

Appendix E: Affirmatively Furthering Fair Housing (AFFH)

Introduction and Overview of AB 686

Assembly Bill 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity¹ and a commitment to specific meaningful actions to affirmatively further fair housing.² AB 686 also mandates that local governments identify meaningful goals to address the impacts of systemic issues such as residential segregation, housing cost burden, and unequal educational or employment opportunities to the extent these issues create and/or perpetuate discrimination against protected classes.³ In addition, it:

- Requires the state, cities, counties, and public housing authorities to administer their programs and activities related to housing and community development in a way that affirmatively furthers fair housing;
- Prohibits the state, cities, counties, and public housing authorities from taking actions materially inconsistent with their AFFH obligation;
- Requires that the AFFH obligation be interpreted consistent with HUD's 2015 regulation, regardless of federal action regarding the regulation;
- Adds an AFFH analysis to the Housing Element (an existing planning process that California cities and counties must complete) for plans that are due beginning in 2021;
- Includes in the Housing Element's AFFH analysis a required examination of issues such as segregation and resident displacement, as well as the required identification of fair housing goals

The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

Analysis Requirements

An assessment of fair housing must consider the elements and factors that cause, increase, contribute to, maintain, or perpetuate segregation, racially or ethnically concentrated areas of poverty, significant disparities in access to opportunity, and disproportionate housing needs.⁴ The analysis must address patterns at a regional and local level and trends in patterns over time. This analysis should compare the locality at a county level or even broader regional level such as a Council of Government, where appropriate, for the purposes of promoting more inclusive communities. For the purposes of this AFFH,

¹ While California's Department of Housing and Community Development (HCD) does not provide a definition of opportunity, opportunity usually related to the access to resources and improve quality of life. HCD and the California Tax Credit Allocation Committee (TCAC) have created Opportunity Maps to visualize place-based characteristics linked to critical life outcomes, such as educational attainment, earnings from employment, and economic mobility.

² "Affirmatively furthering fair housing" is defined to mean taking meaningful actions that "overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for communities of color, persons with disabilities, and others protected by California law.

³ A protected class is a group of people sharing a common trait who are legally protected from being discriminated against on the basis of that trait.

⁴ Gov. Code, §§ 65583, subds. (c)(10)(A), (c)(10)(B), 8899.50, subds. (a), (b), (c); see also AFFH Final Rule and Commentary (AFFH Rule), 80 Fed. Reg. 42271, 42274, 42282-42283, 42322, 42323, 42336, 42339, 42353-42360, esp. 42355-42356 (July 16, 2015). See also 24 C.F.R. §§ 5.150, 5.154(b)(2) (2016).

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“Regional Trends” describe trends in Sonoma County and “Local Trends” describe trends specific to the City of Petaluma.

Sources of Information

The City used a variety of data sources for the assessment of fair housing at the regional and local level. These include:

- Housing Needs Data Packets prepared by the Association of Bay Area Governments (ABAG), which rely on 2015-2019 American Community Survey (ACS) data by the U.S. Census Bureau for most characteristics
 - Note: The ABAG Data Packets also referenced the U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) reports (based on the 2013-2017 ACS)
- U.S. Census Bureau’s Decennial Census (referred to as “Census”) and American Community Survey (ACS)
- Sonoma County 2012 Analysis of Impediments to Fair Housing Choice (2012 AI)
- Local knowledge from City staff

Assessment of Fair Housing

Fair Housing Enforcement and Outreach

Fair Housing Enforcement

The City contracts with Petaluma People Services Center (PPSC) to provide fair housing assistance and landlord/tenant mediation for Petaluma residents. The PPSC also serves residents with rental assistance, COVID assistance, the Bridge the Gap program, and County CDBG-CV. The Bridge the Gap program assists low income seniors with rental costs. PPSC distributes information and educates residents and landlords by providing printed materials, as well as in-person training and educational events. The materials and trainings are provided in English and Spanish as needed fair housing information is also provided on the City’s website.⁵

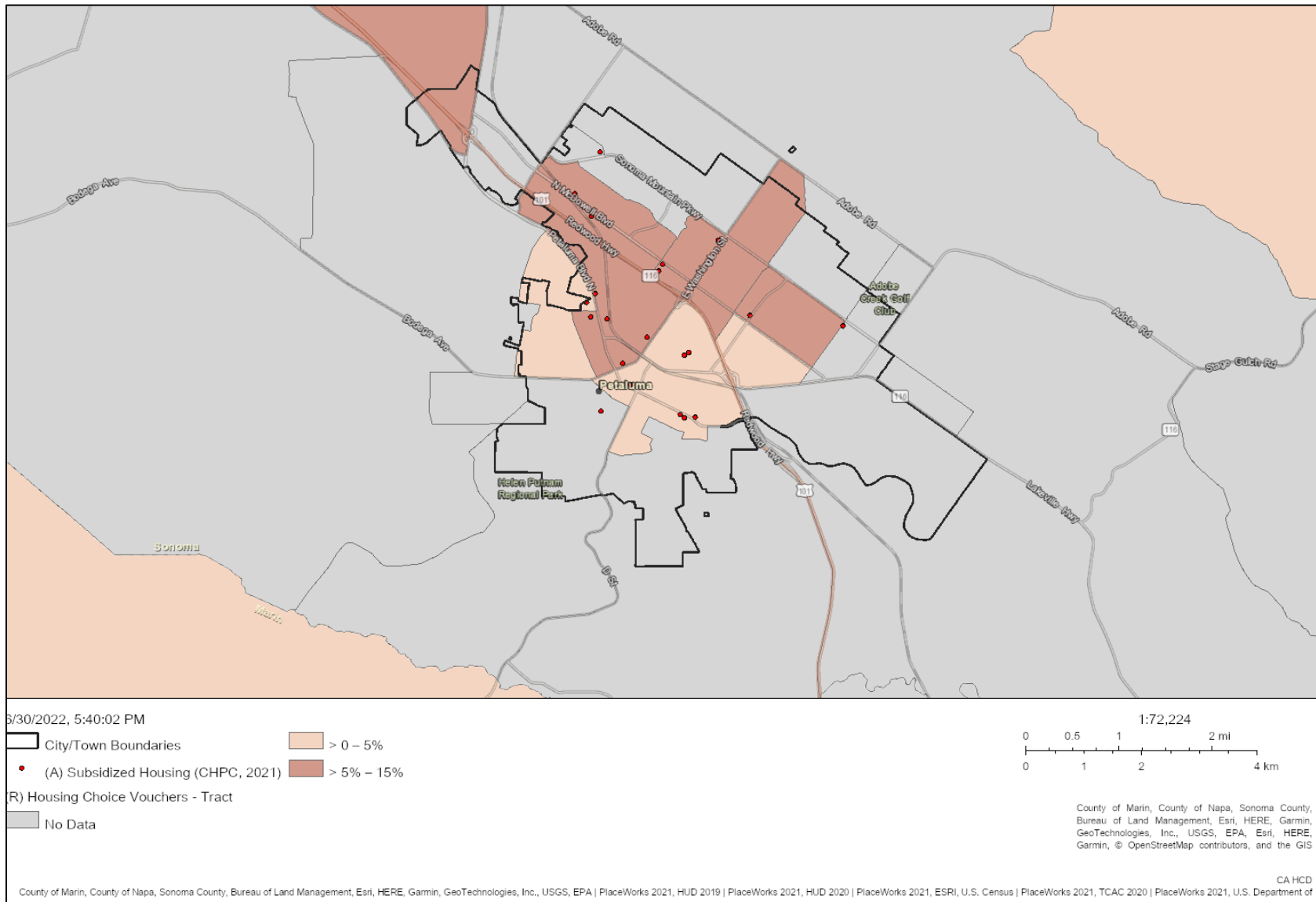
According to the HCD AFFH Data Viewer, between 2013 and 2021, HUD received 13 fair housing inquiries from Petaluma residents. Of the 13 inquiries, five were related to disability status, one to race, one to sex, and six unrelated to a specific issue. During this period, eight persons failed to respond, five inquiries were found to have to valid basis or issue, and one inquirer decided not to pursue the complaint.

In Sonoma County in 2020, only two Office of Fair Housing and Equal Opportunity (FHEO) cases were officially filed through HUD. One case was related to disability status. There were no cases filed in 2020 related to a racial bias.

Subsidized housing projects and Housing Choice Voucher (HCV) recipients by tract are shown in Figure E1. HCV recipients are most concentrated in tracts in the Midtown, Adobe, and College neighborhoods. Subsidized housing projects are located throughout the City but are most concentrated in this area.

⁵ See <https://cityofpetaluma.org/get-landlord-help/>

Figure E1: Subsidized Housing and HCVs by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 California Housing Partnership (CHPC) data), 2022.

Fair Housing Testing

According to the 2012 Sonoma County Analysis of Impediments to Fair Housing Choice (2012 AI), Fair Housing of Marin (FHOM) conducted a study called Race Discrimination in Rental Housing in Sonoma County Based on Voice Identification in 2010. The study was conducted throughout 40 properties in Marin County cities and unincorporated Sonoma County. The study found that 25 percent of tests showed a clear differential treatment favoring White testers compared to Black testers and another 43 percent showed some differential treatment favoring White testers compared to Black testers. The 2012 AI found that fair housing testing in the County was insufficient in measuring housing discrimination.

Fair Housing Education and Outreach

The PPSC hosts annual fair housing training workshops for landlords, property managers, and community members in Petaluma. Information on landlord/tenant assistance and PPSC services are provided on the City's website. The PPSC website, which is advertised on the City website, also includes information on rental assistance, COVID-19 assistance, the Bridge the Gap program, the County CDBG-CV program, and fair housing laws and protections. PPSC distributes information and educates residents and landlords by providing printed materials, as well as in-person training and educational events. PPSC also has a dedicated team that responds to phone calls and emails from the community to address questions and or fair housing complaints. PPSC also participates in state and regional events and presented at the State of California Landlord Association on the subject of state law around landlords asking about rental history anon tenant applications. An example of the outcome of the work PPSC is doing to serve the community, the State organization has agreed to eliminate that question on rental applications. The materials and trainings are provided in English and Spanish as needed.

Integration and Segregation

Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. For example, prior studies have identified socioeconomic status, generational care needs, and cultural preferences as factors associated with “doubling up”- households with extended family members and non-kin.⁶ These factors have also been associated with ethnicity and race. Other studies have also found minorities tend to congregate in metropolitan areas though their mobility trend predictions are complicated by economic status (minorities moving to the suburbs when they achieve middle class) or immigration status (recent immigrants tends to stay in metro areas/ports of entry).⁷

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. ABAG also provided dissimilarity trends in for cities and counties in the 2022 AFFH Segregation Reports. Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across the geographic units, such as block groups within a community. The index ranges from 0 to 100, with 0 denoting no segregation and 100 indicating complete segregation between the two groups. The index score can be understood as the percentage of one of the two groups that would need to move to produce an even

⁶ Harvey, H., Dunifon, R., & Pilkauskas, N. (2021). Under Whose Roof? Understanding the living arrangements of children in doubled-up households. *Duke University Press*, 58 (3): 821–846. <https://doi.org/10.1215/00703370-9101102>

⁷ Sandefur, G.D., Martin, M., Eggerling-Boeck, J., Mannon, S.E., & Meier, A.M. (2001). An overview of racial and ethnic demographic trends. In N. J. Smelser, W.J. Wilson, & F. Mitchell (Eds.) *America becoming: Racial trends and their consequences*. (Vol I, pp. 40-102). National Academy Press Washington, D.C. .

distribution of racial/ethnic groups within the specified area. For example, if an index score above 60, 60 percent of people in the specified area would need to move to eliminate segregation. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

Regional Trends

The racial/ethnic compositions of Sonoma County, Petaluma, and neighboring jurisdictions are presented in Table E1. Sonoma County is characterized by a White majority population (63.2%) followed by a Hispanic/Latino population of 26.7 percent. Other non-White racial/ethnic groups make up a smaller proportion of the population including Asian (4%) and the population of two or more races (3.3%). Petaluma generally has a racial/ethnic composition comparable to the County with slightly more White (non-Hispanic) residents (4.9%) and less Hispanic/Latino residents (4.8 %). Of the selected jurisdictions, Cotati has the largest White population of 74.5 percent and Santa Rosa has the smallest White population of 54.6 percent. Santa Rosa has a larger Hispanic/Latino, Asian, and Black/African American population compared to the County as a whole.

Table E1: Racial/Ethnic Compositions (2019)

Race/Ethnicity	Sonoma County	Petaluma	Cotati	Novato	Rohnert Park	Santa Rosa	Sonoma (City)
White, non-Hispanic	63.2%	68.1%	74.5%	63.5%	61.0%	54.6%	73.4%
Black/African American, non-Hispanic	1.5%	1.1%	0.6%	3.4%	2.2%	2.4%	0.1%
American Indian/Alaska Native, non-Hispanic	0.5%	0.1%	0.0%	0.2%	0.0%	0.7%	0.1%
Asian, non-Hispanic	4.0%	4.4%	1.6%	7.7%	6.6%	5.4%	2.6%
Native Hawaiian/Other Pacific Islander, non-Hispanic	0.3%	0.0%	0.3%	0.1%	0.0%	0.5%	0.0%
Some other race	0.4%	0.8%	0.7%	2.3%	0.3%	0.2%	0.0%
Two or more races	3.3%	3.6%	3.8%	3.9%	3.0%	3.3%	3.0%
Hispanic/Latino	26.7%	21.9%	18.4%	18.9%	26.9%	32.8%	20.8%
Total	499,772	60,767	7,454	55,642	42,902	179,701	11,075
Source: 2015-2019 ACS (5-Year Estimates).							

Racial/ethnic dissimilarity indices for Sonoma County from 1990 to 2020 are presented in Table E2. Trends since 1990 reveal that segregation between all White and non-White groups has increased; however, all current dissimilarity indices still indicate segregation is low according to HUD’s definition of the index. Segregation between Black and White communities is the highest in the County, followed by Hispanic and White communities and Asian/Pacific Islander and White communities. Dissimilarity index scores have increased the most for Hispanic and White communities since 1990 compared to White and Black or Asian communities. As discussed above, the Hispanic/Latino population makes up the second largest population in the County following the White population. Segregation patterns in the City of Petaluma will be compared to dissimilarity indices outlined for Sonoma County in Table E2 in the following section. According to HUD’s definition for dissimilarity index scores, segregation between all racial/ethnic minority groups and White populations is low.

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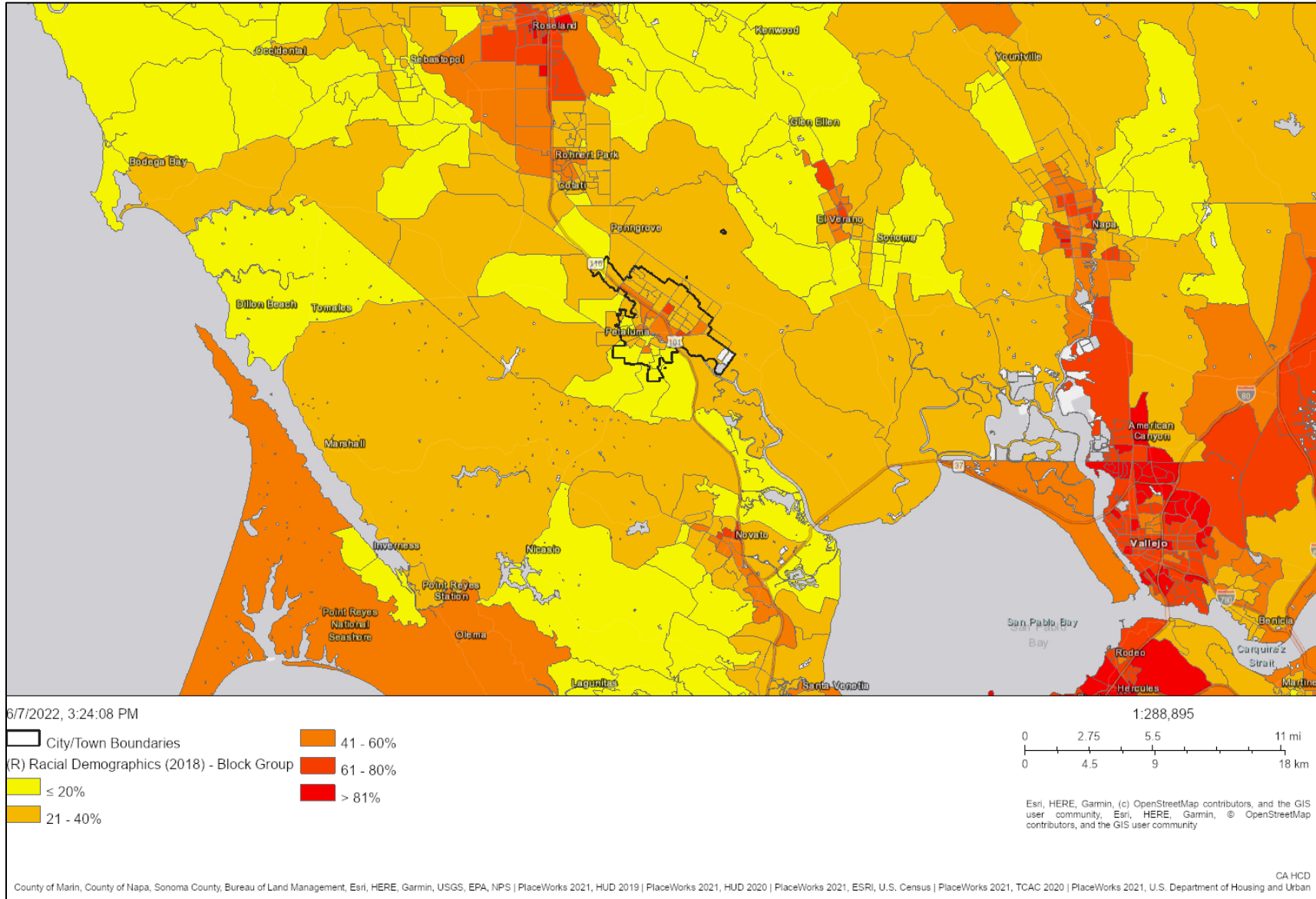
Table E2: Racial/Ethnic Dissimilarity Indices – Sonoma County (2020)

	1990	2000	2010	Current
Non-White/White	21.12	28.06	29.76	34.77
Black/White	33.46	31.11	30.66	39.52
Hispanic/White	24.78	34.54	34.81	38.16
Asian or Pacific Islander/White	25.03	26.06	24.30	32.28
Source: HUD AFFH-T Data, 2020.				

Racial/ethnic minority populations by block group for the region are shown in Figure E2. Non-White populations in Petaluma block groups are generally comparable to other jurisdictions in the region located along the 101 Highway including Novato to the south and Rohnert Park to the north. As discussed previously, there are a higher concentration of block groups in Santa Rosa, north of Petaluma, with larger populations of people of color. Compared to unincorporated Sonoma County areas east and west of the City, Petaluma has slightly higher concentrations of racial/ethnic minority groups. This is consistent with the trend Countywide, where racial/ethnic populations tend to be more concentrated in incorporated cities compared to the incorporated County areas.

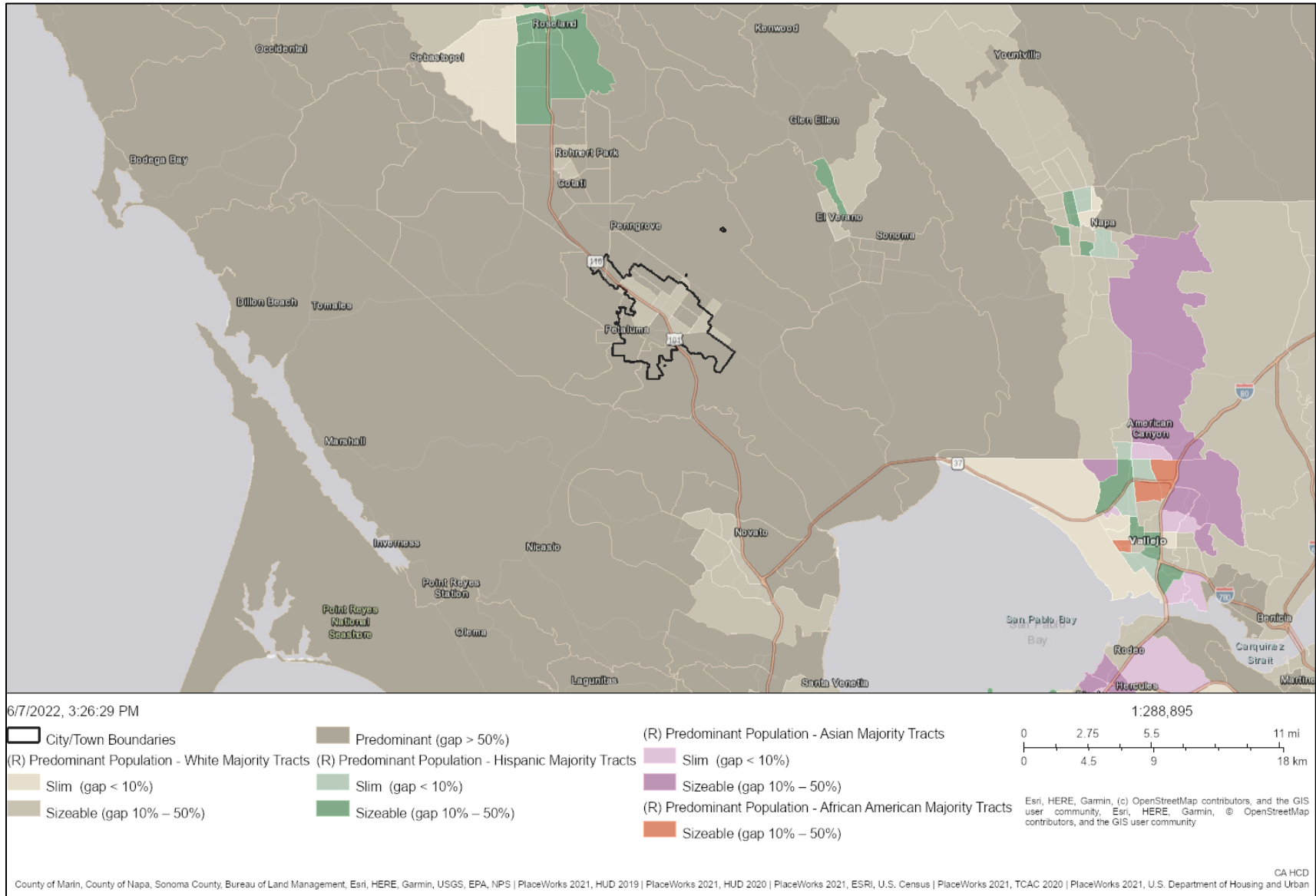
Regional racial/ethnic majority populations are shown at the tract-level in Figure E3. Most tracts in the region, including tracts in Petaluma, have majority White populations. This is consistent with the Countywide racial/ethnic composition, where Whites account for 63.2 percent of the total population. Tracts with Hispanic/Latino majority populations are located north of Petaluma in and adjacent to Santa Rosa and east of Petaluma adjacent to the City of Sonoma.

Figure E2: Regional Racial/Ethnic Minority Population by Block Group (2018)



Source: HCD AFFH Data Viewer (based on 2018 ESRI data), 2022.

Figure E3: Regional Racial/Ethnic Majority Population by Tract



Source: HCD AFFH Data Viewer (based on 2018 ESRI data), 2022.

Local Trends

As discussed above, Petaluma is characterized by a White majority population (68.1%). The Hispanic Latino population is the second largest population in the City, accounting for 21.9 percent of the total population. The change in racial/ethnic composition in the City is presented in Table E3. Since the 2006-2010 ACS, the White population has remained constant. During the same period, all racial/ethnic groups represent a smaller proportion other than the population of some other race and the population of persons of two or more races. In general, the City has not seen a substantial change in the overall racial/ethnic composition since 2010.

Table E3: Change in Racial/Ethnic Composition (2010-2019)

Race/Ethnicity	2010		2019	
	Persons	Percent	Persons	Percent
White, non-Hispanic	38,587	68.1%	41,357	68.1%
Black/African American, non-Hispanic	632	1.1%	646	1.1%
American Indian/Alaska Native, non-Hispanic	211	0.4%	72	0.1%
Asian, non-Hispanic	2,604	4.6%	2,688	4.4%
Native Hawaiian/Other Pacific Islander, non-Hispanic	140	0.2%	26	0.0%
Some other race	29	0.1%	490	0.8%
Two or more races	1,304	2.3%	2,183	3.6%
Hispanic/Latino	13,182	23.3%	13,305	21.9%
Total	56,689	100.0%	60,767	100.0%

Source: 2006-2010 and 2015-2019 ACS (5-Year Estimates).

Racial/ethnic dissimilarity indices from the 2022 ABAG/MTC AFFH Segregation Report are shown in Table E4 for Petaluma and the Bay Area region. It is important to note that the Asian/Pacific Islander and Black/African American populations in Petaluma are small, representing 4.4 percent and 1.1 percent of the total population respectively. Therefore, dissimilarity indices for these groups may be unreliable. Dissimilarity indices for all racial/ethnic groups and the White population are lower in Petaluma compared to the Bay Area. According to these dissimilarity indices, segregation between Latinx and White communities in Petaluma is the highest, followed by Asian/Pacific Islander and White communities, and Black/African American and White communities. Overall, segregation is less of an issue in the City compared to the Bay Area. Further, based on HUD's definition of the index, segregation between all non-White and White communities in the City is low. Programs outlined in this Housing Element aim to ensure segregation levels in the City remain low.

Table E4: Racial/Ethnic Dissimilarity Indices (2000-2020)

	Petaluma			Bay Area
	2000	2010	2020	2020
Asian/Pacific Islander vs. White	22.5*	22.4*	17.5*	18.5
Black/African American vs. White	20.6*	23.0*	17.2*	24.4
Latinx vs. White	17.5	23.4	20.6	20.7
People of Color vs. White	14.0	18.5	15.3	16.8

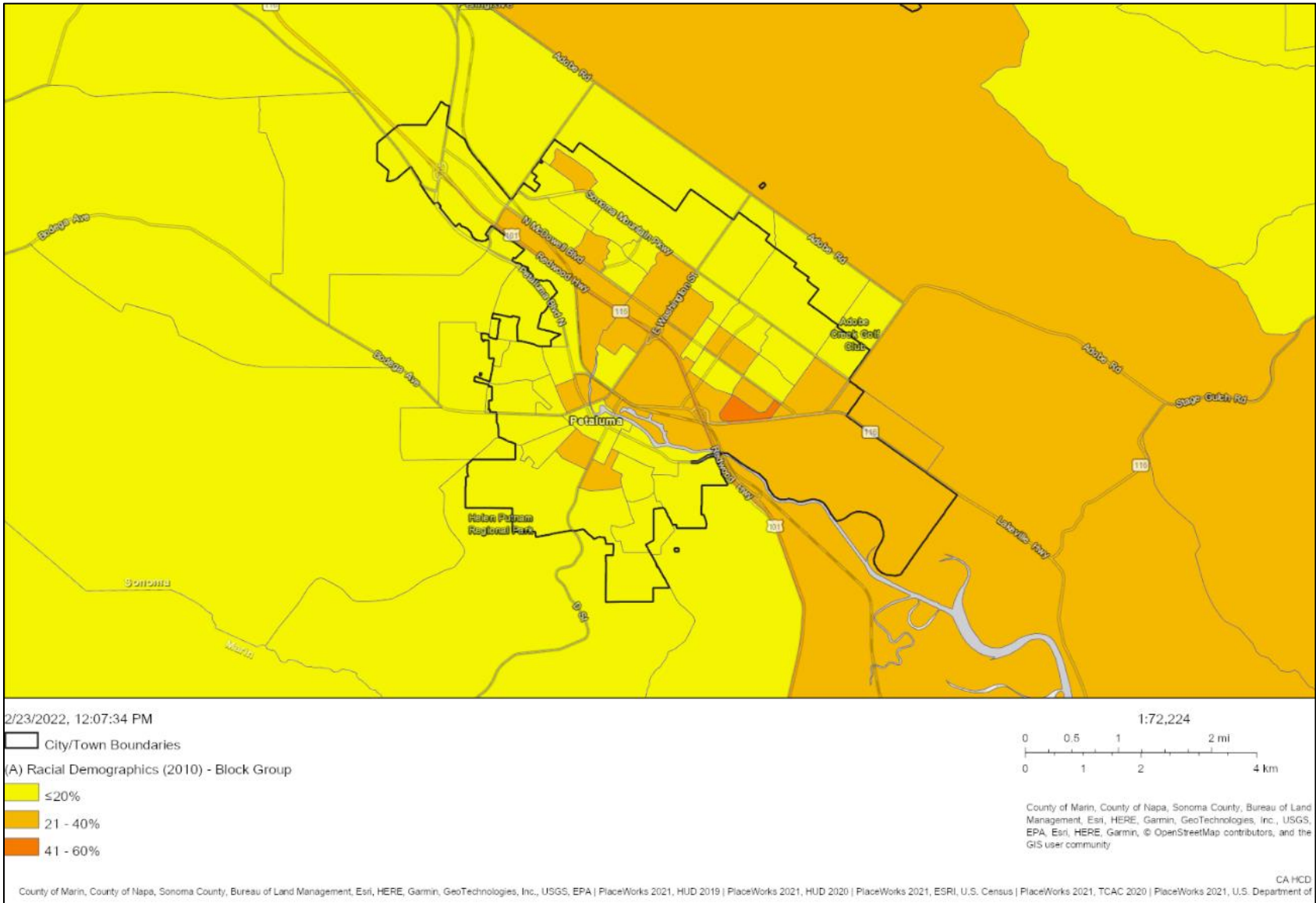
** Index based on racial group making up less than 5 percent of jurisdiction population. Estimates may be unreliable.*
Source: ABAG/MTC AFFH Segregation Report, 2022.

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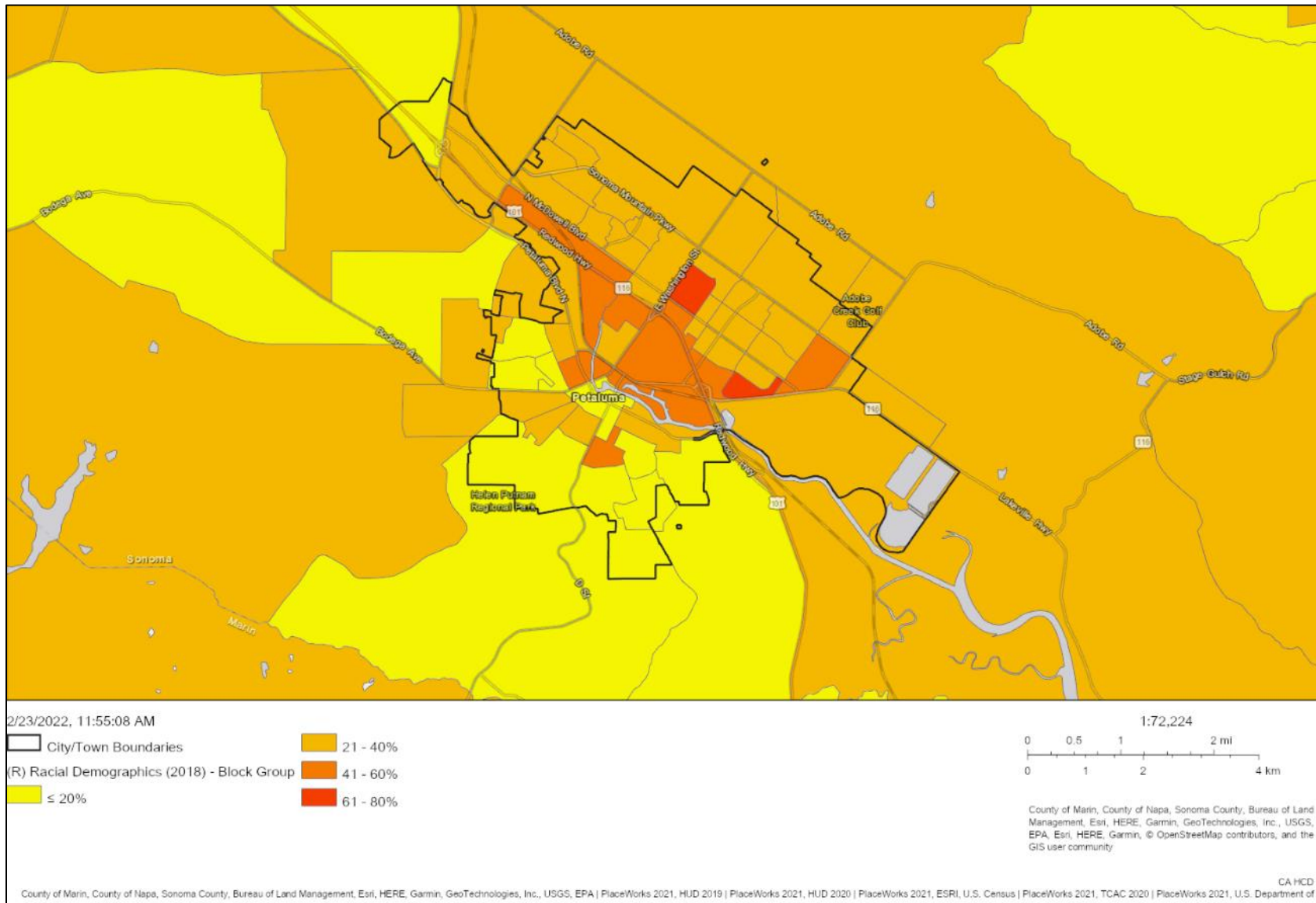
Figure E4 and Figure E5 compare the racial/ethnic composition by block group from 2010 to 2018. According to the HCD AFFH Data Viewer, the non-White population in most Petaluma block groups has increased during this period. Block groups in the central areas of the City along the 101 Highway tend to have larger population of people of color, specifically in the Midtown, Downtown, and Adobe neighborhoods. The Western neighborhood, located in the central southern area of the City, contains block groups with the largest White populations. Most block groups in the City have racial/ethnic minority populations ranging from 21 to 40 percent, while block groups in the central areas have racial/ethnic minority populations ranging from 41 to 80 percent.

Figure E4: Racial/Ethnic Minority Population by Block Group (2010)



Source: HCD AFFH Data Viewer (based on 2010 ESRI data), 2022.

Figure E5: Racial/Ethnic Minority Population by Block Group (2018)



Source: HCD AFFH Data Viewer (based on 2018 ESRI data), 2022.

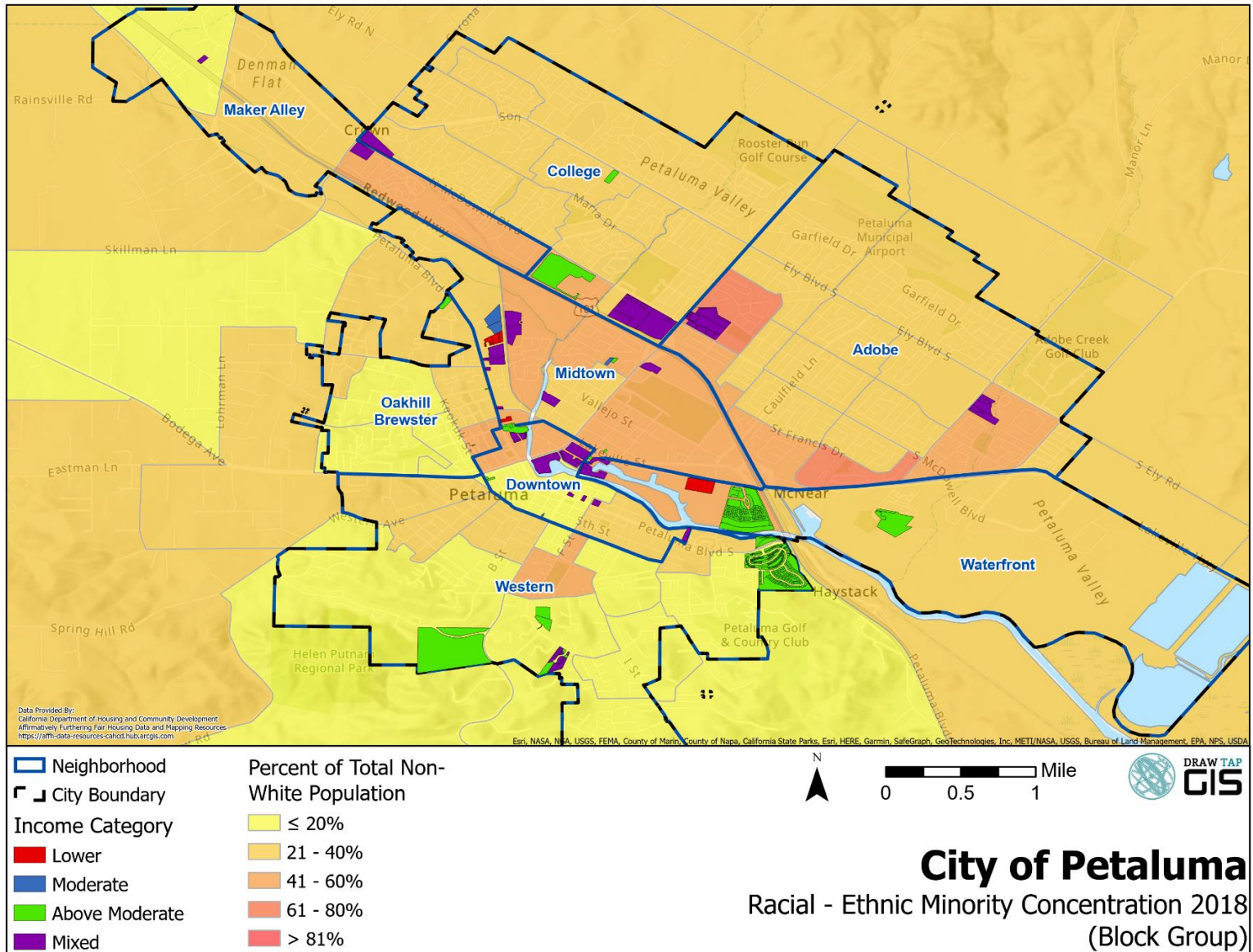
Sites Inventory

To ensure RHNA units are not concentrated in a single area of the City, specifically in areas where fair housing issues are more prevalent, this analysis shows the distribution of RHNA units by various AFFH variables. The distribution of RHNA units by population of racial/ethnic minority groups is shown in Figure E6 and Table E5. Of the 3,260 units selected to meet the RHNA, which includes pipeline projects and opportunity sites, more than half (51.4%) are in block groups where 41 to 60 percent of the population belongs to a racial or ethnic minority group. Approximately 59 percent of moderate income units are in block groups where 41 to 60 percent of the population belongs to a racial or ethnic minority group compared to 50.1 percent of lower income units and 54.7 percent of above moderate income units. More lower income units (49.9%) are in block groups where less than 40 percent of the population belongs to a racial or ethnic minority group compared to moderate income units (41.2%) and above moderate income units (43.7%). There are only two block groups in the City where more than 61 percent of the population is non-White; 30 above moderate income units have been allocated in block groups with racial/ethnic minority populations in this range. RHNA units are generally distributed throughout the City and are not concentrated in a single neighborhood. Mixed income sites have been identified in many different areas of Petaluma and will serve all existing populations regardless of racial/ethnic makeup. Further, the City’s RHNA strategy does not allocate lower income units in areas with larger racial/ethnic minority populations at a rate exceeding moderate and above moderate income units.

