

Appendix D

Fair Housing Assessment

Table of Contents

Appendix D: Assessment of Fair Housing D-1

- D.1 Fair Housing Enforcement and Capacity D-1
 - Fair Housing Services D-1
 - Lending Services D-3
 - Brokerage Services D-5
 - Property Management..... D-5
 - Compliance with Fair Housing Law..... D-6
- D.2 Segregation and Integration D-8
 - Race and Ethnicity D-8
 - Persons with Disabilities..... D-13
 - Familial Status D-16
 - Income Level D-21
- D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence D-25
- D.4 Disparities in Access to Opportunity..... D-26
 - Regional Context D-28
 - Local Context D-32
- D.5 Disproportionate Housing Needs & Displacement Risk..... D-39
 - Cost Burden D-39
 - Overcrowding..... D-43
 - Displacement Risk..... D-45
- D.6 Other Relevant Factors D-51
- D.7 Sites Inventory D-53
- D.8 Summary and Conclusions..... D-57

List of Figures

- Figure D-1: Proportion of Non-Hispanic White Residents, Contra Costa County D-11
- Figure D-2: San Pablo Neighborhood Segregation D-13
- Figure D-3: San Pablo Diversity Index..... D-15
- Figure D-4: Persons with Disabilities..... D-18

Figure D-5: Percent of Children in Female Householder Households.....D-19

Figure D-6: Percent of Children in Married-Couple Households.....D-20

Figure D-7: Low- to Moderate-Income Population, Block GroupD-22

Figure D-8: Poverty Status (2014), San PabloD-23

Figure D-9: Poverty Status (2019), San PabloD-24

Figure D-10: R/ECAP and RCAA Locations, San Pablo RegionD-27

Figure D-11: TCAC Opportunity Areas, Composite Score, Contra Costa County.....D-31

Figure D-12: TCAC Opportunity Areas, Composite Score, San PabloD-35

Figure D-13: TCAC Opportunity Areas, Economic Score, San PabloD-36

Figure D-14: TCAC Opportunity Areas, Education Score, San PabloD-37

Figure D-15: TCAC Opportunity Areas, Environmental Score, San Pablo.....D-40

Figure D-16: Transit Access.....D-41

Figure D-17: Homeowner Cost Burden, 2019.....D-43

Figure D-18: Renter Cost Burden, 2019.....D-44

Figure D-19: Overcrowded Households, San PabloD-46

Figure D-20: Sensitive Communities in San PabloD-47

Figure D-21: Gentrification and Displacement Typologies, San Pablo.....D-50

Figure D-22: Racial Segregation/Integration in 2020 and Regional Redlining in the 1930s.D-52

List of Charts and Tables

Chart D-1: HMDA Loan Denial Rates by Race/EthnicityD-4

Chart D-2: HMDA Loan Applications, 2020.....D-5

Table D-1: Population Growth by Race/Ethnicity, Contra Costa County, 2010 - 2040.....D-8

Table D-2: Population by Race/Ethnicity, Contra Costa County Subdivisions, 2019D-9

Table D-3: Population Growth by Race/Ethnicity, San Pablo, 2000 - 2019.....D-10

Chart D-3: San Pablo and Regional Dissimilarity Index.....D-12

Table D-4: Children Under 18 Years in San Pablo Households, 2019D-16

Table D-5: Poverty Rates in San Pablo, 2019D-21

Table D-6: Domain and Indicators for HCD/TCAC Opportunity Maps.....D-26

Chart D-4: Opportunity Indices, Total PopulationD-29

Chart D-5: Opportunity Indices, Population Living Below the Poverty Line.....D-30
Table D-7: CAASPP Smarter Balanced Test Results, 2018-2019D-33
Chart D-6: Cost Burden by Race/Ethnicity in San PabloD-42
Table D-8: Gentrification and Displacement Census Tract Typologies.....D-49
Table D-9: AFFH Housing Element Sites AnalysisD-55
Table D-10: Fair Housing Issues and Contributing Factors.....D-58

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Appendix D: Assessment of Fair Housing

California Assembly Bill (AB) 686, passed in 2018, amended California Government Code Section 65583 to require all public agencies to affirmatively further fair housing (AFFH). AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. AB 686 requires an assessment of fair housing in 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.

