the sites inventory (Appendix E) to accommodate eight (8) above moderate income units. As part of the feedback received during the community engagement process, additional capacity adequate to accommodate the lower-income RHNA that exists within the R/ECAP has not been included in the sites inventory and was relocated to other areas of the City in order to avoid an undue concentration of lower-income sites.
Program Timing	8	Timing associated with program objectives represent the point at which the program is expected to be fully implemented. Timeframes consider the full length of time needed between the initial and final stages of program implementation, which includes any associated California Environmental Quality Act (CEQA) review, as well as the availability of staff and other needed resources for program implementation. The planning period for the Housing Element is 2023-2031 and all programs are scheduled to be implemented within the first half of the planning cycle, no later than 2026.

Topic	Master Response No.	Master Response
Funding	9	Each program must include specific funding sources that will be allocated for program implementation. Where a source of funding is not available through the end of the planning period, the City cannot guarantee that new or continued funds will become available. Therefore, where the availability of funding is uncertain, specific funding sources cannot be identified. However, the City is committed to continuing to pursue funding sources to fund programs as demonstrated in Program 8, Program 22, and the newly added Program 25.
Services for the unhoused	10	The City provides services for those experiencing homelessness through a contract with the Contra Costa County Coordinated Outreach Referral Engagement (CORE), and the City Council has recently amended the contract with the County to add a full-time Masters Level Social Worker (MSW) to the CORE team. Additionally, in 2021, the City Council adopted a resolution to add a full-time Community Services Manager position to provide administrative, policy, coordination, and communication functions to develop strategies to address homelessness issues in the community.
Emergency Shelters (Community Input)	11	In accordance with Government Code 65583, the City must identify a zone or zones where Emergency Shelters are allowed as a permitted use without discretion. Emergency Shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone, except that a local government may apply written objective standards in accordance with those provided in State law. Allowing community input on the design and services of Emergency Shelters would constitute a discretionary action and would violate State law. However, through Program 15 the City will create and adopt objective design standards to provide ministerial processing for projects that meet 100% of the objective criteria, and the City will invite community input prior to adopting these objective standards.
Safe Parking Sites	12	Safe parking for the unhoused is not a priority of the City Council at this time, but the submission of this comment will bring this to the attention of the City Council for consideration.

Table 2: Batched Responses to Public Comments Received during the 30-Day Public Review Period

Batch No.	Name(s)	Comment	Response/Changes Made
<i>Batch #1</i>			
1	Amy Chionis Brooke Shellflower Carl Grant Carmen Cartagena Elsie Mills Jane Casper Joanne Domingoes Kathleen Mitchell Susan Warren Victoria Miller	1) I want clearer program goals that allow religious institutions to reduce their parking and green space to provide affordable housing and micro communities, like tiny homes, for vulnerable populations, including the unhoused.	Master Response #1: Program 16 will permit parking reductions for religious institutions in exchange for housing in accordance with AB 1851, 2020, and additional Program details will be determined through its implementation which will be before Dec. 2024. This will allow no more than 50% of parking spaces to be eliminated for the purpose of housing development. Housing developments could include tiny homes or housing for vulnerable populations such as those experiencing homelessness, so long as these uses are consistent with the City's development regulations and the Building Code. Further, through Program 2, the City will amend its Development Code to allow manufactured housing on a permanent foundation in the same manner as other single family uses in the same zone. There are no green space requirements for religious institutions and if a religious institution develops affordable housing, the applicant would have the option to utilize incentives or waivers provided by the Density Bonus Program to reduce any greenspace requirements.
1	Amy Chionis Brooke Shellflower Carl Grant Carmen Cartagena Elsie Mills Jane Casper Joanne Domingoes Kathleen Mitchell Susan Warren Victoria Miller	2) I want clearer goals and definitions for “supportive housing” programs that provide safe parking for unhoused living in trailers or their vehicles, and micro-communities (fabricated tiny-homes) and housing for zero-low income individuals or families.	Master Response #2: “Supportive housing” is defined in Appendix C as housing with no limit on length of stay that is occupied by the target population (persons with disabilities and families that are experiencing homelessness) and is linked to on-site services that assist occupants in retaining housing; improving their health status; and maximizing their ability to live and, when possible, work in the community. Supportive housing can include tiny-homes, micro units, or housing for individuals or families earning zero to low income, as

Batch No.	Name(s)	Comment	Response/Changes Made
			<p>long as these structures are consistent with the City's development regulations and the Building Code.</p> <p>Master Response #12: Safe parking for the unhoused is not a priority of the City Council at this time but the submission of this comment will bring this to the attention of the City Council for consideration.</p>
1	Amy Chionis Brooke Shellflower Carl Grant Carmen Cartagena Elsie Mills Jane Casper Joanne Domingoes Kathleen Mitchell Susan Warren Victoria Miller	3) I want 24/7, fully funded, city-led "supportive housing" programs for the unhoused to be planned immediately, "NOT in 2024, NOT THROUGH 2026, NOR until funding is available" and to provide accessible showers, waste management, bathrooms, and social workers that provide services like mental health, food, rehabilitation, medical attention, etc., until homelessness is solved in Concord.	Master Response #3. The City does not develop affordable housing. Rather, as the permitting agency in Concord, the City is responsible for creating the processes and regulatory environment by which housing of all types can be built. In any event, through the programs of the Draft Housing Element Update, the City will amend its regulations to increase opportunities for the development of a variety of housing types
1	Amy Chionis Brooke Shellflower Carl Grant Carmen Cartagena Elsie Mills Jane Casper Joanne Domingoes Kathleen Mitchell Susan Warren Victoria Miller	4) I want the plan to tackle the real crisis of displacement of renters, immigrants, and people of color, which the plan acknowledges is the number one fair housing problem in Concord. Concord must consider rent stabilization and eviction protections, which are proven strategies to address displacement quickly and at scale.	Master Response #4: Since 2016, the City Council has taken several actions to implement tenant protections but has chosen not to implement local regulations on rent control or evictions without a pre-defined "just cause". On June 21, 2022, the City Council considered public comments regarding these issues and opted not to include these as programs in the Draft Housing Element Update. The City Council has noted that the steps being taken to address tenant protections through the Multifamily Rental Housing Inspection Program (Program 7), Rent Registry, Rental Tenant Protection Program and the Residential Tenant Anti-Harassment Protection Ordinance (Program 20) may be sufficient to address community needs and should be allowed to

Batch No.	Name(s)	Comment	Response/Changes Made
			operate and have their effectiveness measured before further actions are taken.
1	Amy Chionis Brooke Shellflower Carl Grant Carmen Cartagena Elsie Mills Jane Casper Joanne Domingoes Kathleen Mitchell Susan Warren Victoria Miller	5) I disagree with the Sites Analysis that calls for encouraging moderate income and high end development in the Monument as a way of “integrating the community.” Gentrification is not integration. This plan would only drive up the costs of rent and exacerbate displacement of the low-income communities of color.	<p>Master Response #5: Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. The sites identified through Appendix E are those sites that have realistic development potential under the City’s currently adopted regulations. The identification of a site in the sites inventory does not ensure that the site will develop within the planning period, and the lack of identification of a site does not ensure that the site will not develop within the planning period. Furthermore, the identification of various income levels in the sites inventory merely demonstrates that the City has adequate capacity for each income level, and does not guarantee that housing developers will provide units at these levels. Actual project income levels are driven by factors other than the sites inventory, and the inventory should not be understood as “encouraging” any particular project type.</p> <p>Several commenters have expressed concern regarding language in Appendix D (page 36 of the initial public review draft) which indicated that “identification of moderate- and above moderate-income sites in [the central/western] area ... will reserve the patterns of segregation ... by promoting the area as a mixed-income neighborhood.” However, as noted above the sites inventory has little if any effect on actual project income</p>

Batch No.	Name(s)	Comment	Response/Changes Made
			<p>levels. Therefore, this section of Appendix D has been revised as follows:</p> <p><i>The Sites Analysis' identification of sites in this central/western area do not exacerbate patterns of segregation, because: (1) the Sites Analysis is merely an indicator of capacity for new development but does not itself influence or determine what income levels the market will ultimately provide; (2) the programs of the Housing Element will help to reverse and improve patterns of segregation throughout the community wide by strengthening tenant protections, incentivizing the production and preservation of deed-restricted affordable units, targeting investments grants funds and outreach to the R/ECAP, and leveraging and advocating for more affordable housing funds into for the City; and (3) the Housing Element Update will increase opportunities for medium and high residential densities in areas with access to resources, outside of lower-resource areas, through the rezoning program in Objective 8.6.</i></p> <p>Master Response #7: The City has one area along Monument Boulevard that meets the criteria for a Racially or Ethnically Concentrated Area of Poverty (R/ECAP). One site in this area has been identified in the sites inventory (Appendix E) to accommodate eight (8) above moderate income units. As part of the feedback received during the community engagement process, additional capacity adequate to accommodate the lower-income RHNA that exists within the R/ECAP has not been included in the sites inventory and was relocated to</p>

Batch No.	Name(s)	Comment	Response/Changes Made
			<p>other areas of the City in order to avoid an undue concentration of lower-income sites.</p> <p>Master Response #6: The purpose of the Housing Element's sites inventory (Appendix E) is to identify sites that are available and suitable to accommodate the Regional Housing Needs Allocation (RHNA) at all income levels. The sites inventory and analysis determines whether program actions must be adopted to ensure that sites are available to accommodate the RHNA and if those sites are sufficient for replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. While the City has sufficient and adequate capacity to accommodate the RHNA at all income levels, the City has committed to a series of programs to Affirmatively Further Fair Housing through increased housing opportunities across the City.</p>
<i>Batch #2</i>			
2	Sydney Ji Yael Chanoff Molly Arthur Regina Berny Jisoo Kim Alison Negrin Paula Reilly Rebekkah Scharf Claudia Leung Vy Vo Sheila Mason Sary Tatpaporn	<p>Housing Element Planning Team Aaron Sage, Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the Concord City Council is in the process of finalizing the City's Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. We have seen homelessness jump dramatically in the</p>	<p>Master Response #4: Since 2016, the City Council has taken several actions to implement tenant protections but has chosen not to implement local regulations on rent control or evictions without a pre-defined "just cause". On June 21, 2022, the City Council considered public comments regarding these issues and opted not to include these as programs in the Draft Housing Element Update. The City Council has noted that the steps being taken to address tenant protections through the Multifamily Rental Housing Inspection Program (Program 7), Rent Registry, Rental Tenant Protection Program and the Residential Tenant Anti-Harassment</p>

Batch No.	Name(s)	Comment	Response/Changes Made
	Margaret Miller Emma Craig	<p>last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color</p> <p>We cannot ignore the racialized impact of this housing crisis. The city's own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>I want to live in an inclusive county that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income,</p>	Protection Ordinance (Program 20) may be sufficient to address community needs and should be allowed to operate and have their effectiveness measured before further actions are taken.

Batch No.	Name(s)	Comment	Response/Changes Made
		<p>working-class families pushed out of our city. Concord, along with other cities, must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of Concord and has impacts beyond the city as well. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the Concord continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p>	

Table 3: Individual Responses to Public Comments Received during the 30-Day Public Review Period

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #1</i>			
1	Beatrice Strnad	<p>Concord is touted as a family town. The home buyer programs seem aligned to that. We want families in every income bracket to remain here. Pride of ownership also tends to beautify neighborhoods. While homeowner initiatives are great, in competitive housing markets, sellers often see subsidized offers as "high risk." Perhaps Concord should consider adding incentives for sellers to accept offers supported by this program. This may help them compete with other offers.</p>	Comment noted.
1	Beatrice Strnad	<p>As a general comment, we thought the element could do more for middle-income members of the community. In California, middleclass incomes are effectively low income. With inflation, that has only gotten worse. Our neighbors are teachers and other highly skilled workers who cannot afford \$700k homes here despite making "good money."</p> <p>For example, housing benefits could help Concord's police shortage. Police aren't popular these days and the pay sucks. Housing benefits could help offset Concord's lower salaries. Police living in the communities they serve also tends to correlate with better relationships and fewer police-related incidents.</p>	Comment noted.

Letter No.	Name(s)	Comment	Response/Changes Made
1	Beatrice Strnad	<p>We moved here to get away from the casual violence and property crimes in SF and Oakland. It appears to be seeping into Concord. While great on paper, in practice, navigation centers attract more issues than they cure. While we do appreciate the rehousing focus in the plan, adding more services increases homeless populations. This exponential growth of Concord's homeless population is not coming from within the community. Albeit likely with noble intentions, the city services are feeding the growth. Please focus on the people who want help and lower incentives for homeless people to come here.</p> <p>Concord is becoming less safe. (E.g., a disturbed man recently attempted to physically assault me downtown.) Attractive services also make being homeless less safe, especially for women and other individuals who are targets of sexual violence. The location of homeless services also matters a lot. Please avoid family-oriented areas like downtown, schools, and parks.</p> <p>Thank you for your work on the element and for considering these comments.</p>	<p>Location of services for those experiencing homelessness is considered in the Housing Element. Capacity identified for Emergency Shelters is identified within industrial and commercial zones (Appendix C). Programs to permit uses that may serve those experiencing homelessness have been developed in accordance with State requirements.</p>
<i>Comment Letter #2</i>			
2	JS	<p>Freeze all new home building and condominiums and all other structures until the current city of Concord residence have a clear goal of how we're going to supply even one more home as there is no water in the state and everybody is being asked to reduce substantially looking at photos and videos of reservoirs they are clearly empty but this is not so smart city wants to keep building and building at some point one Has to open their eyes and figure out how this is going to work can't even keep the electricity on as there doesn't seem to be enough power yet we want to build 200,000 more homes.</p>	<p>Infrastructure constraints are considered within Appendix C of the Housing Element Update. Capacity identified to accommodate the City's housing need exists either through redevelopment and infill opportunities, where infrastructure is present, or through the Concord Reuse Project, where infrastructure is planned.</p>
<i>Comment Letter #3</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
3	Celeste Mcpeak	Everyone deserves help when they need!	Comment noted.
<i>Comment Letter #4</i>			
4	Katherine Dano-Luttjohann	<p>Program 16: It permits religious institutions to reduce parking to provide housing for vulnerable populations, but it proposes to address this issue in 2024. The program should instead move up the date and take immediate action.</p> <p>Program 16 should also allow religious institutions to reduce green space to provide housing for vulnerable populations.</p>	<p>See Master Response #8 regarding Program Timing and Master Response #1 for open space requirements for religious institutions. The timelines do not prevent the City from implementing programs sooner, if implementation moves faster than anticipated.</p> <p>Under Program 16, parking reductions are permitted for religious institutions in accordance with AB 1851 and this objective would codify existing law, existing law is in effect despite program implementation.</p>
4	Katherine Dano-Luttjohann	<p>Program 22: Under “Amend the Development Code to allow supportive housing by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, consistent with State requirements”</p> <p>Supportive housing should be defined in the housing element. It’s not clear to the community if supportive housing is for anyone at risk of homelessness or experiencing homelessness. It’s also not clear the type of supportive housing the program is suggesting.</p> <p>Under “Amend the Development Code to ensure that Emergency Shelters are not subject to the Design and Site Review process (AB 139, 2019),” the program should allow for community-led feedback</p>	<p>See Master Response #2 regarding supportive housing and Master Response #11 regarding community input on the design and site review process as it relates to emergency shelters.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		on the design of emergency shelters and the assistance the program(s) offers to support rehabilitation.	
4	Katherine Dano-Luttjohann	Under “Amend the Development Code to permit the development of Low-Barrier Navigation Centers as a use by-right, without requiring a discretionary action, in mixed-use and non- residential zones that permit residential uses (AB 101, 2019). Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing,” the city should have clear goals that resonate with community feedback that’s been submitted over the years.	The proposed objective to permit the development of Low-Barrier Navigation Centers without discretionary review is a clear objective that is necessary to ensure consistency with State law (AB 101, 2019) and that facilitates additional services for individuals experiencing homelessness, consistent with community feedback over the past several years.
4	Katherine Dano-Luttjohann	<p>Programs must provide for safe parking for unhoused living in trailers or their vehicles, and micro-communities (fabricated tiny-home communities) and housing for zero-low income individuals and multi-family when shelters are inadequate or always full. The Shelter in Concord only has about 78/80 beds, yet individuals experiencing homeless is estimated to be over 800 people in Concord alone.</p> <p>Permanent programs that provide Housing Areas such as safe parking and micro-communities for unhoused seeking safe areas to be safe while housing becomes available should provide accessible showers, waste management, bathrooms/sanitation services, and social workers that provide connections to services individuals need like mental health, food, rehabilitation, medical attention etc.</p>	<p>See Master Response #12 regarding safe parking sites and Master Response #10 regarding services for the unhoused.</p> <p>For “micro-communities” (e.g. tiny homes), services and amenities such as those listed in the comment would be reviewed and approved as part of the project application, as long as these structures are consistent with the City’s development regulations and the Building Code.</p>
4	Katherine Dano-Luttjohann	The deadlines approved by city council for the Housing Element under Program 22 do not make a full commitment in addressing the city’s housing crisis as it exists today.	See Master Response #8 regarding Program timing and Master Response #9