Table E5: Distribution of RHNA Units by Racial/Ethnic Minority Population

Racial/Ethnic Minority Population (Block Group)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	170	19.7%	70	13.9%	401	21.2%	641	19.7%
21-40%	261	30.2%	137	27.3%	428	22.6%	826	25.3%
41-60%	432	50.1%	295	58.8%	1036	54.7%	1763	54.1%
61-80%	0	0.0%	0	0.0%	30	1.6%	30	0.9%
>81%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E6: Sites Inventory and Non-White Population by Block Group (2018)



Source: HCD AFFH Data Viewer (based on 2018 ESRI data) and Veronica Tam & Associates, 2022.

Persons with Disabilities

Persons with disabilities have special housing needs because of the lack of accessible and affordable housing, and the higher health costs associated with their disability. In addition, many may be on fixed incomes that further limits their housing options. Persons with disabilities also tend to be more susceptible to housing discrimination due to their disability status and required accommodations associated with their disability.

Regional Trends

Sonoma County has a larger population of persons with disabilities (11.9%) compared to the Bay Area (9.6%) and City of Petaluma (9.1%) (Table E6). This trend may, in part, be due to the population of elderly persons in the County as persons aged 65 and older tend to have higher rates of disabilities. According to the 2015-2019 ACS, the County has a population of persons aged 65 and older of 19 percent compared to only 17.6 percent in Petaluma. Additional data about age characteristics for the Petaluma population is included in Appendix A, *Housing Needs Assessment*.

Table E6: Disability Status (2019)

	No Disability	With Disability	Percent with Disability
Petaluma	54,621	5,495	9.1%
Sonoma County	436,576	58,940	11.9%
Bay Area	6,919,762	735,533	9.6%
Note: Data reflects civilian noninstitutionalized population.			
Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.			

As shown in Table E7, the Black/African American population has the highest disability rate in the County (19.7%), followed by the American Indian/Alaska Native population (15%), and non-Hispanic White population (13.3%). The Native Hawaiian/Other Pacific Islander population and population of two or more races also have disability rates exceeding the Countywide average. The population of persons aged 75 and older have the highest rate of disabilities of 43.6 percent, followed by the population aged 65 to 74 (19.1%), and population aged 35 to 64 (11%).

Table E7: Disability Status by Race/Ethnicity and Age – Sonoma County (2019)

	Total Population	Percent with Disability
Race/Ethnicity		
Black or African American alone	8,007	19.7%
American Indian and Alaska Native alone	4,323	15.0%
Asian alone	20,386	9.1%
Native Hawaiian and Other Pacific Islander alone	1,585	12.0%
Some other race alone	63,998	7.1%
Two or more races	26,511	10.4%
White alone, not Hispanic or Latino	313,461	13.3%
Hispanic or Latino (of any race)	132,436	8.7%
Age		
Under 5 years	25,134	1.3%
5 to 17 years	73,733	4.6%
18 to 34 years	104,592	6.5%

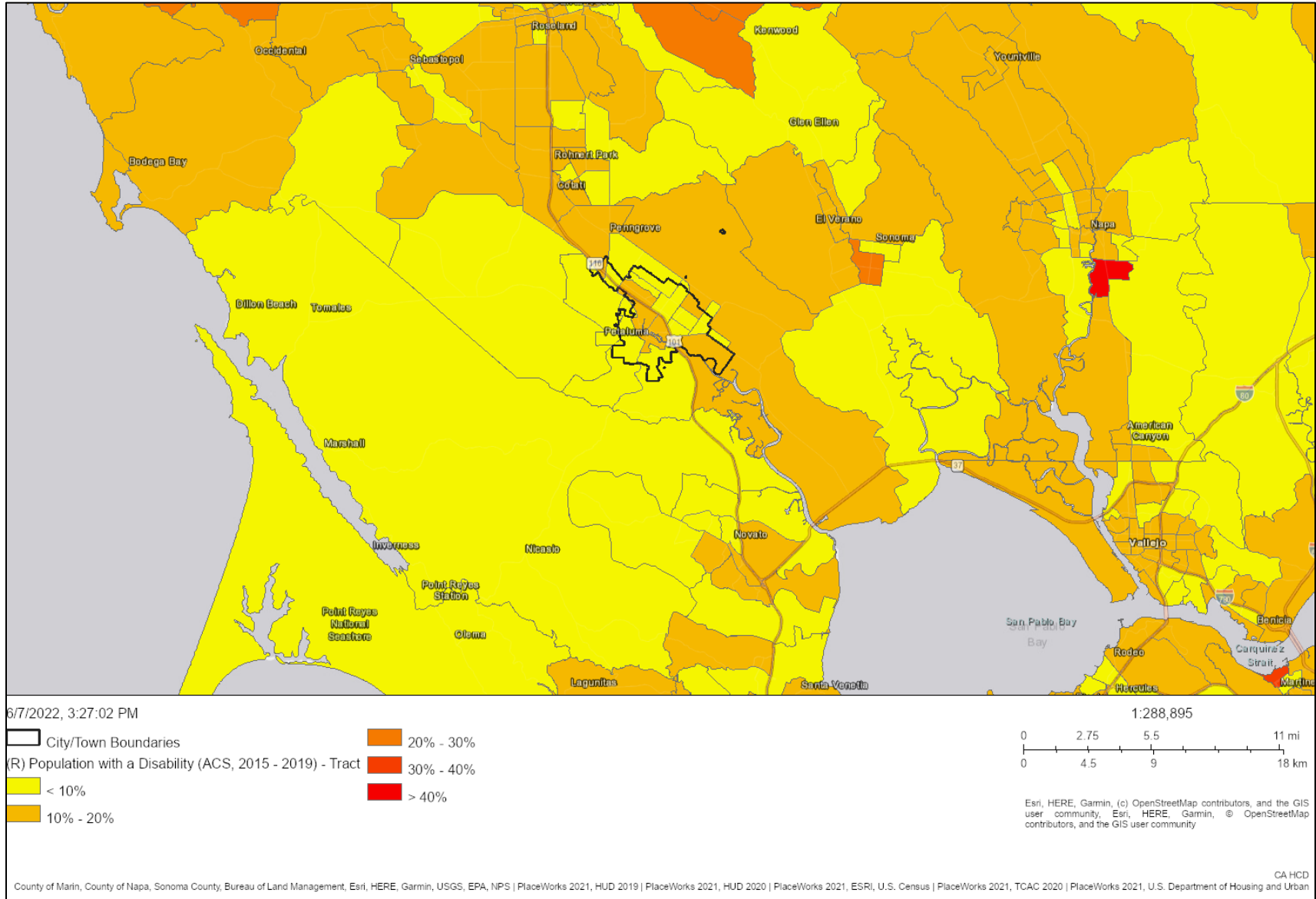
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35 to 64 years	198,513	11.0%
65 to 74 years	57,644	19.1%
75 years and over	35,900	43.6%
Total civilian noninstitutionalized population	495,516	11.9%
Source: 2015-2019 ACS (5-Year Estimates).		

The population of persons with disabilities by tract in the region is shown in Figure E7. Most tracts in the region surrounding Petaluma have populations of persons with disabilities below 20 percent. Tracts with populations of persons with disabilities exceeding 20 percent are located east of the City in and around the cities of Sonoma and Napa, and north of the City near Santa Rosa.

Figure E7: Regional Population of Persons with Disabilities by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

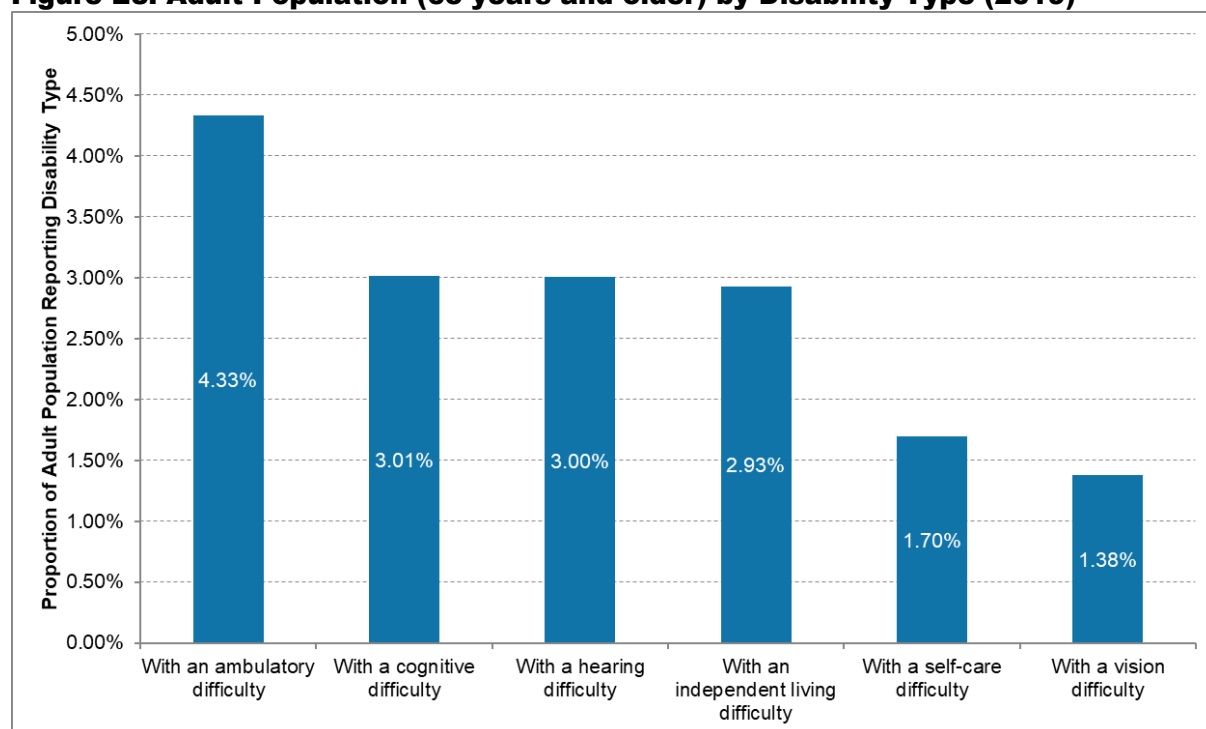
Local Trends

As mentioned previously, Petaluma has a population of persons who experience a disability of 9.1 percent, lower than the County (11.9%) and the Bay Area (9.6%). The ACS records disabilities by type. The following disability types are tallied in the ACS⁸:

- **Ambulatory difficulties:** Having serious difficulty walking or climbing stairs
- **Cognitive difficulties:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions
- **Hearing difficulties:** Deaf or having serious difficulty hearing
- **Independent living difficulties:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping
- **Self-care difficulties:** Having difficulty bathing or dressing
- **Vision difficulties:** Blind or having serious difficulty seeing, even when wearing glasses

Ambulatory difficulties are the most prevalent disability type in the City (4.3%), followed by cognitive difficulties (3%), hearing difficulties (3%), and independent living difficulties (2.9%) (Figure E8). Ambulatory and independent living difficulties are generally more common amongst the elderly population. The population of persons aged 65 years and older accounts for 17.6 percent of the Petaluma population.

Figure E8: Adult Population (65 years and older) by Disability Type (2019)



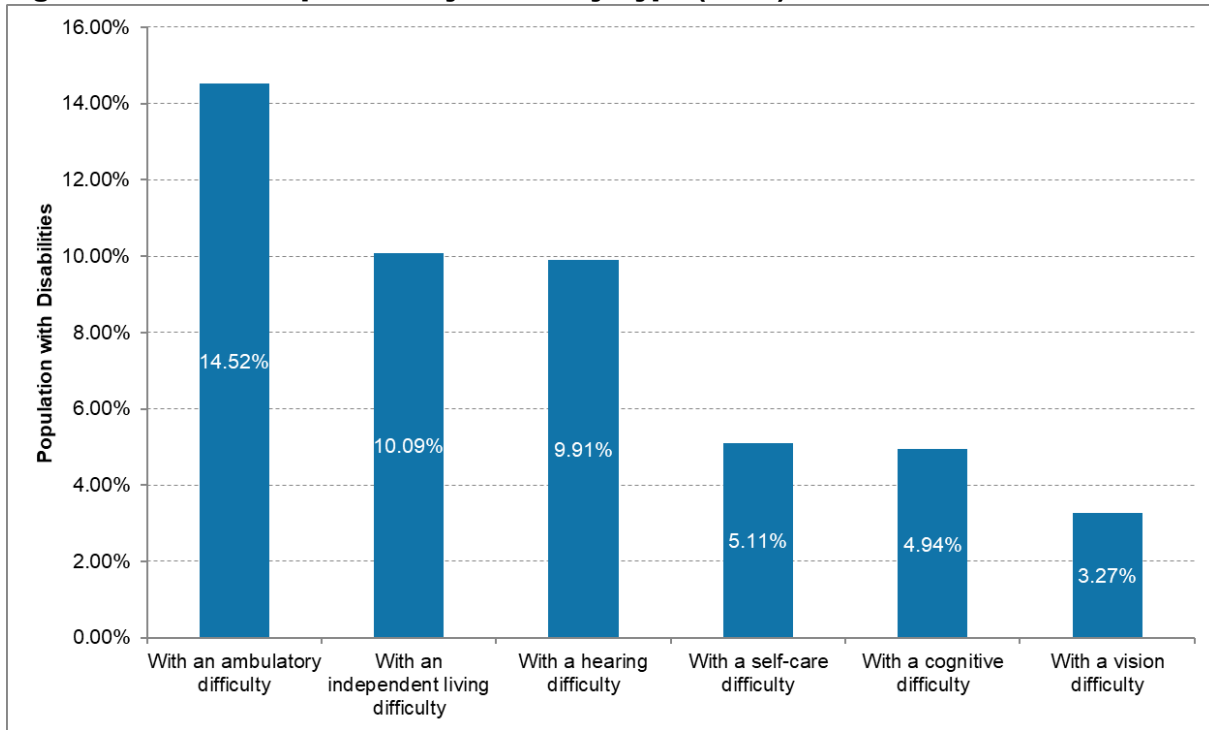
Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.

Disability type for the senior population is shown in Figure E9. Amongst persons aged 65 years and older, 14.5 percent experiences an ambulatory difficulty, 10.1 percent experiences an independent living difficulty, and 9.9 percent experiences a hearing difficulty. As discussed previously, the senior population has the largest proportion of persons who experience a disability compared to other age groups. As such, the three

⁸ United States Census Bureau, How Disability Data are Collected from The American Community Survey. <https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html>.

most common disability types amongst the senior population are also the most common amongst the Petaluma population as a whole.

Figure E9: Senior Population by Disability Type (2019)



Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.

Disability status by race/ethnicity and age for the City of Petaluma is shown in Table E8. The American Indian/Alaska Native population has the highest rate of persons who experience disabilities at 44.1 percent, followed by the Native Hawaiian/Other Pacific Islander population (16.4%), and Black/African American population (13.8%). The non-Hispanic White population also has a rate of disabilities exceeding the Citywide average of 9.1 percent. Like the County, persons aged 75 and older are most likely to experience a disability (41.2%).

Table E8: Disability Status by Race/Ethnicity and Age – Petaluma (2019)

	Total Population	Percent with Disability
Race/Ethnicity		
Black or African American alone	715	13.8%
American Indian and Alaska Native alone	263	44.1%
Asian alone	2,738	7.0%
Native Hawaiian and Other Pacific Islander alone	67	16.4%
Some other race alone	6,607	7.0%
Two or more races	3,208	4.3%
White alone, not Hispanic or Latino	40,951	9.9%
Hispanic or Latino (of any race)	13,081	7.2%
Age		
Under 5 years	3,008	0.0%
5 to 17 years	9,774	3.5%
18 to 34 years	11,809	5.0%
35 to 64 years	25,167	8.1%
65 to 74 years	6,551	14.7%
75 years and over	3,807	41.2%
Total civilian noninstitutionalized population	60,116	9.1%
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		

The population of persons with disabilities by tract is presented in Figure E10. Less than 20 percent of the population in all Petaluma tracts experiences a disability. In general, a larger proportion of the population in tracts along the 101 Highway experience a disability. The areas south of the 101 Highway, in the Midtown and Downtown neighborhoods, also have higher concentrations of racial/ethnic minorities. As shown in Table E8 above, the American Indian/Alaska Native, Native Hawaiian/other Pacific Islander, and Black/African American populations have the largest proportions of persons with disabilities.

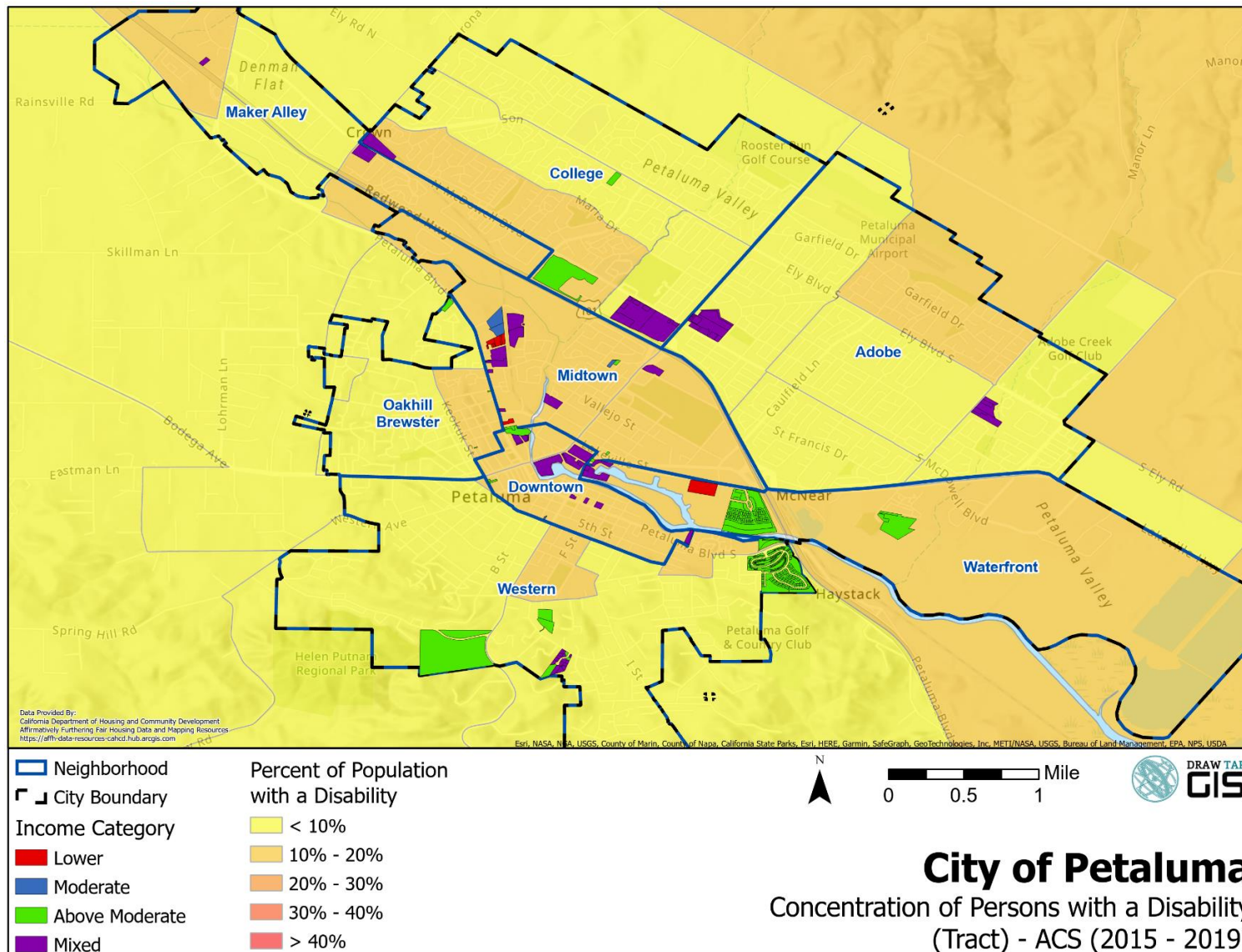
Sites Inventory

Figure E10 and Table E9 show the distribution of RHNA units, including pipeline projects and opportunity sites, by population of persons with disabilities at the tract level. A majority of units selected to meet the RHNA (84.5%) are in tracts where 10 to 20 percent of the population experiences a disability, including 97 percent of lower income units, 98.8 percent of moderate income units, and 75.1 percent of above moderate income units. It is important to note that tracts making up the City of Petaluma have populations of persons with disabilities ranging from 5 percent to 14 percent. There are no tracts where more than 20 percent of the population experiences a disability in Petaluma. While there are more RHNA units in tracts where more than 10 percent of persons experience a disability, sites selected to meet the RHNA are not concentrated in a single area of the City. Further, only 14 percent of the population experiences a disability in the tract with the largest disabled population. Sites selected to meet the RHNA will be available to existing residents regardless of disability status and will not exacerbate existing conditions related to populations of persons with disabilities.

Table E9: Distribution of RHNA Units by Population of Persons with Disabilities

Population of Persons with Disabilities (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<10%	26	3.0%	6	1.2%	472	24.9%	504	15.5%
10-20%	837	97.0%	496	98.8%	1423	75.1%	2756	84.5%
20-30%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
30-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E10: Sites Inventory and Population of Persons with Disabilities (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data) and Veronica Tam & Associates, 2022.

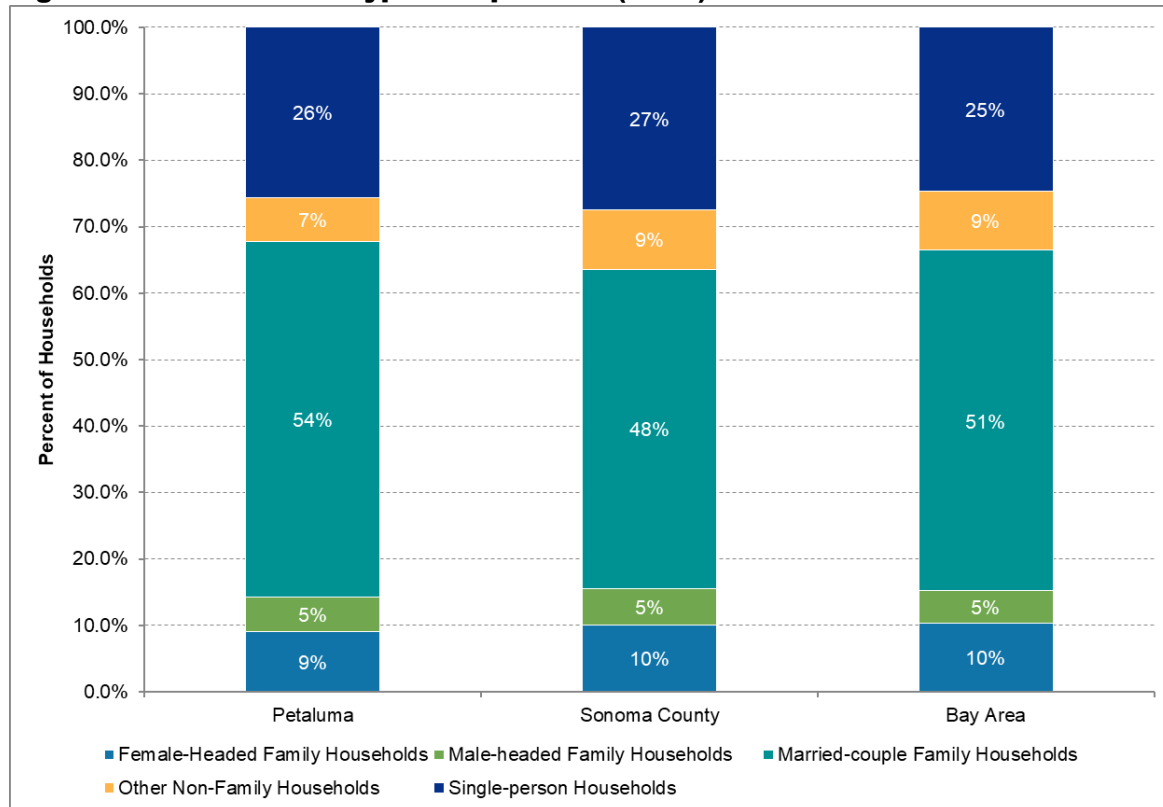
Familial Status

Under the Fair Housing Act, housing providers may not discriminate because of familial status. Familial status covers: the presence of children under the age of 18, pregnant persons, any person in the process of securing legal custody of a minor child (including adoptive or foster parents). Examples of familial status discrimination include refusing to rent to families with children, evicting families once a child joins the family through, e.g., birth, adoption, custody, or requiring families with children to live on specific floors or in specific buildings or areas. Single parent households are also protected by fair housing law.

Regional Trends

Figure E11 shows the household type composition for Petaluma, Sonoma County, and the Bay Area. Petaluma generally has a household type composition comparable to the County and Bay Area. A slightly larger proportion of Petaluma households are married couple family households (54%) compared to the County (48%) and Bay Area (51%). The City also has a slightly lower proportion of other non-family households and female-headed family households compared to the County and Bay Area.

Figure E11: Household Type Composition (2019)



Source: ABAG Housing Element Data Needs Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.

PUBLIC REVIEW DRAFT

Appendix E Draft Affirmatively Furthering Fair Housing

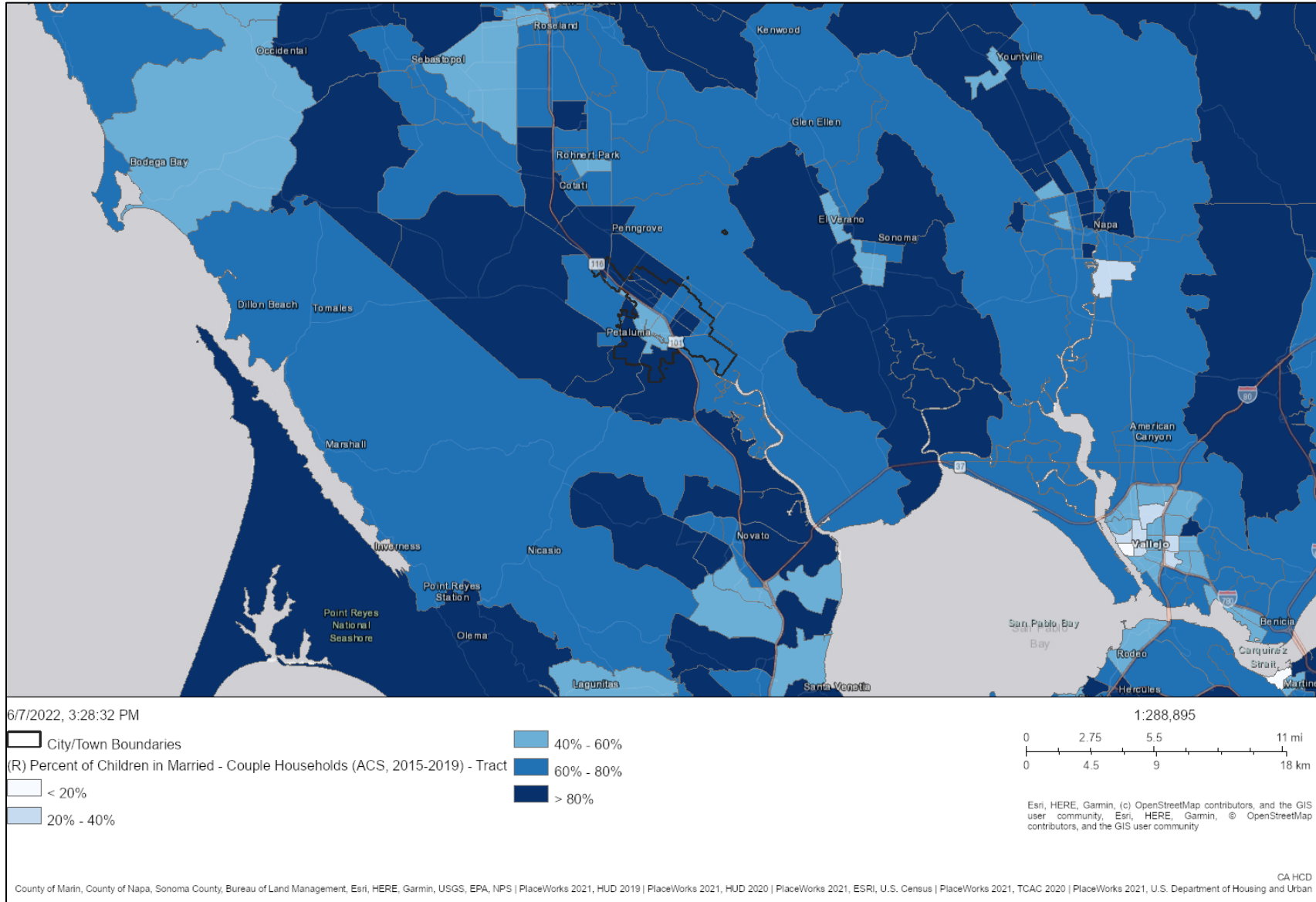
As shown in Table E10, 31.5 percent of Petaluma households has one or more child under the age of 18. The rate of households with children in the City is slightly higher than the County (28.3%) and comparable to the Bay Area (32%).

Table E10: Household Type by Presence of Children (2019)

	Petaluma	Sonoma County	Bay Area
With one or more children under 18	31.5%	28.3%	32.0%
With no children	68.5%	71.7%	68.0%
Total Households	22,655	189,374	2,731,434
<i>Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.</i>			

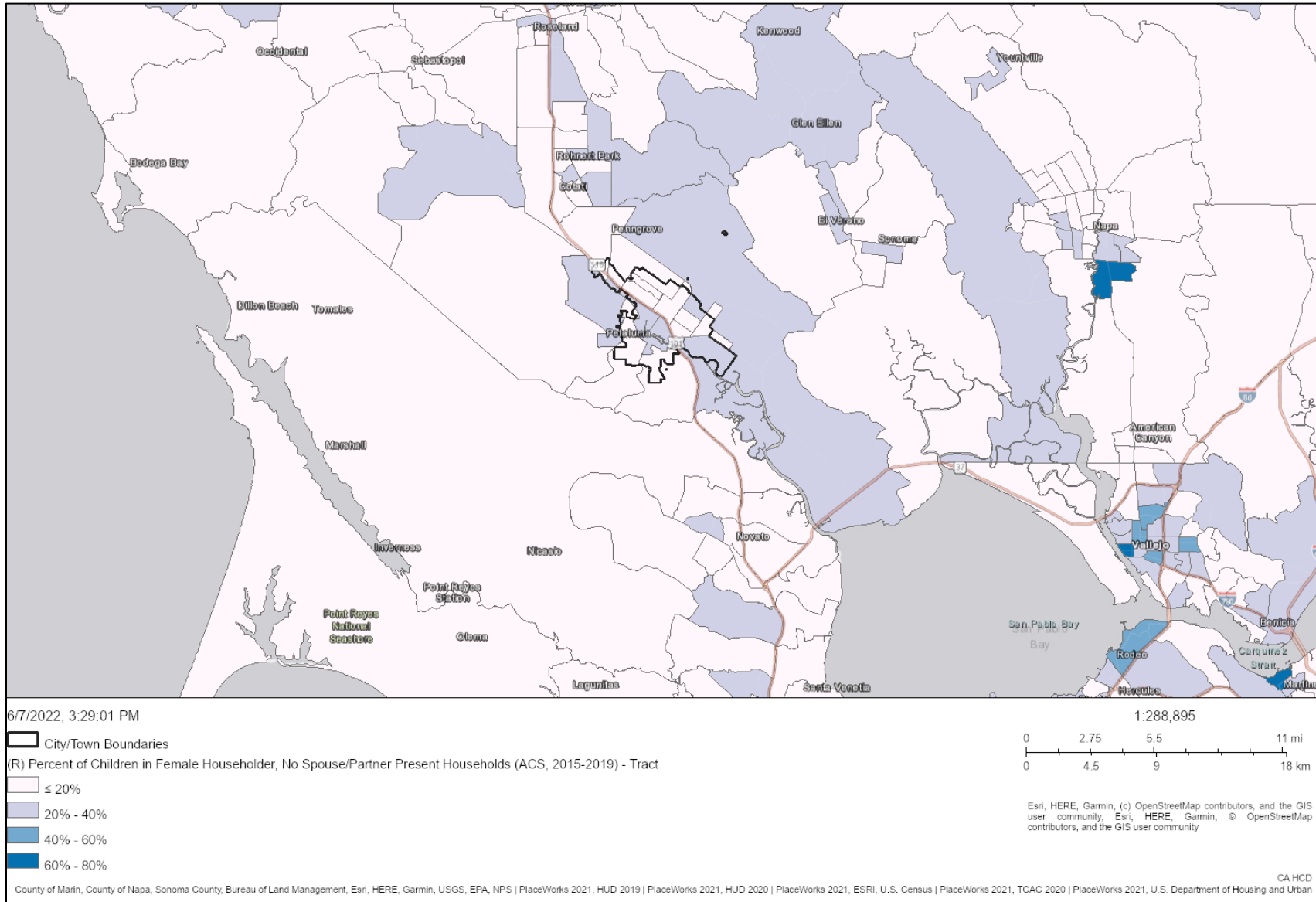
The regional population of children in married couple households at the tract-level is presented in Figure E12. In most of the region surrounding Petaluma, between 60 and 100 percent of children reside in married couple households. In some tracts, only 40 to 60 percent of children live in married couple households. These tracts are located in and around the cities of Petaluma, Sonoma, and Santa Rosa, as well as central Marin County. Figure E13 shows the population of children living in single-parent female-headed households by tract. Tracts with larger populations of children residing in female-headed households tend to be more concentrated in cities in Napa County and Solano County. In most areas surrounding Petaluma, less than 40 percent of children reside in single-parent female-headed households.

Figure E12: Regional Population of Children in Married Couple Households by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Figure E13: Regional Population of Children in Female-Headed Households by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Local Trends

As discussed above, more than half (53.6%) of Petaluma households are married couple families (Table E11). Over a quarter of households in the City are single-person households, 9.1 percent are female-headed families, and 5.1 percent are male-headed families. Since the 2006-2010 ACS, the number of male-headed families in the City has increased the most (+15.9%), followed by single-person households (+10.5%), and female-headed families (+10.3%). During this period, the number of other non-family households decreased by 5.3 percent. Non-family households, not including single-person households, are households where the householder shares the home exclusively with people to whom they are not related.

Table E11: Change in Household Type Composition (2010-2019)

Household Type	2010		2019		Percent Change
	Households	Percent	Households	Percent	
Female-Headed Family	1,878	8.8%	2,071	9.1%	+10.3%
Male-Headed Family	1,002	4.7%	1,161	5.1%	+15.9%
Married Couple Family	11,547	54.4%	12,135	53.6%	+5.1%
Other Non-Family	1,564	7.4%	1,481	6.5%	-5.3%
Single-person	5,254	24.7%	5,807	25.6%	+10.5%
Total Households	21,245	100.0%	22,655	100.0%	+6.6%

Source: 2006-2010 and 2015-2019 ACS (5-Year Estimates).

Figure E14 and Figure E15 show the populations of children living in married couple households and children living in female-headed households by tract in Petaluma. In most tracts, more than 60 percent of children reside in married couple households. There is a small concentration of two tracts in central Petaluma, Midtown and Downtown neighborhoods, where less than 60 percent of children reside in married couple households. All tracts along the southern side of the 101 Highway and one tract in the Adobe neighborhood also have concentrations of children residing in single-parent female-headed households exceeding 20 percent. In general, these areas also have larger populations of racial/ethnic minority groups and persons with disabilities.

Sites Inventory

Figure E14 and Table E12 show the distribution of RHNA units by population of children living in married couple households at the tract-level. A large proportion (63.3%) of RHNA units have been allocated in the Downtown/Midtown neighborhoods where a smaller proportion of children live in married couple households. Approximately 75.8 percent of lower income units, 82.7 percent of moderate income units, and 52.6 percent of above moderate income units are located in this area where 40 to 60 percent of children reside in married couple households. Only 23.1 percent of RHNA units, including 23.3 percent of lower income units, 16.1 percent of moderate income units, and 24.9 percent of above moderate income units, are in tracts where more than 80 percent of children live in married couple households. While a larger proportion of above moderate income units are in tracts where more than 60 percent of children live in married couple households, RHNA units are generally distributed throughout the City and are not concentrated in tracts of a single range. It is also important to note that there are more sites suitable for additional units located in the central areas of the City where fewer children reside in married couple households.