San Pablo is a member of the Contra Costa County Consortium (Consortium), which jointly plans for the housing and community development needs of the county. This includes the allocation of Community Development Block Grant (CDBG) funds received from the Department of Housing and Urban Development (HUD) and the production of associated documents, like the Analysis of Impediments to Fair Housing Choice (AI). In 2019 the Consortium produced the 2020-2025 AI to fulfill its federal AFFH obligation. The assessment provided in this chapter relies on this document as a baseline for understanding fair housing issues in the region and in the city. Extensive public outreach, including within San Pablo, was conducted during the preparation of this document. Where necessary, additional data sources are used to provide an up-to-date assessment of fair housing in San Pablo, including AFFH Mapping and Data Resources provided by the State Department of Housing and Community Development (HCD).

D.1 Fair Housing Enforcement and Capacity

Fair housing services are an essential component of AFFH. They ensure that housing options are accessible to State and federally protected groups, including those based on race, color, gender, religion, national origin, familial status, disability, age, marital status, ancestry, source of income, sexual orientation, genetic information, or other arbitrary factors. Fair housing services help San Pablo residents understand and protect their right to access housing.

FAIR HOUSING SERVICES

The Eden Council for Hope and Opportunity (ECHO) Housing provides fair housing services to residents of several cities in Contra Costa County, including in San Pablo. They also serve Alameda County and Monterey County, and have offices in Antioch, Hayward, Livermore, Oakland, Monterey, and Salinas. ECHO Housing provides counseling, investigation, mediation, enforcement, and

education through their Fair Housing Program. Instances of housing discrimination can be reported to any of ECHO's program offices. According to the Consortium's 2020-2025 AI, ECHO Housing suffers from a severe lack of resources and capacity. As of 2019, only one fair housing counselor serves all of Contra Costa County. In general, fair housing organizations that serve the county are lacking resources, which reduces the strength of outreach to marginalized groups, such as limited-English proficiency (LEP) and LGBTQ residents. While the county has a Language Access Plan (LAP) and provides language assistance to persons upon request, the 2020-2025 AI notes that due to the diversity and size of the LEP population in the county a lack of language access may limit fair housing outreach efforts.

The City also works with Housing Rights, Inc. (HRI) to provide additional fair housing services. This partnership is meant to minimize and resolve conflicts and disputes between landlords and tenants and eliminate all forms of housing discrimination by disseminating tenant/landlord conflict resolution information in the annual mailing about residential programs, and documenting residents' concerns at City Hall before forwarding them to HRI. The City implements a tracking system to record the number of referrals to HRI each year.

Housing discrimination complaints are one method to evaluate the extent of fair housing issues in a community. Complaints can be filed directly with HUD or with the California Department of Fair Employment and Housing (DFEH), or with local housing providers such as ECHO Housing. Per the 2019 Annual Report published by DFEH, there were a total of 320 discrimination complaints filed by residents of Contra Costa County, with 22 related specifically to housing. The 2020-2025 AI estimates that there have been 30 to 40 housing complaints filed across the county on an annual basis between 2011 and 2016. In San Pablo, across Fiscal Years (FY) 2016-2017, 2019-2020, and 2020-2021, ECHO Housing reported 12 total complaints or four complaints annually. Most complaints were on the basis of disability (66.7 percent), followed by race, income source, and other reasons (16.7 percent each). This data was corroborated anecdotally by feedback from residents during outreach events in San Pablo's disadvantaged neighborhoods conducted for the General Plan and Housing Element Update, some of whom reported experiencing discrimination on the basis of income. Percentages may not sum to 100 percent as complaints can be filed under multiple categories. Data for the period between 2017 and 2019 is not available, as ECHO Housing did not differentiate San Pablo cases from other urban county cases.

In November 2020, the City prepared an Affordable Housing Strategy (AHS) to develop policies and strategies to produce and maintain a supply of high-quality, affordable housing. In preparing the AHS, an online survey was distributed to the San Pablo community. Approximately 61 percent of respondents either strongly disagreed or disagreed with the statement: "I am familiar with local programs to help residents find an affordable home." While not specific to fair housing, this response indicates a lack of public awareness regarding local housing programs.