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>We, the city, need to Rapidly Rehouse people experiencing homelessness until we end homelessness, “not just through January 2026 or longer if funding is made available.” As well, we need not rely on the County to place people in housing.</p> <p>We also need to “Continue to fund the MSW for the CORE program” until homelessness is solved for Concord, not “as funding is available.”</p> <p>We also need to fund CORE teams in Concord 24/7, and not share CORE staff with other cities. Concord’s unhoused population is over 800 individuals, which requires more CORE staff assigned to the city alone. According to CORE’s All-County Lead, currently no CORE staff members have shifts on weekend mornings and calls from those in need get backlogged.</p>	<p>regarding funding sources allocated for program implementation.</p>
4	Katherine Dano-Luttjohann	<p>All Programs*:</p> <p>The Plan’s proposed solutions don’t address the real problem. The plan names "displacement risk" as the number one factor contributing to housing inequities in Concord. But the proposed solutions have nothing to do with the problems identified by impacted renters and documented in the data. The real problems are excessive rents and landlords who evict low-income tenants to replace them with higher-income ones. Therefore, the real solutions are rent control and just cause eviction protections.</p> <p>The anti-harassment ordinance that Council just voted for is an important step --but not enough. We are glad that Concord passed an anti-tenant harassment ordinance. But the plan names "economic pressures" as the main reason that workers, immigrants, and people of color are being forced out of their homes. The anti-harassment ordinance won't help families pay the rent. It's meant to complement, not replace, tenant protections by preventing harassment as a tool for</p>	<p>See Master Response #4 regarding rent control and just cause evictions.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>displacement when landlords can't use unfair rent increases and evictions to get families to leave.</p> <p>It is time for action, not more “Study Sessions”. Councilmembers Tim McGallian and Laura Hoffmeister say that they want to take more time to study the issues and see whether more protections are needed. But tenants have been saying that they can't afford the rent for six years. During that time, rents have skyrocketed and families have been forced out. This is a crisis; it requires immediate action. Taking more time means choosing to sit by while more families are pushed out of the city and, in some cases, into the streets.</p> <p>Stop ignoring the voices of vulnerable residents and elevating the agenda of corporate lobby groups like the CA Apartment Association (CAA) who oppose ALL tenant protections of any kind. The city is required to prioritize the input of the people most impacted by the housing crisis in the development of the plan. In Concord, that means low-income renters, immigrants, and people of color. But the planners and elected officials have blatantly ignored our voices, going so far as to state during a City Council meeting that all comments about the need for more tenant protections would be dismissed because three members of the City Council don't support them. The City of Concord is choosing to elevate the wishes of a corporate lobby over actual residents. The city should not treat the CAA as an equal stakeholder when their interest is purely to maximize profits of landlords, (often corporate landlords and investment firms) and property management companies.</p>	
<i>Comment Letter #5</i>			
5	Ady Olvera	<p>Dear Concord City Council,</p> <p>I am emailing to express my disappointment in your decision to approve your Housing Elements goals, policies and programs before</p>	<p>The Housing Element has not been approved. The document is still in a draft form and is expected to be brought forward for formal adoption in 2023.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		the PUBLIC COMMENT period was over. I hope my comments to your plan are submitted to the State’s Housing and Community Development Department (HCD) along with your Housing Element Plan proposal.	
5	Ady Olvera	As an advocate for the unhoused and ally to the tenant community, here is my feedback: -I feel the housing element plan is very vague almost as if it’s intentionally done so to avoid making firm commitments with the community.	Each program includes specific objectives, each of which includes an explicit timeline for implementation.
5	Ady Olvera	-I want clearer program goals that allow religious institutions to reduce not only their parking but also their greenspace to provide affordable housing and micro communities, like tiny homes, for vulnerable populations, including the unhoused. They should be allowed to redesign their property to best suit the audience they’d like to serve.	See Master Response #1 regarding parking reductions and open space requirements for religious institutions proving affordable housing.
5	Ady Olvera	-I want clearer goals and definitions for “supportive housing” programs to provide safe parking areas for our unhoused neighbors living in trailers or their vehicles, to specify the city will rezone, fund, develop micro-communities (fabricated tiny-homes) for individuals experiencing homelessness	See Master Response #2 regarding supportive housing and Master Response #12 regarding safe parking sites.
5	Ady Olvera	-To specify the city will develop affordable housing for individuals that are zero-low income. -To provide along with supportive housing: accessible showers, waste management, bathrooms, and social workers that provide services like mental health, food, rehabilitation, medical attention, etc.,	See Master Response #3 regarding the City’s role in housing development. Program 22 of the Housing Element addresses the needs of persons experiencing homelessness, many of whom are zero to low income. By definition, any supportive housing would include these types of services. The specific services would be reviewed and approved after a project application is filed.

Letter No.	Name(s)	Comment	Response/Changes Made
5	Ady Olvera	-I want the city to draft a policy that redefines zero, low, middle income poverty levels that make affordable housing programs more accessible to vulnerable populations.	Comment Noted. Income levels are calculated and defined by Federal and State agencies.
5	Ady Olvera	-I want 24/7, fully funded, city-led “supportive housing” programs for the unhoused to be planned immediately, “NOT in 2024, NOT THROUGH 2026, NOR until funding is available” until homelessness is solved in Concord.	See Master Response #3 regarding the City’s role in housing development .
5	Ady Olvera	-I want the housing element plan to address the real crisis of displacement of renters, immigrants, and people of color. Concord must consider rent stabilization and eviction protections, which are proven strategies to address displacement quickly and at scale.	See Master Response #4 regarding rent stabilization and eviction protections.
5	Ady Olvera	-I disagree with the Sites Analysis that calls for encouraging moderate income and high end development in the Monument as a way of “integrating the community.” Gentrification is not integration. This plan would only drive up the costs of rent and exacerbate displacement of the low-income communities of color.	See Master Response #5 regarding the sites inventory analysis and Master Response #7 regarding the sites inventory in the Monument Boulevard area.’“”“”’

Letter No.	Name(s)	Comment	Response/Changes Made
5	Ady Olvera	<p>HERE ARE MORE DETAILS:</p> <p>Program 16: It permits religious institutions to reduce parking to provide housing for vulnerable populations, but it proposes to address this issue in 2024. The program should instead move up the date and take immediate action. Program 16 should also allow religious institutions to reduce green space to provide housing for vulnerable populations.</p>	<p>See Master Response #8 regarding Program timing and Master Response #1 regarding open space requirements for religious institutions.</p> <p>. Under Program 16, parking reductions are permitted for religious institutions in accordance with AB 1851 and this objective would codify existing law, existing law is in effect despite program implementation.</p>
5	Ady Olvera	<p>Program 22: -Under “Amend the Development Code to allow supportive housing by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, consistent with State requirements” -Supportive housing should be defined in the housing element. It’s not clear to the community if supportive housing is for anyone at risk of homelessness or experiencing homelessness. It’s also not clear the type of supportive housing the program is suggesting.</p>	<p>See Master Response #2 regarding clarification on supportive housing.</p>
5	Ady Olvera	<p>-Under “Amend the Development Code to ensure that Emergency Shelters are not subject to the Design and Site Review process (AB 139, 2019),” the program should allow for community-led feedback on the design of emergency shelters and the assistance the program(s) offers to support rehabilitation. -Under “Amend the Development Code to permit the development of Low-Barrier Navigation Centers as a use by-right, without requiring a discretionary action, in mixed-use and non- residential zones that permit residential uses (AB 101, 2019). Low-Barrier Navigation Centers are housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services,</p>	<p>See Master Response #11 regarding Emergency Shelter requirements and Master Response #10 regarding services for the unhoused.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		shelter, and housing,” the city should have clear goals that resonate with community feedback that’s been submitted over the years.	
5	Ady Olvera	-Programs must provide for safe parking for unhoused living in trailers or their vehicles, and micro-communities (fabricated tiny-home communities) and housing for zero-low income individuals and multi-family when shelters are inadequate or always full. The Shelter in Concord only has about 78/80 beds, yet individuals experiencing homeless is estimated to be over 800 people in Concord alone.	See Master Response #12 regarding safe parking sites. For “micro-communities” (e.g. tiny homes), services and amenities such as those listed in the comment would be reviewed and approved as part of the project application, as long as these structures are consistent with the City’s development regulations and the Building Code.
5	Ady Olvera	-Permanent programs that provide Housing Areas such as safe parking and micro-communities for unhoused seeking safe areas to be safe while housing becomes available should provide accessible showers, waste management, bathrooms/sanitation services, and social workers that provide connections to services individuals need like mental health, food, rehabilitation, medical attention etc.	See Master Response #10 regarding services for the unhoused.
5	Ady Olvera	-The deadlines approved by city council for the Housing Element under Program 22 do not make a full commitment in addressing the city’s housing crisis as it exists today.	See Master Response #8 regarding Program timing.
5	Ady Olvera	We, the city, need to Rapidly Rehouse people experiencing homelessness until we end homelessness, “not just through January 2026 or longer if funding is made available.” As well, we need not rely on the County to place people in housing.	See Master Response #8 regarding Program timing. The City has its own program to address homelessness that does not rely on the County; see Program 22.
5	Ady Olvera	-We also need to “Continue to fund the MSW for the CORE program” until homelessness is solved for Concord, not “as funding is available.” -We also need to fund CORE teams in Concord 24/7, and not share CORE staff with other cities. Concord’s unhoused population is over 800 individuals, which requires more CORE staff assigned to the city	The Concord City Council has allocated \$304,000 for a fulltime Masters Level Social Worker (MSW) to the CORE team for Fiscal Years 2021-2022 to provide more dedicated full-time staffing to the City of Concord.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>alone. According to CORE’s All-County Lead, currently no CORE staff members have shifts on weekend mornings and calls from those in need get backlogged.</p>	<p>The comment is noted. Program 22 represents the maximum funding the City is able to commit at this time. The City will continue to seek additional funds throughout the planning period.</p>
5	Ady Olvera	<p>I agree with partner organizations that have been supporting Black, Brown and Indigenous communities in Concord, like Raise the Roof Concord, EBASE, EBHO, Monument Impact, and others that:</p> <ul style="list-style-type: none"> -The Plan’s proposed solutions don’t address the real problem. The plan names “displacement risk” as the number one factor contributing to housing inequities in Concord. But the proposed solutions have nothing to do with the problems identified by impacted renters and documented in the data. The real problems are excessive rents and landlords who evict low-income tenants to replace them with higher-income ones. Therefore, the real solutions are rent control and just cause eviction protections. -The anti-harassment ordinance that Council just voted for is an important step –but not enough. We are glad that Concord passed an anti-tenant harassment ordinance. But the plan names “economic pressures” as the main reason that workers, immigrants, and people of color are being forced out of their homes. The anti-harassment ordinance won’t help families pay the rent. It’s meant to complement, not replace, tenant protections by preventing harassment as a tool for displacement when landlords can’t use unfair rent increases and evictions to get families to leave. -It is time for action, not more “Study Sessions”. Councilmembers Tim McGallian and Laura Hoffmeister say that they want to take more time to study the issues and see whether more protections are needed. But tenants have been saying that they can’t afford the rent for six years. During that time, rents have skyrocketed and families 	<p>See Master Response #4 regarding rent control and just cause eviction protections.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>have been forced out. This is a crisis; it requires immediate action. Taking more time means choosing to sit by while more families are pushed out of the city and, in some cases, into the streets.</p> <p>- Stop ignoring the voices of vulnerable residents and elevating the agenda of corporate lobby groups like the CA Apartment Association (CAA) who oppose ALL tenant protections of any kind. The city is required to prioritize the input of the people most impacted by the housing crisis in the development of the plan. In Concord, that means low-income renters, immigrants, and people of color. But the planners and elected officials have blatantly ignored our voices, going so far as to state during a City Council meeting that all comments about the need for more tenant protections would be dismissed because three members of the City Council don't support them. The City of Concord is choosing to elevate the wishes of a corporate lobby over actual residents. The city should not treat the CAA as an equal stakeholder when their interest is purely to maximize profits of landlords, (often corporate landlords and investment firms) and property management companies.</p>	
<i>Comment Letter #6</i>			
6	Mike Cluster	<p>Would like to see higher priority on low & moderate income & supportive housing, including on non-residential properties church owned parking lots and unused space in commercial & industrial zones.</p>	<p>Supportive housing and parking for religious institutions are in effect through State legislation and are enforceable. The programs will incorporate these into the City's Development Code for consistency.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
6	Mike Cluster	would like to see the city setup a fund to which any citizen can contribute for the purpose of buying land specifically for the above types of housing	<p>Program 10 has been revised to incorporate Tenant Opportunity to Purchase, Act (TOPA)/Community Opportunity to Purchase Act (COPA) strategies.</p> <p>The City is legally unable to accept private funds for housing development. However, the Bay Area Housing Finance Authority (BAHFA) has been authorized to do this, and the City may be able to access BAHFA funding for future projects. See Program 8, Objective 8.5</p>
<i>Comment Letter #7</i>			
7	Courtney Coon	I want 24/7, fully funded, city-led “supportive housing” programs for the unhoused to be planned immediately, “not “in “2024”, not “through 2026”, nor “until funding is available.” I want the City to provide accessible showers, waste management, bathrooms, and social workers that provide services like mental health, food, rehabilitation, medical attention, etc., until homelessness is solved in Concord.	See Master Response #3 regarding the City’s role in housing development and Master Response #10 regarding services for the unhoused..
7	Courtney Coon	I also want a plan to tackle the real crisis of displacement of renters, immigrants, and people of color, which the plan acknowledges is the number one fair housing problem in Concord. Concord must consider rent stabilization and eviction protections, which are proven strategies to address displacement quickly and at scale.	See Master Response #4 regarding and rent stabilization and eviction protections.
<i>Comment Letter #8</i>			
8	John O’Brien	I want clearer program goals that allow religious institutions to reduce their parking and greenspace to provide affordable housing and micro communities, like tiny homes, for vulnerable populations, including the unhoused.	See Master Response #1 regarding parking reductions for religious institutions in exchange for affordable housing.

Letter No.	Name(s)	Comment	Response/Changes Made
8	John O'Brien	I want clearer goals and definitions for "supportive housing" programs that provide safe parking for unhoused living in trailers or their vehicles, and micro-communities (fabricated tiny-homes) and housing for zero-low income individuals or families.	See Master Response #2 regarding supportive housing and Master Response #12 regarding safe parking sites.
8	John O'Brien	I want 24/7, fully funded, city-led "supportive housing" programs for the unhoused to be planned immediately, "NOT in 2024, NOT THROUGH 2026, NOR until funding is available" and to provide accessible showers, waste management, bathrooms, and social workers that provide services like mental health, food, rehabilitation, medical attention, etc., until all unhoused people in Concord have a place to live.	See Master Response #3 for information on the City's regulatory role for housing development and Master Response #10 regarding services for the unhoused.
8	John O'Brien	I want the plan to tackle the real crisis of displacement of renters, immigrants, and people of color, which the plan acknowledges is the number one fair housing problem in Concord. Concord must consider rent stabilization and eviction protections, which are proven strategies to address displacement quickly and at scale.	See Master Response # 4 regarding rent stabilization and eviction protections.
8	John O'Brien	I disagree with the Sites Analysis that calls for encouraging moderate income and high end development in the Monument as a way of "integrating the community." Gentrification is not integration. This plan would only drive up the costs of rent and exacerbate displacement of the low-income communities of color. Instead provide more subsidized and guaranteed low cost housing in middle and high income neighborhoods.	See Master Response #5 regarding the purpose of the sites inventory analysis and Master Response #7 regarding Sites Inventory and Monument Boulevard area. The Housing Element includes several programs to support affordable housing development, such as Program 8 through which the City will identify and rezone areas appropriate for medium and high residential densities, specifically in areas not designated as "Low Resource" on the TCAC Opportunity Maps in Appendix D.