Table E12: Distribution of RHNA Units by Children in Married Couple Households

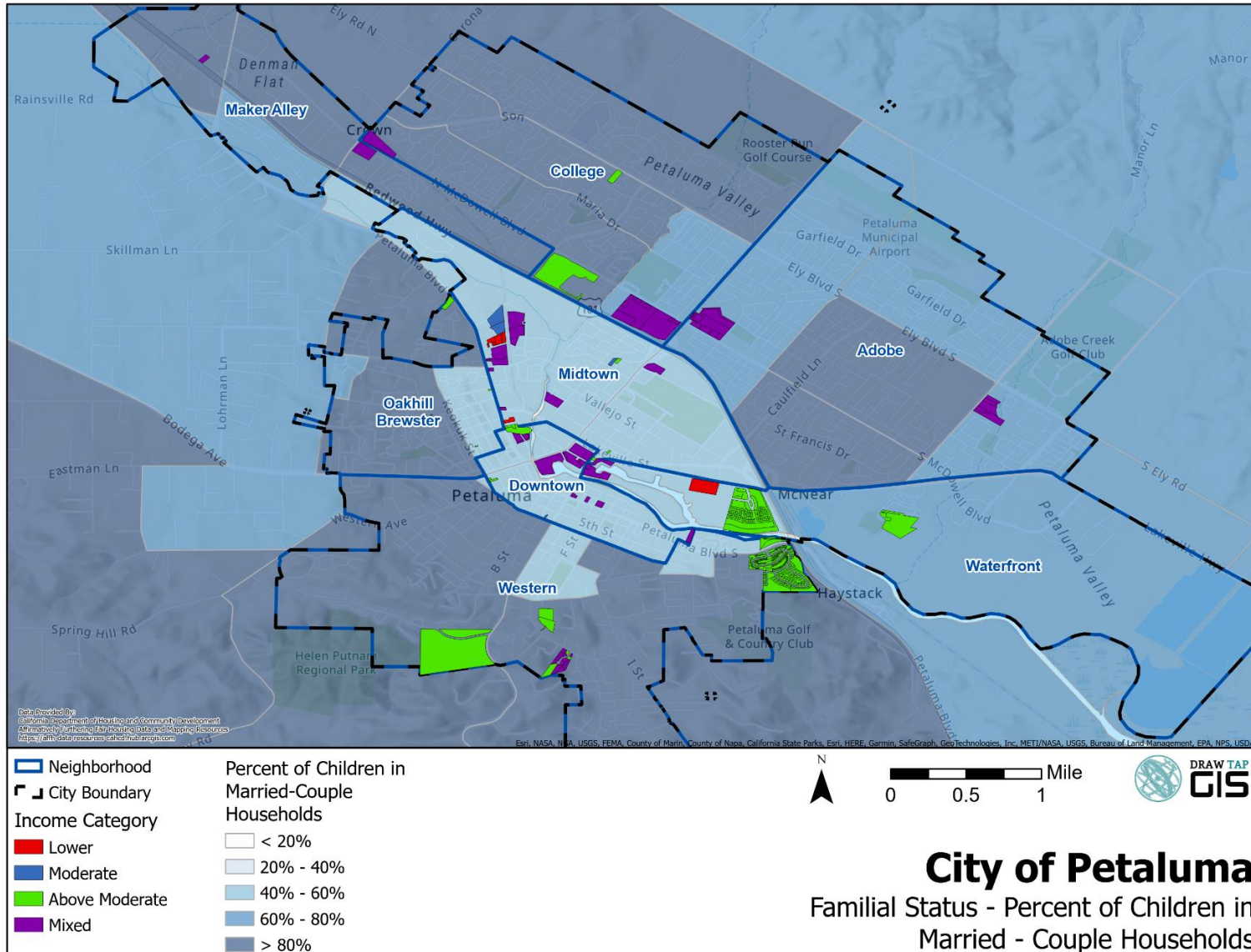
Children in Married Couple HHs (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
20-40%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
40-60%	654	75.8%	415	82.7%	996	52.6%	2065	63.3%
60-80%	8	0.9%	6	1.2%	428	22.6%	442	13.6%
>80%	201	23.3%	81	16.1%	471	24.9%	753	23.1%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E15 and Table E13 show the distribution of RHNA units by population of children residing in single-parent female-headed households. Consistent with the trend described above, most RHNA units are in tracts where 20 to 40 percent of children reside in female-headed households, including 75.8 percent of lower income units, 82.7 percent of moderate income units, and 66.5 percent of above moderate income units. There are no tracts in Petaluma where more than 40 percent of children reside in single-parent female-headed households. The area of the City where more children reside in single-parent female-headed households, Midtown, Downtown, Waterfront neighborhoods, also contains block groups with larger populations of racial/ethnic minority populations (see Figure E5). While there are more lower and moderate income RHNA units allocated in this area of the City compared to above moderate income units, the City will implement place-based strategies, outlined in the Program section of this Housing Element, to ensure existing and future populations in this area have adequate access to resources and facilities.

Table E13: Distribution of RHNA Units by Children in Female-Headed Households

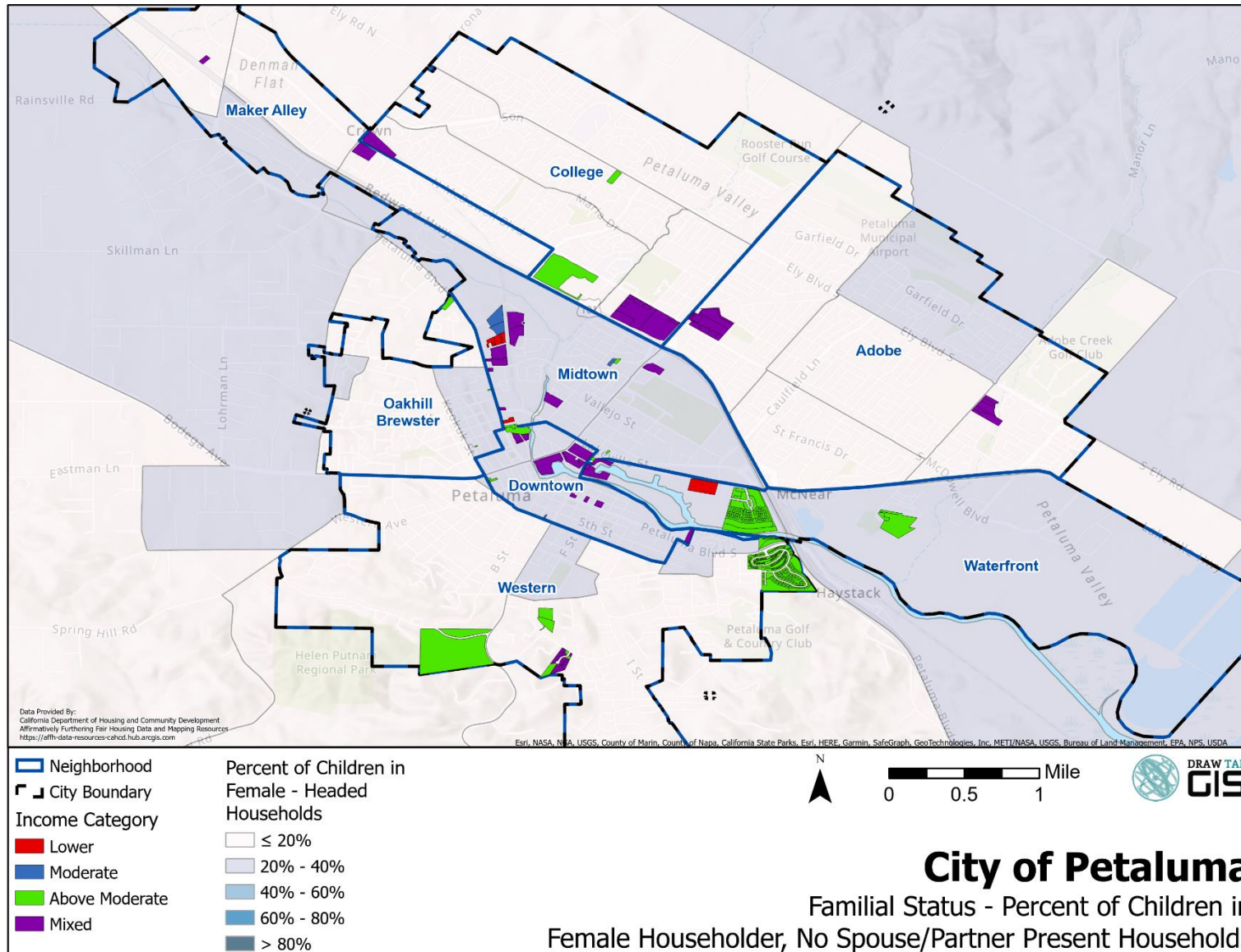
Children in Female-Headed HHs (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<20%	209	24.2%	87	17.3%	635	33.5%	931	28.6%
20-40%	654	75.8%	415	82.7%	1260	66.5%	2329	71.4%
40-60%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
60-80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
>80%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E14: Sites Inventory and Children in Married Couple HHs by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data) and Veronica Tam & Associates, 2022.

Figure E15: Sites Inventory and Children in Female-Headed HHs by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data) and Veronica Tam & Associates, 2022.

Income Level

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the households are LMI (based on HUD income definition of up to 80 percent of the Area Median Income (AMI). The 2020 HUD median income for the Santa Rosa, California Metropolitan Statistical Area (MSA), or Sonoma County, is \$102,700.⁹

Regional Trends

Table E14 shows households by income level in Sonoma County. More than half of households in the County earn more than 100 percent of the AMI. Lower income households are considered households earning less than 80 percent of the AMI. In the County, 36.4 percent of households are lower income. Renter-occupied households are significantly more likely to be lower income compared to owner-occupied households. Approximately 53 percent of renter households in the County are lower income compared to only 25.5 percent of owner households.

Table E14: Household Income Level by Tenure – Sonoma County (2017)

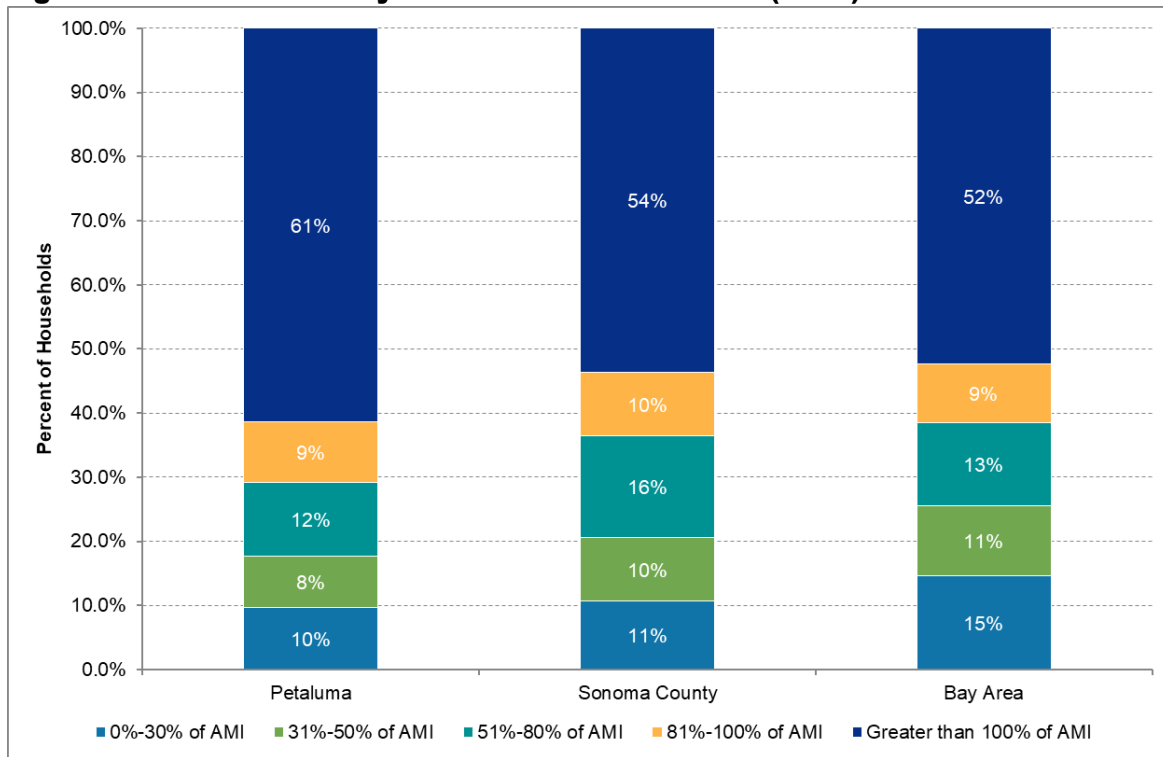
Income Category	Owner-Occupied		Renter-Occupied		All Households	
	Households	Percent	Households	Percent	Households	Percent
0%-30% of AMI	6,920	6.0%	13,380	17.7%	20,300	10.7%
31%-50% of AMI	8,080	7.0%	10,655	14.1%	18,735	9.9%
51%-80% of AMI	14,275	12.5%	15,920	21.1%	30,195	15.9%
81%-100% of AMI	9,995	8.7%	8,925	11.8%	18,920	10.0%
> 100% of AMI	75,335	65.7%	26,565	35.2%	101,900	53.6%
Totals	114,610	100.0%	75,450	100.0%	190,060	100.0%

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

6 shows households by income level in Petaluma, Sonoma County, and the Bay Area. Petaluma has a larger proportion of households earning more than 100 percent of the AMI (61%) compared to both Sonoma County (54%) and the Bay Area (52%). Petaluma also has a smaller proportion of lower income households compared to the County and Bay Area. Approximately 30 percent of Petaluma households are lower income compared to 37 percent in the County and 39 percent in the Bay Area.

⁹ HUD, FY 2020 Income Limits Documentation System.
<https://www.huduser.gov/portal/datasets/il/il2020/2020summary.odn>.

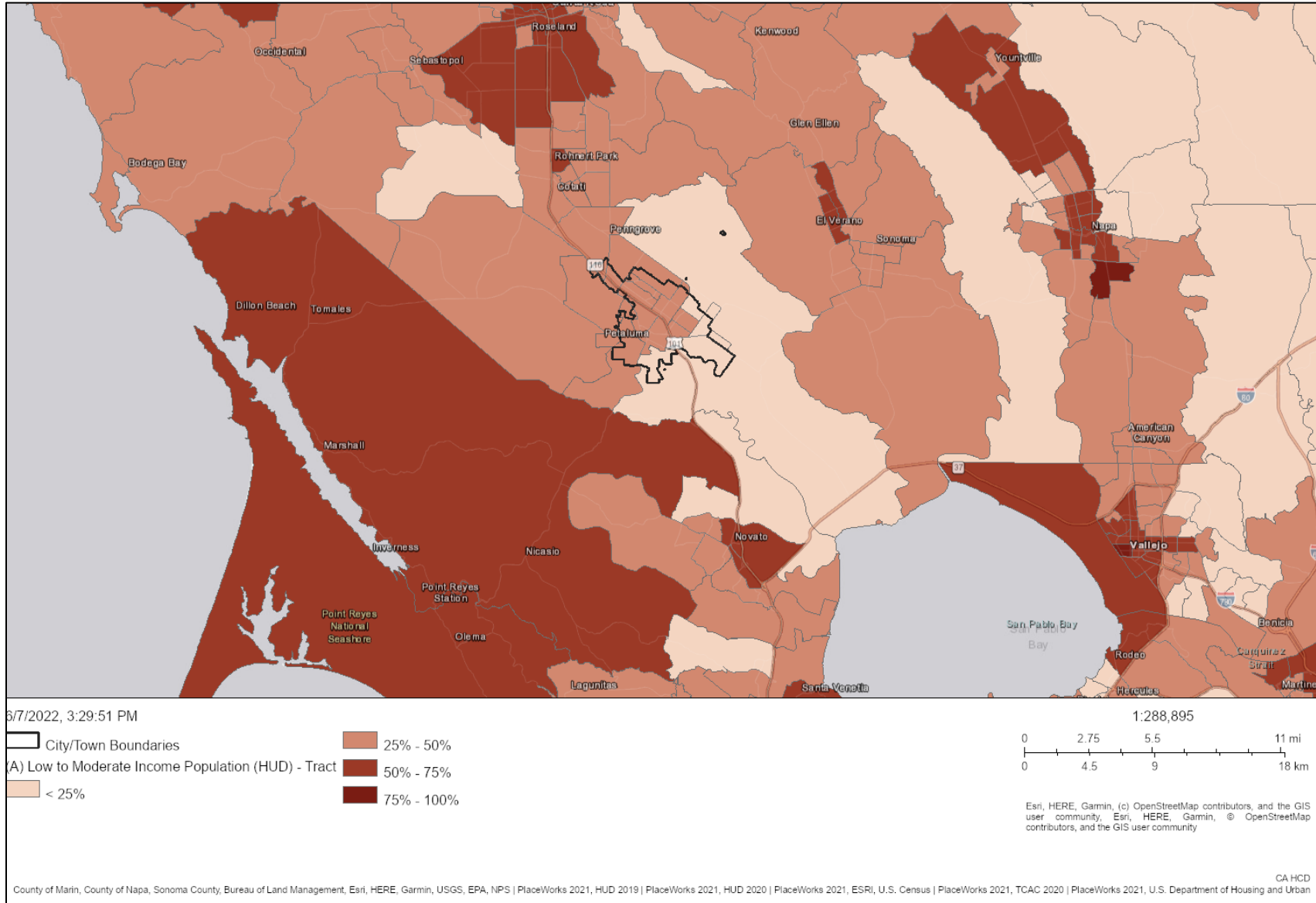
Figure E16: Households by Household Income Level (2019)



Source: ABAG Housing Element Data Package (based on 2020 HUD CHAS Data (2013-2017 ACS)), 2021.

In Figure , populations of low to moderate income (LMI) households are shown for the region at the tract-level. Tracts are considered LMI areas if more than half of households residing in that tract are low or moderate income. In the areas surrounding Petaluma, LMI areas are concentrated north of the City around the City of Santa Rosa and south and west of the City in Marin County. There are no Petaluma tracts that are considered LMI areas. An analysis of LMI populations at the block group-level for the City of Petaluma is included in the Local subsection. This trend is generally consistent with tracts directly adjacent to the City.

Figure E6: Regional Population of LMI Households by Tract



Source: HCD AFFH Data Viewer (based on 2020 HUD data), 2022.

Local Trends

As discussed above, Petaluma is characterized by a smaller population of lower income households compared to the County and Bay Area. Only 29.2 percent of households in Petaluma are lower income, including 21.8 percent of owner-occupied households and 43.7 percent of renter-occupied households. Nearly 70 percent of owner-occupied households and 44.5 percent of renter-occupied households earn more than 100 percent of the AMI, a larger proportion compared to the County.

Table E15: Household Income Level by Tenure in Petaluma (2017)

Income Category	Owner-Occupied		Renter-Occupied		All Households	
	Households	Percent	Households	Percent	Households	Percent
0%-30% of AMI	714	4.9%	1,435	19.0%	2,149	9.7%
31%-50% of AMI	975	6.6%	794	10.5%	1,769	8.0%
51%-80% of AMI	1,505	10.3%	1,069	14.2%	2,574	11.6%
81%-100% of AMI	1,215	8.3%	885	11.7%	2,100	9.5%
> 100% of AMI	10,259	69.9%	3,359	44.5%	13,618	61.3%
Totals	14,668	100.0%	7,542	100.0%	22,210	100.0%

Source: ABAG Housing Element Data Package (based on HUD CHAS Data (2013-2017 ACS)), 2021.

Figure E17 shows the population of LMI households by Petaluma block group. There are seven block groups in the City that are considered LMI areas where more than 50 percent of households are low or moderate income. Most block groups have LMI populations below 50 percent. Of the LMI areas identified, two are located in the Midtown neighborhood, one is located in the Downtown neighborhood but also includes small sections of the Oakhill Brewster and Midtown neighborhoods, one is in the Western neighborhood, one is in the Adobe neighborhood, one is in the Maker Alley neighborhood, and one is in both the Maker Alley and College neighborhoods. The LMI block group in the Maker Alley neighborhood alone also encompasses a large proportion of the unincorporated Sonoma County area north of the City and is not a reflection of Petaluma residents alone.

The block group in the Maker Alley/College neighborhood, bound by N. McDowell Boulevard and Redwood Highway, has the largest LMI population of 76 percent. According to the HCD AFFH Data Viewer, there are seven mobile home parks in Petaluma. Four of the seven mobile home parks, Youngstown Mobile Home Park (102 units), Petaluma Estates (215 units), Capri Mobile Villa (69 units), and Sandalwood Mobile Home Park (178 units), are located in this block group. Lower income households are typically more likely to reside in mobile homes. As discussed previously, the Downtown/Midtown area has higher concentrations of other populations of interest including racial/ethnic minority groups and children residing in female-headed households. While there are subsidized housing units located throughout the City, subsidized housing units are prevalent in this section of Petaluma (see Figure E1). The location of these housing types, mobile homes and subsidized units, likely contributes to the distribution of LMI households in the City.

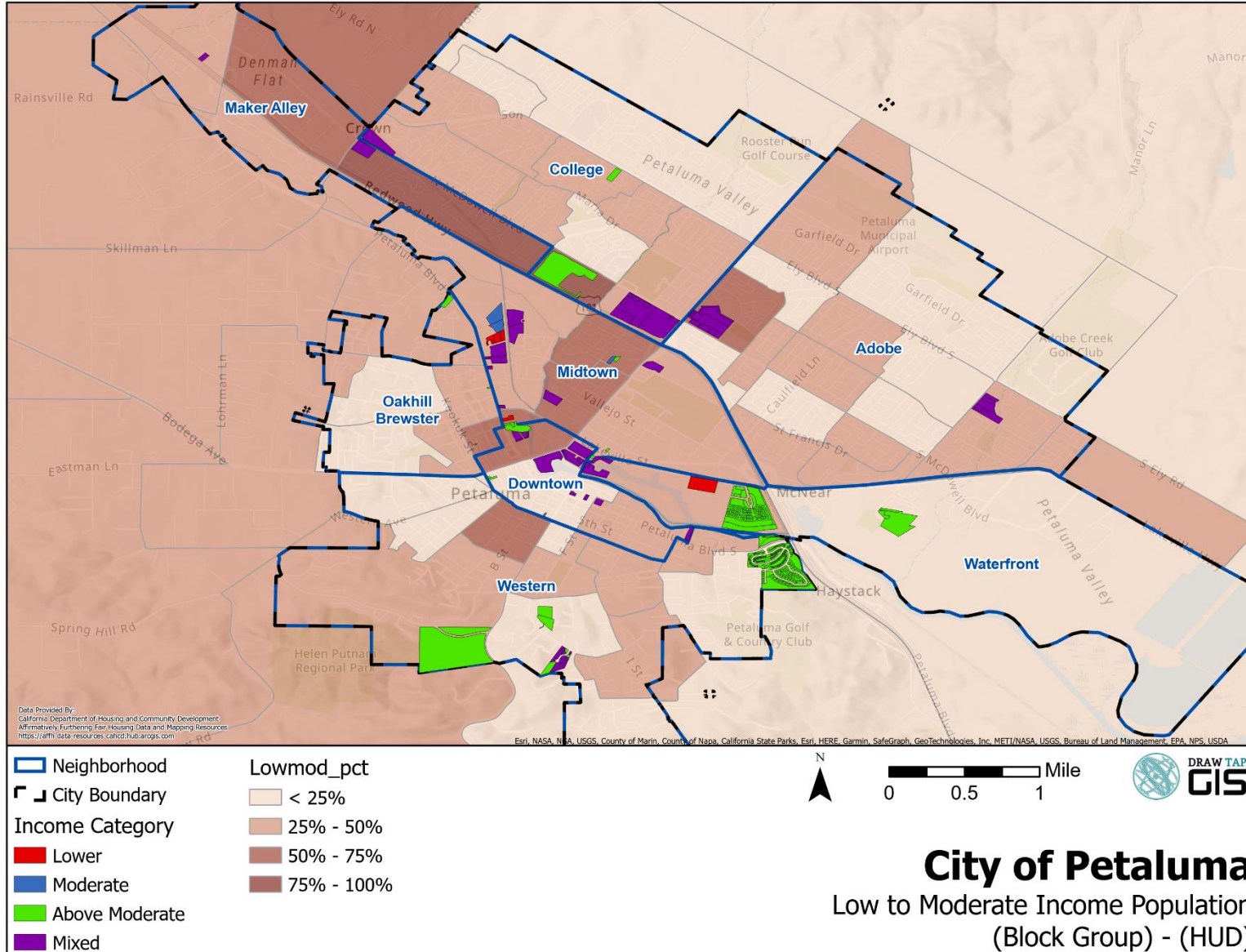
Sites Inventory

Figure E17 and Table E16 show the distribution of RHNA units by LMI household population at the block group-level. Consistent with the Citywide trend, most RHNA units (80.5%) are in block groups where fewer than 50 percent of households are low or moderate income, including 88.3 percent of lower income units, 90.6 percent of moderate income units, and 74.2 percent of above moderate income units. Only 11.7 percent of lower income units and 9.4 percent of moderate income units are in LMI areas compared to 25.8 percent of above moderate income units. The City’s RHNA strategy ensures lower and moderate income units are not concentrated in areas where LMI households are more prevalent. Further, the sites inventory promotes mixed income communities by placing sites that can accommodate a variety of unit types throughout the City, including over a quarter of above moderate income units in LMI areas.

Table E16: Distribution of RHNA Units by Population of LMI Households

LMI Households (Block Group)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
<25%	110	12.7%	70	13.9%	636	33.6%	816	25.0%
25-50%	652	75.6%	385	76.7%	771	40.7%	1808	55.5%
50-75%	59	6.8%	15	3.0%	327	17.3%	401	12.3%
75-100%	42	4.9%	32	6.4%	161	8.5%	235	7.2%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E17: Sites Inventory and LMI Households by Tract



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Racially or Ethnically Concentrated Areas

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

In an effort to identify racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. Areas of High Segregation and Poverty are also identified by HCD and the California Tax Credit Allocation Committee (TCAC), jointly known as the Fair Housing Task Force. Areas of High Segregation and Poverty are defined as tracts where at least 30 percent of the population is living below the poverty line and relies on the location quotient of residential segregation (LQ).¹⁰

Regional Trends

Poverty status by race/ethnicity for Sonoma County is presented in Table E17. The County has a poverty rate of 9.2 percent according to 2015-2019 ACS estimates. The Black/African American population has the highest poverty rate of 17.7 percent, followed by the Native Hawaiian/other Pacific Islander population (14.8%), population of some other race (14.8%), and Hispanic/Latino population (12.1%). The American Indian/Alaska Native population and population of two or more races also have poverty rates exceeding the Countywide average.

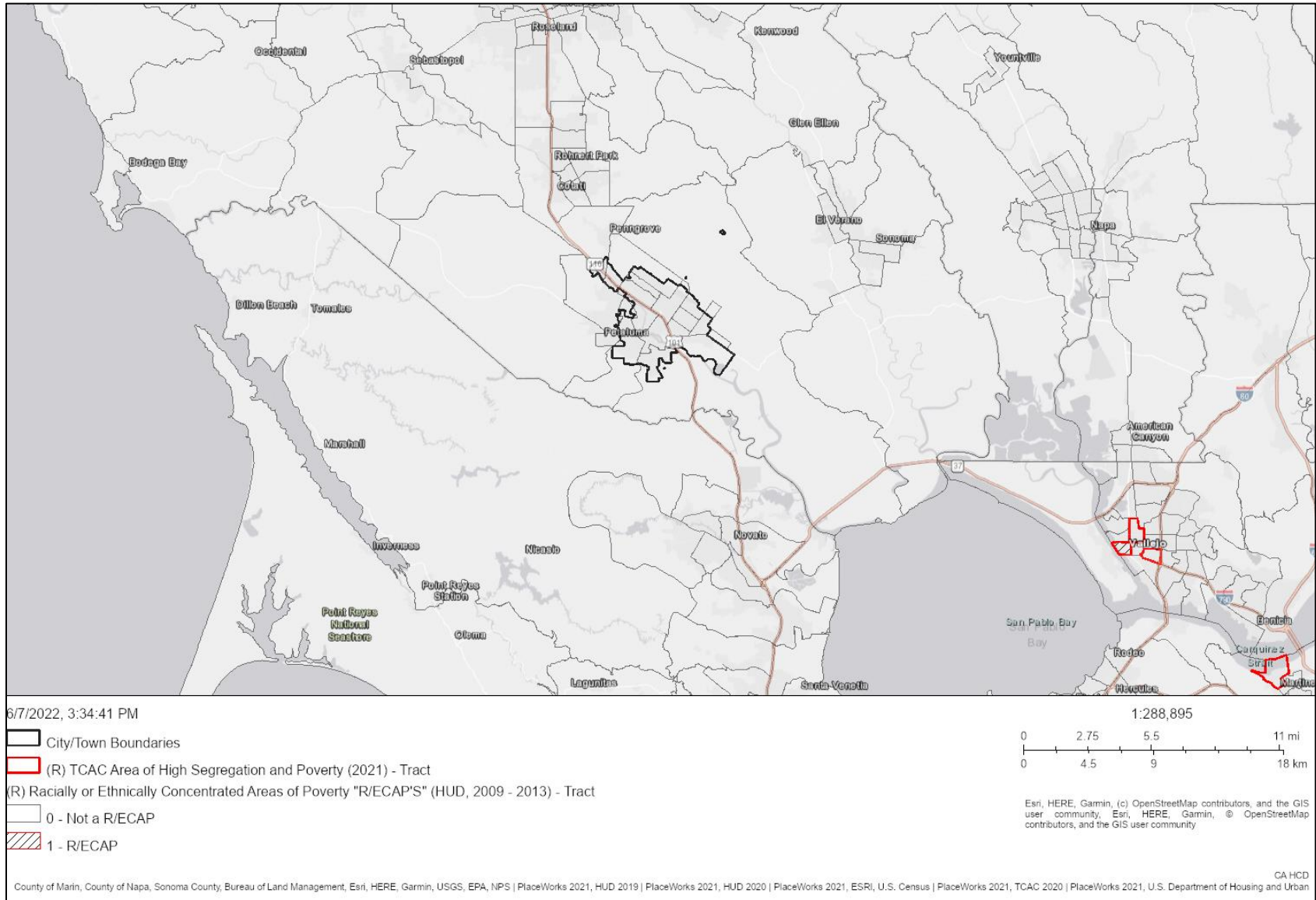
Table E17: Poverty Status by Race/Ethnicity – Sonoma County (2019)

Race/Ethnicity	Total Population	Percent Below Poverty Level
White alone	368,826	7.9%
Black or African American alone	7,890	17.7%
American Indian and Alaska Native alone	4,282	11.9%
Asian alone	20,126	9.0%
Native Hawaiian and Other Pacific Islander alone	1,505	14.8%
Some other race alone	63,517	14.8%
Two or more races	26,344	10.3%
Hispanic or Latino origin (of any race)	131,019	12.1%
White alone, not Hispanic or Latino	312,348	7.7%
Population for whom poverty status is determined	492,490	9.2%
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		

R/ECAPs and TCAC areas of high segregation and poverty throughout the region are shown in Figure E18. There are very few R/ECAPs or TCAC areas of high segregation and poverty in the areas surrounding Petaluma. The closest R/ECAPs or areas of high segregation and poverty are in Solano County east of the City and in Marin County south of the City. There are no R/ECAPs or areas of high segregation and poverty in Sonoma County.

¹⁰ The LQ is a small-area measure of relative segregation calculated at the residential census tract level that represents how much more segregated an area (e.g., a census tract or block group) is relative to the larger area (in this case, the county). For the filter, tracts that have a LQ higher than 1.25 for Blacks, Hispanics, Asians, or all people of color are flagged as being racially segregated in comparison to the county.

Figure E18: Regional TCAC Areas of High Segregation and Poverty and R/ECAPs by Tract (2021, 2013)



Source: HCD AFFH Data Viewer (based on 2021 TCAC and 2009-2013 HUD data), 2022.

Local Trends

Petaluma has a lower poverty rate of 6.7 percent compared to 9.2 percent Countywide (Table E18). Like the County, the Black/African American population has the highest poverty rate (16.4%). The population of a race not listed (“some other race”) (14.1%) and the Hispanic/Latino population (9.3%) also have poverty rates exceeding the Citywide average.

Table E18: Poverty Status by Race/Ethnicity (2019)

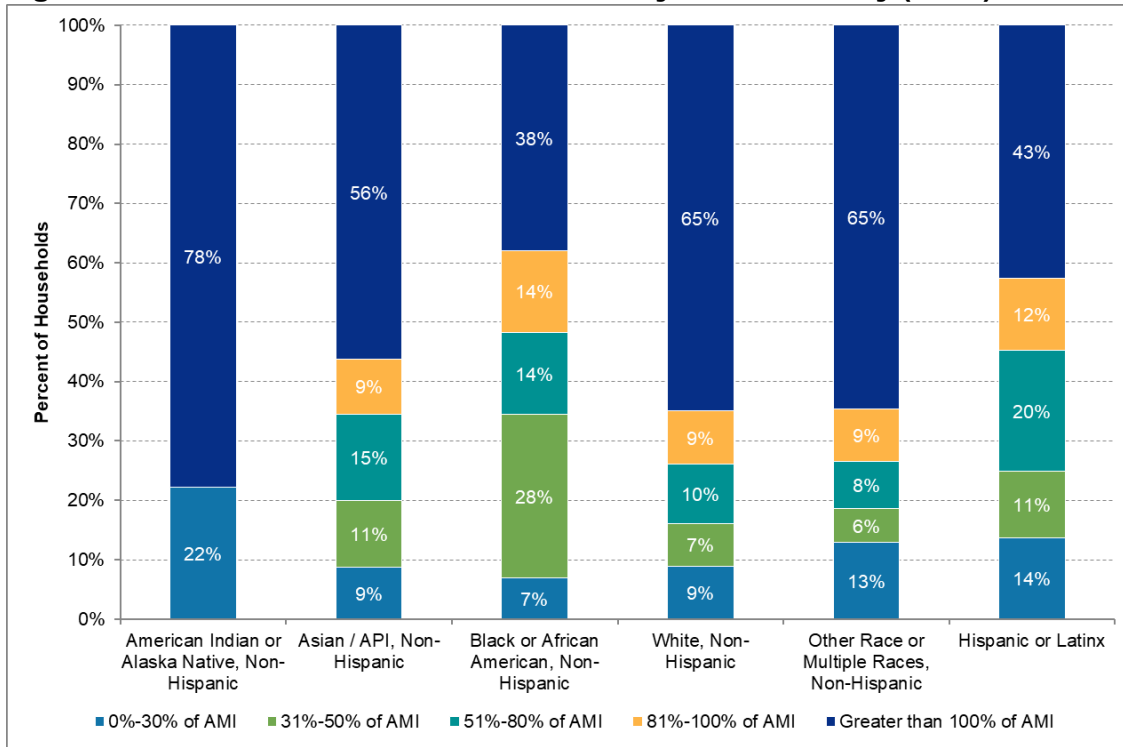
Race/Ethnicity	Total Population	Percent Below Poverty Level
White alone	46,657	5.7%
Black or African American alone	715	16.4%
American Indian and Alaska Native alone	263	4.6%
Asian alone	2,738	6.0%
Native Hawaiian and Other Pacific Islander alone	67	0.0%
Some other race alone	6,654	14.1%
Two or more races	3,208	5.5%
Hispanic or Latino origin (of any race)	13,253	9.3%
White alone, not Hispanic or Latino	40,965	5.6%
Population for whom poverty status is determined	492,490	6.7%
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		

Figure E19 shows the household income distribution by race/ethnicity of the householder. Black/African American households are most likely to earn less than 80 percent of the AMI and be considered lower income. Nearly half of Black/African American households and 45 percent of Hispanic/Latino households are considered lower income. In comparison, only 35 percent of Asian household and 26 percent of non-Hispanic White households are lower income. While most (78%) American Indian/Alaska Native households earn 100 percent of more of the AMI, it is important to note that 22 percent are considered extremely low income, earning less than 30 percent of the AMI.

Poverty status by Petaluma tract is presented in Figure E20. There are two tracts in the City where the population of persons below the poverty level exceeds 10 percent; one is in the center of the City in the Midtown/Downtown neighborhood, and one is in the northwestern corner. It is important to note that the tract in the northwestern corner of the City extends into the northern unincorporated County areas and the cities of Rohnert Park and Cotati. Therefore, the population residing in this tract is not a reflection of Petaluma residents alone. As discussed previously, the tract south of the 101 Highway in the Midtown/Downtown neighborhood also has a larger population of persons with disabilities, a smaller population of children residing in married couple households, and contains block groups with larger racial/ethnic minority populations compared to a majority of the City (see Figure E5, Figure E10, and Figure E14).