This finding is in line with the factors identified in the 2020-2025 AI that contribute to insufficient fair housing enforcement, outreach capacity, and resources. These included lack of resources for fair housing agencies and organizations, lack of meaningful language access, private discrimination, lack of local public fair housing enforcement, lack of State or local fair housing laws, and unresolved violations of fair housing or civil rights laws. Although multiple fair housing groups in Contra Costa offer services including language access, there are patterns of reoccurring fair housing problems in

Contra Costa County that could be reduced with more resources and a firmer public stance on fair housing and civil rights laws by local jurisdictions.

An additional challenge for fair housing rights enforcement in San Pablo is linked to the fact that many tenants do not have formal lease agreements or contracts. As described further below in the discussion of disproportionate needs, staff observes that multigenerational and non-standard family arrangements are common in San Pablo. This means that relatives or friends living with the property owner in the primary dwelling or in an accessory dwelling unit have only informal agreements and lack the leverage to request rectification and rehabilitation of substandard conditions where they occur. The City's Residential Health & Safety (RH&S) Program has proven an effective tool for addressing substandard housing conditions, particularly as access to grants and loans administered by the County for rehabilitation is limited.

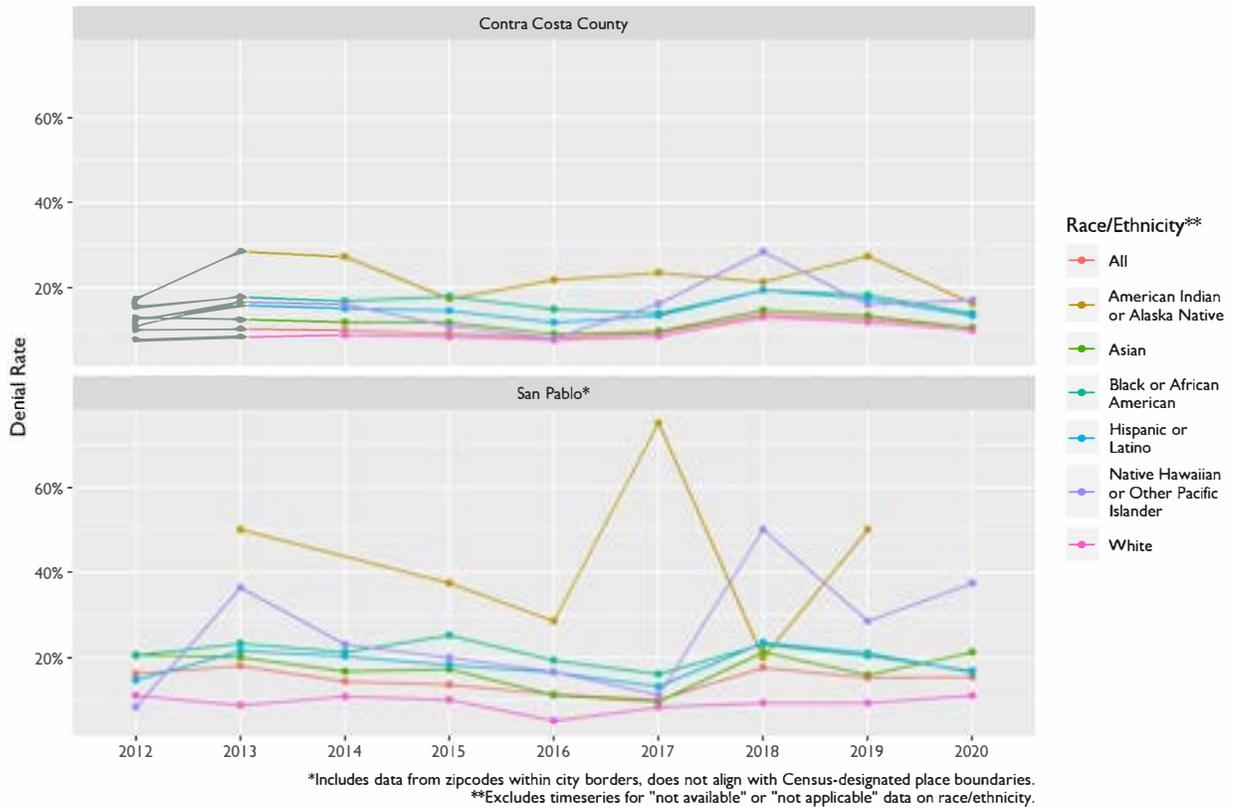
The Housing Action Plan in Chapter 4 includes policies and programs that address fair housing awareness and enforcement, including Program 3-F Landlord/Tenant Dispute Resolution; Program 3-G Just Cause Eviction Protections; Program 3-H Awareness of Fair Housing Programs; Program 3-I Outreach to People Living with Developmental Disabilities; and Program 4-F Residential Health & Safety Program..