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #9</i>			
9	Alison West	I want clearer program goals that allow religious institutions to reduce their parking and green space to provide affordable housing and micro communities, like tiny villages, for vulnerable populations, including the unhoused.	See Master Response #1 regarding parking reductions for religious institutions in exchange for affordable housing.
9	Alison West	I want clearer goals and definitions for "supportive housing" programs that provide safe parking for unhoused living in trailers or their vehicles, and micro-communities (fabricated tiny- homes) and housing for zero-low income individuals or families.	See Master Response #2 regarding supportive housing and Master Response #12 regarding safe parking.
9	Alison West	I want 24/7, fully funded, city-led "supportive housing" programs for the unhoused to be planned immediately, "NOT in 2024, NOT THROUGH 2026, NOR until funding is available," and to provide accessible showers, waste management, bathrooms, and social workers that connect to services like mental health, food, rehabilitation, medical attention, etc., until homelessness is solved in Concord.	See Master Response #3 for information on the City's regulatory role and Master Response #10 regarding services for the unhoused.
9	Alison West	I want the plan to tackle the real crisis of displacement of renters, immigrants, and people of color, which the plan acknowledges is the number one fair housing problem in Concord. Concord must consider rent stabilization and eviction protections, which are proven strategies to address displacement quickly and at scale.	See Master Response # 4 regarding rent stabilization and eviction protections.
9	Alison West	I disagree with the sites analysis That calls for encouraging moderate income and high income development in the Monument corridor as a way of "integrating the community." Gentrification is NOT integration. This plan would only drive up the costs of rent and further displace Low income renters and renters of color.	See Master Response #5 regarding the purpose of the sites inventory analysis and Master Response #7 regarding Sites Inventory and Monument Boulevard area.

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #10</i>			
10	Maria Velazquez	<p>Dear Principal City Planner Aaron Sage,</p> <p>My name is Maria Velazquez and I am graduate researcher who studies tenant housing and how it informs the lives of families and educational policy in the East Bay. I am emailing to thank the city of Concord for its Housing Element Update Draft and the inclusion of Policy 2.4 that seeks to “ensure that any development or redevelopment in Concord does not lead to the displacement of existing residents.” While this policy is a step in the right direction, I urge the city to include more robust tenant protections, such as local rent stabilization and just cause eviction ordinances, to protect constituents from displacement. I fear that without these protections, or commitment towards stronger and local tenant protections, the city may not be able to protect existing residents from displacement.</p>	See Master Response #4 regarding displacement and local tenant protections.
10	Maria Velazquez	<p>While strengthening renter protections beyond the state is recognized as a mechanisms to protect tenants from displacement, the topic is often met with substantial push back at the local level. Divisive rhetoric claims tenants already have protections and any additional protections place an undue burden on landlords. I urge the city to not buy into this framing. As part of my research I have come to understand how low-income tenants are often presumed to have access to rights as tenants (particularly through the state) and yet this may be far from what they experience. Localized ordinances, like the recently passed anti-harassment ordinance, can provide guidelines and definitions that can make state tenant rights more accessible or enforceable in courts. As such, these issues go beyond the rhetoric of tenant versus landlord, but rather demonstrate how a policy or law may be difficult to access, particularly by low-income tenants. Low-income tenants and tenant families have made this evident in Concord throughout the years as they advocated and led campaigns</p>	See Master Response #4 regarding displacement and local tenant protections.

Letter No.	Name(s)	Comment	Response/Changes Made
		around habitability issues (e.g., bedbugs), and most recently with harassment (amongst others issues).	
10	Maria Velazquez	For example, in regards to habitability, California’s implied warrant of habitability provides basic structural, health, and safety standards for rental units. This implied warrant of habitability “entitles tenants to a safe and livable home” and according to the California Tenants’ Right Handbook, stipulates that “all landlords are legally required to make their premises habitable when they originally rent a unit” and required “to maintain it in that condition throughout tenancy.” Yet low-income tenants –who are often Black, Indigenous, and other People of Color, single-parent households, and/or the elderly –often do not experience this implied warrant of habitability. Rather, due to the high cost of living, they may be forced to sacrifice housing quality for housing affordability –an issue that is increasingly being recognized in policy reports and scholarship. Low-income Concord tenants, disproportionately immigrant, Latinx, Black, and female headed households, and community advocates, drew attention to the discrepancies between their presumed habitability rights and what they experienced.	Through Program 7 of the Housing Element the City will continue to ensure the safety of residential buildings through enforcement of building codes on both complaint-driven and proactive bases, and through administration of the Multi-Family Rental Housing Inspection and Maintenance Program for rental housing enforcement conditions/ inspections. In addition, the City will ensure its website remains up to date with code enforcement and substandard housing resources to assist in remediation of violations.

Letter No.	Name(s)	Comment	Response/Changes Made
10	Maria Velazquez	<p>I applaud the city of Concord for taking critical steps in policymaking to address the discrepancies via the multifamily housing inventory inspections (which happens every two years), and most recently the discrepancies relating to harassment/retaliation via Concord’s Tenant Anti-Harassment Protection ordinance. As the city revises its Housing Element Update, I urge the city to further consider its role in policy making and protecting Concord residents from displacement through local tenant protections. Low-income tenants throughout the years have brought attention to the need for rent stabilization and just cause, before and after, the state’s rent stabilization and just cause (e.g. AB-1482). Local rent stabilization and just cause for eviction, along with the right to legal counsel, are proven strategies to prevent displacement, stabilize neighborhoods, and lower evictions. I hope that the next revision of Concord’s Housing Element Update includes more robust ways to prevent and protect Concord from displacement.</p> <p>María Velázquez PhD Candidate, Department of Educational Policy Studies University of Wisconsin-Madison</p> <p>NOTE: Emailed letter has hyperlinks</p>	See Master Response #4 regarding displacement and local tenant protections. “”
<i>Comment Letter #11</i>			
11	Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.	<p>RE: Comments on the City of Concord’s Draft 6th Cycle Housing Element</p> <p>Dear Planning Staff, Consultants, City Councilmembers, and Planning Commissioners,</p> <p>We, the undersigned group of organizations, who serve and work alongside the most vulnerable residents of Concord, thank you for the chance to comment on the City of Concord’s Draft 6th Cycle Housing Element. We commend the planning team for the hard work that they</p>	These introductory comments are noted. See “”

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>have invested in the Assessment of Fair Housing and Appendix F:</p> <p>Community Input and Council Actions on Tenant Protections and Displacement Since 2016. Concord is required by State law to use all available data and “local knowledge,” such as the recent testimony of residents and community organizations, to conduct an in-depth analysis of the fair housing issues impacting members of protected classes. In this vein, the Draft correctly demonstrates that residents who are members of protected classes—in particular, immigrants and people of color—are unfairly and disproportionately harmed by excessive housing costs, eviction, overcrowding, and displacement.</p> <p>However, when considered alongside the data provided in the Draft, the proposed strategies and actions are inadequate to address the scale, severity, and urgency of the fair housing issues identified. We thus urge Concord to consider the following recommendations to revise the Goals, Policies, and Programs to meet the needs of the residents most impacted by the city’s housing and homelessness crises and, in so doing, ensure that Concord’s Housing Element complies with State law, including the duty to affirmatively further fair housing (AFFH).</p>	
11	<p>Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.</p>	<p>Specifically, the City should update the Draft to (1) include clear commitments for the City Council to consider local rent stabilizations and just cause eviction protections by 2024; (2) promote integrated and balanced living patterns by rezoning exclusionary areas; and (3) increase funding for affordable housing development, acquisition-rehab, and community land trusts.</p>	<p>Item (1): See Master Response #4 regarding local rent stabilizations and just cause eviction protections.</p> <p>Item (2): Through Program 8, the City will identify and rezone areas appropriate for medium and high residential densities, specifically in areas not designated as “Low Resources“ on the TCAC Opportunity Maps in Appendix D.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
			Item (3): Program 8 has been revised to detail how the City will leverage available funding sources and advocate for additional funding to increase housing in Concord, including county and regional housing trust funds and community land trusts.
11	Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.	<p>1. Include Clear Commitments for the City Council to Consider Local Rent Stabilization and Just Cause Eviction Protections by 2024</p> <p>The data is clear: Concord’s renters are experiencing a displacement crisis. As noted in the Draft, renters now make up 40% of occupied housing units in Concord. At the same time, the median rent has increased by more than 44% since 2010, outpacing the rise in renter income (37%). While many cities have seen an excessive growth in rental costs during this period, the problem has been especially intense in Concord, as median rent increased 54% faster than in Contra Costa County as a whole. The result is that more than 50% of renter households in Concord are now forced to pay too much for rent. In real numbers, this means that more than 10,000 renter households pay more than 30% of their income on housing; of those, over 5,000 pay more than 50%. For low-income renters, this sort of cost burden means that even a temporary financial setback can put families on the path to eviction and homelessness. It is thus no surprise that, during the pandemic, more than 820 Concord households reported that they were facing eviction when they applied to the State’s Emergency Rental Assistance Program (ERAP) and that the number of unhoused people in Contra Costa County grew by 35%—more than any other part of the Bay Area.</p> <p>These numbers are even more concerning when race is taken into account. Indeed, Black and Latinx residents experience all of these</p>	See Master Response #4 regarding local rent stabilizations and just cause eviction protections.

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		<p>trends more severely than White residents, regardless of income, because structural racism in housing, education, and employment have ensured that residents of color are much more likely to rent than own their homes. In Concord, 57% of Latinx households and 63% of Black households rent. White households are 50% and 100% more likely to own their homes than Latinx and Black households, respectively. And this means that 47% of Latinx households and 57% of Black households experience cost burden, regardless of income or tenure, while only 35% of White ones do. It follows that Latinx households experience overcrowding at a rate six times higher than White households–i.e. 19% as compared to 3%. And given that Concord is geographically segregated by race and income (see Section 2), the burden of displacement risk falls disproportionately on those neighborhoods where residents are predominantly people of color. Therefore, actions taken to protect renters from displacement due to excessive rent increases and unjust evictions will affirmatively further fair housing and move Concord toward a more equitable future. Conversely, refusal to take such actions amounts to a conscious choice to maintain the status quo of harmful racial inequities.</p>	
11	<p>Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.</p>	<p>As such, we are glad to see that the Draft correctly identifies “displacement risk” as the number one “contributing factor” in Concord’s Assessment of Fair Housing. As noted in that section, the data referenced above are further reinforced through multiple forms of “local knowledge,” including responses to the survey and comments made at public meetings, not only during the Housing Element Update, but also over the last six years (see Appendices F and G). The Draft falls short, however, when it comes to identifying “significant, meaningful, and sufficient” actions meant to address the underlying causes of displacement. Concord is legally required to develop concrete, measurable, and realistic actions to address disparities identified in the Assessment of Fair Housing, including displacement risk. The following issues must be addressed to ensure</p>	<p>Program 20 explicitly addresses residential tenant protections. Several program objectives have been revised to strengthen anti-displacement strategies, including Programs 10 and 24. Programs 2, 6, 9, 10, 12, 17, 18, 19, 20, 22, and 24 all include objectives that directly or indirectly address displacement risk.</p>

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		<p>that the proposed actions are truly responsive to the documented causes of displacement.</p> <p>Goals and Policies</p> <p>There is no specific Goal dedicated to preventing displacement and there is only one specific Policy meant to address it. Policy 2.4 reads: “Ensure that any development or redevelopment in Concord does not lead to the displacement of existing residents.” It is crucial to make displacement prevention a Policy. But there are many issues that cause displacement, such as excessive rent increases, no-cause or pretextual evictions, and unlawful harassment. The demolition or gentrification that takes place when low-income communities are targeted for redevelopment can certainly lead to displacement. But the Draft shows that while development and redevelopment activity have been limited over the previous planning period, the displacement pressure facing low-income renters in Concord has continued to grow. Policy 2.4 should thus be revised to provide a more comprehensive and evidence-based commitment to preventing displacement, for example: “Protect existing residents, in particular low-income residents and renters, from all forms of direct and indirect displacement, including development and redevelopment activity, unaffordable rent increases, and no-cause evictions.”</p> <p>Programs</p> <p>Even as written, Policy 2.4 is inconsistent with and undermined by other Programs in the Draft. Specifically, while the Draft claims that Program 2 (Addressing Constraints to Development), Program 6 (By-Right Development), and Program 9 (Middle Density) will all contribute to Policy 2.4, the opposite is true. Without stronger tenant protections, actions that streamline market-rate development and</p>	

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		<p>mixed-income development in which the percentage of affordable units is low will accelerate the kind of direct displacement that Policy 2.4 commits to avoid.</p>	
11	<p>Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.</p>	<p>Further, the Programs identified in Appendix D as addressing displacement risk as the primary contributing factor are inadequate to address the real causes of displacement, as documented in the Assessment of Fair Housing. Note: These comments refer to Table 3 on p. D85.</p> <ul style="list-style-type: none"> ● Program 9 – Middle Density: This program involves allowing property owners to split lots and build duplexes in single-family neighborhoods, in conformance with SB 9 (2021), via ministerial review. As such, it will do nothing to assist the 10,000 renter households who are forced to pay too much for housing and are thus most at risk of displacement. Specifically, there is no guarantee that SB 9 will result in more housing, especially deed-restricted affordable housing, so any potential positive impact on affordability would be decades away. Renter households at risk of displacement need access to stable and affordable housing right away. ● Program 10 – Homeownership Assistance: Homeownership is an important goal for many, especially families of color that have been locked out of housing stability and intergenerational wealth-building due to racist policies in lending. However, Concord’s homeownership programs have a proven track record of only assisting a small number of families, many of them moderate-income. As stated in Appendix 	<p>Program 20 explicitly addresses residential tenant protections. Several program objectives have been revised to strengthen anti-displacement strategies, including Programs 10 and 24. Programs 2, 6, 9, 10, 12, 17, 18, 19, 20, 22, and 24 all include objectives that directly or indirectly address displacement risk. Programs 9, 10, 17 and 18 are intended to supplement other tenant protections and anti-displacement strategies, rather than serving as the City’s primary anti-displacement strategy.</p>

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		<p>A, the City has only assisted 12 low- and moderate-income households in becoming homeowners during the 5th Cycle. The current Draft does not contemplate more funding for homeownership assistance. Therefore, it is clear that, under current conditions, these programs are incapable of assisting the thousands of renter households at risk of displacement, especially when it is the lowest-income households, who do not meet the income qualifications for homeownership programs, that are most at risk of losing their homes.</p> <ul style="list-style-type: none"> ● Program 17 – Preservation and Housing Rehabilitation: In terms of assisting renters, this program calls for “seek[ing] opportunities” to finance the conversion of unsubsidized rental housing to deed-restricted affordable housing. This is an important goal, which we support, but it should include more specific and urgent actions. The Draft states that the City may not even release a Notice of Funding Availability for preservation until December 2025, which would mean that actual conversion might not happen for another year or two after that. Renters at risk of displacement today need strategies that will keep them housed right away. ● Program 18 – Preservation of At-Risk Affordable Housing Units: The loss of existing affordable housing can lead to displacement, and we support efforts to prevent such conversion. However, Appendix D does not identify conversion as a significant driver of displacement in Concord; it identifies “economic pressures,” namely renter cost burden in unsubsidized rental properties, as the main driver. 	