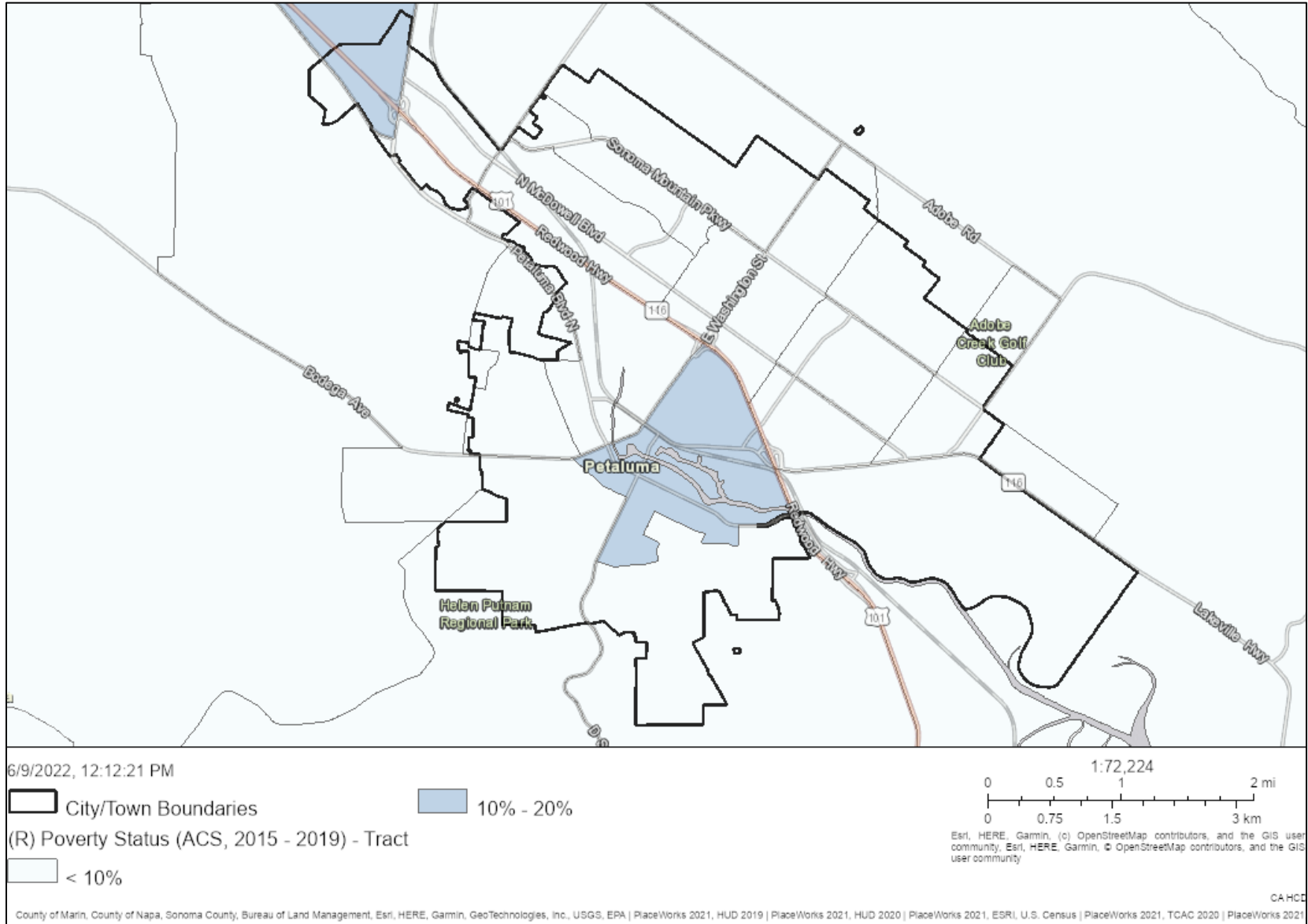
There are no R/ECAPs or TCAC areas of high segregation and poverty identified in Petaluma. Therefore, no RHNA units will be located within tracts with this characterization.

Figure E19: Household Income Distribution by Race/Ethnicity (2019)



Source: ABAG Housing Element Data Package (based on 2020 HUD CHAS Data (2013-2017 ACS)), 2021.

Figure E20: Poverty Status by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Racially or Ethnically Concentrated Areas of Affluence (RCAAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated - a key to fair housing choice. Identifying RCAAs is also important for underserved populations to be able to participate in resources experienced by populations living in areas of influence. According to a policy paper published by HUD, RCAAs are defined as communities with a large proportion of affluent and non-Hispanic White residents. According to HUD's policy paper, non-Hispanic Whites are the most racially segregated group in the United States. In the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.

As of June 2022, HCD has created and released a new version of the RCAA metric to better reflect California's relative diversity and regional conditions, and to aid local jurisdictions in their analysis of racially concentrated areas of poverty and affluence pursuant to AB 686 and AB 1304. To develop the RCAA layer, staff first calculated a Location Quotient (LQ) for each California census tract using data from the 2015-2019 ACS. This LQ represents the percentage of total white population (White Alone, Not Hispanic or Latino) for each census tract compared to the average percentage of total white population for all census tracts in a given COG region. For example, a census tract with a LQ of 1.5 has a percentage of total white population that is 1.5 times higher than the average percentage of total white population in the given COG region. To determine the RCAAs, census tracts with a LQ of more than 1.25 and a median income 1.5 times higher than the COG AMI (or 1.5x the State AMI, whichever is lower) were assigned a numeric score of 1 (Is a RCAA). Census tracts that did not meet this criterion were assigned a score of 0 (Not a RCAA).

Regional Trends

The median household income in Sonoma County is \$81,018 (Table E19). Asian households have the highest median income of \$85,992, followed by non-Hispanic White households (\$85,314), and Native Hawaiian/other Pacific Islander households (\$84,394). In comparison, the population of households of some other race (\$62,027), Hispanic/Latino households (\$67,701), and Black/African American households (\$68,975) have the lowest median incomes. Median income trends for racial groups in the County are consistent with poverty status trends presented in Table E17.

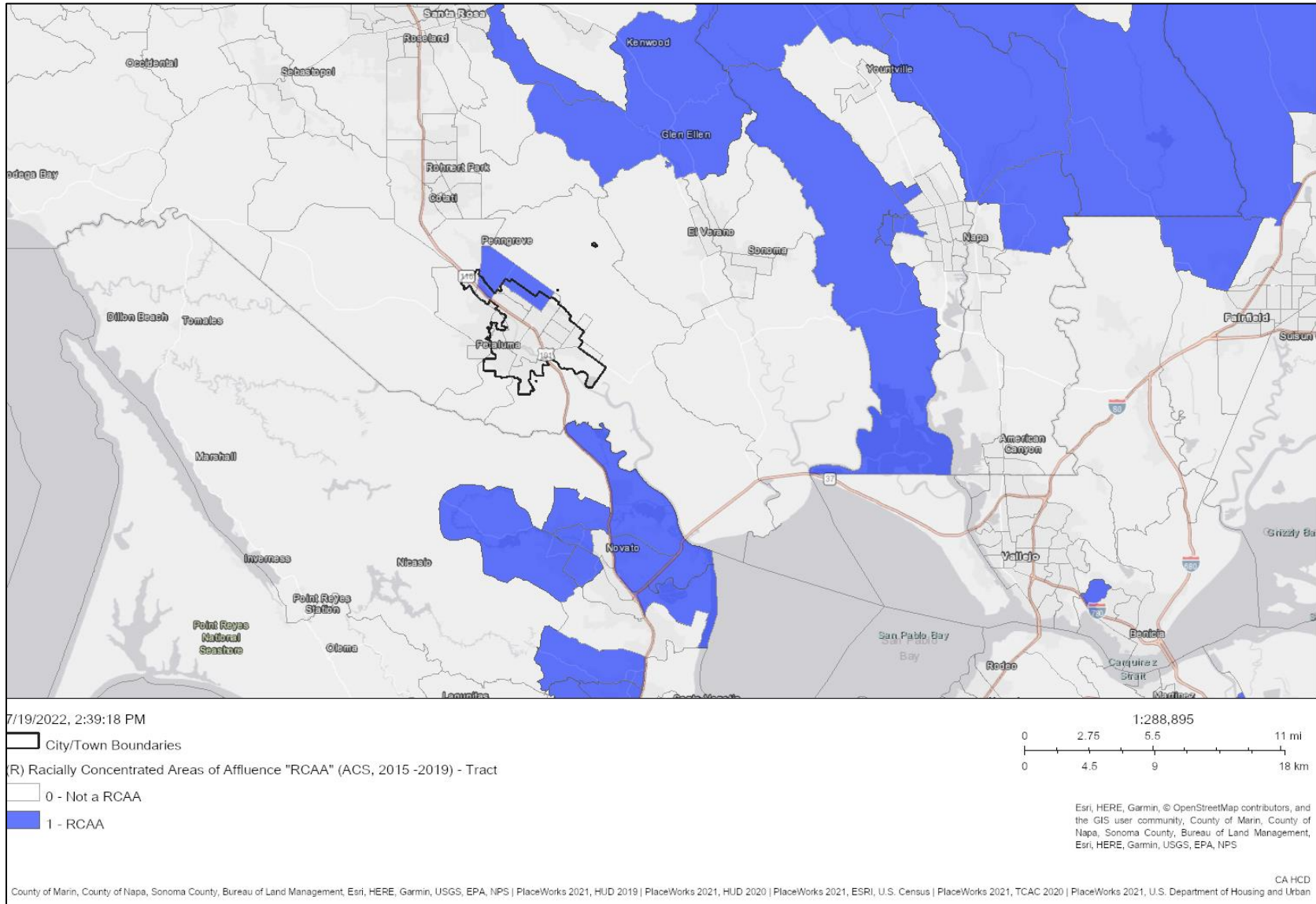
Table E19: Median Household Income by Race/Ethnicity – Sonoma County (2019)

Race/Ethnicity	Percent of Population	Median Income
White alone	82.9%	\$84,212
Black or African American alone	1.2%	\$68,975
American Indian and Alaska Native alone	0.8%	\$81,567
Asian alone	3.5%	\$85,992
Native Hawaiian and Other Pacific Islander alone	0.2%	\$84,394
Some other race alone	8.0%	\$62,027
Two or more races	3.4%	\$79,671
Hispanic or Latino origin (of any race)	17.6%	\$67,701
White alone, not Hispanic or Latino	74.8%	\$85,314
All Households	189,374	\$81,018
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		

Figure E21 shows HCD-identified RCAAs in the region by tract. HCD's methodology for identifying RCAAs was described previously. Several tracts in the region have been identified as RCAAs, including in the counties of Sonoma, Marin, Napa, and Solano. In Sonoma County, RCAAs are most concentrated in the area surrounding the City of Santa Rosa. Napa County and Marin County have higher concentrations of RCAAs compared to Sonoma County and Solano County. One RCAA has been identified in Petaluma. The RCAA located in the City is described further below.

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Figure E21: Regional RCAAs by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS), 2022.

Local Trends

The median household income in Petaluma is \$91,825, higher than \$81,018 Countywide (Table E20). Households of a race not listed (“some other race”) have the lowest median income of \$68,654, followed by American Indian/Alaska Native households (\$71,736), Black/African American households (\$77,708), and Hispanic/Latino households (\$79,314). The White and Asian household populations are the only racial/ethnic groups with median incomes exceeding the Citywide average.

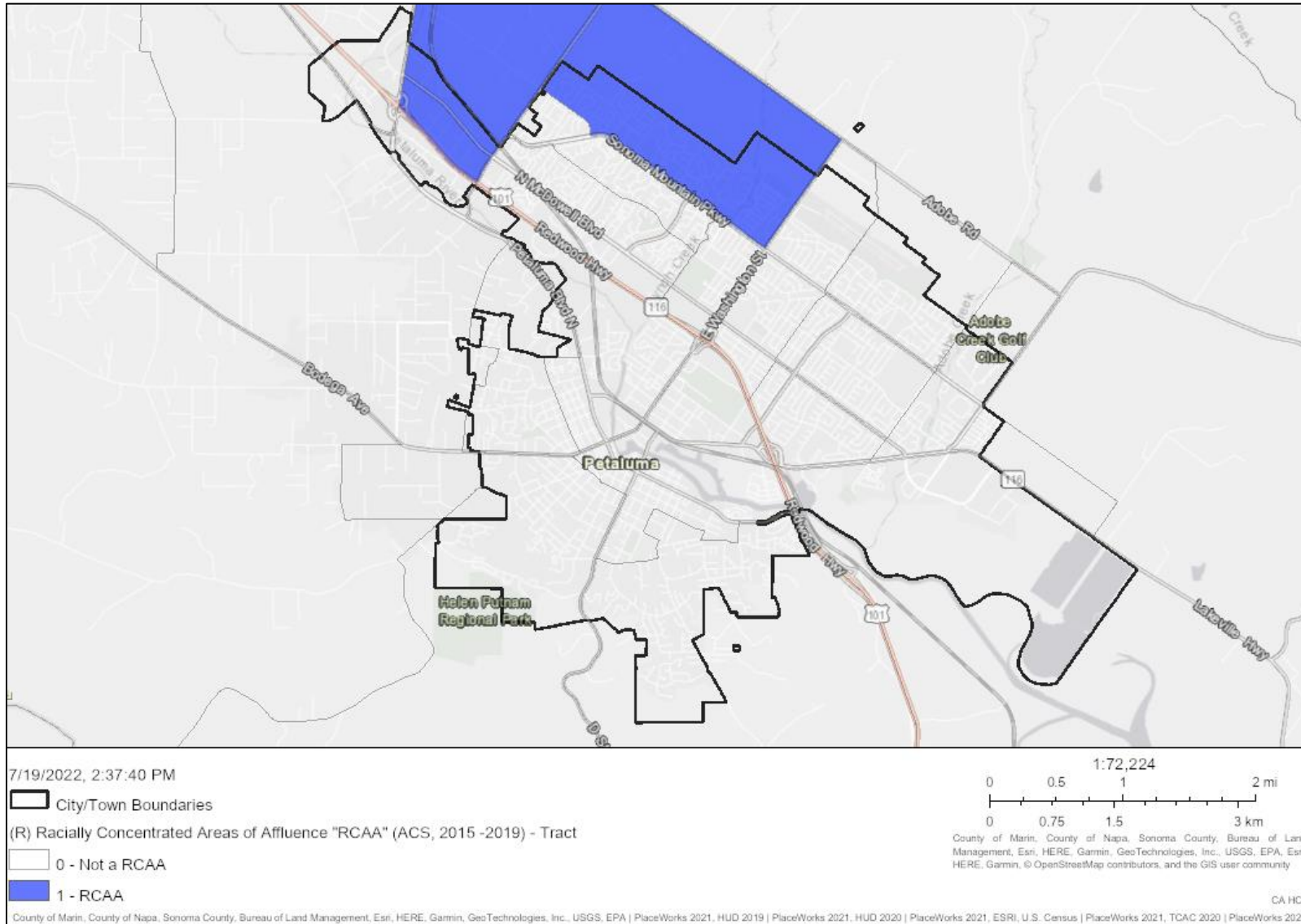
Table E20: Median Household Income by Race/Ethnicity (2019)

Race/Ethnicity	Percent of Population	Median Income
White alone	84.6%	\$95,630
Black or African American alone	1.2%	\$77,708
American Indian and Alaska Native alone	0.4%	\$71,736
Asian alone	4.0%	\$81,897
Native Hawaiian and Other Pacific Islander alone	0.2%	-
Some other race alone	6.2%	\$68,654
Two or more races	3.3%	\$87,384
Hispanic or Latino origin (of any race)	14.3%	\$79,314
White alone, not Hispanic or Latino	77.9%	\$96,745
Population for whom poverty status is determined	22,655	\$91,528
<i>Source: 2015-2019 ACS (5-Year Estimates).</i>		

RCAAs by Petaluma tract are presented in Figure E22. As shown in Figure E5 previously, most block groups in the City have non-White populations exceeding 20 percent. A tract encompassing the parts of the northernmost area of the City in the College and Maker Alley neighborhoods is considered an RCAA. It is important to note that this tract also encompasses some of the unincorporated County areas north of the City and is not a reflection of Petaluma residents alone. As shown in Figure E23, the block group in the College neighborhood with the identified RCAA has the highest median income exceeding \$125,000.

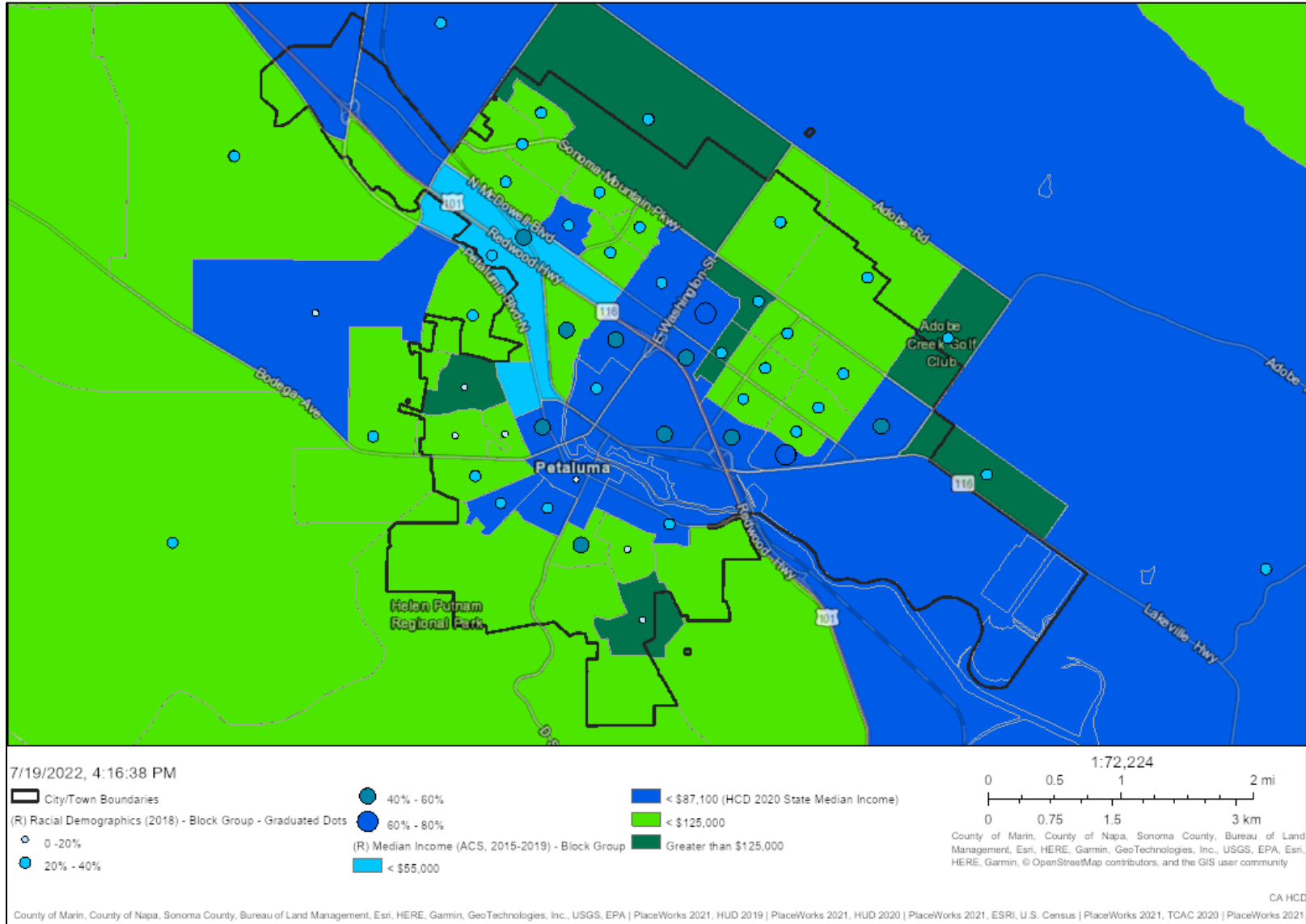
There are no RHNA units located within an RCAA.

Figure E22: RCAAs by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS), 2022.

Figure E23: Racial/Ethnic Minority Population and Median Income by Block Group (2018, 2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS and 2018 ESRI data), 2022.

Access to Opportunities

Significant disparities in access to opportunity are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.” This section utilizes Opportunity Indices used in HUD’s Assessment of Fair Housing (AFH) and Opportunity Maps developed by the Department of Housing and Community Development (HCD) to analyze access to opportunities at the regional and local levels.

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Sonoma County and Petaluma residents’ access to key opportunity assets by race/ethnicity and poverty level. Table E22 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty Index captures the depth and intensity of poverty in a given neighborhood through poverty rate calculations and percentile rankings. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the index value, the higher the school system quality is in a neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the index value, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)). The higher the transit trips index value, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index value, the lower the cost of transportation in that neighborhood.
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the index value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/ departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different

domains made up of a set of indicators. Table E21 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters are:

- **Poverty:** Tracts with at least 30 percent of population under federal poverty line;
- **Racial Segregation:** Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Table E21: Domains and List of Indicators for Opportunity Maps (2020)

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
<i>Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020</i>	

TCAC/HCD assigns “scores” for each of the domains in Table E21 by census tract and computes “composite” scores that are a combination of the three domains. Scores from each individual domain range from 0-1, where higher scores indicate higher “access” to the domain or higher “outcomes.” Composite scores do not have a numerical value but rather rank census tracts by the level of resources (low, moderate, high, highest, and high poverty and segregation).

The TCAC/HCD Opportunity Maps offer a tool to visualize show areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource, and high segregation and poverty and can help to identify areas within the community that provide good access to opportunity for residents or, conversely, provide low access to opportunity. They can also help to highlight areas where there are high levels of segregation and poverty.

The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low resource areas and areas of high segregation and poverty and to encourage better access for low and moderate income and racial/ethnic minority households to housing in high resource areas.

Regional Trend

HUD opportunity indices for Sonoma County are shown in Table E22. The White population has the highest index scores for low poverty, school proficiency, labor market engagement, and environmental health, indicating the White population Countywide is generally exposed to the most positive social and health conditions. The White population below the federal poverty line also received the highest index scores for low poverty, school proficiency, labor market engagement, and environmental health. The Black population scored the highest in transit trips and low transportation cost. The Hispanic/Latino population in Sonoma County received the lowest scores for the following indices: low poverty, school proficiency, labor market engagement. Similarly, the Black population received the lowest index score for environmental health. These index scores reveal Black and Hispanic communities in the County are more likely to experience poverty, have reduced school system quality, have lower labor market engagement, and be exposed to poorer environmental conditions.

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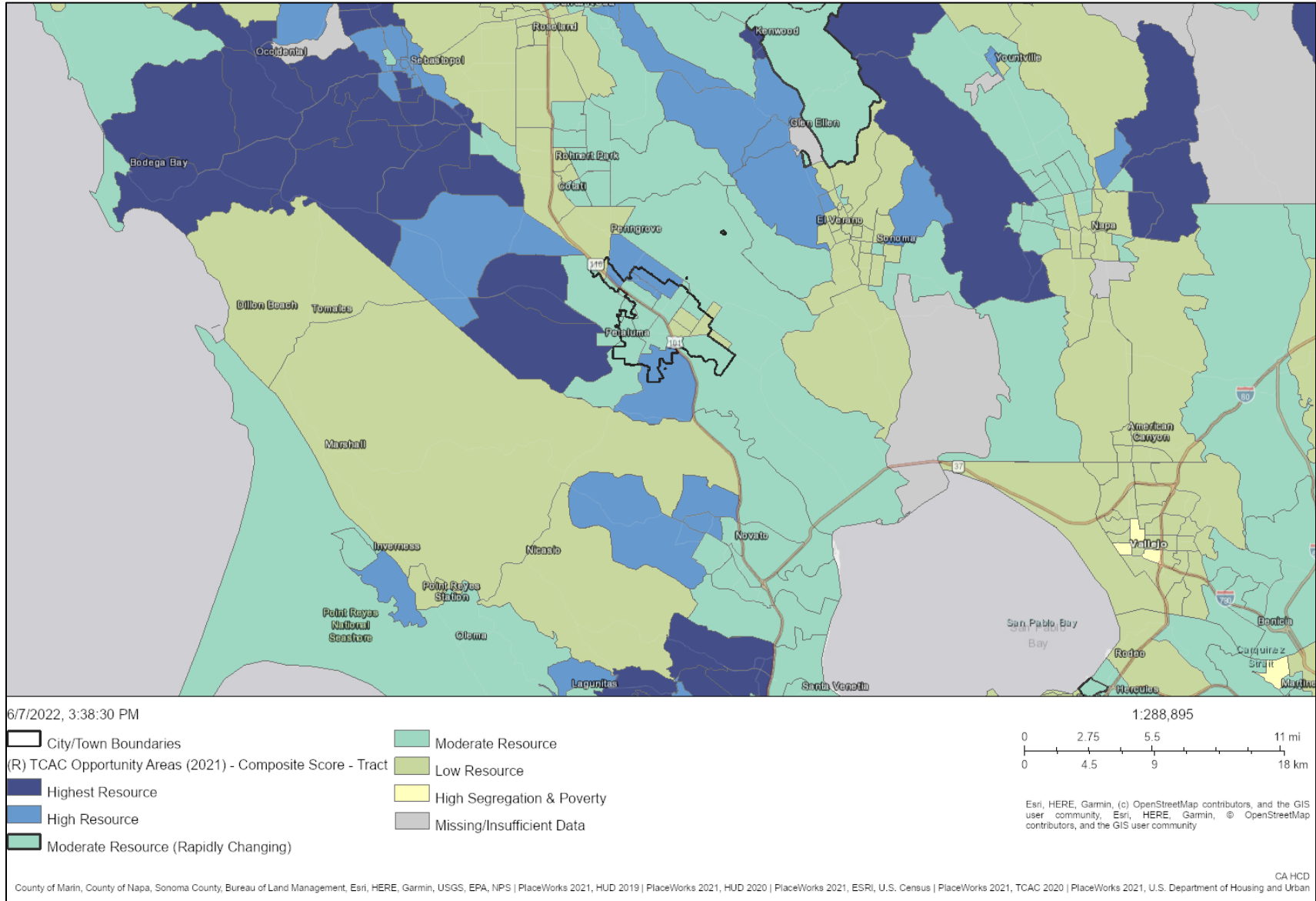
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TCAC opportunity scores by tract for the region surrounding Petaluma are shown in Figure E24. TCAC opportunity map criteria were outlined previously in Table E21. The region is comprised of a mix of tract types, including low resource, moderate resource, high resource, and highest resource areas. There are few areas of high segregation and poverty identified in the region. There are a few areas of high segregation and poverty in Napa County east of the City.

Table E22: HUD Opportunity Indicators by Race/Ethnicity and Poverty Status – Sonoma County and Petaluma (2020)

	Low Poverty	School Proficiency	Jobs Proximity	Labor Market	Transit Trips	Low Transp. Cost	Env. Health
Sonoma County							
Total Population							
White, non-Hispanic	62.07	47.64	47.34	59.91	42.18	66.17	70.22
Black, non-Hispanic	54.57	40.88	51.27	51.20	51.27	71.40	65.20
Hispanic	52.54	36.48	51.41	49.55	48.18	70.28	65.40
Asian or Pacific Islander, non-Hispanic	59.02	43.67	47.78	55.29	46.96	68.65	67.03
Native American, non-Hispanic	55.79	42.10	52.82	51.40	47.88	68.93	64.58
Population below federal poverty line							
White, non-Hispanic	55.14	42.55	50.02	54.00	46.59	69.09	68.40
Black, non-Hispanic	42.70	30.75	59.11	42.02	61.61	77.20	63.43
Hispanic	50.03	35.89	53.29	47.60	50.04	72.06	64.91
Asian or Pacific Islander, non-Hispanic	51.83	40.03	45.42	48.36	49.84	70.79	67.97
Native American, non-Hispanic	46.77	37.37	63.53	45.26	53.92	73.62	62.25
Petaluma							
Total Population							
White, non-Hispanic	65.23	56.84	38.54	68.26	22.40	66.99	84.19
Black, non-Hispanic	63.06	55.58	34.74	66.45	24.83	68.66	83.86
Hispanic	61.73	50.86	35.89	65.39	24.32	69.54	83.75
Asian or Pacific Islander, non-Hispanic	66.87	58.10	31.99	67.10	23.41	66.59	83.86
Native American, non-Hispanic	61.94	53.58	36.86	68.33	23.38	68.58	83.86
Population below federal poverty line							
White, non-Hispanic	59.76	49.60	38.28	64.71	22.32	69.05	84.02
Black, non-Hispanic	67.92	47.87	35.17	54.17	27.39	73.70	83.57
Hispanic	64.13	51.99	36.74	63.17	26.70	71.21	83.55
Asian or Pacific Islander, non-Hispanic	64.52	47.48	33.39	57.48	26.37	71.68	83.58
Native American, non-Hispanic	73.47	62.12	45.87	52.99	28.69	74.08	84.07
Source: HUD AFFH-T Data, 2020.							

Figure E24: Regional TCAC Opportunity Area Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

Local Trend

HUD opportunity index scores for Petaluma are presented alongside the County scores in Table E22. Unlike the County, the Asian/Pacific Islander population in Petaluma scored the highest in including low poverty and school proficiency. The White population received the highest index scores for school proficiency, jobs proximity, and environmental health. Like the County, the Black and Hispanic populations in the City tended to score lower in most HUD opportunity indices including low poverty, school proficiency, labor market engagement, and environmental health. In general, all racial/ethnic populations in Petaluma have higher scores across the opportunity indicators compared to the populations Countywide.

TCAC Opportunity Map scores for Petaluma tracts are shown in Table E23 and Figure E26. A majority of tracts in the City are categorized as moderate resource areas. Two tracts in the northwestern corner of the City located in the College neighborhood, and one tract in the southern area of the City, Western neighborhood, are considered high resource tracts. There are three low resource tracts on the eastern side of the City in the Adobe neighborhood. The northernmost corner of the City is also considered a low resource area; however, this tract is mostly a reflection of the population north of Petaluma, not of Petaluma residents alone. As discussed previously, the Adobe neighborhood contains block groups with higher concentrations of racial/ethnic minority populations compared to the rest of the City (see Figure E5). The distribution of racial/ethnic groups by TCAC opportunity area are further described below.

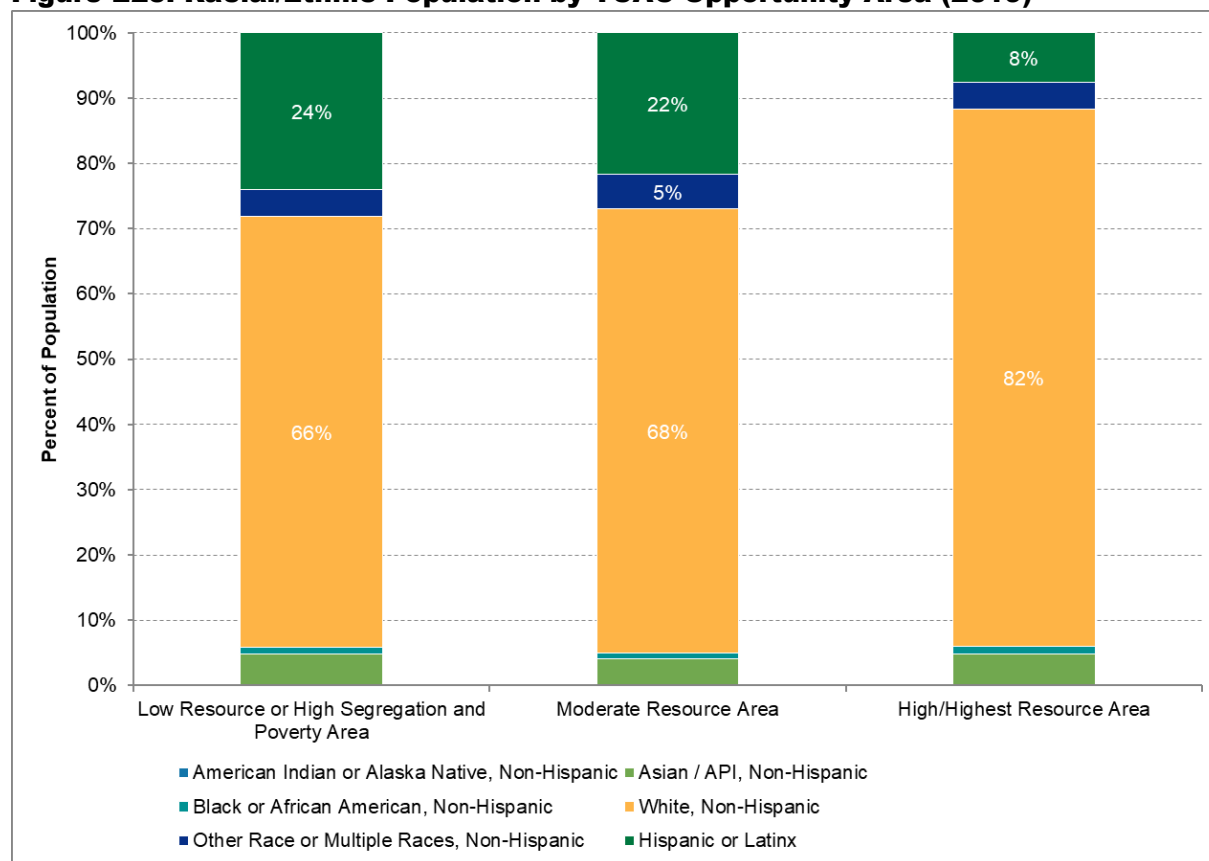
Table E23: TCAC Opportunity Area Scores by Tract (2021)

Census Tract	Economic Score	Environmental Score	Education Score	Composite Score	Final Category
6097150601	0.221	0.051	0.356	-0.508	Low Resource
6097150602	0.38	0.111	0.356	-0.303	Low Resource
6097150603	0.228	0.514	0.436	-0.212	Moderate Resource
6097150607	0.370	0.852	0.777	0.284	High Resource
6097150609	0.175	0.682	0.777	0.090	Moderate Resource
6097150610	0.249	0.869	0.777	0.197	High Resource
6097150611	0.521	0.001	0.421	-0.928	Low Resource
6097150612	0.390	0.072	0.458	-0.249	Moderate Resource
6097150701	0.185	0.206	0.738	-0.059	Moderate Resource
6097150702	0.472	0.39	0.738	0.227	High Resource
6097150800	0.284	0.859	0.621	0.090	Moderate Resource
6097150901	0.210	0.444	0.658	-0.034	Moderate Resource
6097150902	0.366	0.684	0.554	0.047	Moderate Resource
6097151000	0.254	0.840	0.48	-0.070	Moderate Resource
6097151201	0.098	0.428	0.33	-0.466	Low Resource

Source: UC Berkeley – TCAC Opportunity Area Scores by Tract. 2021

A larger proportion of White residents reside in high resource tracts (Figure E25). Approximately 82 percent of persons residing in high resource tracts are White, while only 66 percent of persons in low resource tracts and 68 percent of persons in moderate resource tracts are White. Conversely, a significantly larger proportion of persons residing in low resource (24%) and moderate resource (22%) are Hispanic. Only 8 percent of the population residing in high resource areas are Hispanic.

Figure E25: Racial/Ethnic Population by TCAC Opportunity Area (2019)



Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates) and TCAC/HCD Opportunity Maps, 2020), 2021.

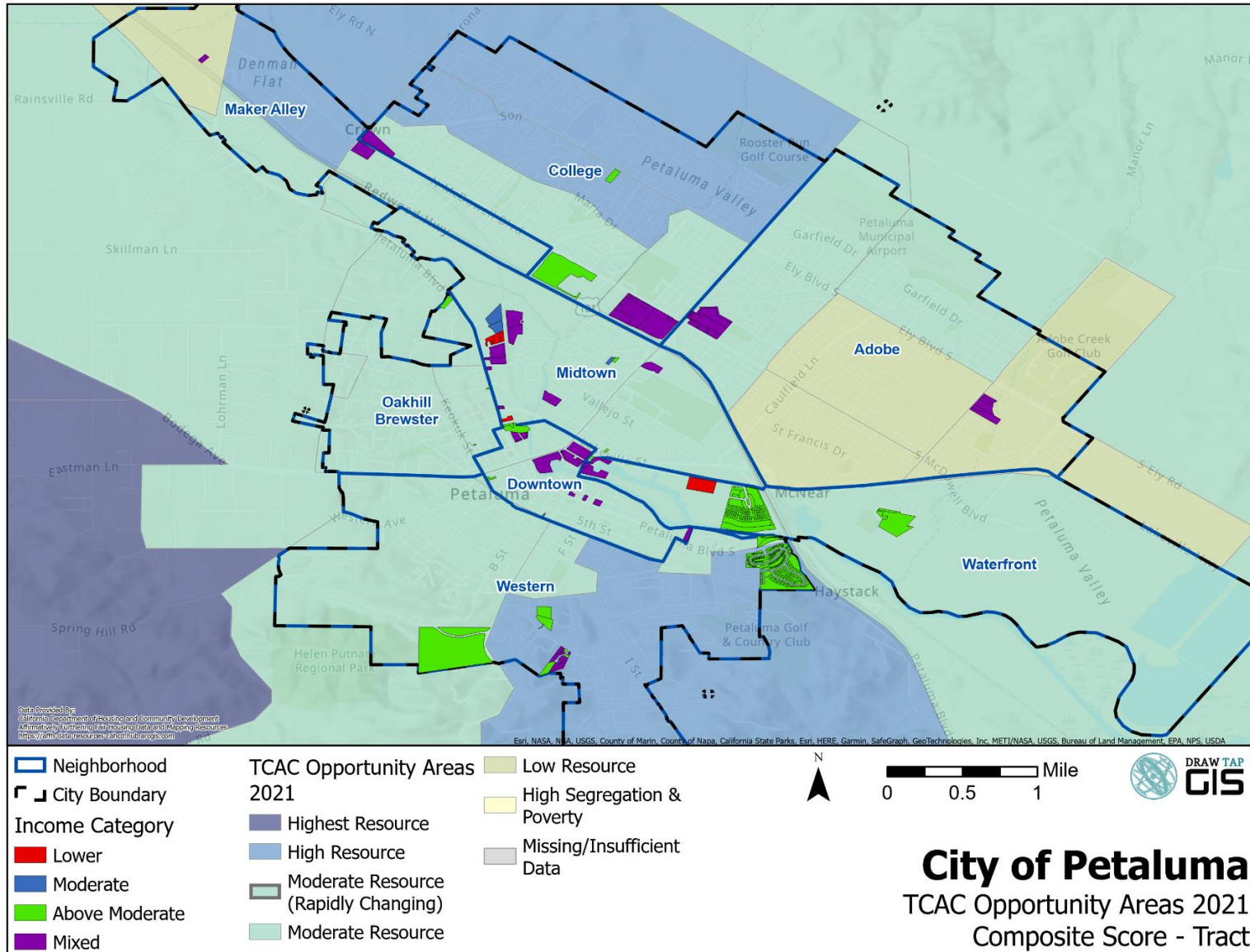
Sites Inventory

Sites selected to meet the RHNA and TCAC Opportunity Map scores by tract are presented in Figure E26. Table E24 shows the distribution of RHNA units by income allocation and TCAC Opportunity Area score. Consistent with the citywide trend, most RHNA units (86.3%) are located in moderate resource tracts. Of the remaining units, 4.8 percent are in low resource tracts and 8.9 percent are in high resource tracts. The City’s RHNA strategy places a larger proportion of lower income units in low resource tracts (7.9%) compared to moderate (1.2%) and above moderate income units (74.3%). It is important to note that there are 82 above moderate income units, 6 moderate income units, and 68 lower income units allocated in low resource tracts. Lower income units alone are not allocated in tracts with this designation. The distribution of RHNA units is generally consistent with the trend Citywide, where a majority of tracts are considered moderate resource areas.