LENDING SERVICES

Discrimination in lending practices can be a major contributor to fair housing issues in a community, as this limits the ability of individuals to live in a location of their choosing. Loan denial rates can be derived from data provided by lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The 2020-2025 AI found, based on 2016 HMDA data for the Oakland-Hayward-Berkeley region, that non-white applicants were consistently denied home loans at slightly higher rates than white applicants, with Pacific Islander and Native American applicants denied at the highest rates. The data does not indicate the grounds for the denial, and it cannot be proven on the basis of this data that the denials were not justified on the basis of standard financial criteria; however, the trend suggests both that there is potential for bias within the financial system and that there may be a need for financial literacy training among non-whites to help those groups better understand how to improve their credit scores.

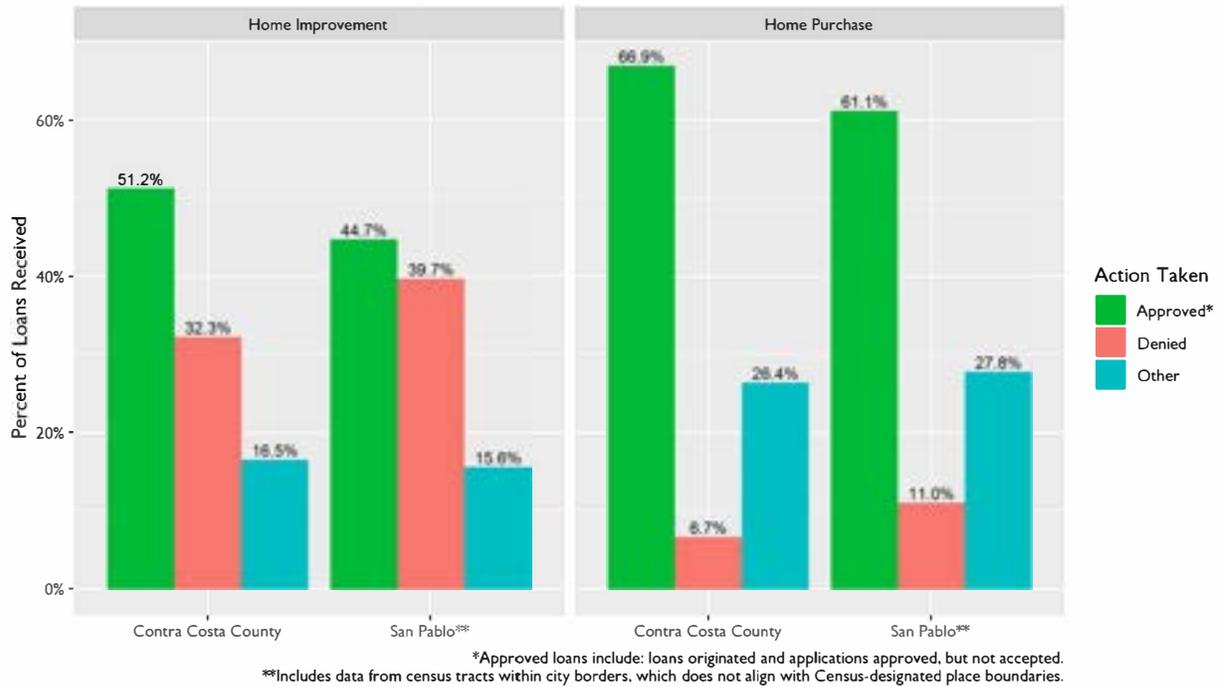
Charts 3-1 and 3-2 provide an overview of lending patterns in San Pablo when compared to the county. Chart D-1 confirms the findings of the 2020-2025 AI and shows that such potentially discriminatory lending patterns have continued at the county level up until the year 2020. San Pablo has similarly seen uneven lending patterns and as of 2020 (the most recent year that data is available) Native Hawaiian or Other Pacific Islander and Asian applicants had the highest loan denial rates, followed by Black or African American and Hispanic or Latino applicants. Further, since 2012 white applicants in San Pablo have consistently experienced lower than average loan denial rates. The wider variation in loan denial rates for American Indian or Alaska Native and Native Hawaiian or Other Pacific Islander applicants is due to the low number of applicants during the period who identified as such. Chart D-2 demonstrates that in 2020 the city had lower loan approval rates for both home improvement and home purchase loans than the county.