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11	Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.	<p>Thus, the Draft must prioritize actions that will directly address the documented causes of displacement.</p> <ul style="list-style-type: none"> ● Program 19 – Replacement Requirements: This program is meant to ensure that demolition resulting from new development activity does not lead to a loss in the number or affordability of rental housing units, or displacement of low-income tenants, in conformance with SB 330 (2019). These are important measures, but they are already State law. Concord can and must do more to address the “economic pressures” it has identified as displacing low-income renters. ● Program 20 – Residential Tenant Protections: Concord has taken some initial and important steps to strengthen tenant protections, such as requiring landlords to offer a one-year lease and provide relocation assistance for no-cause evictions beyond what is required in AB 1482 (2020), implementing a rent registry (2021), and passing an anti-tenant harassment ordinance (2022). However, as shown in Appendix D, displacement has gotten worse during the 5th Cycle, when many of these programs, including tenant/landlord mediation, were in place. So while this is an important start, Concord needs to go further to address the full scope of the problem. <p>To reiterate, the Draft identifies “displacement due to economic pressures” as the main contributing factor to Concord’s fair housing issues. Yet these corresponding Programs are insufficient to address those economic pressures or the evictions that accompany them. Thus, the proposed Programs do not rise to meet HCD’s requirement that the City’s AFFH actions be “significant, meaningful, and substantial.” Rather than rely on scattershot Programs to stop displacement, the Draft should include a Program that is dedicated to proven, effective, and immediate anti-displacement strategies. It should commit to robust engagement with impacted renters and community- based organizations that serve them to develop rent</p>	<p>Program 20 explicitly addresses residential tenant protections. Several program objectives have been revised to strengthen anti-displacement strategies, including Programs 10 and 24. Programs 2, 6, 9, 10, 12, 17, 18, 19, 20, 22, and 24 all include objectives that directly or indirectly address displacement risk. See Master Response #4 regarding local rent stabilizations and just cause eviction protections.</p> <p>“”</p>

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		<p>stabilization and eviction protection ordinances that are more protective than AB 1482 by 2024. And it should commit to allocating funds for rental assistance and legal counsel for households facing eviction.</p> <p>Given that “economic pressures” are the primary cause of displacement in Concord, the City must proactively pursue evidence-based policies that will reduce the gap between rents and tenants’ incomes and regulate no-cause and pretextual evictions as a means by which property owners skirt existing legal protections, vacate rental units occupied by lower-income families, and rent them out at higher rates to more affluent tenants. This approach is not only supported by the data in the Draft and HCD’s Guidance, but also Concord’s residents. Appendix F notes that displacement was a top concern, and rent stabilization and eviction protections were two of the top solutions, named by people who participated in the Housing Element Town Halls, while Appendix G makes clear that tenants and community-serving organizations have been demonstrating the need for more robust tenant protections since 2016. Further, among the approximately 800 residents who responded to the survey, large numbers identified unaffordable housing costs (54%), sudden rent increases (52%), sudden lease termination (39%), lack of maintenance (37%), and eviction (35%) as the main causes of displacement in the city.</p>	

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11	Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.	<p>2. Promote Integrated and Balanced Living Patterns by Rezoning Exclusionary Areas</p> <p>The Housing Element is required, per State law, to “[replace] segregated living patterns with truly integrated and balanced living patterns.” Specifically, in accommodating the Regional Housing Needs Allocation (RHNA), the Sites Inventory must affirmatively further fair housing. Thus, during the 6th Cycle Update, Concord must show that it has enough adequate and suitable sites to accommodate its RHNA, as in the 5th Cycle, but also to remedy patterns of racial and economic segregation. In particular, Concord must demonstrate how its Sites Inventory decreases segregation index scores by income and among members of protected classes within the city as well as the regional scale.</p> <p>At the same time, Concord is required to reduce housing disparities experienced by members of protected classes. In practice, this means that land use and development decisions must be made in a manner that promotes community stability, economic and educational opportunity, and environmental justice in lower-income communities, while also promoting desegregation and inclusion in higher-income ones. The City should thus take proactive steps to increase the supply of affordable housing in all parts of Concord. But the Sites Inventory does the opposite; it intentionally locates moderate- and above moderate-income sites in Central/West Concord to “[provide] opportunities for households with higher incomes, which...are more likely to be persons identifying as White” in lower-income communities of color. It justifies this as a of “integrating the community.” Gentrification is not integration.</p> <p>According to the analysis provided in the Assessment of Fair Housing, policies that encourage more affluent White residents to move into lower-income neighborhoods are precisely what generate</p>	See Master Response #5 regarding the sites inventory and analysis and Master Response #6 regarding the sites inventory as it relates to fair housing.

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		<p>the “economic pressures” that drive displacement in Concord. This aspect of the Sites Inventory thus directly contradicts Policy 2.4: “Ensure that any development or redevelopment in Concord does not lead to the displacement of existing residents.” Rather than advance gentrification in Central/West Concord, the City should prioritize upzoning land in South/East Concord, with the measurable goal of providing zoning capacity for at least 1,000 affordable homes. It should also proactively identify funding, sites, and mission-driven development partners to encourage affordable and mixed-income developments in higher-resource areas.</p>	
11	<p>Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.</p>	<p>Concord is segregated by race and income in ways that harm low-income households and members of protected classes, in particular immigrants and people of color. White people are the most racially isolated group in Concord, and White and Latinx residents are the most highly segregated groups, due to the racialized disparities in renter versus ownership tenure. Correspondingly, above moderate-income households are the most economically isolated group. Concord is significantly more economically segregated than the region as a whole; low-income and non-low-income households are 50% more segregated in Concord than the regional average, and very low- and above moderate- income households are 59% more segregated. These patterns are reinforced through the segregation of high-density and low-density residential zones and the maintenance of single-family-exclusive districts in more affluent parts of the city.</p> <p>The Sites Inventory fails to mitigate this pattern by promoting opportunities for low-income households to move to racially concentrated areas of affluence. There are only two lower-income sites located in Clayton Valley, and none of them are located east of West Street on Clayton Road, despite the clear presence of many appropriately sized vacant and underutilized sites to the south and east. By reinforcing existing forms of segregation, this approach fails not only to AFFH, but also to meet the priorities of Concord</p>	<p>See Master Response #5 regarding the sites inventory and analysis and Master Response #6 regarding the sites inventory as it relates to fair housing. As noted in the following comment, the City has included an objective in Program 8 to promote more integrated living patterns through a future rezoning effort.</p>

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		<p>residents; according to the survey, 51% of respondents said that new housing should be spread throughout the city—more so than any other response—and 45% said that more housing should be built in single-family zones.</p>	
11	<p>Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.</p>	<p>However, whenever this issue of spreading affordable housing throughout the city has been raised, the planning team has responded that it is not possible within the existing zoning since land in South/East Concord is zoned for less than 30 dwelling units/acre. Rather than search for ways to accommodate lower-income sites in lower-density but higher-resource areas in order to AFFH during the 6th Cycle, the planning team has instead proposed to “[r]ezone sites to increase multifamily residential options outside of lower resource areas by December 2026” in Program 8 (Fair Housing). This approach is problematic for two reasons.</p> <p>First, with a timeline of December 2026, the Draft does not address the urgency of the problem. If land is not upzoned until 2026, then low-income residents might not see the opportunity to move to more resourced areas until 2030 or later. It is unclear how this program will have “beneficial impacts within the planning period” as required by State law.</p> <p>Second, the Draft is insufficiently specific about which areas will be considered for rezoning, mentioning “areas with access to resources—such as in high resource areas as provided by the TCAC maps...—amenities, and/or public transit.” There are several areas with amenities and/or public transit, including Downtown, where the low-</p>	<p>See Master Response #8 regarding Program timing. The timing associated with the rezone program has been updated to reflect when the process will begin.</p> <p>Regarding the areas to be considered for rezoning, see revised language in Program 8. Per Objective 8.6, rezoning will occur in areas that are not designated as “Low Resource” on the TCAC Opportunity Maps, which encompasses a large portion of the City designated either as “Moderate Resource” or “High Resource”. The language regarding “amenities and/or public transit” is found in the introductory text for Program 8 and is not in the actual objective. This language has been revised to clarify that amenities and public transit will be considered during the rezoning, but would not be a quantifiable objective. Therefore, this rezoning program allows</p>

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		<p>income sites are already concentrated. Therefore, as criteria, amenities and/or transit are not enough in and of themselves to promote the required desegregation. As for resources, the Draft mentions in many places that only a small segment of Concord is designated “higher-resource” by TCAC. Thus, relying upon TCAC’s higher-resource designation as a prerequisite for rezoning will unnecessarily restrict the creation of new affordable housing development and residential mobility opportunities in Concord.</p> <p>The mandate to AFFH is about breaking down barriers to opportunity that have been erected along lines of protected characteristics. In terms of residential segregation in Concord, these lines are evidently racial and economic. Therefore, rather than rely upon the criteria of amenities, transit, and/or resources, the City should commit to using available data on the concentration of White homeowners and higher- income households, as well as below-average school poverty rates, to decide where to upzone land. It should immediately consult with residents from the communities most harmed by segregation and the organizations that serve them to identify more lower-income sites in South/East Concord for the 6th Cycle, and commit to further community engagement and rezoning by the end of 2024. And it should proactively promote opportunities for affordable housing development in racially and economically exclusionary areas by locating prime sites, dedicating financial resources, and recruiting non-profit development partners.</p>	<p>adequate flexibility to increase housing opportunities in middle- and upper-income areas outside of existing lower-income areas with amenities and transit.</p>

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11	Concord Community Based Organizations (37 Total) See Exhibit C, Comment Letter #11 for full list.	<p>3. Increase Funding for Affordable Housing Development, Acquisition-Rehab, and Community Land Trusts</p> <p>It is no secret that Concord was well off the mark of meeting its lower-income RHNA during the 5th Cycle; as of the end of 2021, the City had only met 2% of this need. The lack of adequate local funding for producing and preserving affordable housing is one of the main reasons for this shortfall. Concord has an Affordable Housing Trust Fund, but it has only provided local source funding for one 62-unit development in recent years. With a 46% increase in lower-income need for the 6th Cycle, Concord is going to have to do more to meet the needs of current and future residents and comply with State requirements. Yet, the Draft fails to meaningfully address this funding gap for housing affordable to lower-income households. We support Program 12 (Inclusionary Housing), which would increase in-lieu fees to the maximum feasible level and finally extend the inclusionary requirements to rental and condo developments. But much more needs to be done.</p> <p>The only other action listed in the Draft that might increase funding is Program 8 (Fair Housing), specifically, working with the Contra Costa County Consortium to develop a Regional Housing Trust Fund (RHTF). However, the Board of Supervisors has already approved the creation of the RHTF, and County staff are currently working to establish it. It is not at all clear from the Draft how Concord would add to the establishment of the RHTF, or how this would lead to increased funding to produce and preserve affordable housing in Concord. As such, it is inappropriate to identify this as a meaningful Program—whether pursuant to AFFH, as it is currently framed, or any other Goal. If the City intends to add additional funding to the RHTF, or work to ensure that some percentage of it flows to Concord, then</p>	Additional objectives related to the pursuit of funding have been added to Program 8, and Program 25 is a newly incorporated program to address funding.

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		<p>those measurable objectives should be clearly stated. Otherwise, this item should be removed.</p> <p>Rather than just appeal to the County and the State for resources, as the City has long done, Concord should commit to concrete actions that will increase local funding for affordable housing development, acquisition-rehab, and community land trust purchases. This should include establishing or increasing taxes on higher-cost real-estate transactions, vacant properties, or large landlords and supporting community benefit negotiations at large market-rate developments, such as the Concord Naval Weapons Station.</p> <p>We thank you, again, for the opportunity to comment on the Draft Housing Element and look forward to reading your responses to the comments and recommendations made throughout this letter.</p>	

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<i>Comment Letter #12</i>			

12	Kristin Laughlin (East Bay Alliance for a Sustainable Economy)	<p>Dear Mayor, Concord City Council and Housing Planning Team,</p> <p>I am writing on this last day for official feedback on the draft Housing plan to share my concerns with you after the last City Council meeting on July 21 where the Housing Element was discussed.</p> <p>First, I do want to thank the Mayor and Council for supporting inclusion of TOPA/COPA policies which give the option to tenants and local community non-profits to make a first offer when rental properties are up for sale. This is an important strategy for more local and affordable home ownership. However, investing only in homeownership strategies is not at all sufficient to stop the rampant displacement of low-income renters and people of color that is happening in Concord, and has been accelerating over the past six years.</p> <p>The Raise the Roof Coalition that my organization EBASE helps to convene, came together in the Spring of 2016 precisely because we saw a groundswell of low-income and immigrant tenants in the Monument Corridor coming to City Council pleading for relief from excessive rent increases, unjust evictions and serious habitability issues and unresponsive landlords. Many residents went on a rent strike to protest these conditions. All the tenants in one of the buildings who tried to stand up for their rights got evicted, as there is no local just cause ordinance in place, and there is no enforcement of state laws that say retaliation is illegal. Other residents had to move because they simply could not afford the rent increases.</p> <p>I certainly want to acknowledge that the City and Council have invested in programs like the Multi-Unit Inspection program in 2017 to help address habitability issues, and the City did just vote for an anti-harassment ordinance to provide more of a legal framework for tenants to protect themselves against landlords who harass tenants through retaliation and neglecting or denying repairs.</p>	Comments noted.
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12	Kristin Laughlin (East Bay Alliance for a Sustainable Economy)	<p>However, it is critical to note that the through-line over the last six years has been a demand by vulnerable tenants for rent stabilization and more eviction protections.</p> <ul style="list-style-type: none"> • In 2016 – Hundreds of tenants and community members participated in a Housing Forum in June 2016, as well as a series of hearings related to a six-month study-session by Council. The vast majority urged Council to stabilize rents and pass eviction protections. At a bare minimum, they asked council to pass an eviction and rent-hike moratorium over the holidays, which Council denied. • In 2018 – Twenty-nine families were evicted from Parkside apartments when an investment firm purchased the apartment complex. The working class residents, largely immigrants, asked Council for more tenant protections and rent relief, as they were told that they could re-apply for their apartments if they were prepared to pay a \$700 increase in monthly rent. Residents and community members marched and flocked to Council. Just a couple sample articles are here: Rent control emerges as hot topic in Contra Costa’s biggest city More than two dozen East Bay residents displaced as housing crisis drags on • In 2019 – More low-income residents participated in community forums that were part of the City’s Ad-Hoc committee considering Tenant Protections. • In 2021, over 500 residents signed a petition expressing their concern about displacement should Ellis Lake Park be developed---a park central to the Monument Corridor. They urged protections like rent control and just cause and the formation of an Anti-Displacement Taskforce. <p>We also know that the pandemic only exacerbated the economic insecurity of the most vulnerable tenants, disproportionately affecting</p>	See Master Response #4 regarding rent stabilization and eviction protections.

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		<p>the Latinx and Black community. The plan’s own analysis also captures that racialized reality of disproportionate rent burden and housing insecurity.</p> <p>Thus, it is disturbing that the majority of Council decided last Tuesday that they would not systematically address the very real crisis of displacement or support meaningful strategies like rent stabilization and eviction protections like a stronger just cause ordinance. These strategies are evidence-based strategies for mitigating displacement at the scale needed. These are the strategies that residents have been constantly asking for over the years. They are essential strategies for actually creating fair and affordable housing in Concord.</p>	
12	Kristin Laughlin (East Bay Alliance for a Sustainable Economy)	<p>I am concerned that the City planners agreed to omit these strategies from the housing plan for the next eight years, even though this has been the feedback from the community. It is my understanding that the feedback of impacted people are the ones that are supposed to be considered in this process. Why are their demands being sidelined?</p> <p>I urge the planning team and Council to strengthen Concord’s Housing Element to truly commit to stop the ongoing displacement of low-income families of color from Concord and to include rent stabilization and eviction protections, as they are key effective strategies to stem the displacement. To ignore these pleas yet again is to make a conscious choice to maintain the status quo of harmful racial inequities and pursue a Concord that is less inclusive and diverse.</p> <p>Thank you.</p>	See Master Response #4 regarding rent stabilization and eviction protections.
<i>Comment Letter #13</i>			

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13	Monument Impact	<p>RE: Concord Housing Element</p> <p>Dear Planning Staff, Mayor Aliano, and Councilmembers,</p> <p>Thank you for the hard work that has gone into the Housing Element and the AFFH assessment.</p> <p>As a Concord resident who also serves our most vulnerable community members, I view the Housing Element as vital to address our current housing crisis, stop displacement, and ensure Concord’s diverse population has access to greater opportunity.</p> <p>I urge the City to take more concrete steps to stop displacement and prevent homelessness. It was disappointing that the Council could not reach consensus on June 21st about including proven programs that would address the displacement of low-income tenants out of Concord and in some cases out of housing altogether.</p> <p>Preventing Displacement</p> <p>It’s important to note that Council decided over a year ago against forming an Anti-Displacement taskforce that we had suggested. At that time, Council asked that the issue of displacement be addressed in the Housing Element. Yet there are no concrete, evidence-based plans or even tangible commitments to prevent displacement anywhere in the Housing Element.</p> <p>The AFFH points to the fact that rents have increased by 44% since 2010 and that 10,000 residents are rent-burdened, including 5,000 who are extremely rent-burdened. This is the number one driver of displacement in Concord. The 35% increase in homelessness in Contra Costa—the highest in the Bay Area—has largely been attributed to people losing their housing due to the high cost of rents, the high cost of living, and evictions. Yet, commitments to looking at</p>	<p>See Master Response #4 regarding rent stabilization and eviction protections.</p> <p>Program 20 explicitly addresses residential tenant protections. After the City Council meeting on June 21, 2022, several program objectives have been revised to strengthen anti-displacement strategies, including Programs 10 and 24. Programs 2, 6, 9, 10, 12, 17, 18, 19, 20, 22, and 24 all include objectives that directly or indirectly address displacement risk.</p>

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		<p>rent stabilization and just cause for evictions—tried and true ways of preventing displacement—are nowhere to be found in the plans and programs.</p> <p>Impact of the Housing Crisis on People of Color We cannot ignore the impact of this housing crisis on people of color. The city’s AFFH clearly notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet. At The affordability crisis hurts our whole community, but it is disproportionately impacting people of color. As per the AFFH, 47% of Latinx residents and 57% of Black residents are rent burdened in Concord.</p> <p>Monument Impact fields 60 calls a month from tenants on the verge of losing their homes—more than 50% are from Concord residents.</p>	
13	Monument Impact	<p>Production and Preservation of Affordable Housing We support the production and preservation of affordable housing. However, many of the policies, plans and programs do not directly address funding. Streamlining market-rate development and mixed-income development with a very low the percentage of affordable units will not solve the affordability crisis. It could accelerate displacement. The Sites Analysis calls for encouraging moderate income and high-end development in the Monument Corridor as a way of “integrating the community.” Gentrification is not integration, and this would increase rents and make displacement and fair housing problems worse, not better.</p> <p>In addition, ADU’s, homes for low-income first-time homeowners, and middle density plans would not help very many of Concord’s most vulnerable renters who desperately need an affordable place to call home. Concord has no idea how many ADUs we currently have,</p>	See Master Response #9 regarding funding, and Master Response #5 regarding income levels designated in the sites inventory. ADUs are intended as part of the City’s overall anti-displacement strategy rather than a primary anti-displacement program.