Table E24: Distribution of RHNA Units by TCAC Opportunity Area

TCAC Opportunity Area Category (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
High Resource	18	2.1%	0	0.0%	272	14.4%	290	8.9%
Moderate Resource	777	90.0%	496	98.8%	1541	81.3%	2814	86.3%
Low Resource	68	7.9%	6	1.2%	82	4.3%	156	4.8%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E26: Sites Inventory and TCAC Opportunity Area Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data) and Veronica Tam & Associates, 2022.

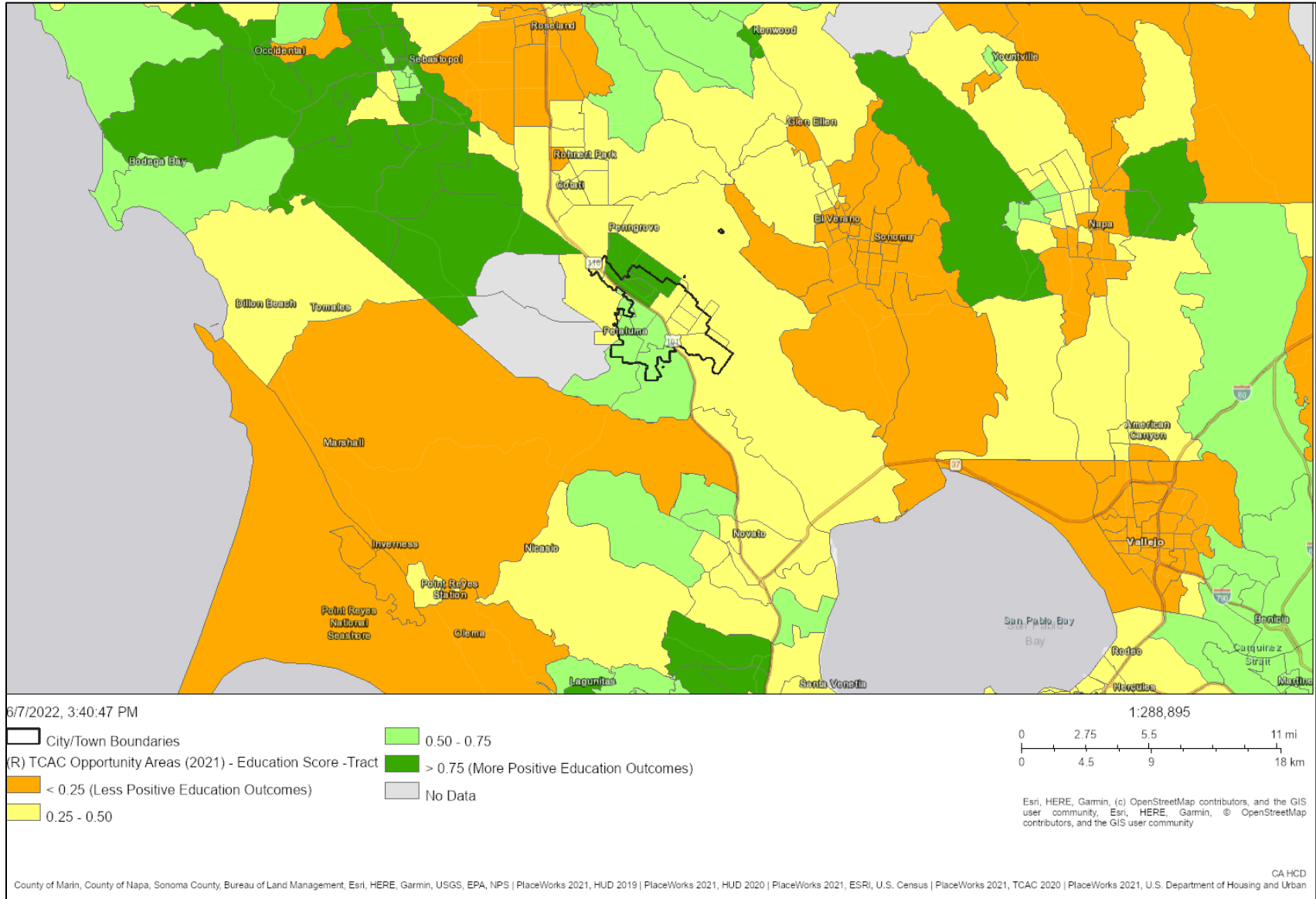
Education

Regional Trend

The Sonoma County Office of Education (SCOE) oversees 40 school districts Countywide. Petaluma City Schools is the school district overseeing the Petaluma Joint Union High District and the Petaluma City Elementary district. As discussed previously, HUD opportunity indicator scores for Sonoma County show that White populations Countywide have the best access to higher quality schools, followed by the Asian/Pacific Islander population, and Native American population. The Black and Hispanic populations have the worst school system quality compared to other racial/ethnic groups.

TCAC education scores are determined using the following variables: math proficiency, reading proficiency, high school graduation rates, and student poverty rates. TCAC education scores for the region are shown in Figure E27. Most tracts in the region have education scores of 0.50 or below. There are smaller areas with tracts scoring in the highest quartile in Petaluma, Sonoma County northwest of the City, Sonoma and Napa counties east of the City, and Marin County south of the City. TCAC education scores for the City are generally higher compared to adjacent jurisdictions.

Figure E27: Regional TCAC Education Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

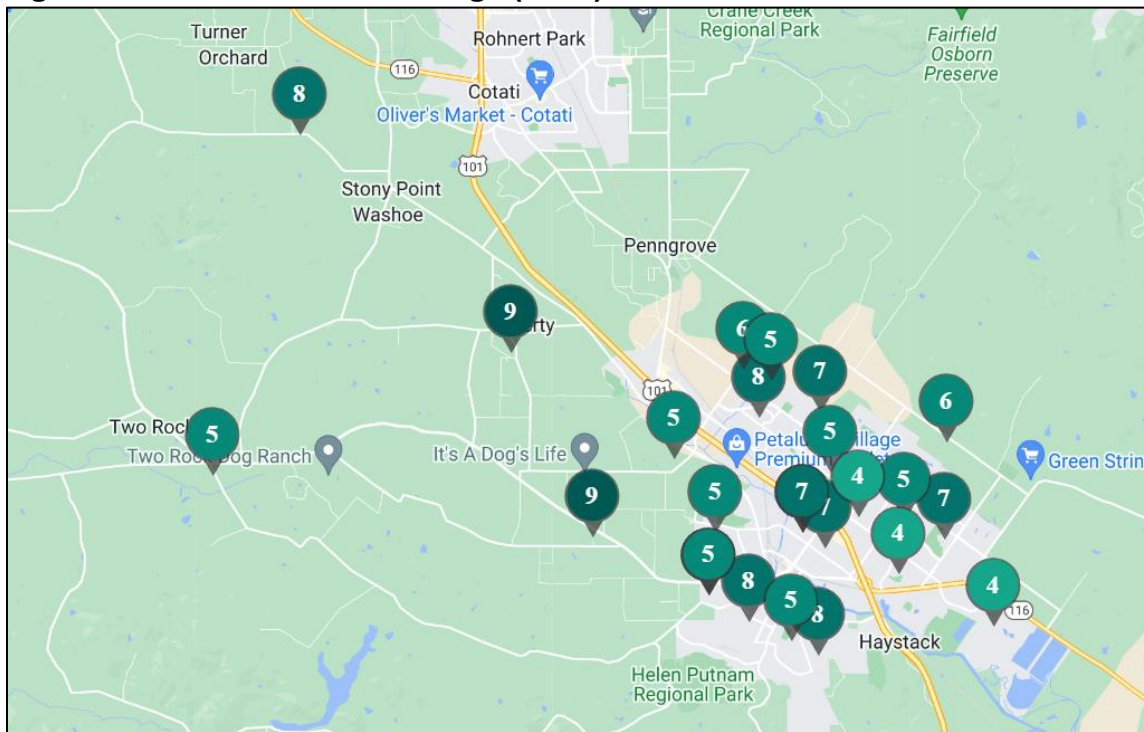
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Local Trend

Greatschools.org is a non-profit organization that rates schools across the States. The Great Schools Summary Rating calculation is based on four ratings: the Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average,” 5-6 “average.” and 7-10 “above average.” Figure E28 shows that Petaluma schools have Great School Ratings ranging from 4 to 9. A majority of schools fall into the 5 to 6 range, indicating most schools in the City are considered average.

Figure E28: Great Schools Ratings (2022)

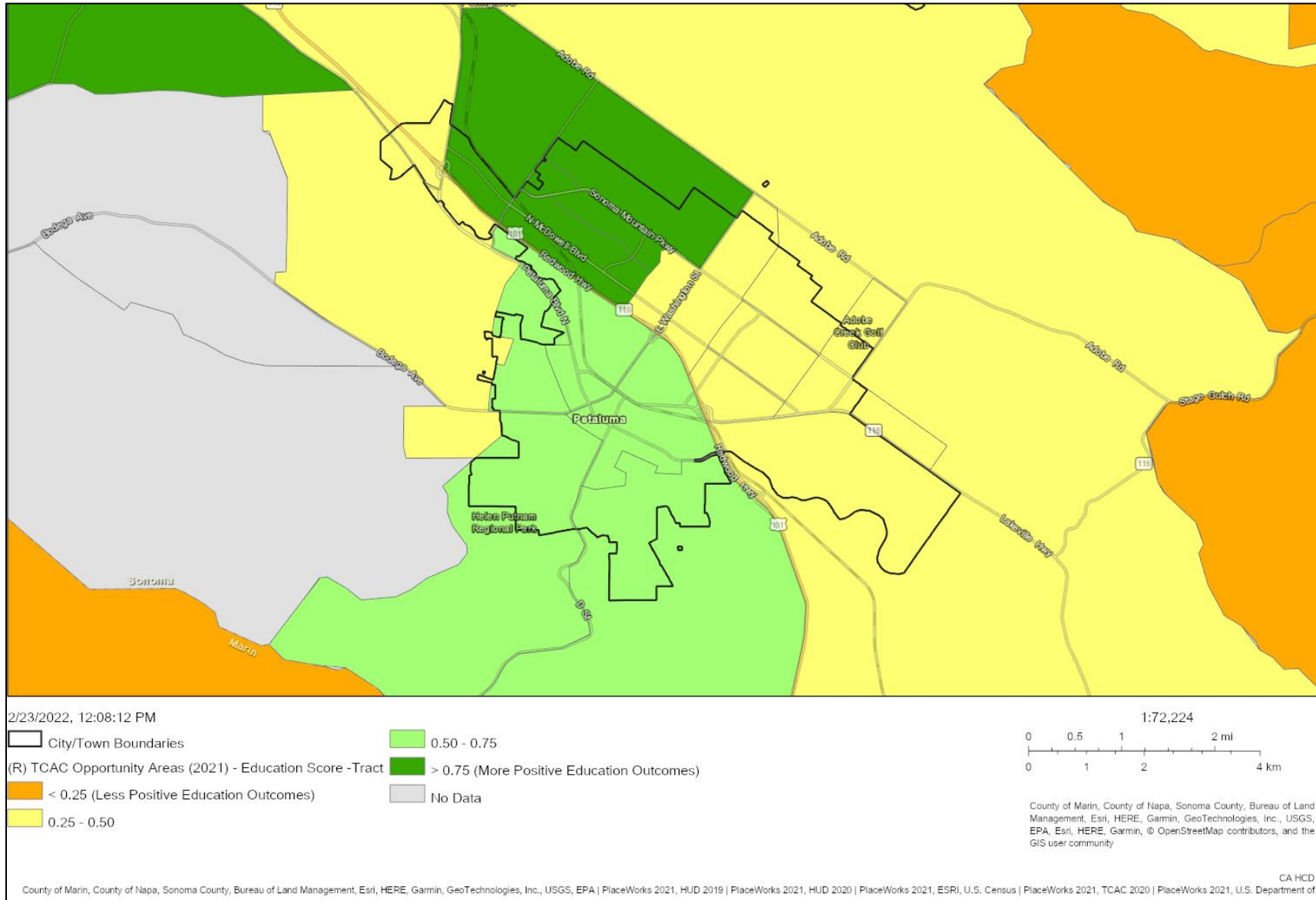


Source: GreatSchools.org, GreatSchools Rating – Petaluma, CA, 2022.

HUD Opportunity Indicators for Petaluma were shown previously in Table E22. School proficiency index scores for all Petaluma populations regardless of race or ethnicity are higher than for populations Countywide. Unlike the County, the Asian/Pacific Islander population in Petaluma received the highest school proficiency index score, followed by the White population, and Black population. The Hispanic and Native American populations scored the lowest in school proficiency.

Figure E29 shows TCAC education scores by tract for the City of Petaluma. The northernmost areas, Maker Alley and College neighborhoods, received TCAC education scores in the highest quartile. The southern areas, Midtown, Downtown, Oakhill Brewster, and Western neighborhoods, received scores between 0.50 and 0.75, and the eastern side of the City, Adobe and Waterfront neighborhoods, received the lowest scores in the City between 0.25 and 0.50.

Figure E29: TCAC Education Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

Transportation

Regional Trend

This section uses the following HUD Opportunity Indicator scores to analyze regional transportation opportunities: jobs proximity index, transit trips index, and transportation cost index. HUD's opportunity indicators can provide a picture of transit use and access in Sonoma County through the transit index¹¹ and low transportation cost index.¹² Index values can range from zero to 100 and are reported by race so that differences in access to transportation can be evaluated based on racial or ethnic background. Index values for the County were shown previously in Table E22. As presented in Table E22 previously, in the County, the Black population was most likely to utilize public transit and have the lowest transportation costs. Conversely, the White population is the least likely to use public transportation and have the highest transportation costs.

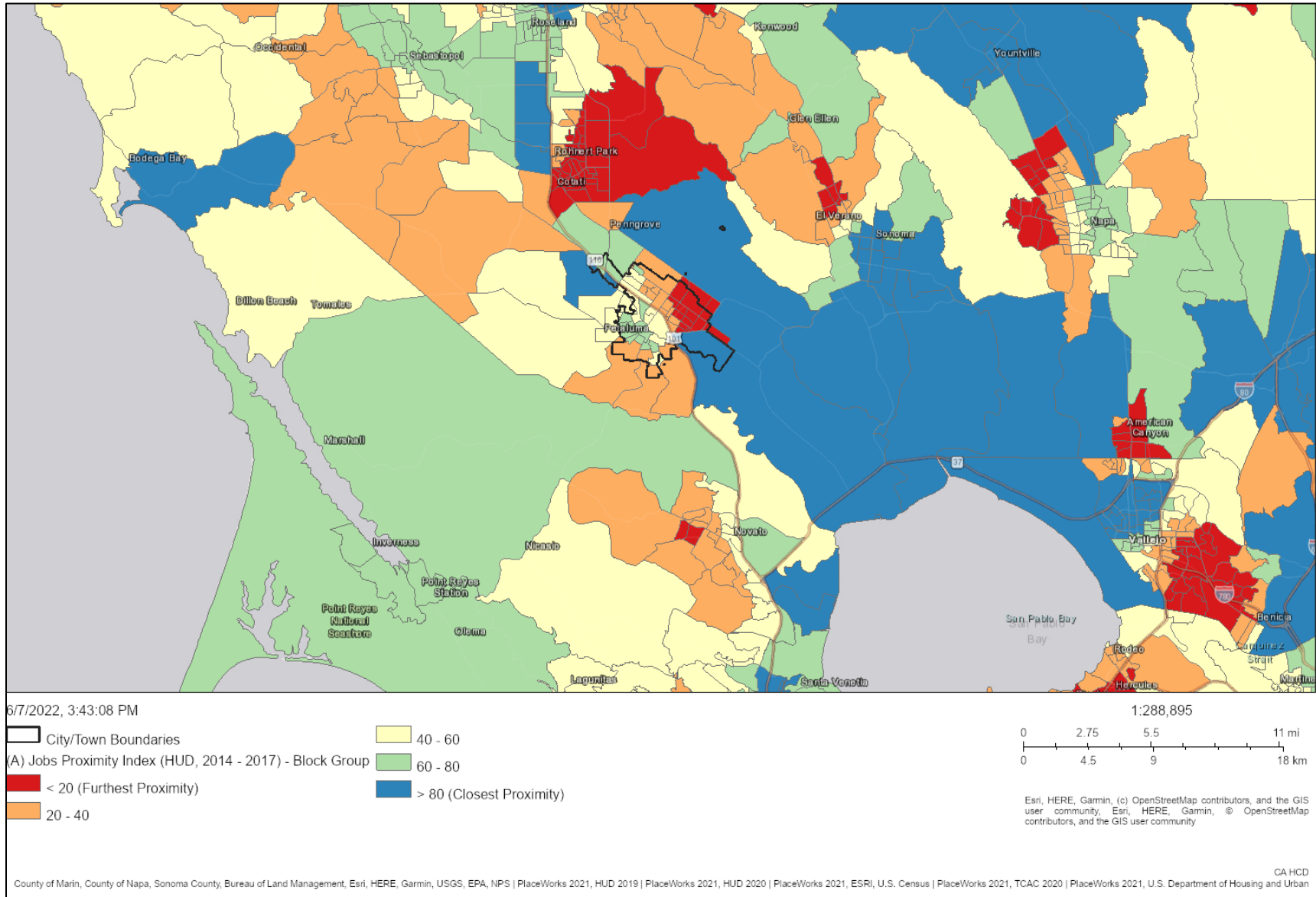
The jobs proximity index can also be used to analyze transportation accessibility, as well as economic opportunity. Access to economic opportunities are discussed further in the following section of this Assessment of Fair Housing. In the County, the Native American population has the highest jobs proximity index of 52.8, followed by the Hispanic population (51.4), and Black population (51.3). The White (47.3) and Asian/Pacific Islander (47.8) populations received the lowest jobs proximity index scores. Jobs proximity index scores are also shown by block group for the region in Figure E30. Generally, areas east of the City tend to have higher jobs proximity index scores. West of Petaluma, most block groups have jobs proximity index scores ranging from 20 to 60. Jobs proximity scores for Petaluma block groups are generally consistent with the region; however, there is one group of block groups in the City with jobs proximity index scores below 20 (worst scores).

AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), Sonoma County has an AllTransit Performance Score of 3.4 (out of 10). The map in Figure E31 shows that only the areas directly adjacent to major highways have high transit scores. According to AllTransit, in the County, 74.4 percent of jobs are located within ½ mile of transit and 75.4 percent workers live within ½ mile of transit. Further, 72.3 percent of households are within a ½ mile of transit including 100 percent of Low Income Housing Tax Credit (LIHTC) buildings totaling 5,588 units.

¹¹ Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.

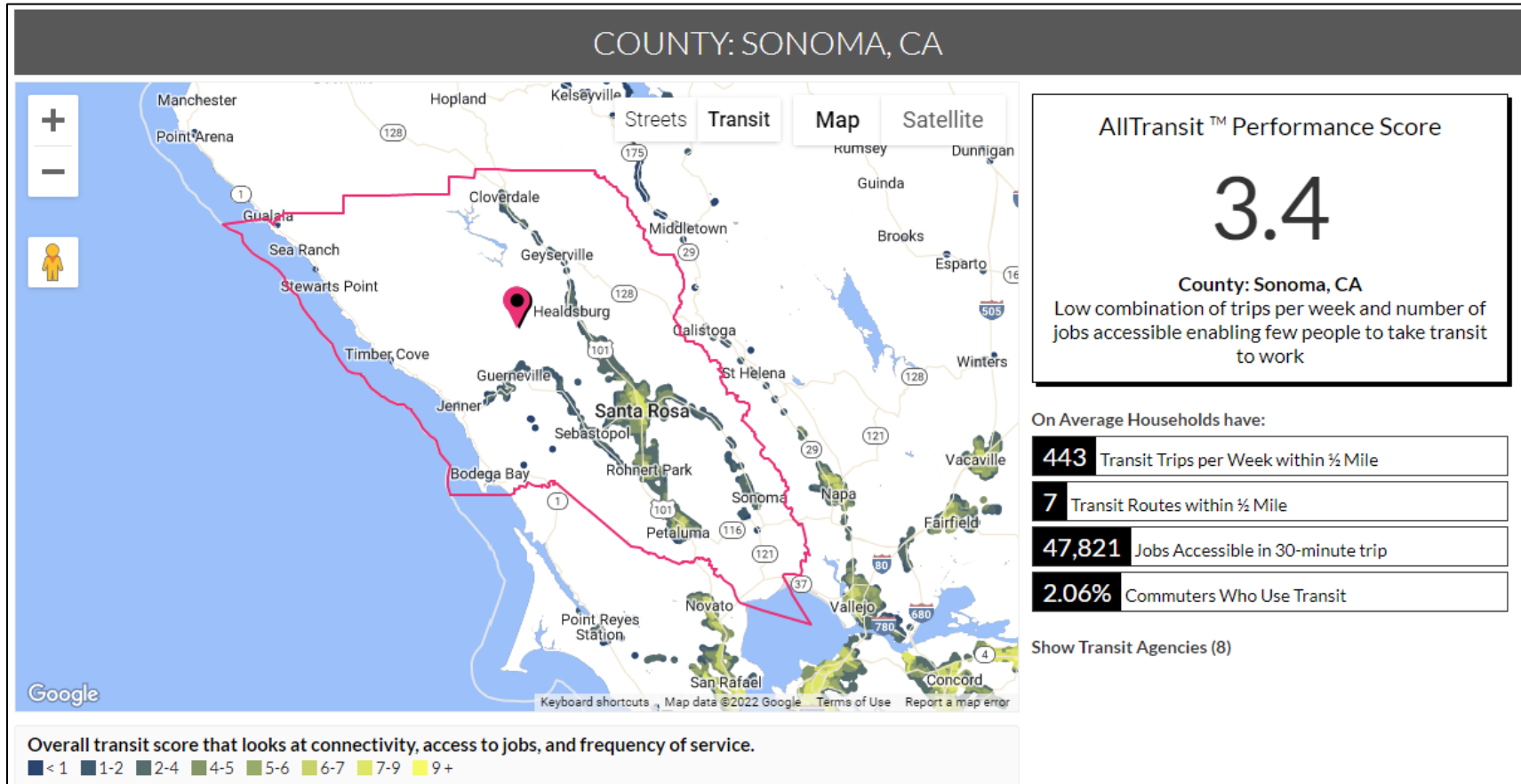
¹² Low Transportation Cost Index: This index is based on estimates of transportation costs for a family that meets the following description: A 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.

Figure E30: Regional HUD Jobs Proximity Score by Block Group (2017)



Source: HCD AFFH Data Viewer (based on 2014-2017 HUD data), 2022.

Figure E31: Sonoma County All Transit Performance Score and Map (2019)



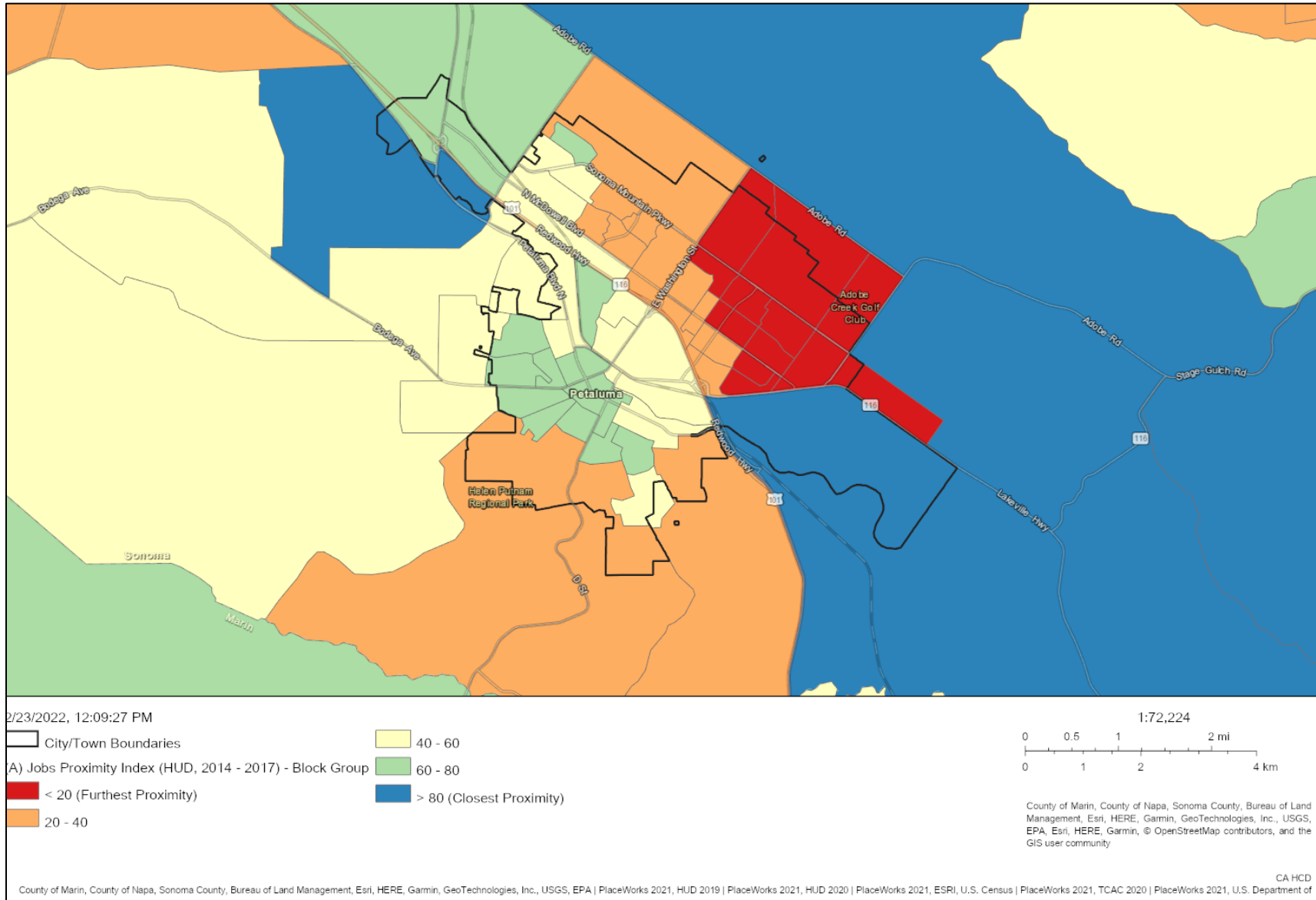
Source: AllTransit Performance Score – Sonoma County, CA 2019, 2022.

Local Trend

HUD Opportunity Indicator scores for Petaluma are presented in Table E22 above. Compared to the County, Petaluma residents regardless of race or ethnicity are less likely to utilize public transportation and more likely to have high transportation costs. Black residents in Petaluma are most likely to utilize public transit, while White residents are least likely. Hispanic residents have the lowest transportation costs.

Jobs proximity index scores for Petaluma residents are also lower than populations Countywide. In the City, the White population received the highest jobs proximity index score while the Asia/Pacific Islander population was least likely to be located close to employment opportunities. Jobs proximity index scores by block group are shown for the City in Figure E32. Block groups in the City have variable jobs proximity index scores. The northeastern area of the City, Adobe neighborhood, has the lowest scores (<20), while the Waterfront neighborhood has the highest scores (>80). Parts of the Adobe neighborhood, College neighborhood, and Western neighborhood also have lower scores ranging from 20 to 40. The central and northern areas of the City, Midtown, Downtown, Oakhill Brewster Maker Alley neighborhoods, contain block groups with moderate jobs proximity index scores ranging from 40 to 80.

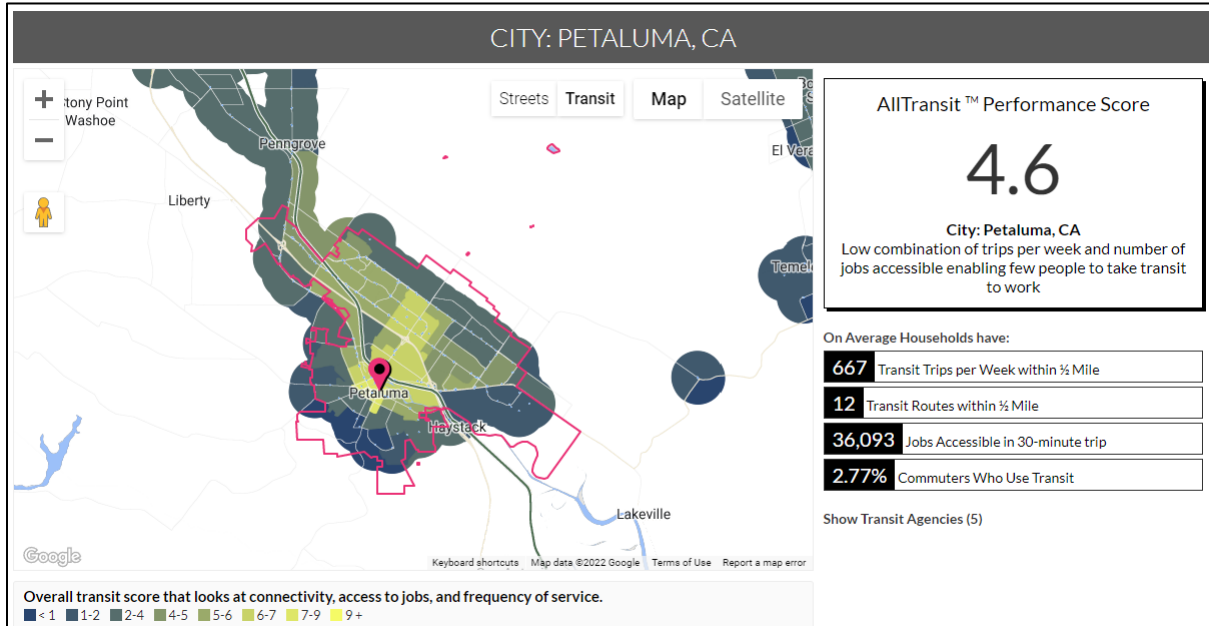
Figure E32: HUD Jobs Proximity Score by Block Group (2017)



Source: HCD AFFH Data Viewer (based on 2014-2017 HUD data), 2022.

Petaluma received an AllTransit Performance Score of 4.6, higher than 3.4 Countywide. As shown in Figure E33, the central areas of the City have better access to transit compared to the areas along the City boundaries. According to AllTransit, 94.6 percent of jobs are located within a ½ mile of transit and 93.9 percent of workers live within a ½ mile of transit, a significantly larger proportion than throughout Sonoma County. Approximately 94 percent of households live within a ½ mile of transit including 100 percent of LIHTC buildings.

Figure E33: Petaluma All Transit Performance Score and Map (2019)



Source: AllTransit Performance Score – Petaluma, CA 2019, 2022.

Economic

Regional Trend

HUD provides values for labor market index¹³ and jobs proximity index¹⁴ that can be used to measure for economic development in Sonoma County. Like other HUD opportunity indicators, scores range from 0 to 100 and are published by race and poverty level to identify differences in the relevant “opportunity” (in this case economic opportunity). The labor market index value is based on the level of employment, labor force participation, and educational attainment in a census tract- a higher score means higher labor force participation and human capital in a neighborhood. The jobs proximity index for Sonoma County is described in detail in the previous section, *Transportation*.

¹³ Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.

¹⁴ Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

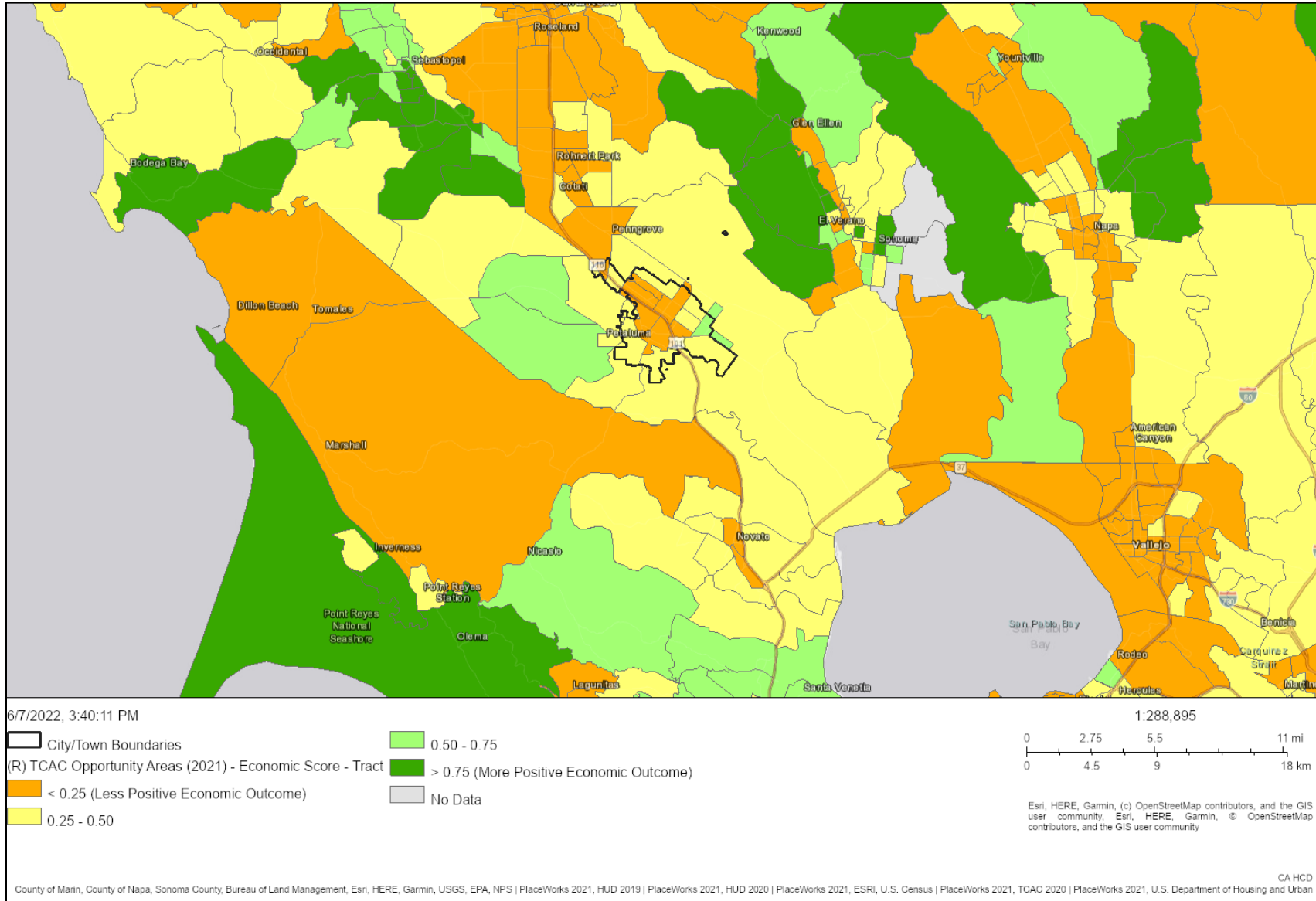
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In the County, the White population received the highest labor market engagement index score (59.9), followed by the Asian/Pacific Islander population (55.3), and Native American population (51.4) (see Table E22). The Black (51.2) and Hispanic (49.6) populations scored the lowest in labor market engagement.

TCAC economic scores are determined using the following variables: poverty, adult education, employment, job proximity, and median home value. TCAC economic scores are shown by tract in the region in Figure E34. Most tracts in Petaluma and the areas surrounding the City scored below 0.50 for economic opportunities. There are some tracts, north of the City in Sonoma and Napa County and south of the City in Marin County, that scored in the highest quartile. TCAC economic scores for Petaluma tracts are generally consistent with the surrounding areas.

Figure E34: Regional TCAC Economic Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

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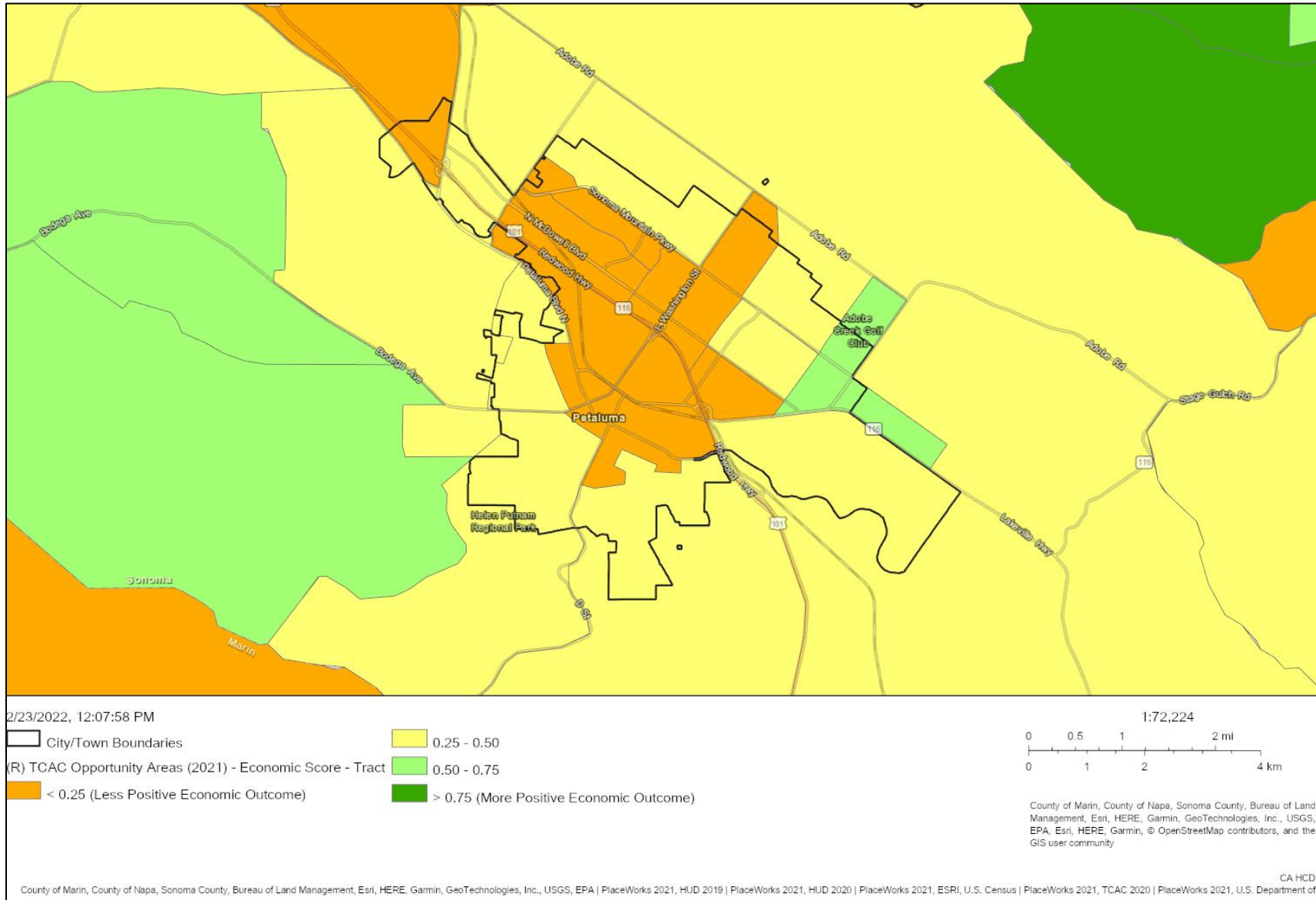
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Local Trend

HUD Opportunity Indicator scores for Petaluma show that populations in the City have higher labor market engagement compared to the County, regardless of race (see Table E22). In the City, the Native American (68.3), White (68.3), and Asian/Pacific Islander (67.1) populations have the most labor market engagement. Like the County, the Black (66.5) and Hispanic (65.4) populations scored the lowest in labor market engagement.

TCAC economic scores are determined using the following variables: poverty, adult education, employment, job proximity, and median home value. TCAC economic scores by tract are shown for Petaluma in Figure E35; most tracts in the City scored below 0.50. There is one area in southeast corner of the City in the Adobe neighborhood where the TCAC economic score exceeds 0.50. The central areas of the City (Downtown, Midtown, College, and Adobe neighborhoods) tend to have lower TCAC economic scores compared to tracts along the City boundaries. In general, this area of the City also has higher concentrations of racial/ethnic minority groups, persons with disabilities, and children residing in single-parent female-headed households (see Figure E5, Figure E10, and Figure E15). As shown in Figure E32 previously, block groups in the central area of the City received moderate jobs proximity index scores; however, block groups in the center of the City generally scored better in employment access compared to the tracts along the perimeter.

Figure E35: TCAC Economic Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

Environmental

Regional Trend

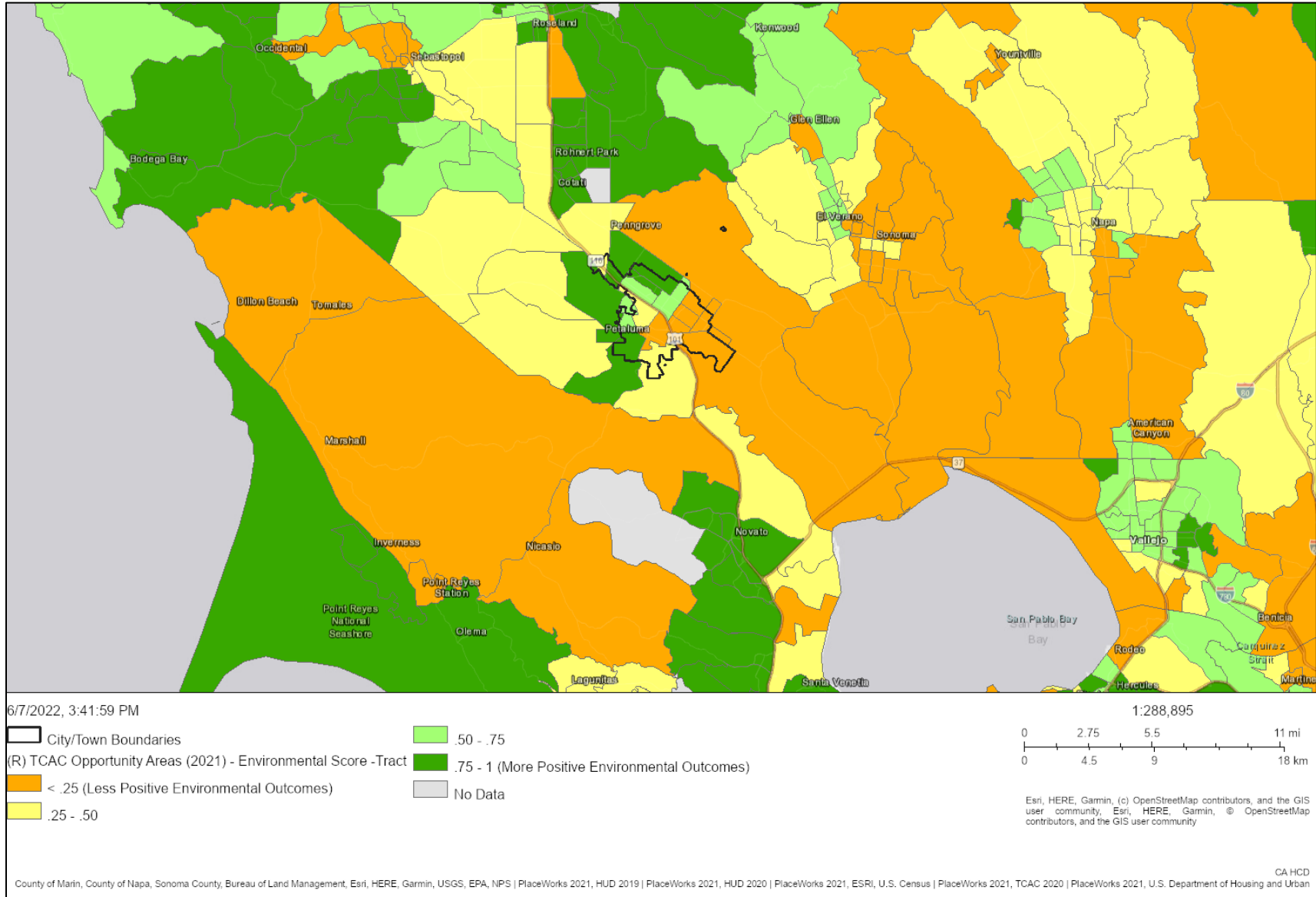
Environmental conditions residents live in can be affected by past and current land uses like landfills or proximity to highways. The TCAC Environmental Score shown in Figure E36 is based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. TCAC Environmental Scores range from 0 to 1, where higher scores indicate a more positive environmental outcome (better environmental quality).

Tracts scoring in the lowest quartile for environmental quality are prevalent throughout the region, specifically in Marin County west of the City and unincorporated Sonoma County east of the City. Tracts with scores of 0.50 and above are generally concentrated in northern Sonoma County, however environmental scores in this region are variable. TCAC environmental scores for Petaluma tracts are also variable and are generally consistent with surrounding jurisdictions.

Figure E36 shows the TCAC Environmental Score based on CalEnviroScreen 3.0. However, the Office of Environmental Health Hazard Assessment released updated scores in October 2021 (CalEnviroScreen 4.0). The CalEnviroScreen 4.0 scores in Figure E37 are based on percentiles and show environmental conditions are above average (30th percentile or lower). Tracts along the 101 Highway from Petaluma to Santa Rosa have worse environmental conditions. Tracts east of the City in Napa Valley and surrounding Vallejo also have lower CalEnviroScreen 4.0 percentile scores. Petaluma tracts have worse environmental conditions compared to the unincorporated County areas directly east and west. However, scores in Petaluma are generally consistent with jurisdictions to the north along the 101 Highway.

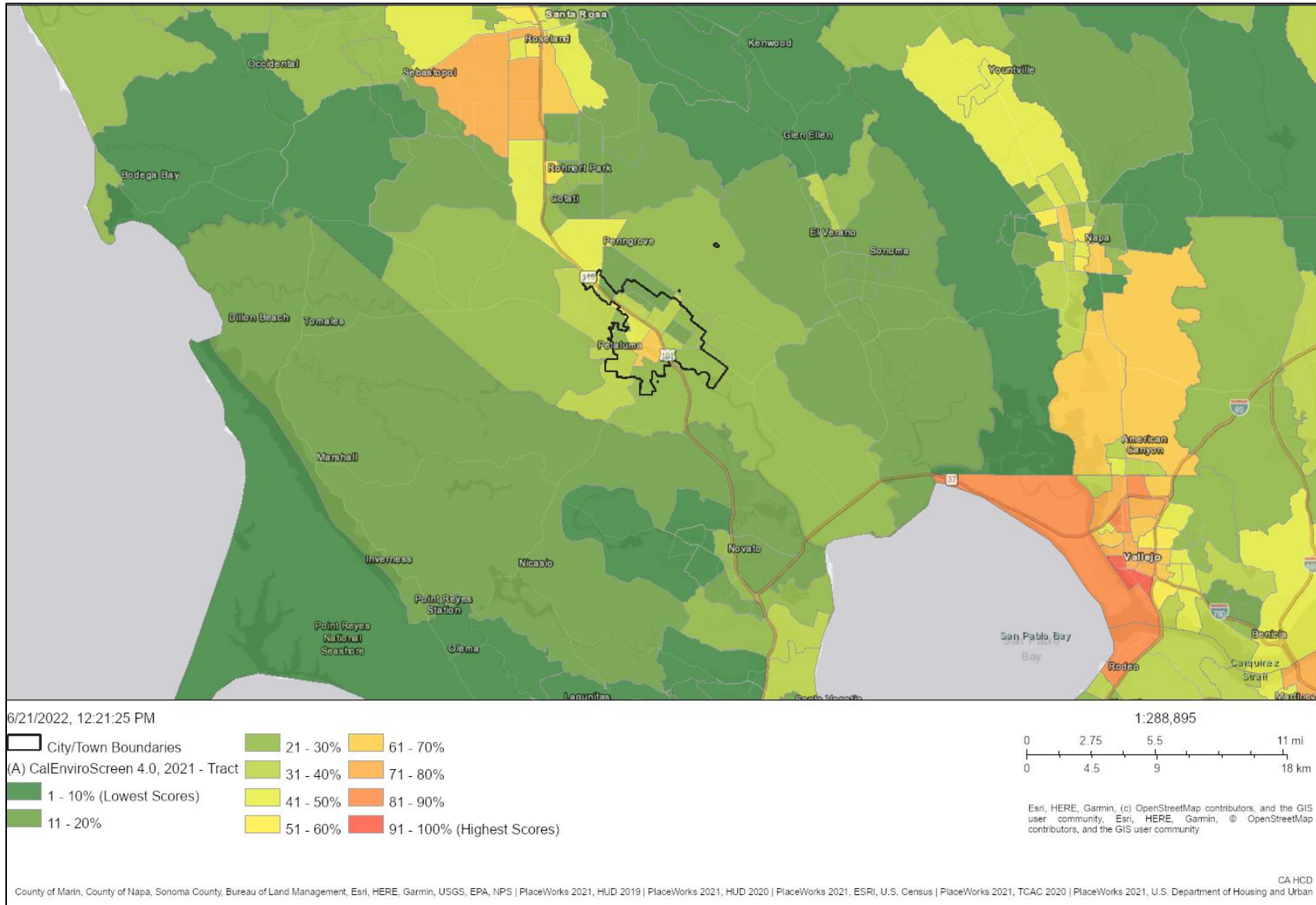
HUD's opportunity index for "environmental health" summarizes potential exposure to harmful toxins at a neighborhood level. Index values range from 0 to 100 and the higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group. In Sonoma County, environmental health index values range from 64.6 for the Native American population to 70.2 for the White population (see Table E22). For the population below the poverty level, index scores range from 63.4 for the Black population to 68.4 for the White population. Environmental scores for all populations below the poverty line are lower compared to the respective racial/ethnic populations as a whole, except for the Asian/Pacific Islander population.

Figure E36: Regional TCAC Environmental Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

Figure E37:Regional CalEnviroScreen 4.0 Percentile Scores by Tract (2021)

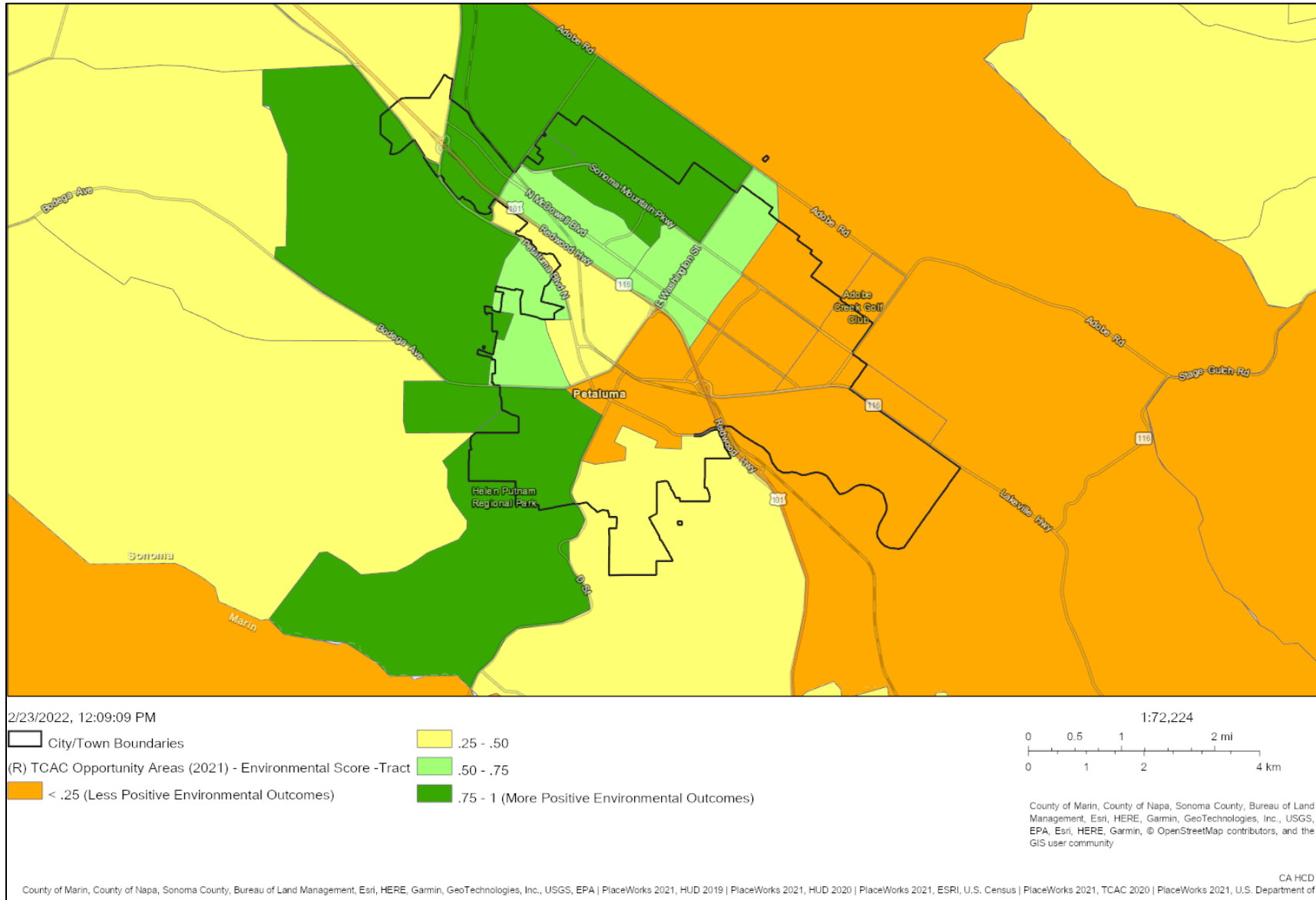


Source: HCD AFFH Data Viewer (based on 2021 OEHA CalEnviroScreen 4.0 data), 2022.

Local Trend

TCAC environmental scores based on OEHHA's CalEnviroScreen 3.0 show that the southern areas of the City, including Waterfront neighborhood and parts of the Adobe, Midtown, Downtown, and Western neighborhoods, scored the in the lowest quartile for environmental conditions (Figure E38). Conversely, the northern section of the City, College, Maker Alley, Oakhill Brewster neighborhoods, and part of the Western neighborhood, scored above 0.50. TCAC environmental scores in this area are higher than adjacent tracts in unincorporated Sonoma County. Three tracts scoring in the lowest quartile are considered low resource areas (see Figure E26).

Figure E38: TCAC Environmental Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 TCAC data), 2022.

CalEnviroScreen 4.0 percentile scores differ from TCAC environmental scores in Petaluma (Figure E39). The updated CalEnviroScreen 4.0 map shows that tracts in the center of the City, Downtown/Midtown area, have the worst environmental conditions. Most tracts in the City scored within the 30th percentile, indicating environmental conditions in these areas are adequate. The Midtown and Downtown neighborhoods also have higher concentrations of non-White populations and children residing in single-parent female-headed households (see Figure E5 and Figure E15).

HUD Opportunity Indicators for Petaluma populations are presented in Table E22 above. Environmental health scores for all racial/ethnic groups in the City are higher than the Countywide scores. Environmental health scores range from 83.8 for the Hispanic population to 84.2 for the White population. For the population below the federal poverty level, environmental health indices range from 83.6 for the Hispanic population to 84.1 for the Native American population. Environmental health index scores for the total population and population below the poverty level are comparable in Petaluma.

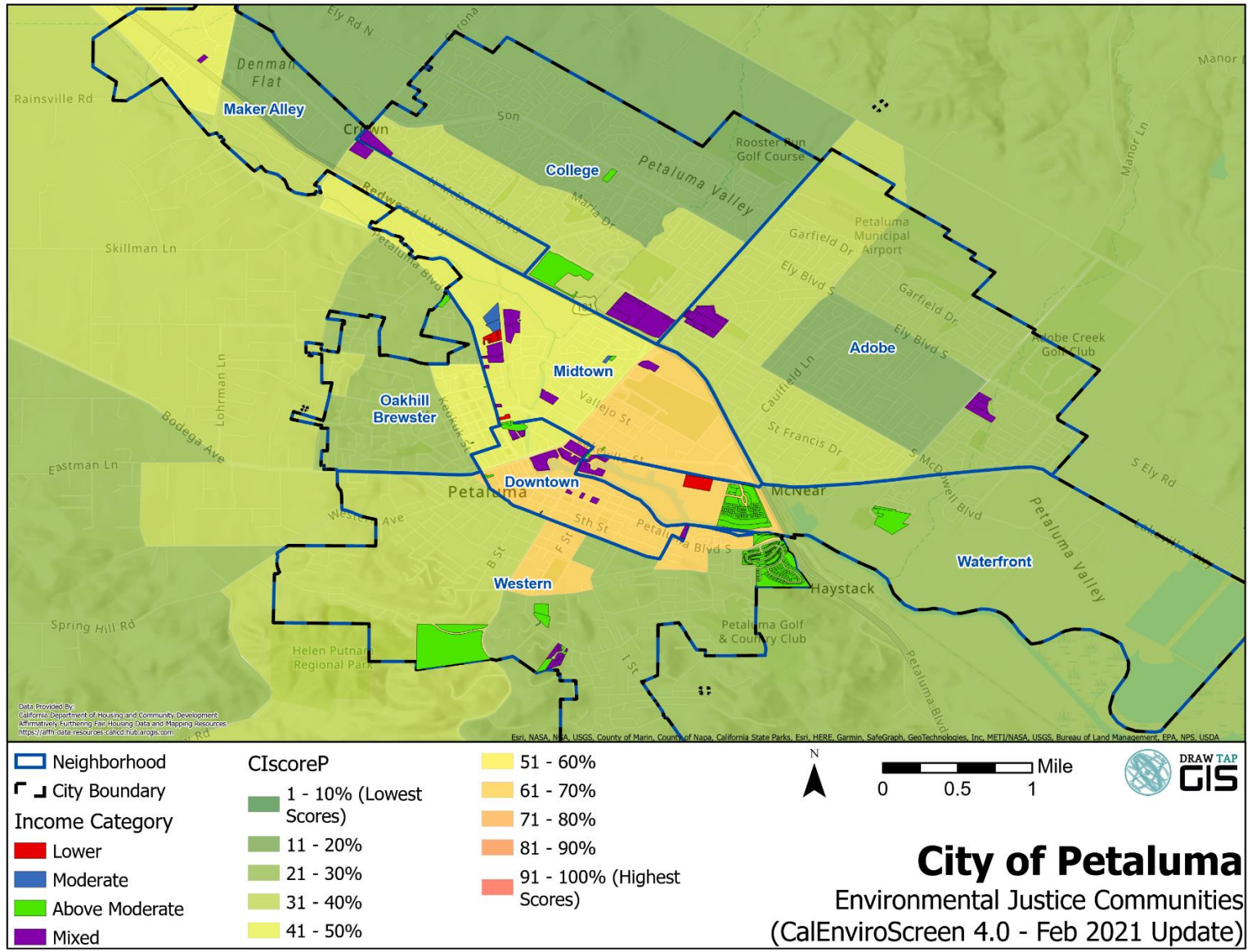
Sites Inventory

The distribution of units selected to meet the RHNA by CalEnviroScreen 4.0 percentile score are presented in Table E25 and Figure E39. Nealy 46 percent of units are in the tract with the lowest CalEnviroScreen 4.0 score. It is important to note that this tract received a score of 60.6 and is not at the higher end of the range presented. Three percent of lower income units, 1.2 percent of moderate income units, and 33 percent of above moderate income units are in tracts scoring within the 30th percentile (best scores). Although 60 percent of lower income units are in the lowest scoring tract, the City also allocates 62.5 percent of moderate income units and 35 percent of above moderate income units in this section of the City. The City’s RHNA strategy includes a mix of unit types located throughout the City and does not concentrate units of a single income level in any area. There are also several mixed income sites that include both lower and above moderate income units in areas with better CalEnviroScreen 4.0 scores, ensuring units of all income levels are allocated in tracts with variable scores.

Table E25: Distribution of RHNA Units by CalEnviroScreen 4.0 Percentile Score

CalEnviroScreen 4.0 Score (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
11-20%	0	0.0%	0	0.0%	11	0.6%	11	0.3%
21-30%	26	3.0%	6	1.2%	614	32.4%	646	19.8%
31-40%	123	14.3%	81	16.1%	273	14.4%	477	14.6%
41-50%	195	22.6%	101	20.1%	334	17.6%	630	19.3%
51-60%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
61-70%	519	60.1%	314	62.5%	663	35.0%	1496	45.9%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E39: Sites Inventory and CalEnviroScreen 4.0 Score by Tract (2021)



Source: HCD AFFH Data Viewer (based on 2021 OEHHA CalEnviroScreen 4.0 data) and Veronica Tam & Associates, 2022.

Disproportionate Housing Needs

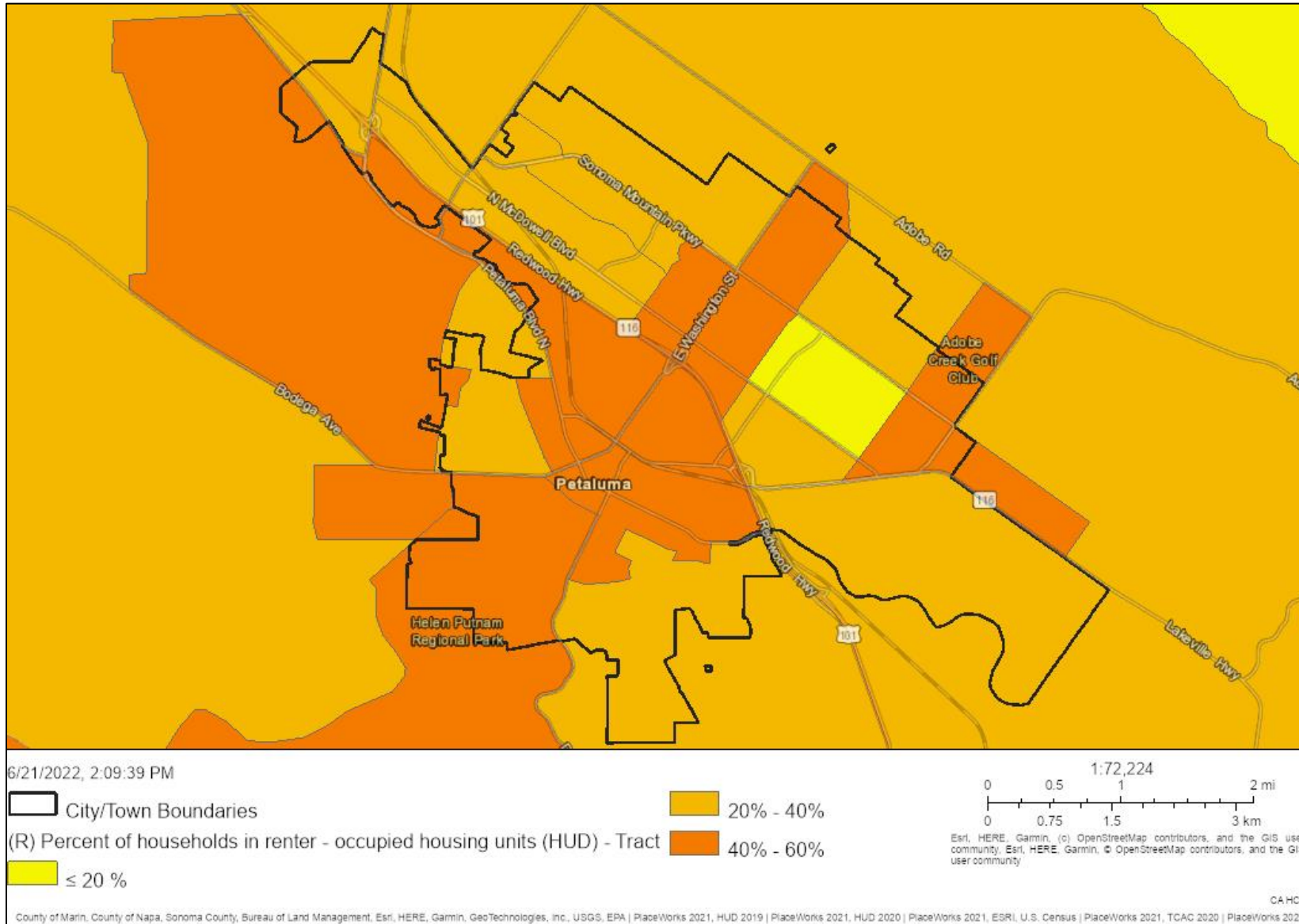
The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, overcrowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and
- Units with physical defects (lacking complete kitchen or bathroom)

According to CHAS data based on the 2013-2017 ACS, 41.7 percent of Sonoma County households experience housing problems, compared to only 36 percent of households in Petaluma. In both the County and City, renters are more likely to be affected by housing problems than owners. Tracts with higher concentrations of renter-occupied households are generally concentrated in the center of the City, in and around the Downtown and Midtown neighborhoods (Figure E40).

Figure E40: Percent of Renter-Occupied Households by Tract (2020)



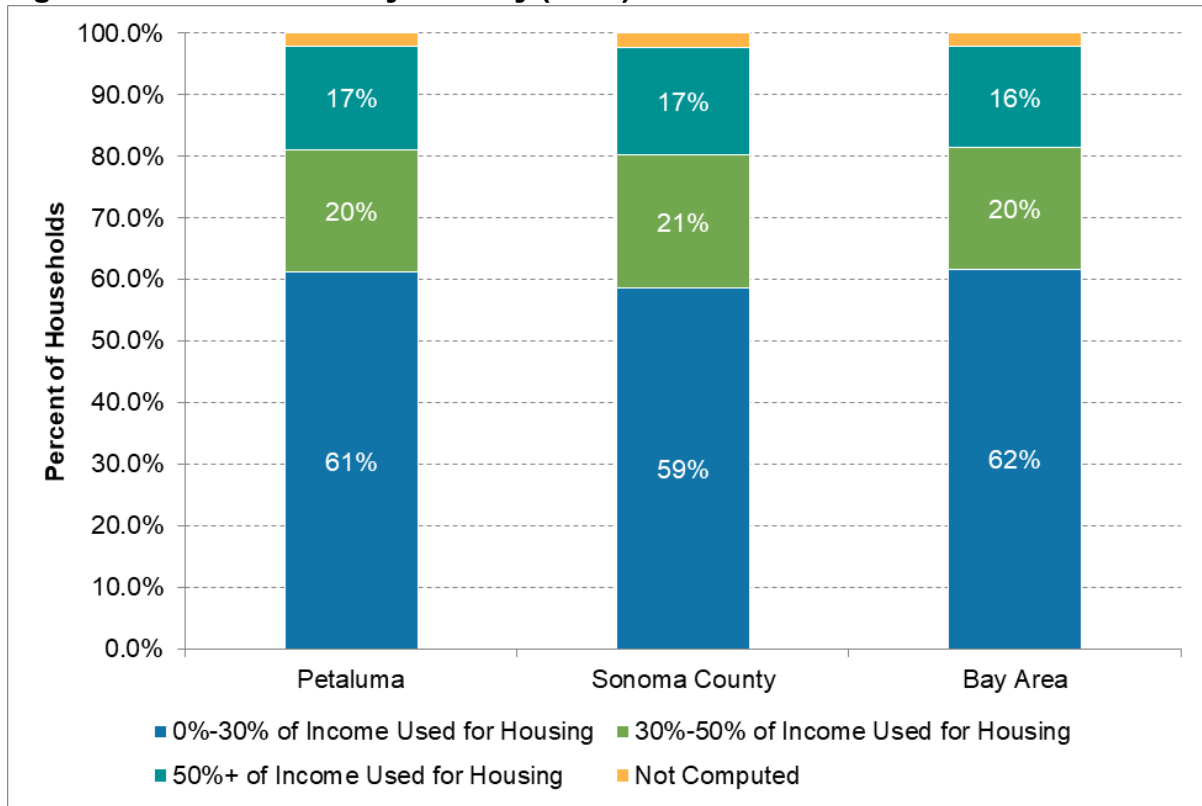
Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Cost Burden

Regional Trend

Households paying 30 percent or more of their income in housing costs are considered cost burdened and households paying 50 percent or more on their income are considered severely cost burdened. As discussed previously, 41.7 percent of households in Sonoma County experience one or more housing problem, including 37.3 percent that are cost burdened. According to more recent 2015-2019 ACS data included in the ABAG Housing Element Data Package, 38.9 percent of Sonoma County households are cost burdened including 17.4 percent severely cost burdened households (Figure E41). Cost burden is slightly more prevalent in the County compared to the Bay Area. Only 36 percent of households in the Bay Area are cost burdened including 16 percent severely cost burdened. Rates of cost burden in the City are comparable to the County and the Bay Area.

Figure E41: Cost Burden by Severity (2019)



Source: ABAG Housing Element Data Package (based on 2015-2019 ACS (5-Year Estimates)), 2021.

Housing problems and cost burden by race and ethnicity for Sonoma County is shown in Table E26. Estimates may differ slightly from Figure E41 as this dataset utilizes the 2020 HUD CHAS data based on the 2013-2017 ACS. As mentioned above, renter-occupied households are more likely to experience housing problems and cost burden. Over half of renter-occupied households in the City experience a housing problem compared to only 32.3 percent of owner-occupied households. In the County, Black renters are cost burdened at the highest rate (56%), followed by Hispanic renters (54.3%), and White renters (49.7%). The Asian, American Indian, and Pacific Islander renter household populations are not cost burdened at a rate exceeding the Countywide average.

Table E26: Housing Problems & Cost Burden by Race – Sonoma County (2017)

	White	Black	Asian	American Indian	Pacific Islander	Hispanic	All
With Housing Problem							
Owner-Occupied	30.3%	42.3%	39.6%	28.6%	66.7%	43.4%	32.3%
Renter-Occupied	51.9%	57.8%	49.2%	47.0%	75.6%	66.3%	56.0%
All Households	37.6%	51.9%	42.9%	38.9%	74.5%	57.6%	41.7%
With Cost Burden							
Owner-Occupied	29.3%	41.1%	36.7%	24.3%	66.7%	32.8%	29.4%
Renter-Occupied	49.7%	56.0%	38.7%	47.0%	48.9%	54.3%	49.1%
All Households	36.2%	50.3%	37.4%	36.3%	51.0%	46.1%	37.3%

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Housing problems and cost burden often affect special needs populations, such as elderly households and large households, disproportionately.¹⁵ Only 29.4 percent of owner-occupied households in the County are cost burdened, compared to 31.2 percent of owner-occupied elderly households. Fewer owner-occupied large households are cost burdened compared to the County average, however significantly more experience one or more housing problem. Housing problems tallied include cost burden, overcrowding, and substandard housing conditions such as lack of complete kitchen or plumbing facilities. The high proportion of large owner-occupied households experiencing a housing problem (49.9 percent) is likely due to overcrowding as large households are more likely to be overcrowded. Similarly, only 49.1 percent of all renters in the City are cost burdened while 55.3 percent of elderly renters and 53.8 percent of large renter households are cost burdened. Both elderly and large renter-occupied households experience housing problems at rates exceeding the Citywide average. As discussed above, housing problems other than cost burden include lack of complete facilities (kitchen or bathroom) and overcrowding.

Table E27: Housing Problems, Elderly and Large Households – Sonoma County (2017)

	Owner-Occupied			Renter-Occupied			All HHs
	Elderly	Large HH	All Owner	Elderly	Large HH	All Renter	
Any housing problem	31.5%	49.9%	32.3%	57.8%	79.2%	56.0%	41.7%
Cost burden >30%	31.2%	28.6%	29.4%	55.3%	53.8%	49.1%	37.3%

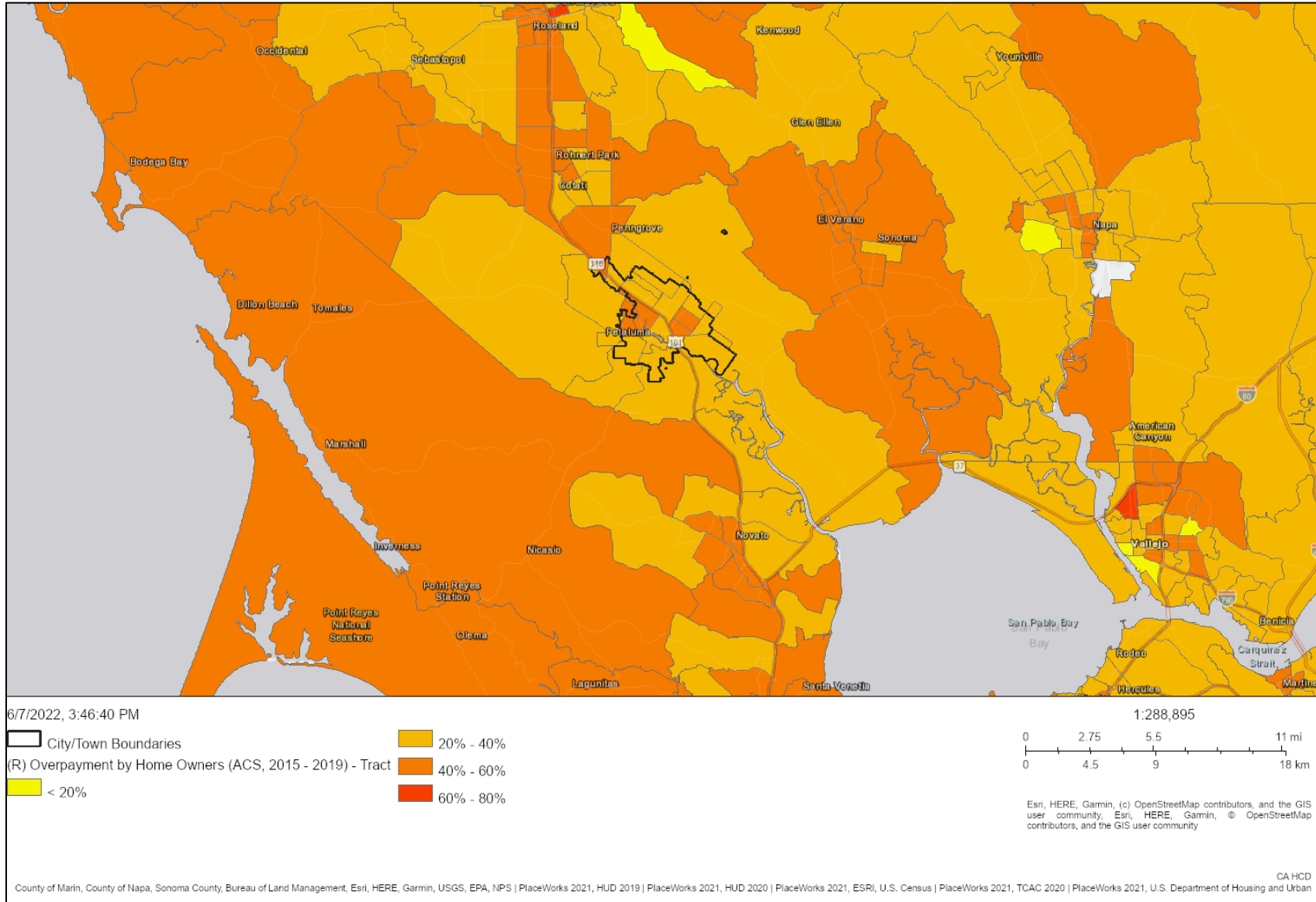
Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Figure E42 and Figure E43 show cost burden by tenure geographically for the region. While there are some tracts throughout the region surrounding Petaluma where fewer than 20 percent of owners overpay for housing, between 20 and 60 percent of owners are cost burdened in a large majority of tracts. Coastal areas west of Petaluma tend to have higher concentrations of cost burdened owners compared to the inland areas. Owner cost burden amongst Petaluma tracts is consistent with the surrounding areas.