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		<p>nor could the City ensure they would be affordable. There have been very few new homes built for low-income first-time homeowners.</p> <p>The urgent need for more affordable housing production and preservation needs more concrete strategies and a better timeframe for ensuring funding of new affordable homes and for preventing the conversion of affordable units to market rate units. This funding is particularly important because without more money, the programs listed in the City’s own plan—like preserving at-risk rental properties or starting a community land trust—will not work. Conversions are happening now, unit by unit.</p>	
13	Monument Impact	<p>To meet its RHNA goals, Concord needs to provide over 2,000 affordable homes for low-income residents over the next 8 years. There is strong interest from the community in seeing a CLT in Concord. The City should focus its effort on raising funds for CLT purchases, proactively identifying unsubsidized properties where tenants are at risk of displacement, and recruiting CLTs or other non-profit housing providers to convert those properties to affordable housing. In addition, discounting surplus land would make development more feasible for CLTs and nonprofit developers.</p>	<p>Program 8 includes bringing awareness to Community Land Trusts and support with funding for an outside expert. The City is committed to continuing to pursue funding sources to fund programs as demonstrated in Program 8 (revised), Program 22, and newly added Program 25.</p>

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13	Monument Impact	<p>Rezoning Exclusionary Neighborhoods</p> <p>Lastly, the City must meaningfully address segregation by taking the racial and economic makeup of exclusionary neighborhoods into consideration. Rezoning land for affordable housing close to better performing schools will create real opportunities for low-income people to live in more affluent, exclusionary neighborhoods if they want to.</p> <p>For the past six years, hundreds of tenants—mostly immigrants and people of color—have shared painful stories of rent increases, landlord harassment and evictions. But today, with the economic impacts of the pandemic and a looming recession, the situation is far worse.</p> <p>The City did not come close to meeting its 5th Cycle RHNA Goals, meeting only 2.4% of its very low-income and 0.7% of its low-income goals. We need an equitable Housing Element that is backed by the political will to pass strong tenant protections, including rent stabilization and just cause and to be proactive in making the development of affordable housing and preservation in sensitive neighborhoods more feasible.</p> <p>We look forward to seeing a stronger draft of the Housing Element that incorporates public comment in the months to come.</p>	<p>Program 8 includes an objective to rezone sites within “Moderate Resource” and “High Resource” areas as designated on the TCAC Opportunity Maps.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #14</i>			
14	Monument Impact, Letter to City Council	<p>Dear Honorable Members of the Concord City Council,</p> <p>As the incoming Executive Director of Monument Impact, I join with my colleagues and our allies in writing to ask that you to prevent displacement, stabilize neighborhoods, and lower evictions within the Black and Latinx communities specifically. This is what impacted low income community members have been saying year after year, for the past six years. Concord should pass rent control and eviction protections to address displacement quickly and at scale.</p> <p>Please reconsider and do not:</p> <ul style="list-style-type: none"> • Build more high-end housing in low-income communities • Cause gentrification and make displacement worse; rent will rise even faster in neighborhoods where already, between 40-80% of renters pay more than they can afford. <p>Although we are extremely grateful that Concord tenants are protected from harassment now, we still have a lot to accomplish. Low-income Concord residents deserve to have affordable housing options, not fear that high rents will take them to the streets. Entire families live in fear of being homeless because they cannot afford to pay the rent. Many are currently behind with rent payments of thousands of dollars.</p> <p>Please reconsider and protect the low-income residents of Concord.</p>	<p>See Master Response #4 regarding rent control and eviction protections to address displacement.</p> <p>The City does not build housing; see Master Response #3 regarding the City's role in housing development.</p> <p>See Master Response #5 regarding income designations in the sites inventory.</p>
<i>Comment Letter #15</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
15	East Bay Housing Organizations (EBHO)	<p>RE: Comments on the Affordable Housing Components of the City of Concord's Draft 6th Cycle Housing Element</p> <p>Dear Planning Staff, Consultants, City Councilmembers, and Planning Commissioners,</p> <p>Thank you for the opportunity to comment on Concord's Draft Housing Element. East Bay Housing Organizations (EBHO) is an organization that works to produce, preserve, and protect affordable housing opportunities for low-income communities across Contra Costa and Alameda Counties. Many of our 400+ individual and organizational members live, work, or provide affordable homes in Concord. Having reviewed and discussed the Draft Housing Element with our member-based Concord Committee, I'd like to submit the following comments regarding actions we see as supportive of meeting Concord's affordable housing needs and those we think could be strengthened to more fully align with the Draft Goals and Regional Housing Needs Allocation (RHNA). It's no secret that Concord was well off the mark of meeting its lower-income RHNA obligations during the 5th Cycle. As of the end of 2021, the City had only met 2% of its lower-income RHNA.1 With a 46% increase in lower-income need for the 6th Cycle, Concord is going to have to do a lot more than it has iⁿ the past in order to meet the needs of current and future residents and comply with State requirements. We hope to continue to collaborate with staff and the City Council to make Concord a place that people of all backgrounds and incomes can afford to call home.</p> <p>To start, EBHO supports Program 12 to improve Concord's Inclusionary Housing Program (IHP) by raising in lieu fees to the maximum feasible level and removing the 600-unit threshold that prevents inclusionary requirements from applying to rental and</p>	Comment noted.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>condo developments. Despite explicit interest in affordable development among local officials and residents, Concord is currently constrained in its ability to meet the demand for affordable homes by the small size of its Affordable Housing Trust Fund (AHTF). As of March 2022, there was only \$6 million in the AHTF, which is less than the \$7.8 million used to fund the 62-unit Galindo Terrace—the only development to receive a grant from the AHTF in recent years.² Clearly, then, the City needs to look for solutions to bridge the gap between the scale of the need and the scale of its resources. It’s thus critical that the IHP, and especially its in lieu fee structure, is revised to create the maximum amount of lower-income homes and fee revenue, without undermining the feasibility of new projects.</p>	
15	East Bay Housing Organizations (EBHO)	<p>It’s also clear from the Draft Housing Needs Assessment (Appendix B) that low-income households experience cost burden at a much higher rate than moderate-income ones in Concord. Indeed, 71% of households making less than 80% of Area Median Income (AMI) experience cost burden, while only 37% of households making between 80 and 100% of AMI do.³ Thus, as a measurable goal for Program 12, we request that you commit to considering the disparities in housing need by income before allowing moderate-income rental units to count toward the new inclusionary requirements. At a minimum, we ask that the formulas for income mix be cost-neutral compared to one another, so that no single approach to meeting the affordability requirements is more or less costly than any other. This is needed to ensure that the City and its residents are guaranteed the same amount of value recapture in exchange for development rights, regardless of the path taken by the developer, and that at least some developers will elect to provide homes for very low-income households, who experience the greatest need.</p>	The comment is noted and will be considered during implementation of Program 12.

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15	East Bay Housing Organizations (EBHO)	<p>Unfortunately, Program 12 is the only significant proposal to increase the scale of the AHTF. Program 8 (Fair Housing) calls for the City to work with the Contra Costa County Consortium to develop a Regional Housing Trust Fund (RHTF). However, the Board of Supervisors has already approved the creation of the RHTF; County staff are currently working to establish it. Moreover, the RHTF will only be funded at \$12 million per year, and is meant to support activities across all “3 Ps” (production, preservation, protection), so it’s risky to assume that the establishment of the RHTF will meaningfully increase the amount of local source funding available to Concord. The City should amend this item to clarify how working with the County Consortium will lead to increased funding for affordable development in Concord through specific measurable objectives. It should also remove this item from Program 8, as it’s not clear from the Draft how supporting the RHTF will affirmatively further fair housing (AFFH).</p> <p>This aspect of Program 8 reflects the fact that Concord tends to prefer to appeal to the County and the State to address its affordable housing funding gaps. Indeed, at a City Council hearing on the Draft on June 21st, 2022, the Council directed staff to include a commitment to advocating at the State level for affordable housing dollars to replace the loss of redevelopment programs. While it’s true that cities often have fewer resources than higher levels of government, the City of Concord still has a number of opportunities to generate local revenue for affordable housing—opportunities that it’s currently passing up. Therefore, the City should consider additional ways of increasing local source funding for affordable development, including rallying constituents to support a general obligation bond; creating or increasing taxes on higher-cost real-estate transactions, vacant properties, or large landlords; and supporting community benefit</p>	The City is committed to continuing to pursue funding sources to fund programs as demonstrated in Program 8 (revised), Program 22, and newly added Program 25. Revisions have been made to Program 8 to clarify next steps regarding the County’s RHTF.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>negotiations at large market-rate developments, such as the Concord Naval Weapons Station.</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
15	East Bay Housing Organizations (EBHO)	<p>While more local source funding will be critical to meeting Concord’s lower-income need during the 6th Cycle, there are certainly other steps that the City can take to reduce the cost of affordable development. We thus encourage the City to consider the following:</p> <ul style="list-style-type: none"> ● Reducing or waiving impact fees and other City-imposed development costs for 100% affordable developments. According to research conducted by one of our members, MidPen, fee waivers can reduce overall development costs by 5-6%. This is an especially valuable strategy for localities without a lot of resources to finance affordable development, like Concord, because these cost reductions count as a local contribution in the competitive process of awarding tax credits.⁴ ● Providing ministerial review and other forms of streamlined permitting for 100% affordable developments. To that end, we support providing clarity regarding ministerial review for the City’s Affordable Housing Incentive Program (Program 11). We also strongly support creating a citywide affordable housing overlay that provides by-right approval for affordable developments, wherever zoning permits it, as contemplated in Program 6 (By-Right Development). And we urge the City to expedite both of these efforts, committing to complete them by December of 2024. ● Going beyond the requirements of the State Surplus Land Act (SLA). This could include recruiting mission-driven affordable housing providers to develop public land, initiating any required rezoning and environmental analysis, and donating land to decrease project costs and reduce the need for interest-bearing loans, which tend to decrease overall project affordability. 	<p>Program 11 has been revised to clarify that reduced and deferred fees are offered through the Affordable Housing Incentive Program.</p> <p>Through Programs 6 and 15, by-right development will be available with objectives targeted for 2024.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
15	East Bay Housing Organizations (EBHO)	<p>In addition to funding and permitting activities, Concord can have a positive impact on increasing the supply of affordable homes through policies that prioritize residents and community development organizations over corporate and/or outside investors in the real-estate market. Therefore, we're glad to see the City Council is interested in pursuing a Tenant Opportunity to Purchase Act (TOPA)/Community Opportunity to Purchase Act (COPA).</p> <p>However, in response to the City Council discussion of this item on June 21st, 2022, we request that you consider two things. First, TOPA/COPA policies work best when they go hand-in-hand. While it's important to prioritize tenants in the purchasing process, to build wealth and prevent displacement, it's often difficult for tenants to assemble the capital needed to make an acceptable offer during the limited timeframe provided by TOPA. In that case, COPA allows non-profits, such as affordable housing developers and community land trusts, which tend to have access to more funding and technical experience, to buy the property on behalf of tenants or other lower-income households. In other words, COPA serves as a "backstop" to ensure that there's a way to preserve affordable housing and prevent displacement in the event that the existing tenants can't or don't want to purchase and manage the property on their own. Without COPA, many more properties will be lost to the speculative market in ways that will further reduce the affordability of Concord's neighborhoods. Second, these policies are best pursued at the local level. While there have been recent efforts to enact a statewide TOPA/COPA, they have routinely stalled because the diverse nature of California's economic and political landscape has made it difficult to secure agreement on a single, unified policy. There's no telling if or when a statewide policy will be passed, or whether it will truly reflect the needs and desires of local residents. If Concord believes that TOPA/COPA will help</p>	<p>Program 10 has been included to address local TOPA and COPA policies, based on direction from the City Council on July 21, 2022. Integration of TOPA and COPA policies can be considered during implementation of Program 10.</p>

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		address the challenges identified in the Draft, then Concord should work with local stakeholders to develop its own TOPA/COPA.	
15	East Bay Housing Organizations (EBHO)	Finally, we note that the Sites Inventory does not appear to take potential tax-credit scoring into consideration when assessing whether or not a site is realistic from the perspective of affordable housing development. We therefore request that the City include “back-of-the-napkin” estimates of how lower-income sites will score on locational factors in Exhibit A of Appendix E. This is especially important given the discussion throughout the Draft of Concord’s lack of higher-resource zones per the Tax Credit Allocation Committee (TCAC) and the City’s deferral of upzoning higher-resource areas—which runs counter to the requirement to	See Master Response #5 regarding the sites inventory analysis and Master Response #6 regarding the sites inventory as it relates to fair housing. State law does not include eligibility for tax credits or other funding sources as a required criteria for designating lower-income sites. However, under Objective 25.4, the City will submit a letter to the TCAC requesting changes to make

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		<p>affirmatively further fair housing (AFFH), as well as TCAC priorities—until much later in the 6th Cycle.</p> <p>We thank you, again, for the opportunity to comment on the Draft Housing Element and look forward to reading your responses to the comments and recommendations made throughout this letter.</p>	<p>projects in Low Resource areas with access to transit and other amenities more competitive for tax credits.</p>
<i>Comment Letter #16</i>			
16	<p>United Brotherhood Carpenters and Joiners of America Local Union No. 152</p>	<p>Re: City of Concord Draft Housing Element Update Dear Ms. Mindy Gentry,</p> <p>Please accept these comments on the above referenced Draft Housing Element Update on behalf of the members of Carpenters Local 152, which represents working men and women in the city of Concord and Contra Costa County. We appreciate the opportunity and look forward to working together on this important endeavor.</p> <p>To meet the urgent need for housing units outlined in the State’s Regional Housing Needs Allocation (RHNA), as well as the policy goals outlined in the City of Concord Draft Housing Element Update, it is vital that the City of Concord support efforts to build the local construction workforce. Local 152 has long been at the forefront of training the next generation of construction workers, opening pathways to the industry for diverse and traditionally underserved populations, and embracing new technologies and delivery methods to expedite the construction of much needed housing.</p> <p>The City of Concord notes in its Housing Element Update Draft that the construction industry is facing a “historic shortage of skilled labor, and the labor gaps might get even larger.” To be clear, neither</p>	<p>Comment noted.</p>