Cost burden amongst renter-occupied households is more prevalent in the region. There is a larger proportion of tracts where more than 60 percent of renters overpay for housing. Tracts along the 101 Highway throughout Sonoma County, in Napa County/Vallejo area, and along coastal Sonoma County have larger proportions of cost burdened renters.

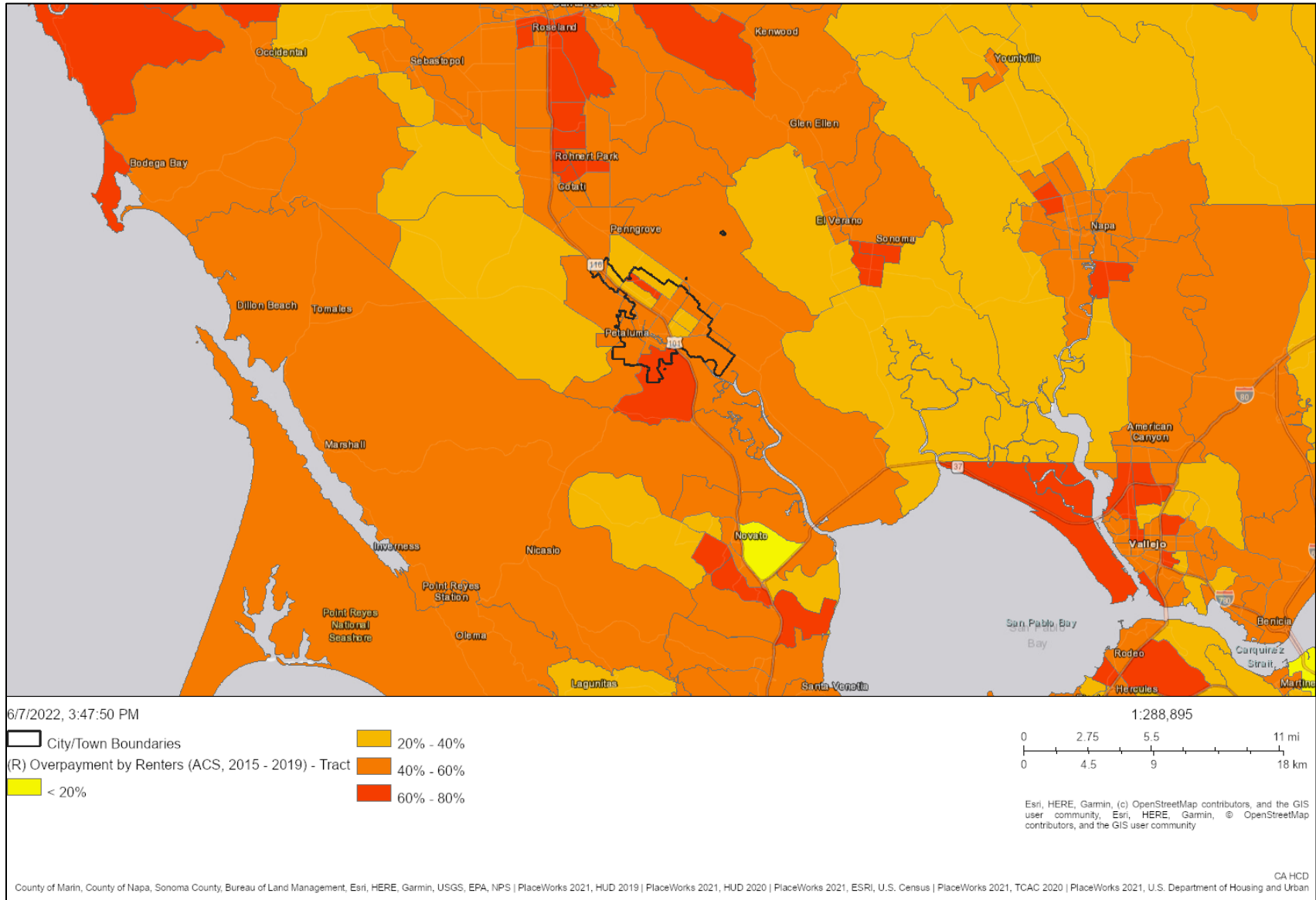
¹⁵ Elderly households include elderly families, two persons with either or both age 62 or older, and elderly non-families (i.e., single-person elderly households). Large households are considered households with five or more related persons.

Figure E42: Regional Cost Burdened Owners by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Figure E43: Regional Cost Burdened Renters by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Local Trend

A slightly smaller proportion of owners in the City are cost burdened compared to the County (33.1% vs. 37.3%, respectively) (Table E28). The proportion of cost burdened owners in the City is comparable to the County (29.2% vs. 29.4%); however, a significantly smaller proportion of renters are cost burdened in Petaluma (40.6% vs. 49.1%). All racial/ethnic groups except the White and American Indian populations are cost burdened at a rate exceeding the average in the City. Pacific Islander households are cost burdened at the highest rate (100%), followed by Black households (60.7%), Hispanic households (47%), and Asian households (33.7%). All Black and Pacific Islander owner-occupied households are cost burdened.

Table E28: Housing Problems and Cost Burden by Race – Petaluma (2017)

	White	Black	Asian	American Indian	Pacific Islander	Hispanic	All
With Housing Problem							
Owner-Occupied	29.1%	100.0%	35.0%	40.0%	100.0%	48.8%	31.7%
Renter-Occupied	39.7%	58.3%	30.7%	0.0%	--	63.0%	44.3%
All Households	32.4%	64.3%	34.0%	20.0%	100.0%	56.3%	36.0%
With Cost Burden							
Owner-Occupied	28.6%	100.0%	34.3%	40.0%	100.0%	38.6%	29.2%
Renter-Occupied	38.2%	54.2%	31.7%	0.0%	--	54.3%	40.6%
All Households	31.6%	60.7%	33.7%	20.0%	100.0%	47.0%	33.1%

-- = No households.

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

According to 2015-2019 ACS estimates, Petaluma has a slightly smaller elderly population than the County. Countywide, 19 percent of the population is aged 65 or older compared to 17.6 percent in the City. Petaluma also has a smaller proportion of large households of five or more people compared to the County (9% vs. 9.3%). As presented in Table E29, owner-occupied elderly households have housing problems and cost burden at a rate exceeding the citywide average. Cost burden is less prevalent amongst owner-occupied large households, but housing problems are more prevalent, likely due to overcrowding. Similarly, renter-occupied elderly and large households experience housing problems at a rate exceeding the City average. Nearly 72 percent of large renter households experience one or more housing problem.

Table E29: Housing Problems, Elderly and Large Households – Petaluma (2017)

	Owner-Occupied			Renter-Occupied			All HHs
	Elderly	Large HH	All Owner	Elderly	Large HH	All Renter	
Any housing problem	35.0%	44.8%	31.7%	49.0%	71.5%	44.3%	36.0%
Cost burden >30%	35.0%	28.8%	29.2%	46.6%	63.3%	40.6%	33.1%

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Figure E45 and Figure E46 show the proportion of cost burdened household by tenure at the tract-level in Petaluma. Between 20 and 40 percent of owners overpay for housing in most Petaluma tracts. Between 40 and 60 percent of owners are cost burdened in five tracts: two in the Adobe neighborhood, two in the Oakhill Brewster/Western neighborhoods, and one in the northernmost corner of the City (Maker Alley neighborhood). As discussed previously, the tract in the northernmost corner of the City encompasses much of the area north of the City in the unincorporated County and City of Cotati; therefore, data in this tract is not representative of Petaluma residents alone.

A significantly larger proportion of renters overpay for housing in nearly all Petaluma tracts. Between 40 and 60 percent of renters overpay in most tracts. There are two tracts where 60 to 80 percent of renters

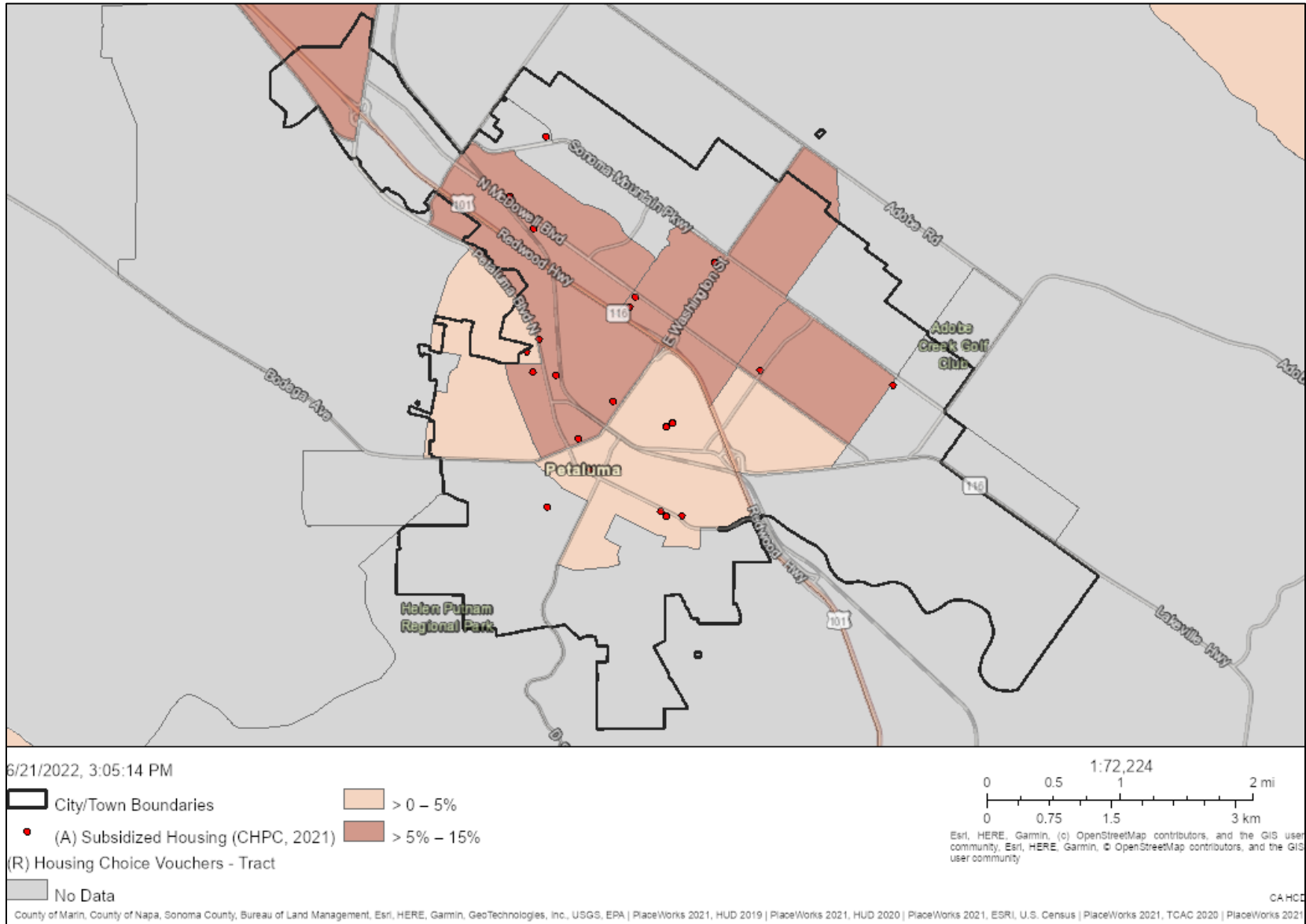
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are cost burdened: one in the College neighborhood and one in the Western neighborhood. It is relevant to note that the tract in the Western neighborhood encompasses a large area that is not part of the incorporated City.

HCV recipients by tract are presented in Figure E44. There is no data for either of the tracts where more than 60 percent of renters are cost burdened. To protect the confidentiality of those receiving Housing Choice Voucher Program assistance, tracts containing 10 or fewer voucher holders have been omitted from this dataset. Between 1 and 15 percent of renters in several tracts in the center of the City receive HCVs. Subsidized housing projects are generally located in the same areas of the City.

Figure E44: HCV Recipients by Tract and Subsidized Housing



Source: HCD AFFH Data Viewer (based on 2021 CHPC data), 2022.

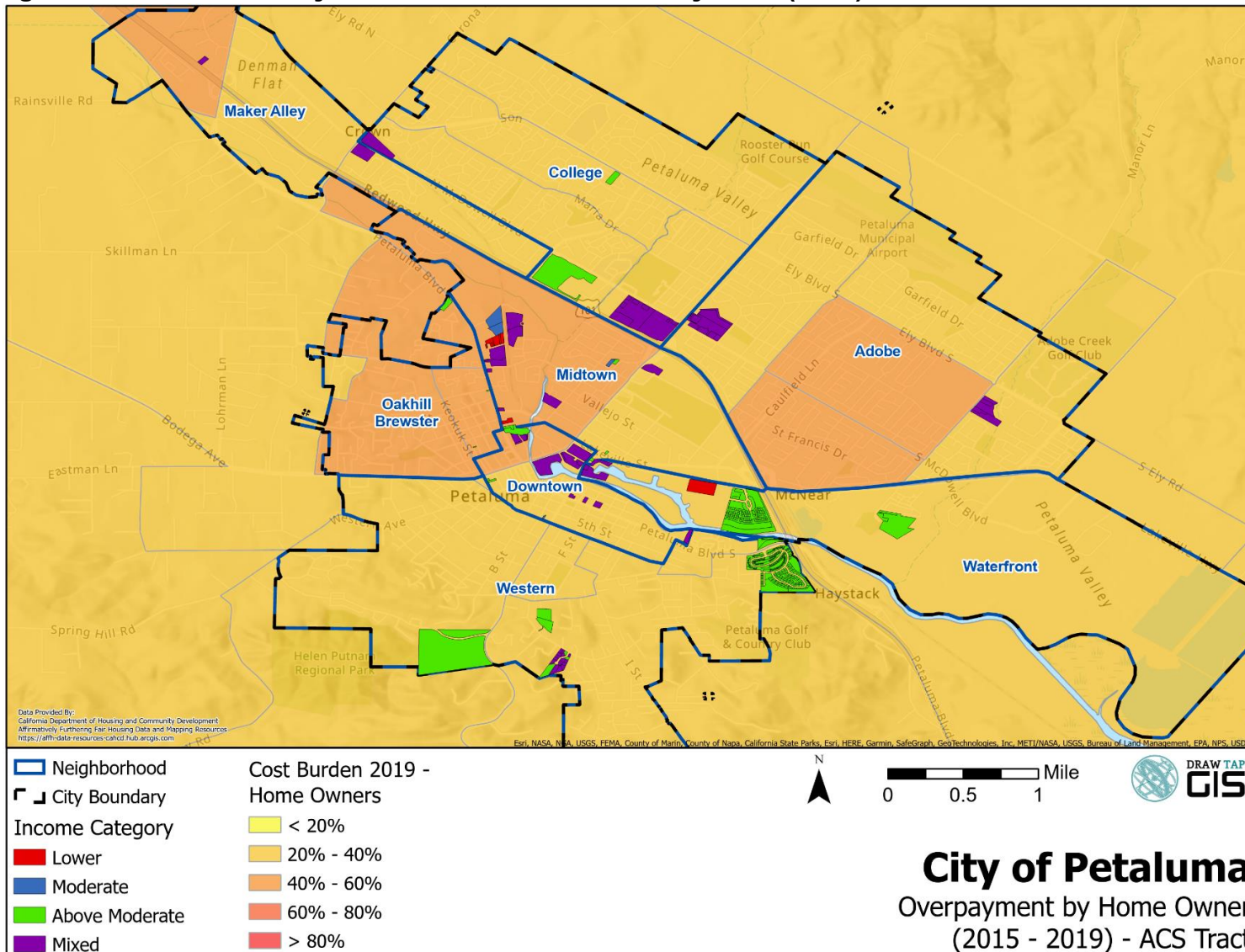
Sites Inventory

The distribution of RHNA units by cost burdened owners at the tract-level is shown in Figure E45 and Table E30. Consistent with the Citywide trend, 80.4 percent of RHNA units are in tracts where 20 to 40 percent of owners overpay for housing, including 77.4 percent of lower income units, 79.9 percent of moderate income units, and 82 percent of above moderate income units. Though a larger proportion of above moderate income units are in tracts where fewer owners are cost burdened, sites are generally distributed throughout the City. Further, the City’s RHNA strategy does not concentrate units of a single income level in one area of the City.

Table E30: Distribution of RHNA Units by Cost Burdened Owner Population

Cost Burdened Owners (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
20-40%	668	77.4%	401	79.9%	1553	82.0%	2622	80.4%
40-60%	195	22.6%	101	20.1%	342	18.0%	638	19.6%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E45: Sites Inventory and Cost Burdened Owners by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data) and Veronica Tam & Associates, 2022.

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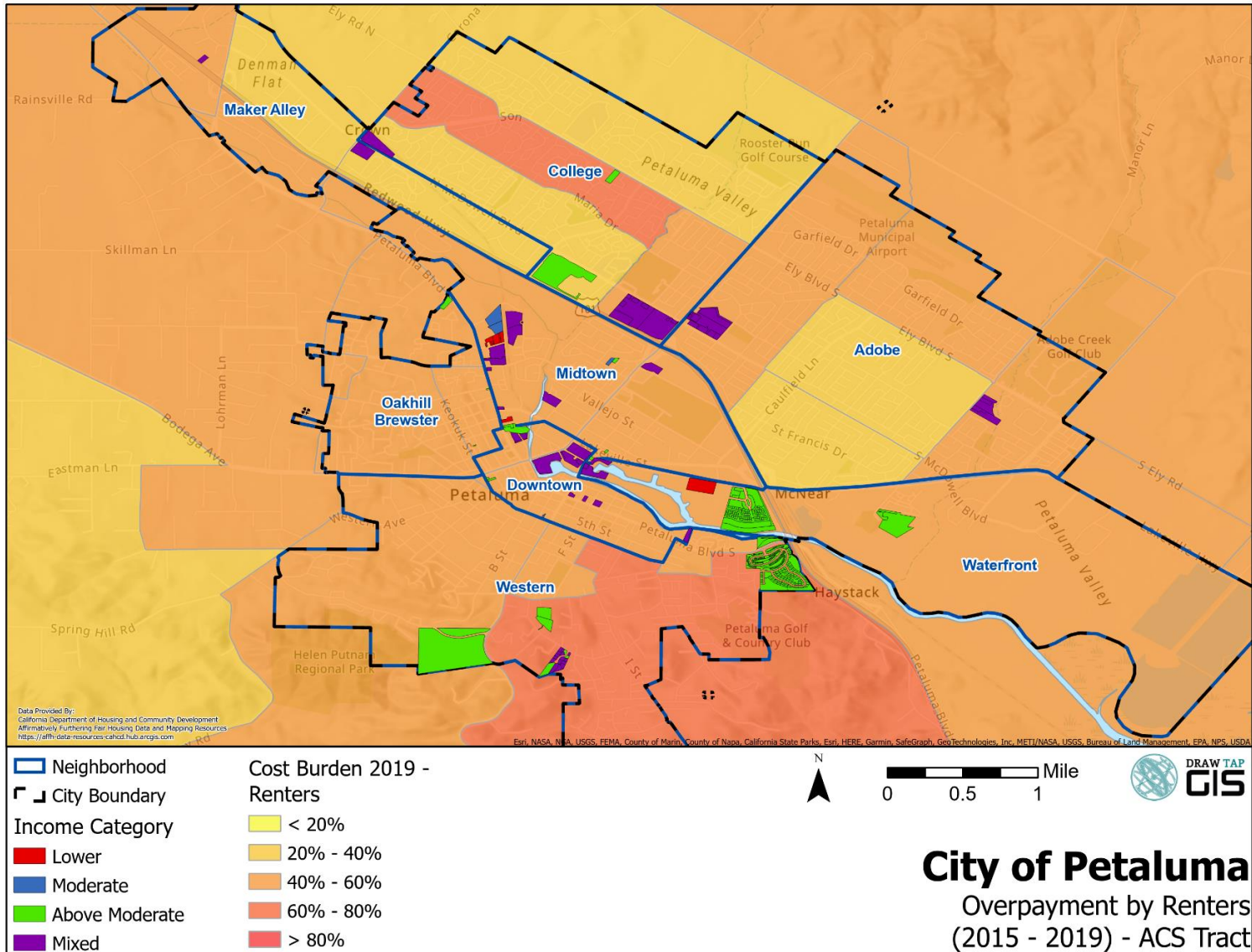
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Figure E46 and Table E31 show the distribution of RHNA units by population of cost burdened renter-occupied households. As discussed previously, most tracts in Petaluma have populations of cost burdened renters ranging from 40 to 60 percent. The distribution of RHNA units is consistent with this trend. Approximately 80 percent of units, including 83.7 percent of lower income units, 83.9 percent of moderate income units, and 77.1 percent of above moderate income units are in tracts with proportions of overpaying renters in this range. Only 2.1 percent of lower income units, or 18 units, are in tracts where more than 60 percent of renters are cost burdened compared to 14.4 percent of above moderate income units. A larger proportion of lower income units and moderate income units are in tracts where less than 40 percent of renters are cost burdened compared to above moderate income units. As mentioned previously, the City's RHNA strategy does not concentrate units of any income level in a single area of the City. The sites inventory ensures a variety of housing types are distributed throughout the City, encouraging mixed income communities.

Table E31: Distribution of RHNA Units by Cost Burdened Renter Population

Cost Burdened Renters (Tract)	Lower Income		Moderate Income		Above Moderate Income		Total Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
20-40%	123	14.3%	81	16.1%	162	8.5%	366	11.2%
40-60%	722	83.7%	421	83.9%	1461	77.1%	2604	79.9%
60-80%	18	2.1%	0	0.0%	272	14.4%	290	8.9%
Total	863	100.0%	502	100.0%	1,895	100.0%	3,260	100.0%

Figure E46: Sites Inventory and Cost Burdened Renters by Tract (2019)



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data) and Veronica Tam & Associates, 2022.

Overcrowding

Regional Trend

Households with more than one person per room are considered overcrowded and households with more than 1.5 persons per room are considered severely overcrowded. Overcrowding may indicate an insufficient supply of affordable housing suitable for larger households. Overcrowding is significantly more prevalent amongst renter-occupied households. As shown in Table E32, 10 percent of renter-occupied households in the County are overcrowded compared to only 2.2 percent of owner-occupied households. According to 2013-2017 ACS estimates, slightly older than the estimates provided for Sonoma County below, 6.5 percent of households in the Bay Area are overcrowded including three percent of owner-occupied households and 10.9 percent of renter-occupied households. Based on this data, overcrowding is more common in the Bay Area compared to the Sonoma County.

Table E32: Overcrowding by Tenure – Sonoma County (2017)

	Overcrowded (>1.0 person per room)	Severely Overcrowded (>1.5 persons per room)	Total Households
Owner-Occupied	2.2%	0.5%	116,393
Renter-Occupied	10.0%	3.0%	72,981
All Households	5.1%	1.4%	189,374

Source: 2015-2019 ACS (5-Year Estimates).

Nearly 67 percent of housing units in Sonoma County are single-family detached homes and 8.4 percent are single-family attached units. Of multi-family housing units in the County, 6.6 percent are two to four units, 4 percent are 5 to 9 units, 5.6 percent are 10 to 49 units, and 3.7 percent are 50 units or more. Table E33 shows housing units in Sonoma County by number of bedrooms. Most housing units in the City have two to four bedrooms, 14.4 percent are studio- or one-bedroom units, and 2.5 percent have five or more bedrooms.

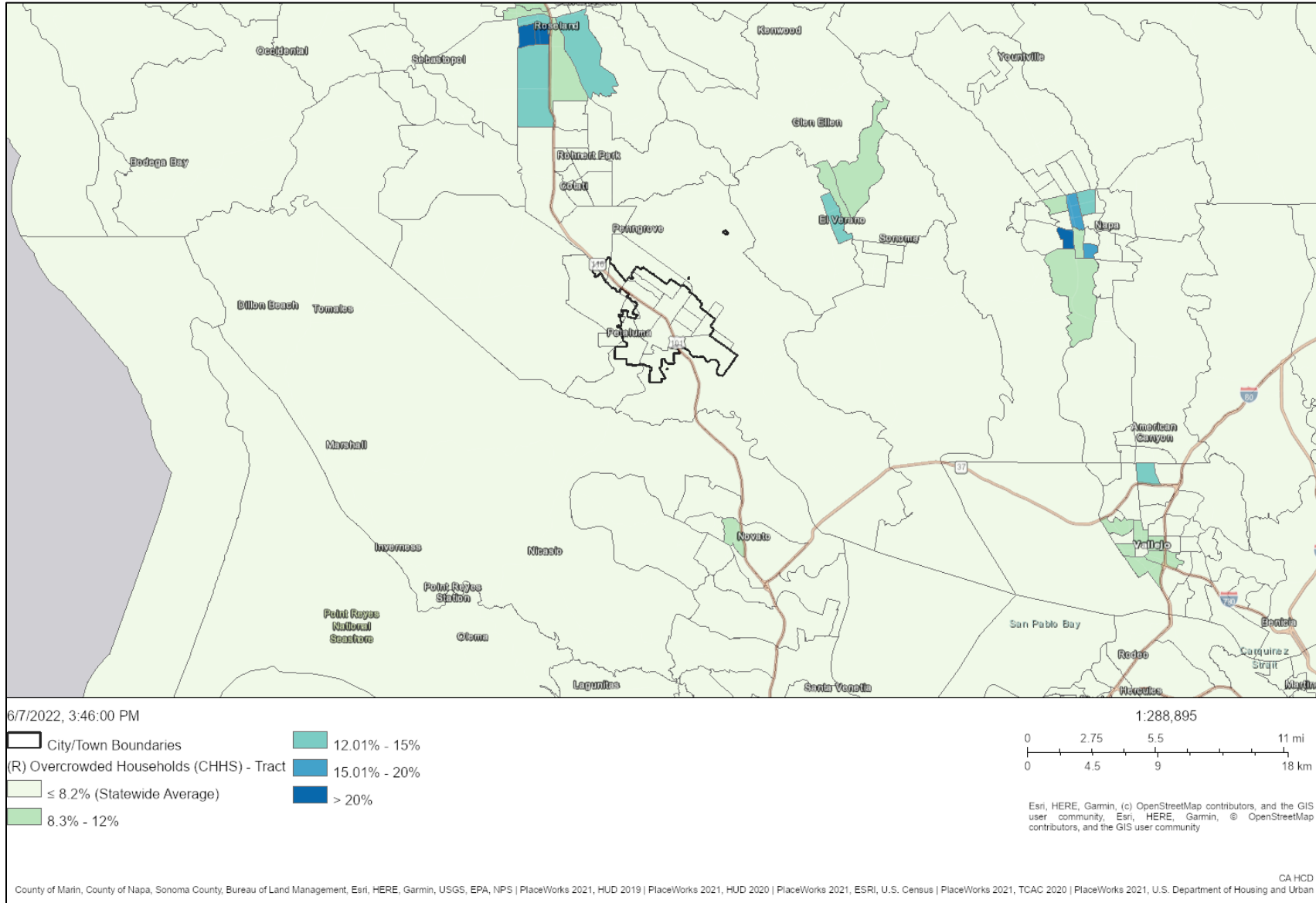
Table E33: Housing Units by Bedrooms – Sonoma County (2019)

	Housing Units	Percent
No bedroom	5,925	2.9%
1 bedroom	24,049	11.6%
2 bedrooms	61,566	29.6%
3 bedrooms	79,383	38.2%
4 bedrooms	31,642	15.2%
5 or more bedrooms	5,148	2.5%
Total housing units	207,713	100.0%

Source: 2015-2019 ACS (5-Year Estimates).

Figure E47 shows overcrowded households by tract in the region. The HCD Data Viewer shows tracts where the proportion of overcrowded households exceeds the Statewide average of 8.2 percent. There are few tracts in or adjacent to Petaluma with proportions of overcrowded households exceeding the Statewide average. Tracts where overcrowding is more prominent are most concentrated in and around the cities of Santa Rosa, Sonoma, and Napa. There are no tracts in Petaluma where more than 8.2 percent of households are overcrowded, indicating that overcrowding is less prevalent in the City compared to nearby jurisdictions to the north and east.

Figure E47: Regional Overcrowded Households by Tract



Source: HCD AFFH Data Viewer (based on 2015-2019 ACS data), 2022.

Local Trend

Overcrowding by tenure and severity for the City of Petaluma is included in Table E34. Overcrowding is less prevalent in the City compared to the County. Only 3.7 percent of households have more than one person per bedroom including 1.5 percent of owner-occupied households and 7.8 percent of renter-occupied households. Like the County, overcrowding disproportionately affects renter households compared to owners. However, compared to the County and the Bay Area, fewer households are overcrowded in Petaluma.

Table E34: Overcrowding by Tenure – Petaluma (2017)

	Overcrowded (>1.0 person per room)	Severely Overcrowded (>1.5 persons per room)	Total Households
Owner-Occupied	1.5%	0.2%	14,931
Renter-Occupied	7.8%	0.9%	7,724
All Households	3.7%	0.5%	22,655

Source: 2015-2019 ACS (5-Year Estimates).

Like the County, the largest proportion of units in Petaluma have three bedrooms (38.9%), followed by four bedrooms (23.6%), and two bedrooms (22.2%). The City has a smaller proportion of studio and one-bedroom units and a larger proportion of 5+ bedroom units compared to the County.

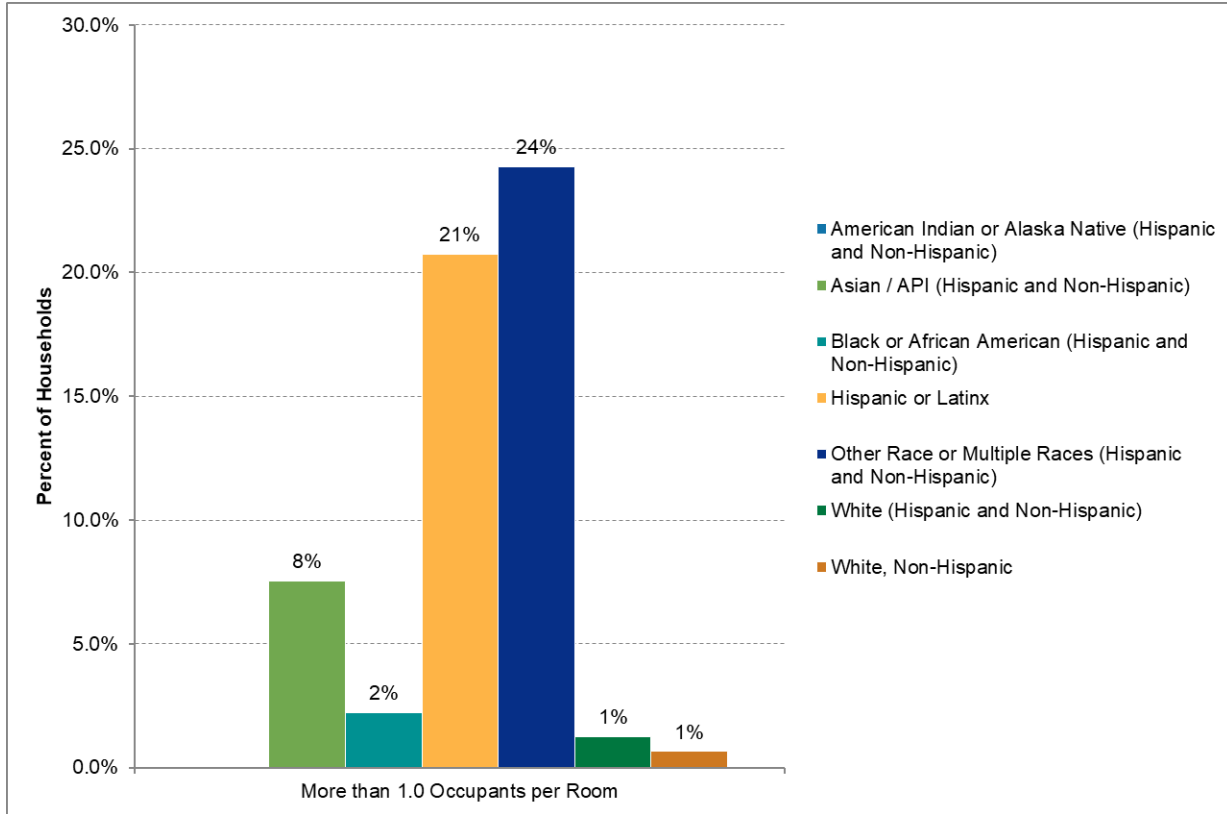
Table E35: Housing Units by Bedrooms – Petaluma (2019)

	Housing Units	Percent
No bedroom	435	1.9%
1 bedroom	2,127	9.1%
2 bedrooms	5,160	22.2%
3 bedrooms	9,060	38.9%
4 bedrooms	5,505	23.6%
5 or more bedrooms	1,004	4.3%
Total housing units	23,291	100.0%

Source: 2015-2019 ACS (5-Year Estimates).

Overcrowding may affect various racial/ethnic groups differently due to cultural influences. Some cultures may be more likely to live with extended family members, increasing the need for larger housing units to avoid overcrowding. As shown in Figure E48, in Petaluma, households of a race not listed/households of multiple races and Hispanic/Latinx households are significantly more likely to be overcrowded compared to other racial/ethnic groups (24% and 21%, respectively). A significant proportion of Asian/API households are also overcrowded (8%). Comparatively, only two percent of Black/African American households and one percent of White households are overcrowded.

Figure E48: Overcrowding by Race (2019)



Source: ABAG Housing Element Data Package (2015-2019 ACS), 2021.

There are no tracts in the City where more than 8.2 percent, the Statewide average, of households are overcrowded.

Substandard Housing Conditions

Regional Trend

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. Incomplete facilities and housing age are estimated using the 2015-2019 ACS. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs.

Of housing units in Sonoma County, less than one percent lack complete kitchen facilities and 0.3 percent lack complete plumbing facilities. Incomplete kitchen facilities are more common amongst renter-occupied households. Approximately 1.6 percent of renter-occupied households lack complete kitchen facilities compared to only 0.2 percent of owner-occupied households (Table E36).

Table E36: Housing Units Lacking Complete Facilities – Sonoma County (2019)

	Lacking complete kitchen facilities	Lacking complete plumbing facilities	Total Households
Owner-Occupied	0.2%	0.2%	116,393
Renter-Occupied	1.6%	0.3%	72,981
All Households	0.8%	0.3%	18,9374

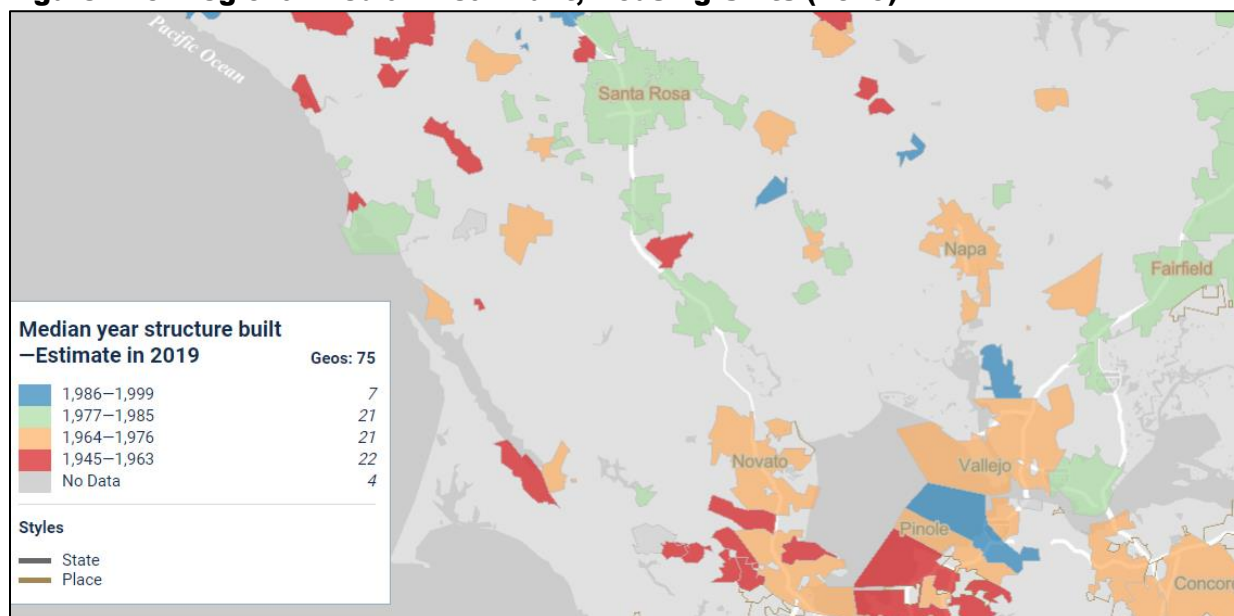
Source: 2015-2019 ACS (5-Year Estimates).