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		<p>Contra Costa county nor the City of Concord have enough skilled, highly productive residential construction workers to build the 5,000+ units that the City of Concord is supposed to produce over an 8 year time period. This is itself an approximately 45 percent increase from the prior Housing Element cycle’s RHNA goals for Concord. Despite this, as the housing crisis in our communities has continued to deteriorate in recent years, the number of workers employed in building construction in Contra Costa County has actually decreased by 7% since 2018. A continuously shrinking local construction workforce cannot build over 5,000 units of housing in 8 years.</p>	
16	<p>United Brotherhood Carpenters and Joiners of America Local Union No. 152</p>	<p>To support the policy goals of Concord’s Housing Element Update, Local 152 is requesting that the City add local hire and apprenticeship requirements to the General Plan and Housing Element for all residential construction projects larger than 10 units. The standards Local 152 is proposing in this comment letter would help to ensure greater benefits for the broader community, help ensure that construction labor needs are met, and guarantee that new residential development projects within the City are making needed investments in the region’s skilled construction industry workforce.</p> <p>The City Should Bar Issua’ce of Building Permits Unless Each Future Residential Development of 10 units or Above has a Viable Apprenticeship Program and Local Hiring Requirements</p> <p>The Carpenters propose the following additions to the Municipal Code of the City of Concord. For any residential project larger than 10 units.</p>	<p>Codifying a local hire and apprenticeship requirement to residential construction projects in Concord could raise concerns with additional development costs, resulting in a potential constraint to development. The City Council has not identified this as a priority at this time but the submission of this comment will bring this to the attention of the City Council for consideration.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
16	United Brotherhood Carpenters and Joiners of America Local Union No. 152	<p>Permitting requirements in the Municipal Code of the City of Concord.</p> <p>A person, firm, corporation, or other entity applying for a building permit under the relevant section of the Municipal Code of the City of Concord, California shall be required to comply with the apprenticeship, healthcare, and local hire requirements of the Housing Element and General Plan. Failure to comply with the requirements set forth in this section shall be deemed a violation of this article.</p> <p>Apprenticeship:</p> <p>For every apprenticeable craft, each general contractor and each subcontractor (at every tier for the project) will sign a certified statement under penalty of perjury that it participates in a Joint Apprenticeship Program Approved by the State of California, Division of Apprenticeship Standards OR in an apprenticeship program approved by the State of California Division of Apprenticeship Standards that has a graduation rate of 50% or higher and has graduated at least thirty (30) apprentices each consecutive year for the five (5) years immediately preceding submission of the pre qualification documents. The contractor or subcontractor will also maintain at least the ratio of apprentices required by California Labor Code section 1777.5.</p> <p>Local Hire Policy:</p> <p>Contractor will be required to provide documentation that the contractor will hire a minimum of twenty-five percent (25%) of staff for any job classification with more than four (4) employees employed whose primary residence, which is not a post</p>	Comment noted. See response to prior comment.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>office box, is, and has been, within Contra Costa county within 180 days of the expected date of issuance of the Notice to Proceed for the project.</p> <p>While there has been a remarkable economic expansion in Concord since 2010, rising inequality and displacement adds to the City's affordability crisis and threatens to undermine the region's strong economy. Policies that require the utilization of apprentices and a local construction workforce will help counteract such trends. In tandem with programs currently operational by Local 152 outlined below, such policies will help improve local access to the type of living wage job the community needs, and also help ensure that the City meet the goals of the Draft Housing Element Update.</p> <p>Local 152 has implemented many programs that will enable the City to meet the Draft Housing Element goals. These programs include a robust Joint Apprenticeship Training Committee, vigorous utilization of apprentices in the City of Concord, healthcare coverage for all members and their families, and innovation within the construction industry.</p> <p>Joint Apprenticeship Training Committees (JATC's), such as the Carpenters Training Committee for Northern California (CTCNC), are a proven method of career training built around a strong partnership between employers, training programs and the government. This tripartite system is financially beneficial not only for the apprentice, but is a major benefit for the employer and the overall economy of the City of Concord. The CTCNC monitors current market conditions and adjusts the workflow of apprentices to meet the needs of the community, heading off any shortage of skilled workers. History has demonstrated that strong utilization of</p>	

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		<p>apprentices throughout the private sector helped California builders produce millions of units of housing.</p> <p>CTCNC recruitment strategies include robust diversity and inclusionary outreach programs, such as pre-apprenticeship, with proven results in representative workplaces and strong local economies. It is imperative that our underserved populations have supportive and effective pathways to viable construction careers, while ensuring that employers are able to find and develop the best and brightest talent needed to thrive in a competitive economy.</p> <p>Employer-paid health insurance plans for our members and their families provides preventative services to stay healthy and prevent serious illness. Timely care reduces the fiscal burden for our members and their families, and significantly reduces the utilization of safety-net programs administered by the City of Concord and Contra Costa County.</p> <p>Embracing new technologies and delivery systems will have a significant impact on the construction industry, particularly the residential sector. Increasing housing delivery methods reduces project durations and provides City of Concord residents housing sooner. Local 152 is at the forefront of ensuring that new construction technologies deliver those benefits while also creating work opportunities for those already in the trades as well as those looking to begin a construction career.</p> <p>Local 152 is in a unique position to address many of the key ideas outline in the City of Concord Housing Element Update. By investing in the training and utilization of apprentices, performing outreach to ensure that the workforce closely mirrors the demographics of our local community, providing employer-paid healthcare for our</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>members and their families, and promoting innovation in the residential construction sector, Local 152 is prepared to assist in closing the affordability gap in the City of Concord and the Bay Area. We look forward to engaging City staff and elected leaders as the Housing Element moves forward and working cooperatively to bridge the needs of the City with the skills and tools of Local 152.</p> <p>Thank you for your time and consideration of these comments.</p>	
<i>Comment Letter #17</i>			
17	Jody	<p>Houston, the fourth-most populated city in the country, has reduced its rate of homelessness over the last decade by 63%, far and away the best performing major city during that time.</p> <p>It has achieved these fantastic and sustained results with a “housing first” approach that focuses on getting homeless people into one-bedroom apartments as fast as possible, and worrying about things like jobs, drug addiction, mental health issues, and more, later.</p> <p>The logic, as elaborated by Michael Kimmelman writing for the New York Times, is that if someone’s already drowning, it doesn’t help to teach them how to swim first.</p> <p>This method has critics, but it’s paying off. Local news reporting on the turnaround claim that the vast majority of homeless Houstonites housed this way have remained in their house for longer than 2 years.</p> <p>From 2007 to 2020, a national survey recorded a 31.6% drop in homelessness Statewide, largely driven by Houston’s successes, especially considering the rise in homelessness in Austin.</p>	<p>Comment noted. Program 22 allows for integration of this approach during development of the City’s Strategic Plan on homelessness.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #18</i>			
18	Laura Nakamura	<p>RE: Housing Element Draft Plan</p> <p>The current trend in the housing market in which corporations are buying up housing stock across the country is of great concern to me. We have seen and heard countless stories throughout Concord of potential first-time home buyers, many of them Millennials, being priced out of the market by all-cash, non-contingent offers. The growing trend of corporate landlords owning significant single-family residential stock has some disturbing implications for cities everywhere.</p> <p>The draft plan names “displacement due to economic pressures” as the main contributing factor to Concord’s fair housing issues.</p> <p>With regards to the housing element, I think it’s important that we invest in housing stabilization measures for tenants and invest in programs that help individuals and families work towards home ownership and remain in the community.</p> <p>I favor increasing funding for the development of affordable housing, acquisition and rehabilitation of qualifying tenant properties and investment in community land trusts.</p> <p>Hope Johnson’s comments about the obstacle being the cost of affordable housing speaks to the reason that we need to be investing in programs that not only support creating affordable housing but also affordable housing that is sustainable – preservation is key.</p> <p>We need to adopt policies that prioritize vulnerable tenants who are at risk for becoming unsheltered or displaced and adopt tenant-driven strategies to stabilize our community and also protect our stock of existing affordable housing.</p>	<p>TOPA/COPA policies have been incorporated in Program 10, and the City’s support for Statewide policies that address this issue is discussed in Program 25.</p> <p>See Master Response #4 regarding displacement. The City is committed to continuing to pursue funding sources to fund programs as demonstrated in Program 8 (revised), Program 22, and newly added Program 25.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>We need to adopt right of first purchase policies like TOPA to support home ownership pathways for tenants; community land trusts, nonprofit developers.</p> <p>We need to adopt policies that mitigate the gentrification and displacement of members of our community.</p> <p>This is a racial equity issue – if we were adhering to the spirit of the Government Assessment of Racial Equity (GARE) assessment questions, we would be working to address the displacement of our black and brown neighbors. Building moderate income and high-end properties in low-income communities of color does the opposite of what this plan is intended to do. Instead it ignores the inequities, increases displacement and does nothing to improve fair housing.</p>	
<i>Comment Letter #19</i>			
19	Laura Nakamura, letter to City Council	<p>Dear Concord City Council,</p> <p>Concord’s Housing Element must ensure that all residents and families have a safe, affordable and healthy place to call home. I urge the Council to pass a tenant Anti-Harassment Policy that will prevent further harassment and displacement of Concord families. These are our neighbors and they are members of our community. The current draft plan does not go far enough in addressing what has been expressed by the Concord residents. But passing a strong anti-harassment policy will help to shape Concord’s Housing Element to one that reflects true input from the community.</p>	The Rental Tenant Protection Program and the Residential Tenant Anti-Harassment Protection Ordinance are incorporated in Program 20.
<i>Comment Letter #20</i>			
20	Kevin (East Bay for Everyone)	<p>Hi there,</p> <p>We are a housing advocacy group working on our letter to Concord for the Draft Housing Element. Can you help us confirm some points before we send it in?</p> <p>Reading through the site inventory, we are trying to find changes in density that Concord plans as part of the Housing Element:</p>	Adequate sites have been identified in the Sites Inventory to meet the City’s Regional Housing Needs Allocation (RHNA), including a 25% buffer (Appendix E); therefore, a rezoning program to include higher densities is not required or proposed to address capacity.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>- Reused non-vacant sites will have by-right development permitted at 20% BMR. Is there a timeline for this?</p> <p>- Multifamily housing in East Concord rezoning expected to be completed in 2027.</p> <p>Is that it? Are there other sites in the site inventory that are going to be rezoned for additional density, or are they going to keep the same density they have today? (Putting aside CNWS.) Some cities, for example, have a column for “planned zoning designation” or “planned density allowed” in their site inventory table.</p> <p>We want to make sure we are submitting accurate feedback to you and to HCD. We appreciate the help – we are a 100% volunteer organization and while we know you must include all of this when you submit to HCD, it can be difficult for us to synthesize 400+page documents from many different cities.</p>	<p>Program 8 includes a rezoning program to address Affirmatively Furthering Fair Housing issues to provide additional opportunity outside of “Low Resource” areas on the TCAC Opportunity Maps in Appendix D.</p> <p>Program 6: By-Right Development</p> <ul style="list-style-type: none"> • Amend the Development Code by January 2024 to permit by-right development on sites previously identified in past Housing Elements in which at least 20 percent of the units are affordable to lower income households in accordance with the specifications of Government Code Section 65583.2(c). • Provide additional pathways by which residential and mixed-use development providing at least 20% affordable units can be permitted by-right by June 2026. <p>Program 8: Fair Housing</p> <ul style="list-style-type: none"> • Rezone sites to increase multifamily residential options outside of lower resource areas by December 2026.
<i>Comment Letter #21</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
21	William Goodwin (Resident Empowerment Program Leader, Hope Solutions EBHO, Monument Impact)	<p>As a citizen I am excited that the City Council is in the process of finalizing the City’s Housing Element for the Sixth Cycle. Because this housing plan will determine what actions the City will take in the next 8 years to Affirmatively Further Fair Housing, I urge the city of Concord to take a more aggressive posture to stop displacement and homelessness in our community. The Point in Time Count in 2020 revealed that homelessness jumped dramatically in the last two years in Contra Costa, increasing by 35%. The top two reasons for losing housing were Affordability (the high cost of living/rents) and Evictions.</p> <p>Hundreds of tenants have pleaded with the City in recent years to intervene, so that they could stay in their homes. The vast majority showing up at Council meetings have been immigrants and people of color. Year after year, Concord families have asked for rent stabilization and for more protections from unjust evictions. But the rents in Concord continue to skyrocket, rising by more than 44% since 2010. Now families are facing unjust evictions and excessive rent increases to the point that they are not even able to put food on the table.</p> <p>The racialized impact of this housing crisis cannot be ignored. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement. Concord’s own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord.</p>	The Housing Element is in its draft form and is expected to be brought before the City Council for adoption in 2023. See Master Response #4 regarding rent stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>A World Class City is an inclusive city, that is racially and ethnically diverse, and where working families of different income levels can thrive. Those who work in our communities should be able to live in our communities. Why does the City of Concord continue to omit proven strategies from their plan, and only offer token solutions? Aren't you tired of seeing lower income, working-class families being pushed out of our city? Concord City Government must take immediate, concrete and effective action to stop displacement.</p> <p>Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. This Housing Plan must include these proven remedies. The plan needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. It is absolutely imperative for determining the future of this City. Otherwise, we will continue to see more and more residents living on the streets.</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #22</i>			
22	East Bay for Everyone	<p>RE: Draft Housing Element</p> <p>To Whom It May Concern,</p> <p>East Bay for Everyone is a membership organization advocating for housing, transit, tenant rights, and long-term planning in the East Bay. We and the undersigned organizations write to provide comments on the City of Concord's 6th Cycle Housing Element Public Review Draft.</p> <p>Programs and Policies</p> <p>Concord says they will rezone high resource East Concord for multifamily but not until 2027:</p> <p>This date is far too deep into the 6th Cycle to realistically realize MF housing production within the planning period. A typical MF project takes one to two years for site control and entitlement and at least two years for construction.</p> <p>Low-income housing financed by LIHTC regularly takes much longer. A 2027 rezoning would defer action till halfway into the planning period and leave barely enough room for housing to be entitled, permitted and constructed by the end of 2031.</p> <p>Consider moving this date up to 2025.</p> <p>'''</p>	<p>Program 8 will implement the rezone by 2026. This includes the time needed for outreach, analysis, and required CEQA studies. See Master Response #8 regarding Program timing.</p>
22	East Bay for Everyone	<p>Proposes to reduce parking requirements for residential uses in the transit overlay district, but only by 25%</p> <p>While parking reductions near transit are appreciated, Concord's base parking standards are especially high for MF housing. For example, two spaces are required for two bedroom units. Off-street parking requirements are typically not based on any empirical study and have no relation to parking demand, especially in places with access to rail</p>	<p>The City Council has elected to remove objectives from Program 16, and has expressed concerns with any further parking reductions.</p>

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		<p>and frequent bus service. A 25% reduction from very high base requirements could result in projects still being overparked, which increases costs with negative environmental and affordability externalities.</p> <p>Consider eliminating parking requirements within the transit overlay district, or reducing them to 50% of the base requirements.</p>	
22	East Bay for Everyone	<p>Middle density program exists but only as an ad hoc process and only allowed for ownership:</p> <p>Middle density housing is an important tool for creating diverse housing types and more attainable housing choices.</p> <p>Firstly, unfortunately Concord's program seems geared towards PUDs and ad hoc development. By not allowing middle density housing allowed by-right, this program ensures only well-capitalized developers and property owners will be allowed to participate.</p> <p>Concord should consider allowed middle density housing allowed near downtown and North Concord in transition zones from more intensive TOD development patterns.</p> <p>Second, middle density housing should not be restricted to ownership. A diverse set of tenures should be incentivized for middle housing to cater to Concord's diverse population.</p>	Middle density housing may be for rental or ownership.
22	East Bay for Everyone	<p>Lot Consolidation Incentive (Program 13)</p> <p>We think this is a good approach to foster small lot development.</p> <p>The incentives should be developed into a comprehensive program and not be limited to ad hoc waivers.</p>	Comment noted.