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Housing age can also be used as an indicator for substandard housing and rehabilitation needs. As stated above, structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation. In the County, 73.2 percent of the housing stock was built prior to 1990, including 33.5 percent built prior to 1970 (Table E38). Figure E49 shows median housing age for cities and Census-designated places (CDPs) in the region. Jurisdictions with aging housing units are not generally concentrated in a single area of the region. Petaluma, Santa Rosa, and Fairfield tend to have younger median housing ages compared to other jurisdictions.

Figure E49: Regional Median Year Built, Housing Units (2019)



Source: 2015-2019 ACS (5-Year Estimates).

Local Trend

Housing units lacking complete kitchen or plumbing facilities are slightly less common in Petaluma than the County. Approximately 0.7 percent of the housing stock lacks complete kitchen facilities and less than 0.1 percent lacks complete plumbing facilities. However, a larger proportion of renters lack complete kitchen facilities in Petaluma (2 percent) compared to the County (1.6 percent). As shown in Table E37, like the County, incomplete facilities are more common amongst renter-occupied households than owner-occupied households. However, there are no renter-occupied households lacking complete plumbing facilities in the City.

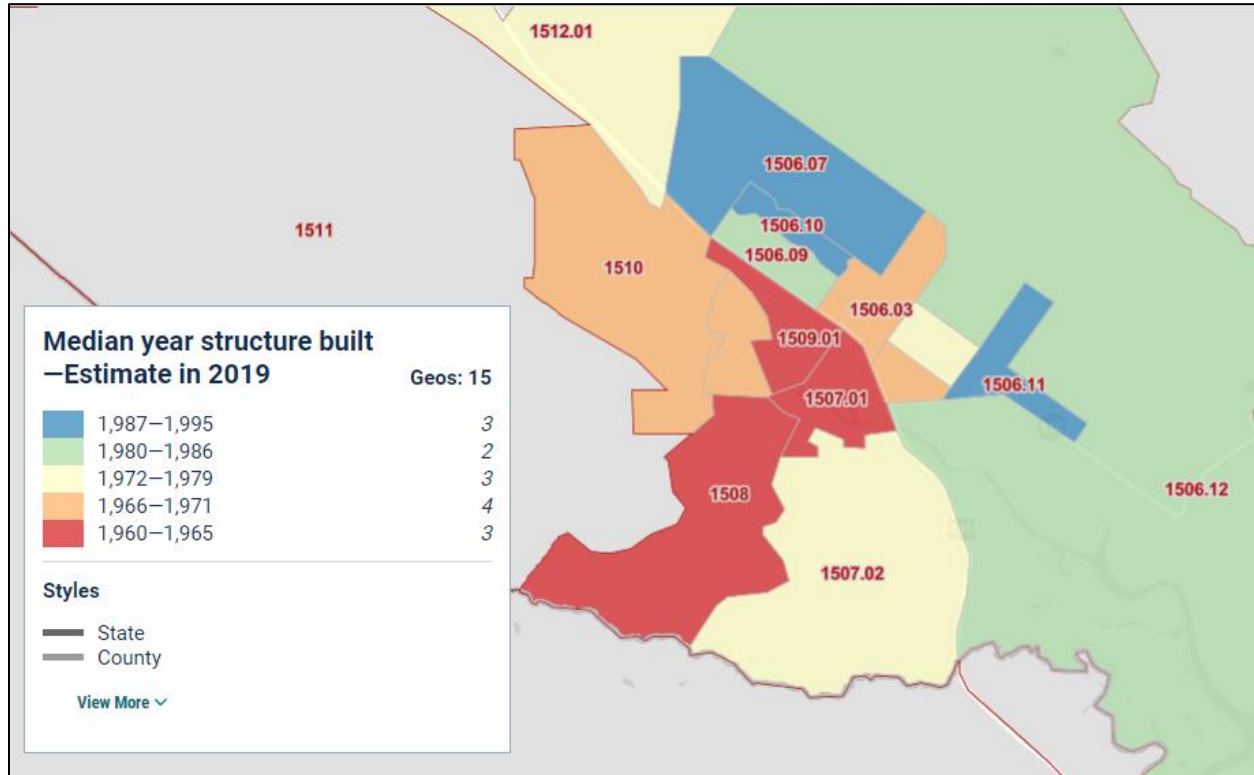
Table E37: Housing Units Lacking Complete Facilities – Petaluma (2019)

	Lacking complete kitchen facilities	Lacking complete plumbing facilities	Total Households
Owner-Occupied	0.1%	0.1%	14,931
Renter-Occupied	2.0%	0.0%	7,724
All Households	0.7%	<0.1%	22,655

Source: 2015-2019 ACS (5-Year Estimates).

Table E38 and Figure E50 show the housing stock age in Petaluma by tract. Older housing units tend to be more concentrated in the Midtown, Downtown, and Western neighborhoods. More than 90 percent of housing units in tracts 1506.01 and 1506.02 were built prior to 1990. However, more than half of housing units are aged 50 or older in tracts 1507.01, 1508, 1509.01, 1509.02, and 1510. In general, the eastern side of the City has a larger proportion of new housing units. Petaluma has a larger proportion of new housing units compared to the County.

Figure E50: Median Year Built by Tract, Housing Units (2019)



Source: 2015-2019 ACS (5-Year Estimates).

Table E38: Year Housing Units Built by Tract (2019)

Tract/Jurisdiction	1969 or earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or later (<30 Years)	Total
1506.01	44.7%	48.8%	6.5%	1,411
1506.02	23.4%	72.1%	4.5%	1,550
1506.03	48.3%	29.8%	21.9%	3,017
1506.07	9.1%	11.1%	79.8%	1,829
1506.09	9.8%	52.2%	38.0%	2,016
1506.1	0.9%	42.7%	56.3%	1,369
1506.11	4.4%	36.9%	58.8%	1,487
1506.12	15.8%	54.3%	29.9%	1,700
1507.01	54.0%	22.1%	23.9%	2,133
1507.02	40.0%	32.0%	28.0%	2,030
1508	54.8%	16.7%	28.6%	2,078
1509.01	59.5%	13.7%	26.9%	2,080
1509.02	51.2%	33.2%	15.6%	1,471
1510	52.8%	28.5%	18.7%	1,521
1512.01	32.1%	33.5%	34.4%	3,101
Petaluma	33.3%	34.3%	32.4%	23,291
Sonoma County	33.5%	39.6%	26.8%	207,713

Source: 2015-2019 ACS (5-Year Estimates).

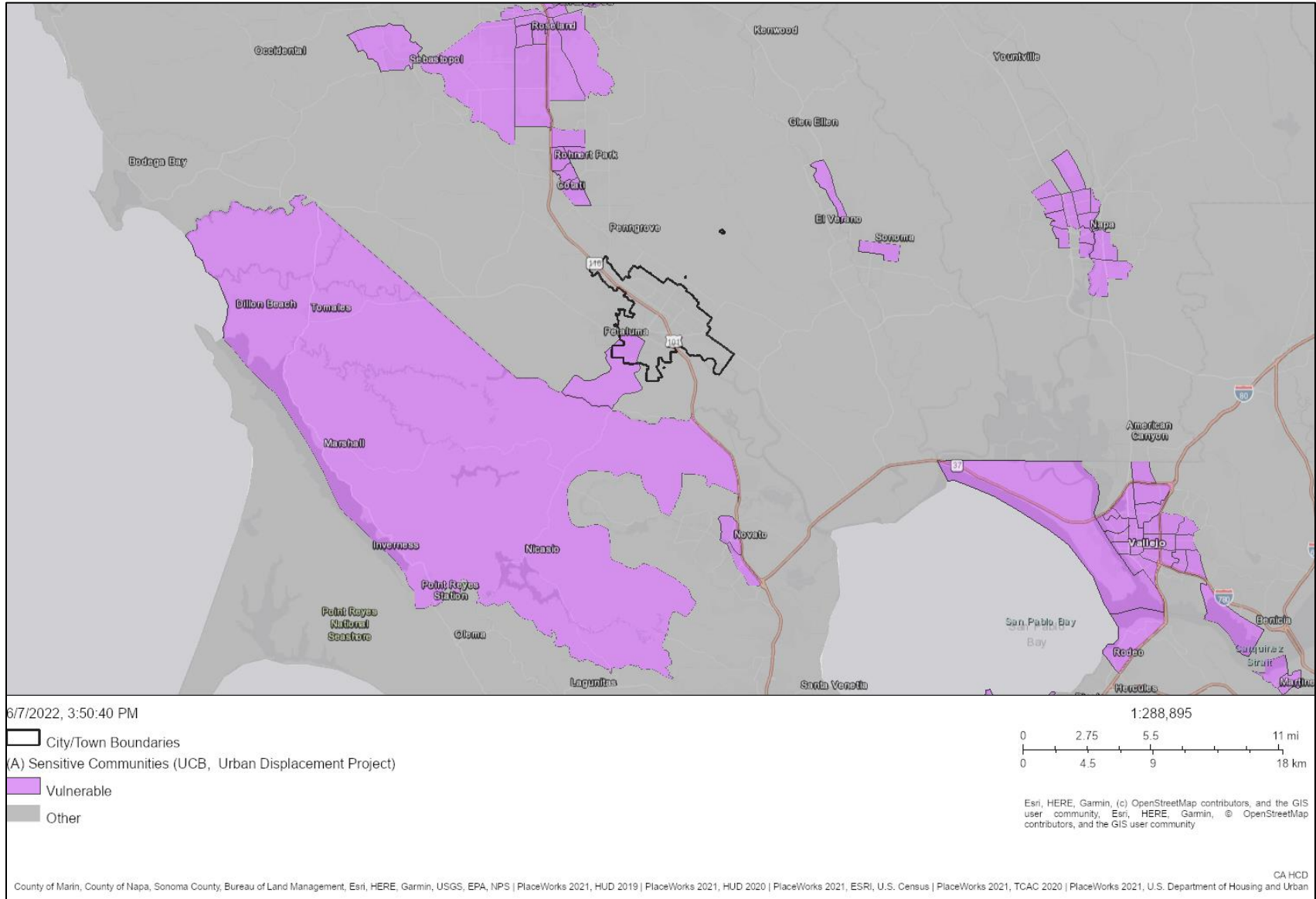
Displacement Risk

UC Berkley’s Urban Displacement project defines residential displacement as “the process by which a household is forced to move from its residence- or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the research has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. Vulnerability was defined using the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps.

Regional Trend

Using this methodology, sensitive communities in the region are most concentrated in Marin County, around Santa Rosa, and around Vallejo in Solano County (Figure E51). There is one tract that encompasses part of Petaluma that is considered a sensitive community. The trend in the City is consistent with the trend in neighboring jurisdictions including the unincorporated County areas directly adjacent to the City.

Figure E51: Regional Communities At Risk of Displacement (2020)



Source: HCD AFFH Data Viewer (based on 2021 UC Berkeley Urban Displacement Project data), 2022.

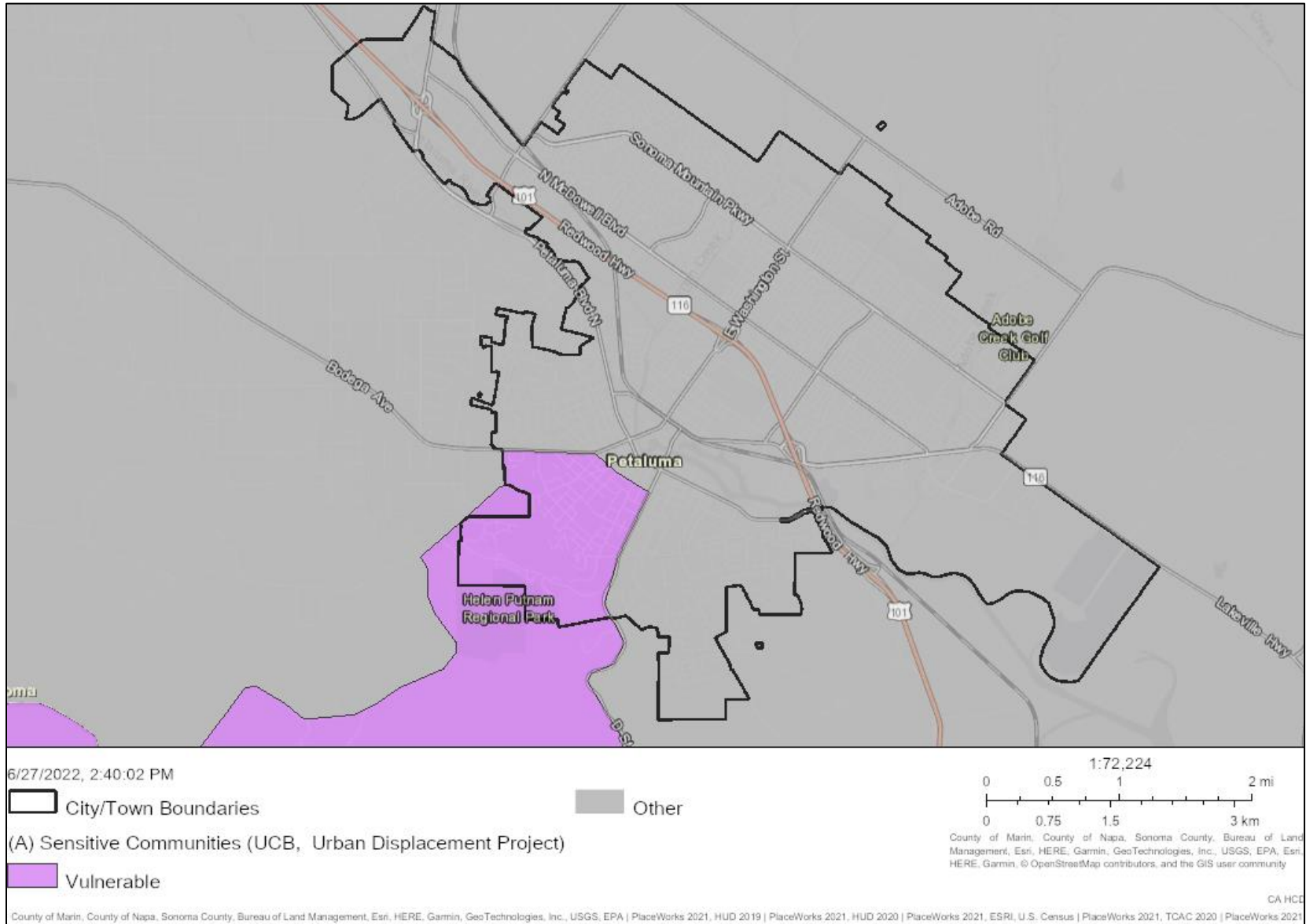
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Local Trend

The Urban Displacement Project identified one sensitive community at risk of displacement in Petaluma (Figure E52). The tract is located in the Western neighborhood. It is important to note that this tract encompasses a larger proportion of the unincorporated area than the City and is not a reflection of Petaluma residents alone. This tract is classified as a moderate resource area.

Figure E52: Communities At Risk of Displacement (2021)



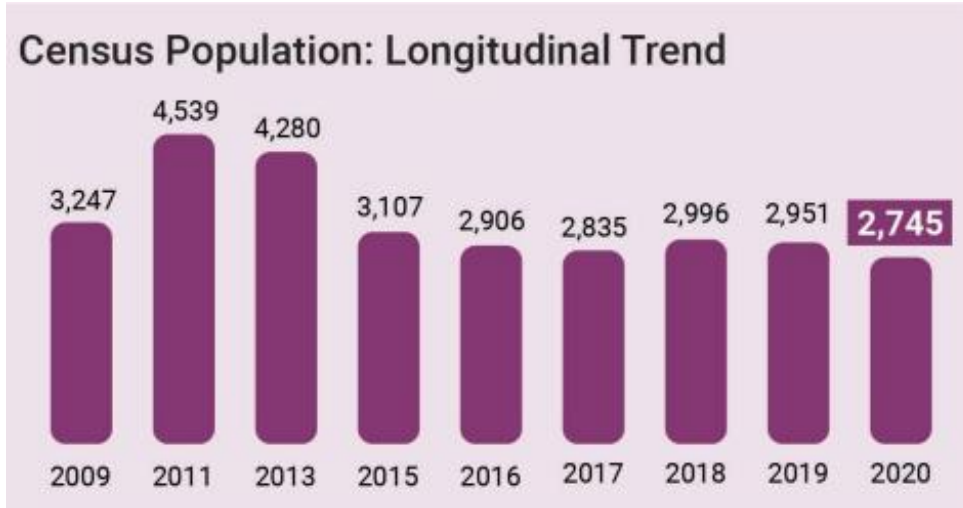
Source: HCD AFFH Data Viewer (based on 2021 UC Berkeley Urban Displacement Project data), 2022.

Homelessness

Regional Trend

According to data from the 2020 Sonoma County Homeless Census Comprehensive Report, there were 2,745 persons experiencing homelessness in the County in 2020. Since 2009, the population of persons experiencing homelessness has decreased from 3,247 (-15.5 percent). Of the total population experiencing homelessness, 38 percent were sheltered, and 62 percent were unsheltered. There are several emergency shelters located in the County and region surrounding Petaluma, including two in the City.

Figure E53: Homeless Population Trend – Sonoma County (2020)



Source: 2020 Sonoma County Homeless Census Comprehensive Report.

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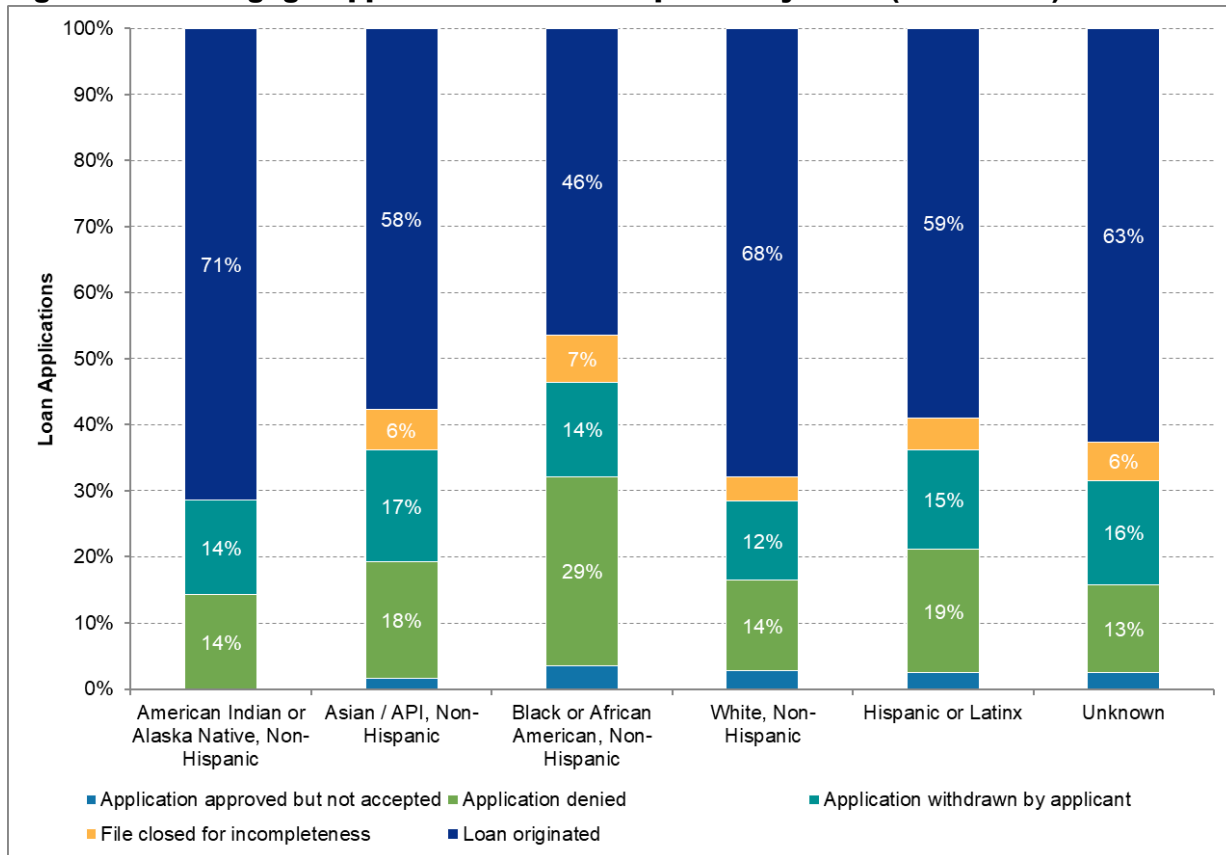
homelessness residing in the City, more than half (55.1 percent) are sheltered, a significantly larger proportion compared to the County.

In September 2021, the City of Petaluma declared a Shelter Crisis in response to the confluence of issues affecting communities who are unsheltered and the surrounding community in the context of the pandemic. This resolution allowed the City, through the City Manager, to exercise sole discretion to suspend compliance with local building approval procedures or state or local housing, health, habitability, planning and zoning, or safety standards and procedures, for projects of the City of Petaluma to provide emergency housing on City owned or leased property. This allowed the City to implement innovative housing measures in the form of the People’s Village at the COTS.

Home Loans

Home loan applications and acceptance rates by race and ethnicity are presented in Figure E55. Of the applications submitted from 2018 to 2019, 62.9 percent of applicants were White, 23.5 percent were of an unknown race or ethnicity, 8.1 percent were Hispanic or Latinx, and 4.3 percent were Asian/API. All races appear to be underrepresented compared to the overall racial/ethnic composition in the City, likely due to the large population of applicants with an unknown race. The Hispanic/Latino population is the most dramatically underrepresented. While they represent 21.9 percent of the total population, they only make up 8.1 percent of the home loan applicant pool. Black/African American applicants had the highest denial rate of 29 percent, followed by the Hispanic/Latinx population (19%), and Asian/API population (18%). In comparison, only 14 percent of both the American Indian/Alaska Native and White populations were denied.

Figure E55: Mortgage Applications and Acceptance by Race (2018-2019)



Source: ABAG Housing Element Data Needs Package, 2021.

Sites Inventory

The distribution of RHNA units is further detailed in Figure E56 and Table E40 below. Sites selected to meet the RHNA are distributed throughout eight neighborhoods in the City including the Adobe, College, Downtown, Maker Alley, Midtown, Oakhill Brewster, Waterfront, and Western neighborhoods, and 11 tracts. The distribution of RHNA sites throughout different neighborhoods ensures new housing is accessible throughout the City. Most of the tracts are moderate resource areas. There are also two low resource tracts and two high resource tracts containing RHNA units. There is a total of 156 RHNA units allocated in low resource tracts including 68 lower income units, 6 moderate income units, and 82 above moderate income units, ensuring lower income units alone are not allocated in areas with this designation. In high resource tracts, there are 261 above moderate income units and 18 lower income units. The sites selected to meet the RHNA are discussed by neighborhood below.

Adobe Neighborhood

A total of 125 units, 8 lower income, 6 moderate income, and 111 above moderate income, have been allocated in the Adobe neighborhood. RHNA units are allocated in tracts 1506.03 and 1506.11 in this neighborhood. Neither are considered sensitive communities at risk of displacement. Tract 1506.03 is categorized as a moderate resource area and has a larger non-White population (72.6%). This tract is also considered an LMI area where 67 percent of households are low or moderate income. However, the City's RHNA strategy only allocates 30 above moderate income units in this tract, ensuring lower and moderate income units are not concentrated in an LMI area. Tract 1506.11 is a low resource area with smaller non-White (56.2%) and LMI (46%) populations. A variety of RHNA units of various income levels are allocated in this tract. The City's RHNA strategy in this neighborhood does not exacerbate fair housing conditions.

College Neighborhood

The College Neighborhood is made up of two moderate resource tracts and one high resource tract. The City's RHNA strategy allocates a mix of units of various income levels in this neighborhood, including 81 lower income units, 49 moderate income units, and 194 above moderate income units. Lower and moderate income units are allocated in tract 1506.09 where some block groups have larger non-White and LMI populations. The variety of unit-types allocated in this area ensure lower income units are not concentrated in this section of the City. Populations of interest and fair housing issues in this area of the City are generally consistent with the Citywide trend. RHNA sites in the College Neighborhood will promote mixed income communities and will not exacerbate conditions related to fair housing.

Downtown Neighborhood

As discussed previously, the Downtown and Midtown neighborhoods have the most overlapping fair housing issues including larger populations of racial/ethnic minorities, children living in female-headed households, and LMI households. Despite this trend, only 13 lower income units are located in in LMI area in this neighborhood. An additional 264 above moderate income units are located in this LMI area. Both tracts containing RHNA units in the Downtown Neighborhood are moderate resource tracts with non-White populations ranging from 16.9 to 43.7 percent. The Downtown Neighborhood contains the largest proportion of RHNA units compared to other neighborhoods in the City. However, units are evenly distributed between the lower, moderate, and above moderate income RHNA, promoting mixed income communities and ensuring units of a single income category are not concentrated in this section of the City. A total of 1,186 RHNA units, including 417 lower income units, 314 moderate income units, and 455 above moderate income units are located in the Downtown Neighborhood, The City's RHNA strategy, in tandem with the actions outlined in this Housing Element, does not exacerbate conditions related to fair housing.

Maker Alley Neighborhood

The Maker Alley Neighborhood is comprised of one moderate resource tract and one low resource tract. A total of 167 RHNA units (102 lower income units, 32 moderate income units, and 33 above moderate income units) are allocated in this neighborhood. Like all neighborhoods discussed previously, variety of units of different income levels allocated in this neighborhood ensures lower and moderate income units are not concentrated in one neighborhood alone. It is important to note that 60 lower income units and only one above moderate income unit are located in the low resource tract. However, this tract has smaller populations of racial/ethnic minorities (16.4%) and LMI households (34%). The moderate resource tract is an LMI area where 76 percent of households are low or moderate income. There are 42 lower income units, 32 moderate income units, and 32 above moderate income units allocated in this area. The City's RHNA strategy, in tandem with the actions outlined in this Housing Element, does not exacerbate conditions related to fair housing.

Midtown Neighborhood

Sites selected to meet the RHNA in the Midtown Neighborhood are also allocated towards all income levels; there are 143 lower income units, 101 moderate income units, and 196 above moderate income units located in this neighborhood. Both tracts in this area are moderate resource tracts with racial/ethnic minority populations and LMI household populations consistent with Citywide trends. The RHNA strategy in the Midtown Neighborhood will not exacerbate conditions related to fair housing.

Oakhill Brewster Neighborhood

Only 12 above moderate income units have been allocated in the Oakhill Brewster Neighborhood. This neighborhood has non-White populations and LMI household populations consistent with the Citywide trend. Both tracts in this area are moderate resource areas. The addition of 12 above moderate income units in this section of the City will not exacerbate fair housing conditions.

Waterfront Neighborhood

The Waterfront Neighborhood contains the second largest proportion of RHNA units after the Downtown Neighborhood. Of the 649 units allocated in the Waterfront neighborhood, 604 are above moderate income units and 45 are lower income units. There are no block groups in this neighborhood that are considered LMI areas and non-White populations range from 33 to 44 percent in this area. Both tracts are characterized as moderate resource tracts. While there is a high concentration of above moderate income units in this neighborhood where few fair housing issues are present, the combination of units allocated in the Waterfront neighborhood and other Petaluma neighborhoods ensures above moderate income units are not concentrated in this area alone. The allocation of 45 lower income units in this neighborhood also promotes affordable housing in areas of Petaluma where fair housing conditions are less prevalent. The allocation of lower income units throughout the City, in areas where fair housing conditions are variable, promotes mobility and guards against concentrations of lower income housing in a single area of Petaluma. The City's RHNA strategy in the Waterfront Neighborhood does not exacerbate conditions related to fair housing.

Western Neighborhood

There is a total of 357 units in the Western Neighborhood (67 lower income units and 290 above moderate income units). There are three tracts in the Western Neighborhood, two are moderate resource areas and one is a low resource area. Tract 1508 is also considered a sensitive community at risk of displacement.

As discussed previously, it is relevant to note that this tract encompasses a large proportion of the unincorporated County area south of the City and is not a reflection of Petaluma residents alone. There are no lower or moderate income units allocated in the sensitive community. The Western neighborhood generally has smaller populations of racial/ethnic minorities (14.6% to 22.9%) and LMI households (15% to 27%). RHNA units allocated in this neighborhood will not be exposed to fair housing conditions in excess of Citywide trends. Further, lower income units in this section of the City and in other neighborhoods where fair housing conditions are more prevalent, ensure lower income households are not concentrated in a single area.

The City's RHNA strategy distributed RHNA units of various income levels throughout the City, promoting mixed income communities and ensuring units of a single income level are concentrated in one area of the City. The City's RHNA strategy, along with the actions outlined in this Housing Element, does not exacerbate conditions related to fair housing.

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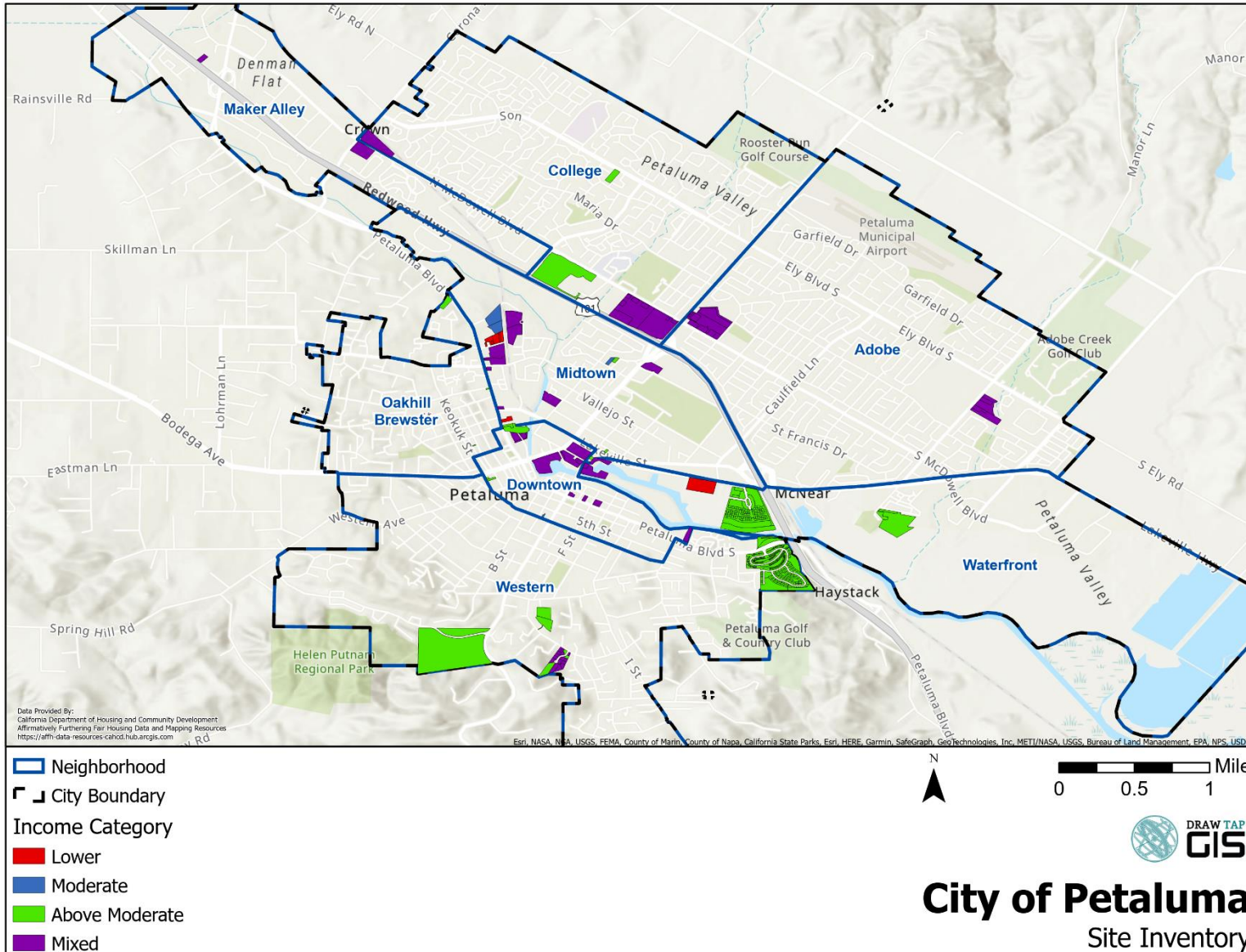
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Table E40: Distribution of RHNA Units by Neighborhood and AFFH Variable

Tract	HHs in Tract	Total Capacity	Income Distribution			% Non-White*	% LMI*	TCAC Opp. Cat.	At Risk of Displacement
			Lower	Moderate	Above Moderate				
Adobe Neighborhood									
1506.03	2,866	30	0	0	30	72.6%	67.0%	Moderate	No
1506.11	1,430	95	8	6	81	56.2%	46.0%	Low	No
College Neighborhood									
1506.03	2,866	53	0	0	53	39.9%	30.0%	Moderate	No
1506.09	2,008	260	81	49	130	27.1 – 55.4%	32.0 – 76.0%	Moderate	No
1506.10	1,346	11	0	0	11	24.2%	27.0%	High	No
Downtown Neighborhood									
1507.01	2,059	909	404	314	191	16.9 - 43.7%	13.0 – 38.0%	Moderate	No
1509.01	2,041	277	13	0	264	41.5%	57.0%	Moderate	No
Maker Alley Neighborhood									
1506.09	2,008	106	42	32	32	55.4%	76.0%	Moderate	No
1512.01	2,920	61	60	0	1	16.4%	34.0%	Low	No
Midtown Neighborhood									
1507.01	2,059	152	21	0	131	43.7%	38.0%	Moderate	No
1509.01	2,041	288	122	101	65	30.1 – 49.6%	37.0 - 57.0%	Moderate	No
Oakhill Brewster Neighborhood									
1509.01	2,041	4	0	0	4	35.6 – 41.5%	50.0 – 57.0%	Moderate	No
1509.02	1,409	8	0	0	8	21.2%	46.0%	Moderate	No
Waterfront Neighborhood									
1506.12	1,666	264	0	0	264	33.0%	24.0%	Moderate	No
1507.01	2,059	385	45	0	340	43.7%	38.0%	Moderate	No
Western Neighborhood									
1507.01	2,059	50	49	0	1	22.9%	27.0%	Moderate	No
1507.02	1,939	279	18	0	261	14.6 – 16.2%	14.0 – 15.0%	High	No
1508	2,012	28	0	0	28	18.0%	26.0%	Moderate	Yes

* Some tracts contain multiple block groups; therefore, data that is provided at the block group level (racial/ethnic minority population and LMI household population) will be shown as a range of the block group population where RHNA units are located.

Figure E56: Sites Inventory and Neighborhoods



Source: Veronica Tam & Associates, 2022.

Contributing Factors

Lack of Fair Housing Testing, Education, and Outreach

As mentioned in the Assessment of Fair Housing Section, the City currently collaborates with Petaluma People Services Center (PPSC) to provide fair housing assistance and landlord/tenant mediation for Petaluma residents. The City does have fair housing information accessible on the City website; however, fair housing outreach may be insufficient. Current outreach practices may not provide sufficient information related to fair housing, including federal and state fair housing law, and affordable housing opportunities. Cost burdened renters, specifically in the Western and College neighborhoods, may be unaware of affordable housing opportunities. Most discrimination inquiries filed through HUD by Petaluma residents were related to disability status. The City may lack sufficient education and outreach related to reasonable accommodations and ADA laws based on the proportion of complaints related to disability status. Further, while fair housing testing was conducted in the County, fair housing tests in Petaluma may be insufficient for monitoring housing discrimination.

Contributing Factors

- Lack of fair housing testing
- Lack of monitoring
- Lack of targeted outreach

Substandard Housing Conditions

While the City does not have a large proportion of households lacking complete kitchen or plumbing facilities, approximately 68 percent of housing units are aged 30 years or older, including 33 percent aged 50 years or older, and may require minor or major rehabilitation. Aging housing units are most concentrated in the central areas of the City where there are concentrations of protected populations (non-White, persons with disabilities, persons below the poverty level). This area also has higher concentrations of HCV recipients compared to the remainder of the City.

Contributing Factors

- Age of housing stock
- Cost of repairs or rehabilitation

Discrimination in Home Sales Market and Disparities in Homeownership Rates

The Hispanic/Latino population appears to be underrepresented in the home loan application pool; however, the race or ethnicity of 21 percent of loan applicants is unknown. The Black/African American population was denied home loans at the highest rate (29 percent), followed by the Hispanic/Latinx population (19 percent), higher than the White population (14 percent). The Hispanic/Latino population makes up the second largest population in the City after the White population.

Contributing Factors

- Lack of fair housing testing/monitoring
- Availability of affordable housing
- Lack of opportunities for residents to obtain housing in higher opportunity areas

Concentration of Protected Populations

The central areas of the City, specifically in and around the Downtown and Midtown neighborhoods, have concentrations of overlapping populations of interest as outlined in this Assessment of Fair Housing. Concentrated populations in this area include racial/ethnic minorities, persons with disabilities, children in female-headed households, and persons below the poverty line. This area of the City also has the largest proportion of aging housing units that may be in need of rehabilitation. This part of the City is considered a moderate resource area. Tracts in the Downtown/Midtown neighborhoods have larger proportions of renter-occupied households (46.2% to 55.4%) compared to other areas of the City. More than 40 percent of renters in these tracts are cost burdened. It is also important to note that a substantial proportion of RHNA units are also located in this section of the City.

Contributing Factors

- Location and type of affordable housing
- Lack of private investment
- Lack of public investments in specific neighborhoods, including services or amenities

Inequities in Access to Opportunities

A majority of Petaluma is considered a moderate resource area. There are three high resource areas in Petaluma, one of which is also an RCAA. Two of the high resource areas and the RCAA are located in the northernmost area of the City in the Maker Alley and College neighborhoods. Conversely, low resource tracts are concentrated in the Adobe neighborhood on the eastern side of Petaluma. This area of the City also received lower TCAC education scores, TCAC environmental scores, and HUD jobs proximity scores compared to the remainder of the City.

Contributing Factors

- Lack of private investment
- Lack of public investments in specific neighborhoods, including services or amenities