Letter No.	Name(s)	Comment	Response/Changes Made
22	East Bay for Everyone	<p>Replacement Requirements (Program 19)</p> <p>Demolition protections and replacement requirements are important anti-displacement tools.</p> <p>We urge Concord to follow the City of Oakland’s lead and codify SB330/SB8 demolition protections and replacement requirements in the municipal code. SB330/SB8 is slated to sunset in 2031.</p> <p>The City of Oakland recently updated its development application to require an affidavit of project applicants regarding proposed demolition of protected units under SB330/SB8 and provide details as to the displaced tenants and replacement units. Concord should follow suit.</p> <p>The development community must be made aware of SB330/SB8 demolition protections and replacement requirements. We have seen instances where project applicants have applied for entitlements to demolish empty, protected apartments and rebuild without being aware of SB330/SB8 demolition protections and replacement units. Their applications were rejected, but the damage to displaced tenants was already done.</p>	<p>The revised Program 19 includes the development of an affidavit for compliance with SB 330 and SB 8. Objectives of replacement requirements under Program 19 include educational and technical assistance.</p>
22	East Bay for Everyone	<p>Site Inventory</p> <p>We did not have time to examine the feasibility of individual sites; the lack of comments here should not be read to support the belief that development on the sites is feasible.</p> <p>Buffer</p> <p>Per Kapur et al (UCLA 2021), around 28 out of 369 sites, or about 12%, of Concord’s site inventory in the 5th Cycle had building permits issued.¹ If we were to assume that 12% of Concord’s 6th Cycle inventory was to become housing, Concord would need to demonstrate capacity for $5073 / 12\% =$ about 42,000 homes in their site inventory. Instead, they include capacity for just 5700 homes in their site inventory, or an implicit assumption that ‘bou’ 88% of sites</p>	<p>The City has adequate capacity to meet its RHNA obligation, however through Program 8 the City has committed to rezone to higher densities in “Moderate Resource” and “High Resource” areas as designated on the TCAC Opportunity Maps. See Master Response #5 regarding the sites inventory analysis.</p>

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		<p>in the inventory will get permits. We think it is unrealistic that a site inventory with a capacity of 5700 homes will become 5070 actual homes. We think these numbers should be much higher; demonstrating capacity for 20,000 homes in the site inventory would be a good start.</p> <p>Lack of Rezoning Development has gotten a lot tougher since t^{he} 5th Cycle:</p> <ul style="list-style-type: none"> - Interest rates are higher - Material costs are higher - Supply chains are longer - Labor costs are higher <p>Rents and home prices are higher, but not by enough to offset the increases in these four areas. We are disappointed to see Concord attempt to hit its targets with the existing density on many of its sites. We do not think that sites that were not chosen for development in the 5th Cycle will become more viable now.</p> <p>Further, we know the existing densities are not high enough because developers are pulling out of projects in Concord. A developer recently withdrew from building housing at North Concord and the Naval Weapons Station developer is also attempting to renegotiate the project.</p> <p>To increase the likelihood of development, Concord should increase the base density on each site by at least 25% and to reduce mandatory parking minimums on all sites by 50%.</p> <p>Naval Weapons Station As we expressed in our letter in advance of the ENA extension meeting with Seeno, we are concerned about the Naval Weapons Station project and the developer's intention to e.g. build more single</p>	

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		<p>family homes than initially planned, and count ADU's toward the lower income targets. We think counting 300 homes from the NWS toward the target is a reasonable likelihood-of-development assumption to make.</p>	
22	East Bay for Everyone	<p>Constraints Analysis Setbacks for Multifamily housing According to the Constraints Analysis, multifamily setback minimums “remain relatively similar between the residential zones.” (p. 21). This means that setbacks applied to single family zones are largely the same as those applied to multifamily housing. What is the rationale for this? The front setback for RH and RM multifamily development are listed as 25’ and 30’, respectively. Concord’s front setbacks for multifamily residential development are between 1.5 and 2 times as far as its neighboring peer city Walnut Creek. Concord’s rear setbacks multifamily residential development are between 3 and 5 times as far as its neighboring peer city Walnut Creek. Concord’s front and rear setbacks for multifamily residential development should be relaxed to facilitate more efficient land use. Priority should be given, however, to reducing the front setback in order to encourage walkable and human-scale urban fabric. We look forward to continuing to engage with the City of Concord in this process.</p>	Comment noted.
<i>Comment Letter #23</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
23	Medeleine Zywicki	<p>Dear City Council Members.</p> <p>My sincere thanks to you for all your work on the anti-harassment ordinance. Now I come again asking for a comprehensive housing plan that would protect tenants from wrongful displacement and eviction. Again, I acknowledge that in some cases the property owners may be abused by destructive tenants. But in our present need for more low-income housing, eviction could easily leave families homeless. I am hopeful that you will address this issue for the people of Concord.</p> <p>Madeleine Zywicki</p>	<p>See Master Response #4 regarding tenant protections.</p> <p>“”</p>
<i>Comment Letter #24</i>			
24	Donna Walton	<p>To really help the citizens of Concord, we need solutions that can work quickly. We need rent control, just cause eviction, and funds for rental assistance and legal services. We also need a safe, legal location for the unhoused to sleep, take care of their daily needs, and store their belongings.</p>	<p>See Master Response #4 regarding just cause eviction and rent control.</p> <p>“”</p>
<i>Comment Letter #25</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
25	Wendy Hershey	<p>Dear Concord Housing Element'</p> <p>We've seen an enormous increase in the number of people trying to stay alive in the streets compared to a few years ago. The leadership in the City of Concord has not been working to protect renters from unjust evictions and soaring rent increases and has not provided for enough truly affordable housing. Many people who work in Concord can't afford to live here.</p> <p>Your draft needs clearer definitions and goals for "supportive housing" programs, including programs other cities have that provide tiny homes or organized tent communities while people wait for permanent housing. Your draft didn't reassure me that there will be safe parking for people living in vehicles and trailers.</p> <p>We need round the clock supportive housing right away, not two years from now. People need sanitation and showers plus social workers, food, medical services, mental health support, and rehabilitation from substance abuse.</p> <p>More tenant displacement will continue if Concord's government continues to fail to enact rent stabilization and just cause eviction ordinances.</p> <p>I paste in part of a June 22 Bloomberg News article about HUD's desire that communities invest in solutions other than sweeping people off public streets without giving them any alternative place to stay alive.</p> <p>Inadequate tenant protections, paucity of truly affordable housing and adequate social services have contributed to homelessness.</p> <p>We need strong and swift action to make our community safe for everybody.</p>	<p>See Master Response #4 regarding displacement and protections from unjust evictions; Master Response #2 regarding supportive housing; Master Response #10 regarding services for the unhoused; Master Response #12 regarding safe parking sites.</p> <p>“”</p> <p><i>Note: Pasted Bloomberg News article is found in Exhibit C, Comment Letter #25.</i></p>

Letter No.	Name(s)	Comment	Response/Changes Made
Comment Letter #26			
26	Veronica Barragan	<ul style="list-style-type: none"> • Rent Control and Just Cause for Evictions, along with right to legal counsel and rental assistance, are proven strategies to prevent displacement, stabilize neighborhoods, and lower evictions. This is what impacted low-income community members have been saying year after year. Concord should pass rent control and eviction protections in order to address displacement quickly and at scale. 	See Master Response #4 regarding rent control and just cause eviction protections.
Comment Letter #27			
27	Kathy Youngson	<p>Dear City Council and Housing Element Planning Team,</p> <p>I am writing re: the City Council’s finalizing the City’s Housing Element, the plan that will determine the actions that the City will take over the next 8 years to promote fair and affordable housing. I commend the City Council on this plan. Overall, it seems to be a very comprehensive plan that addresses the many issues facing renters and homeowners and I learned a great deal about our City policies. Your plan states that Black and Latinx residents are more likely to rent their homes and therefore, are disproportionately impacted. I have been a resident of Concord since I was 4 years old and lived here when it was a predominantly white community. The increase in the diversity of our population has greatly benefitted us all – from the great variety of restaurants of many ethnicities to the variety of cultural celebrations to an influx of a wide diversity of ideas. I hope</p>	<p>The Housing Element is in draft form and is expected to be brought before the City Council for adoption in 2023.</p> <p>See Master Response #4 regarding rent stabilization and eviction protections.</p>

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		<p>we never go back to a “mono-culture”!! To help protect this vulnerable population, please make rent stabilization and eviction protections, like a ‘just-cause’ ordinance part of the City’s Housing Element. Please pay attention to the solutions that impacted residents have advocated for, that was stated in your Housing Element (to prioritize the input of the people most impacted by the housing crisis in the development of the plan).</p> <p>I urge the City to take more aggressive action to stop displacement and homelessness in our community. I personally have 4 friends whose children have left the state in order to be able to afford their first home, even though they are college educated and working in well-paying jobs. Also, as I drive around town, it has become very evident that the issue of homelessness is not just an ‘inner city’ problem anymore – it has arrived in Concord.</p> <p>Our city has suffered from a disproportionate number of young people leaving our community and therefore depriving it of the energy and ideas that young adults can bring to our businesses, civic groups and daily life. Please do your part to make Concord a place where a wide variety of people, of different ages, different ethnicities and income groups, will want to come and live.</p> <p>We do not benefit from corporate landlords who have no stake in our community or interest in being part of our daily lives or in making our city a better place to live – and yet we are impacted by their decisions. I understand that landlords need to make a profit – but it should be equitable regarding the amount of rent they charge and who they to rent to.</p> <p>I am looking forward to decisions made by the City Council that will benefit ALL of the citizens of our city.</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #28</i>			
28	Rhea Laughlin [Central County Regional Group (CCRG) and First 5 Contra Costa]	<p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I write to you to offer input on the City’s Housing Element plan. We in the Central County Regional Group (CCRG) and First 5 Contra Costa want every Concord child and resident to have a healthy, safe, and affordable place to call home. We want every parent to have a secure and dignified place to raise their family.</p> <p>The current reality in Concord, however, is that too many families suffer from displacement, homelessness, and a pervasive threat of rising rents. Indeed, homelessness in Contra Costa has increased by 35% in the past 2 years because of unaffordable housing costs/rents and evictions (Point in Time Count 2020).</p> <p>Here in Concord, rents in Concord have skyrocketed, rising by more than 44% since 2010. Our 2018 community-based housing assessment revealed widespread housing inequity, disproportionately impacting families with young children, low income renters, and residents of color. Primary concerns documented in our Housing Crisis Hits Home in Concord report included excessive rent increases, unjust evictions, and hazardous living conditions. Since then, hundreds of tenants struggling with housing instability have pleaded with the City Council to intervene with needed public policies, including local rent stabilization and just cause for eviction protections.</p> <p>Similarly, in 2021, 500 tenants in the Ellis Lake neighborhood appealed to City Council in the form of a petition, city sponsored workshops, and testimonies before Council, to pass tenant protection policies. Specifically, renters were concerned about displacement as a result of city plans for Ellis Lake Park improvements. While the park</p>	See Master Response #4 regarding rent stabilization and just cause for eviction protections. “”

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>plans did not move forward, Council neglected to pass the requested policies for rent control and just cause for evictions.</p> <p>Most recently, Concord residents underscored their need for rent control and just cause policies in every single housing element workshop, and related Housing and Economic Development and City Council meetings. An overwhelming majority of residents represented low-income immigrants and people of color. The city's own draft plan notes that Black and Latino residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latino residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it disproportionately impacts people of color.</p> <p>Nonetheless, in the most recent housing element review by City Council, a majority of Council members callously and egregiously proclaimed it was "premature" to consider rent control and just cause for eviction policies. Rent control and just cause are proven policies to address displacement quickly and to scale. Anything short of including them in the current housing element is a blatant disregard for community input, ignores the widespread suffering of Concord children and families, and exacerbates racial, economic, and housing inequity across the city.</p> <p>This Housing Plan is critical to fostering housing stability for Concord's future generations. It is imperative that City Council include rent stabilization and eviction protections in the Housing Plan. REAL solutions to housing insecurity and racial inequity are urgently needed. We appeal to you to please listen to Concord residents' requests: rent stabilization and just cause for eviction</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>protections. We are counting on you to protect Concord's young children and families.</p>	
<i>Comment Letter #29</i>			
29	<p>Alex Hernandez, CCRG Presidents</p>	<p>Estimado Concilio de Concord, Estamos en un momento muy importante para lograr protecciones para nuestros inquilinos en Concord. Por años hemos pedido control de renta, desalojo por causa justa y política anti acoso. Necesitamos darle seguridad y estabilidad a nuestros inquilinos.83mperatión está en sus manos. Concord es la ciudad donde las familias vienen primero y ustedes deben dar prioridad a las protecciones de los inquilinos.</p> <p>Translation: “Dear Concord Council, We are at a very important time to achieve protections for our tenants in Concord. For years we have asked for rent control, just cause eviction and an anti-harassment policy. We need to give security and stability to our tenants. The decision is in your hands. Concord is the city where families come first and you must prioritize tenant protections.</p>	<p>Desde 2016, el Consejo Municipal ha tomado varias medidas para implementar la protección de los inquilinos, pero ha optado por no implementar el control de alquileres ni prohibir los desalojos sin “na "causa j”sta” predefinida. El 21 de junio de 2022, el Concejo Muni83mperatideró los comentarios públicos sobre estos temas y optó por no incluirlos como programas en el borrador del Elemento de Vivienda. El Concejo Municipal ha señalado que los pasos que se están tomando para abordar las protecciones de los inquilinos a través del Programa de Protección de Inquilinos de Alquiler y la Ordenanza de Protección Contra el Acoso de Inquilinos Residenciales (Programa 20) pueden ser suficientes para abordar las necesidades de la comunidad y deben implementarse primero para medir el progreso antes de continuar. se toman acciones.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
			English See Master Response #4 regarding rent control and just cause eviction.
<i>Comment Letter #31</i>			
30	Yoally Munoz	<p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the City Council is in the process of finalizing the City’s Housing Element, a comprehensive housing plan that gives us a once in a DECADE opportunity to ensure that every Concord child and family has a healthy, safe and affordable home.</p> <p>I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. The hardest hit are low-income women of color with children. We know this housing crisis is another form of racial, class and gender injustice.</p> <p>This is why families have asked at every single housing element meeting for truly affordable housing and renter protections. Yet the housing element draft proposals do not address these needs and are out of touch with what really works.</p>	The Housing Element is in draft form and is expected to be brought before the City Council for adoption in 2023. See Master Response #4 regarding displacement.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>This Housing Plan is absolutely critical for determining the future of this City. Concord residents need rent control and eviction protections. These are the only solutions proven to address displacement quickly and widely. Residents have attended and provided repetitively evidence for the need of this protections via testimonies. If the City continues to omit this in their plan and offer token solutions, families and children in Concord will continue to face the burden of not having equitable housing for ALL. It's time that all families of color and the most vulnerable population voices be heard by the Council representatives, incorporate the needs and give family the relief they need.</p>	
<i>Comment Letter #31</i>			
31	Carla Castillo	<p>Housing Element Planning Team Aaron Sage,</p> <p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the City Council is in the process of finalizing the City's Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. We have seen homelessness jump dramatically in the last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for</p>	<p>The Housing Element is in it's draft form and is expected to be brought before the City Council for adoption in 2023. See Master Response #4 regarding displacement.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color</p> <p>We cannot ignore the racialized impact of this housing crisis. The city's own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>I want to live in an inclusive city that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income, working-class families pushed out of our city. This City must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of this City. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the City continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p> <p>As a physician in Martinez and soon Concord I can't understand the importance of this issue and the potential harms for my patients.</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
		Views are my own	
<i>Comment Letter #32</i>			
32	Tiffany Ku	<p>Housing Element Planning Team Aaron Sage, Dear Concord Housing Element Planning Team and City Council, I am currently a medical provider at Contra Costa County, where I take care of many residents from Concord. I am aware that the City Council is in the process of finalizing the City’s Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. We have seen homelessness jump dramatically in the last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color We cannot ignore the racialized impact of this housing crisis. The city’s own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx</p>	<p>The Housing Element is in draft form and is expected to be brought before the City Council for adoption in 2023. See Master Response #4 regarding rent stabilization and protection from unjust evictions.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>I want my patients to live in an inclusive city that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income, working-class families pushed out of our city. This City must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of this City. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the City continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p>	
<i>Comment Letter #33</i>			
33	Gabi Rivas (First 5 Contra Costa)	<p>Dear Concord City Council and Housing Element consulting team,</p> <p>Thank you for the opportunity to comment on the current Housing Element draft.</p> <p>We can all agree that Concord children and families should have access to affordable, safe and secure housing. It is imperative that our most vulnerable, our young children, can grow up in a community where their basic needs are met, such as having a roof over their heads.</p>	See Master Response #4 regarding rent stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>I am writing on behalf of the hundreds of Concord families and children we serve. Many of which you have heard from, for the past 7 years. To this day, families continue to struggle to maintain housing while paying skyrocketing rents and fearing being unjustly evicted. The housing element is critical and it needs to truly reflect the community needs as it will dictate the next 8 years. Unfortunately, the current draft falls short and leaves many Concord families without the protections they need and that they have requested to be included during this process.</p> <p>Families are at a brink of displacement and urgent protections are needed now. The Concord community fully supports tenant protections, as you have seen by the 500 signatures provided to you from Ellis Lake tenants just a year ago and the hundreds of testimonies you have heard throughout the years. Stories from families who came to you in desperation but found very little to no support, and unfortunately were forced to uproot out of their community and leave Concord.</p> <p>Prevent further displacement of Concord families and include real strategies in the housing element to keep children housed. Allow Concord children to grow up in the community they call home by including tenant protections in the housing element.</p> <p>Thank you,</p> <p>Gabi Rivas Community Engagement Coordinator First 5 Contra Costa</p>	
<i>Comment Letter #34</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
34	Hugo Ramirez	<p>Dear City of Concord Elected Officials and Staff</p> <p>I'm a homeowner in the neighborhood surrounding Woodside Elementary School. My voice as a homeowner shouldn't be any more resonant than that of a tenant. However, based on Concord's draft Housing Element there appears to be little regard for Concord's tenants, so I'll use my voice as a homeowner in hopes that you'll consider advancing strategies that will protect tenants, stabilize our communities, and combat gentrification and displacement. What's actually relevant to my comments is that I've dedicated my career to supporting anti-displacement strategies.</p> <p>ADU and first-time homebuyer programs will hardly make a dent in addressing affordability, much less in protecting low-income tenants from displacement.</p> <p>City of Concord must promote programs and policies that protect our most vulnerable tenants, including:</p> <ul style="list-style-type: none"> Just cause eviction protections Rent control Scale up eviction legal defense (ideally a right to counsel/full-scope representation) and other housing-related legal services Scale up tenants' rights education, outreach and counseling services (to help with eviction notice, habitability issues, other tenant-landlord matters) Implement tenant-based rental subsidies (deep and shallow, time-limited and ongoing) Implement a permanent emergency rental assistance Require more affordable units/in-lieu fees of developers in Concord's inclusionary policy Advocate for vacancy control and expansion of rent control 	<p>Further, Program 10 has been revised to include TOPA/COPA policies.</p> <p>See Master Response #4 regarding tenant protection and steps being taken to address tenant protections such as housing discrimination.</p> <p>Program 10 has been revised to incorporate Tenant Opportunity to Purchase Act (TOPA)/Community Opportunity to Purchase Act (COPA) strategies and several programs in the Housing Element include assistance for homeownership (Program 10), incentives for development (Program 11) and preservation of affordable housing (Program 18).</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>Investigation of housing discrimination in housing and other fair housing complaints</p> <p>Right of first offer/first refusal for mission-driven housing providers to purchase real estate</p> <p>More funding for affordable housing via taxes, bonds, linkage fees (new construction, acq./rehab, land banking, technical assistance, etc.)</p> <p>Explore other models that promote housing affordability, such as social housing, small sites program, limited-equity coops, hotel/commercial conversion, etc.</p> <p>No-interest loans/grants for low-income homeowners to address deferred maintenance and estate planning/other legal services to ensure the transfer of wealth to the next generation who have been priced out of their hometown</p>	
34	Hugo Ramirez	<p>Finally, with regard to housing density: Stay away from our already-vulnerable communities, especially the Monument Corridor. Focus your efforts on densifying within the plan for the former Concord Naval Weapons Station and consider building multi-family homes in larger parcels in neighborhoods with single-family homes.</p> <p>Be bold and do the right thing for our most vulnerable residents.</p>	<p>See Master Response #7 regarding the sites inventory and Monument Boulevard. Further, the only program of the Housing Element that proposes an increase in density is Program 8, which targets “Moderate Resource” and “High Resource” areas outside of the Monument Boulevard area.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter # 35</i>			
35	Jan Warren	<p>Dear Staff and Members of the City Council,</p> <p>Comments for Concord Housing Element</p> <p>Housing insecurity is a clear issue in Concord. Displacement disproportionately impacts people of color. Proposed solutions don't address the housing problems.</p> <p>In order for the Concord Housing Element to be accepted by the State it must address actual action solutions and provide housing in different areas of the City. The Monument area is already overly impacted by low-income housing. Building higher income housing in the Monument area will just cause more displacement.</p>	See Master Response #5 for information regarding the purpose of the sites inventory analysis, and Master Response #7 regarding the sites inventory in the Monument Boulevard area.
35	Jan Warren	<p>The Housing Element requires the City to prioritize solutions from impacted residences, especially those paying more than 30-50% of their income on rent. The Housing Element must include specifics to reduce displacement.</p> <p>Home ownership is stated to be an important City goal, yet over the last 8 years, Concord has only helped 12 low-moderate income households purchase an affordable home. ADUs are no solution for lower income households. It is so stated in your Housing Element. Where are the solutions?</p>	Comment noted.

Letter No.	Name(s)	Comment	Response/Changes Made
35	Jan Warren	<p>The residential tenant protection program is not a success. It has taken six years to attain an Anti-Harassment Ordinance with actual enforcement.</p> <p>The Site Analysis calls for moderate and high-end development in the Monument area. Years ago a mobile home park in the Monument area was removed to allow housing, which didn't offer opportunities for low income. Instead, the people in the mobile home park were displaced. You are just continuing the same pattern.</p> <p>For too long the City of Concord has relied on the Concord Naval Station land to supply affordable housing. Concord has lots of older apartments. I encourage you to work with non-profits and a Community Land Trust to convert more apartments to affordable housing units.</p>	See Master Response #4 regarding tenant protections.
35	Jan Warren	<p>Rezoning is needed in more affluent areas. Specifics need to be shown to address segregation and inequality.</p> <p>We are all in this together. Concord has to build their share of housing for a change. Your neighbor. The need is so great we all need to contribute.</p>	Program 8 includes an objective to rezone for increased density in high resource areas.
<i>Comment Letter #36</i>			
36	Mihaela Gough (Centro Legal)	<p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am an eviction defense attorney who has represented Concord tenants for half a decade. I have seen first hand what impacts and causes displacement and homelessness in the city. The answer is rising rents and the desire for landlords to maximize profits. To do so, these landlords sometimes go through great lengths to evict existing tenants simply to raise the rents on their properties. Housing is the foundation of education, healthcare, safe communities, and job security. Housing is the number one way to prevent homelessness.</p> <p>Homelessness and housing insecurity has a number of negative consequences for the whole community. Housing insecurity or</p>	See Master Response #4 regarding rent control and just cause eviction protections.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>hazardous housing leads to worse mental health outcomes for children, increasing the rate of depression and other psychological states. Homelessness and housing insecurity creates worse educational outcomes for children, long-term economic outcomes, and long-term health outcomes. Experiencing homelessness or housing insecurity for a child will affect them the rest of their lives. For adults, homelessness or housing insecurity leads to worse physical and mental outcomes. Housing insecurity also increases the number of traumas a person faces including things like rape, assault, starvation, social isolation, and lack of access to primary and preventative health care.</p> <p>The best way to prevent homelessness is to keep people in safe homes. And the best way to keep people safe in their homes is to prevent evictions.</p>	
36	Mihaela Gough (Centro Legal)	<p>I am aware that the City Council is in the process of finalizing the City’s Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community.</p> <p>There are important policies and tools that protect tenants from displacement and homelessness: robust just cause protections, rent control with rent-hike ceilings and rent adjustment boards, allowances for subletting or additional tenants to enable tenants to share expenses, providing a right to counsel in all eviction proceedings, and enforcement agencies and mechanisms that stop bad habitability and tenant harassment. These measures require some budgetary backing and ongoing community engagement. In the long-term, to keep people housed in the most expensive place to live and</p>	<p>The Housing Element is still in a draft form and is expected to come before the City Council for adoption in 2023. See Master Response #4 regarding rent control and just cause eviction protections.</p>

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>build housing in the world, tenant protections must become a priority if we truly want diverse, inclusive, and more equitable communities.</p>	
36	Mihaela Gough (Centro Legal)	<p>The city’s own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of this City. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the City continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p>	See Master Response #4 regarding rent control and just cause eviction protections.
<i>Comment Letter #37</i>			
37	Derek Sagehorn (East Bay for Everyone)	<p>Hello,</p> <p>I attended this evening’s workshop on behalf of East Bay for Everyone and reviewed the Program Implementation portion of the draft housing element. I expect East Bay for Everyone to provide additional more formal comments on the draft, including the site inventory, at a later date.</p>	See Master Response #8 regarding program timing.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>My comments are as follows:</p> <ul style="list-style-type: none"> • Concord says they will re-zone high resource East Concord for multifamily but not until 2027: this date is far too deep into the 6th Cycle to realistically realize MF housing production within the planning period. A typical MF project takes one to two years for site control and entitlement and at least two years for construction. Low-income housing financed by LIHTC regularly takes much longer. A 2027 rezoning would defer action till halfway into the planning period and leave barely enough room for housing to be entitled, permitted and constructed by the end of 2031. Consider moving this date up to 2025. 	
37	Derek Sagehorn on behalf of East Bay for Everyone	<ul style="list-style-type: none"> • Proposes to reduce parking requirements for residential uses in the transit overlay district, but only by 25%: while parking reductions near transit are appreciated, Concord’s base parking standards are especially high for MF housing. For example, two spaces are required for two bedroom units. Off-street parking requirements are typically not based on any empirical study and have no relation to parking demand, especially in places with access to rail and frequent bus service. A 25% reduction from very high base requirements could result in projects still being overparked, which increases costs with negative environmental and affordability externalities. Consider eliminating parking requirements within the transit overlay district, or reducing them to 50% of the base requirements. 	Comment noted. Due to the limited transit service in much of the City, the City Council has indicated concerns with any parking reductions not specifically required by State law.

Letter No.	Name(s)	Comment	Response/Changes Made
37	Derek Sagehorn on behalf of East Bay for Everyone	<ul style="list-style-type: none"> • Middle density program exists but only as an ad hoc process and only allowed for ownership: middle density housing is an important tool for creating diverse housing types. Firstly, unfortunately Concord's program seems geared towards PUDs and ad hoc development. By not allowing middle density housing allowed by-right, this program ensures only well-capitalized developers and property owners will be allowed to participate. Concord should consider allowed middle density housing allowed near downtown and North Concord in transition zones from more intensive TOD development patterns. Second, middle density housing should not be restricted to ownership. A diverse set of tenures should be incentivized for middle housing to cater to Concord's diverse population. 	While the intent of Program 9, Middle Density, is to further facilitate development in single-family zoned lots, consistent with the requirements of Senate Bill 9 (SB 9) it is not a standalone program and is one of many programs in the Housing Element that aims to facilitate and accelerate housing production in the City. For example, through Program 8, the City is committing to rezoning areas appropriate for medium and high residential densities in "Moderate Resource" and "High Resource" areas as designated on the TCAC Opportunity Maps.
<i>Comment Letter #38</i>			
38	Mary Hassett	<p>Housing Element Planning Team Aaron Sage,</p> <p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the City Council is in the process of finalizing the City's Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. I have heard too many personal stories of tenants who have been displaced or evicted unfairly from their apartments in Concord over the past 6 years. Their personal stories are heart wrenching and appalling. Now is the time to protect the most vulnerable in our community. Please put families first and act on behalf of the</p>	See Master Response #4 regarding stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>Hundreds of tenants facing excessive rent increases and unjust evictions who have pleaded with the city, year after year, for rent stabilization and for more protections from unjust evictions. Now is the time to act on their behalf.</p> <p>We cannot ignore the racialized impact of this housing crisis. The city's own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>I want to live in an inclusive city that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income, working-class families pushed out of our city.</p> <p>This Housing Plan is absolutely critical for determining the future of this City. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions.</p> <p>These families MATTER. Please do everything in your power to act on their behalf.</p> <p>Thanks Mary Hassett 26 year Concord resident</p>	
<i>Comment Letter #39</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
39	Ronald Ahnen	<p>Vice Mayor Laura Hoffmeister,</p> <p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the City Council is in the process of finalizing the City's Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. We have seen homelessness jump dramatically in the last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color</p> <p>We cannot ignore the racialized impact of this housing crisis. The city's own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p>	See Master Response #4 regarding stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>I want to live in an inclusive city that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income, working-class families pushed out of our city. This City must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of this City. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the City continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p> <p>It is time to do the right thing by these low income residents as housing is a necessary right for human dignity. This is where human rights get protected.</p> <p>Thank you, Ron Ahnen Ronald Ahnen</p>	

Letter No.	Name(s)	Comment	Response/Changes Made
<i>Comment Letter #40</i>			
40	Joanna Lawrence Shenk	<p>Housing Element Planning Team Aaron Sage,</p> <p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am a concerned citizen of Contra Costa County and a licensed clergy person. I am aware that the Concord City Council is in the process of finalizing the City’s Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in our community. We have seen homelessness jump dramatically in the last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color</p> <p>We cannot ignore the racialized impact of this housing crisis. The city’s own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet due to racist policies in housing and employment. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p>	See Master Response #4 regarding stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>I want to live in an inclusive county that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in our community should be able to live in our community. I am tired of seeing lower income, working-class families pushed out of our city. Concord, along with other cities, must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of Concord and has impacts beyond the city as well. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the Concord continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p> <p>Joanna Lawrence Shenk</p>	
<i>Comment Letter #41</i>			

Letter No.	Name(s)	Comment	Response/Changes Made
41	Sophia DeWitt (EBHO)	<p>Housing Element Planning Team Aaron Sage,</p> <p>Dear Concord Housing Element Planning Team and City Council,</p> <p>I am aware that the City Council is in the process of finalizing the City’s Housing Element, a comprehensive housing plan that will determine what actions the City will take in the next 8 years to promote fair and affordable housing. I want to urge the city to take more aggressive action to stop displacement and homelessness in Concord. We have seen homelessness jump dramatically in the last two years in Contra Costa, increasing by 35%. The Point in Time Count in 2020 revealed that the top two reasons for losing housing were the high cost of living/rents and evictions.</p> <p>The rents in Concord have skyrocketed, rising by more than 44% since 2010. Hundreds of tenants facing excessive rent increases and unjust evictions have pleaded with the City in recent years to intervene so that they could stay in their homes and put food on the table. Year after year, they have asked for rent stabilization and for more protections from unjust evictions. The vast majority showing up at Council meetings have been immigrants and people of color We cannot ignore the racialized impact of this housing crisis. The city’s own draft plan notes that Black and Latinx residents are more likely to be renters and struggle to make ends meet. Specifically, 47% of Latinx residents and 57% of Black residents are forced to pay too much for housing in Concord. While this affordability crisis is hurting our whole community, it is disproportionately impacting people of color and driving displacement.</p> <p>Concord residents deserve to live in an inclusive city that is racially and ethnically diverse and where working families of different income levels can thrive. I believe that those who work in the community</p>	See Master Response #4 regarding stabilization and protection from unjust evictions.

Letter No.	Name(s)	Comment	Response/Changes Made
		<p>should be able to live in the community. I am tired of seeing lower income, working-class families pushed out of Concord. The City must take immediate, concrete and effective action to stop displacement. It is imperative that Concord consider rent stabilization and eviction protections in their Housing Plan, which are proven strategies to address displacement quickly and at scale.</p> <p>This Housing Plan is absolutely critical for determining the future of Concord. It needs to offer REAL solutions to the very real problem of affordability and growing racial inequality. Please listen to what tenants and residents have been asking for: rent stabilization and protection from unjust evictions. If the City continues to omit this in their plan and offer token solutions, then we will continue to see more and more residents living on the streets.</p> <p>Sophia DeWitt</p>	

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DUDEK

2280 HISTORIC DECATUR ROAD, SUITE 200
SAN DIEGO, CALIFORNIA 92106
T 619.591.1370 F 619.591.1399

State Department of Housing And Community Development
C/O Land Use and Planning Unit
2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833

August 16, 2022

Subject: City of Concord Draft 6th Cycle Housing Element

I am pleased to submit the Draft 6th Cycle Housing Element on behalf of the City of Concord. The Planning and Urban Design team at Dudek is honored to have been selected to assist the City with this exciting update to the Housing Element and in developing a strategy to meet Concord's comprehensive housing needs over the next eight-years. This draft plan has been developed to meet the requirements of Housing Element law, recent relevant housing-related legislation, the guidance provided by the State Department of Housing and Community Development (HCD), and community needs.

Through a robust outreach strategy, the City, its consultants, and community-based organizations have worked closely with the community, interested stakeholders, and decision makers to develop a bold vision for the City, and this outreach strategy will be continued throughout the update process. Our team looks forward to HCD's review of the submitted draft and will ensure that all feedback and comments from HCD and the public are addressed prior to Housing Element adoption.

In accordance with the requirements of AB 215 (2021), the Draft 6th Cycle Housing Element for the City of Concord was made available for a 30-day public review period from May 27, 2022, through June 27, 2022. Comments were then considered for a minimum of 10-days and edits were made to the draft Housing Element in response to public comments received. The revised Draft of the Housing Element was posted for commentor review from August 8th, 2022 through August 15th, 2022.

Attached you will find the City of Concord's Housing Element, including goals, policies, and programs, as well as all supporting documentation. A subsequent hard copy has been mailed for your files.

Should you have any questions, please contact me at (760)479-4846 or by email at edickson@dudek.com.

Sincerely,



Elizabeth Dickson
Senior Planner