Chart D-1: HMDA Loan Denial Rates by Race/Ethnicity



Source: Home Mortgage Disclosure Act Data, 2012-2020

Chart D-2: HMDA Loan Applications, 2020



Source: Home Mortgage Disclosure Act Data, 2020

BROKERAGE SERVICES

Real estate brokers or salespersons whose business is in San Pablo may belong to one of several associations, but most likely belong to the Contra Costa Association of REALTORS (CCAR). Like all associations, CCAR has a Multiple Listing Service (MLS)—Paragon MLS—and is part of the NORCAL MLS ALLIANCE, an MLS data integration project across the seven leading MLSs in Northern California. CCAR is bound by the Code of Ethics and Standards of Practice of the National Association of REALTORS (NAR), which explicitly states in Article 10 that members shall not discriminate against any person on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity.

PROPERTY MANAGEMENT

The City’s AHS discusses the role of property management companies in San Pablo’s housing market. It notes that larger multifamily properties, which are often operated by professional property management companies, tend to command higher rents than smaller properties. These buildings are typically newer and provide modern amenities, while smaller rental buildings tend to be older, have smaller units, or provide fewer amenities. Property management companies are also more likely to raise rents on a regular basis. It is also estimated that in 2019, Wall Street investors owned and rented

103 single-family homes in San Pablo.¹ As discussed in the AHS, these types of property owners typically charge more than the area median rent and tenants report paying for maintenance and repairs as well as a variety of punitive fees, such as late payment fees.² Such practices may place additional burdens on groups already facing disproportionate housing needs.

COMPLIANCE WITH FAIR HOUSING LAW

HCD guidance on Affirmatively Furthering Fair Housing requires an analysis of compliance with existing fair housing laws and regulations. Examples of State fair housing laws include:

- California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2)
- FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271)
- Government Code section 65008 covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.
- Government Code section 8899.50 requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.
- Government Code section 11135 et seq. requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.
- Density Bonus Law (Gov. Code, § 65915.)
- Housing Accountability Act (Gov. Code, § 65589.5.)
- No-Net-Loss Law (Gov. Code, § 65863)
- Least Cost Zoning Law (Gov. Code, § 65913.1)
- Excessive subdivision standards (Gov. Code, § 65913.2.)
- Limits on growth controls (Gov. Code, § 65302.8.)
- Housing Element Law (Gov. Code, § 65583, esp. subs. (c)(5), (c)(10).)

¹ "Wall Street Landlords, California," *Anti-Eviction Mapping Project*, 2019. Available at:

<https://www.anti-evictionmap.com/wallstreet/>

² "The New Single-Family Home Renters of California: A Statewide Survey of Tenants Renting from Wall Street Landlords", *Tenants Together*, May 2015. Available at:

<http://www.tenants-together.org/sites/tenants-together.org/files/The%20New%20Single-Family%20Home%20Renters%20of%20California.pdf>;

Francesca Mari, "A \$60 billion housing grab by Wall Street," *New York Times Magazine*, March 4, 2020. Available at: <https://www.nytimes.com/2020/03/04/magazine/wall-street-landlords.html>

As described in Chapter 3: Housing Resources, the City does not receive direct federal funding allocations (e.g., CDBG and HOME funds) due to its small population; instead, federal funds are provided to and allocated by Contra Costa County. As the recipient of federal funds, the County is required to maintain Affirmatively Furthering Fair Housing (AFFH) certification and to demonstrate compliance through its Consolidated Plan and Annual Action Plans, which are submitted to HUD for approval prior to receipt of the CDBG, Emergency Solutions Grants, Housing Opportunities for Persons With AIDS (HOPWA) funds, and HOME funds. By extension and to remain competitive for these funds, the City of San Pablo also has a duty to demonstrate AFFH compliance with State fair housing laws, including but not limited to California Fair Employment and Housing Act (FEHA); FEHA Regulations; and Government Code sections 65008, 8899.50, and 11135 et seq.

The City of San Pablo must also comply with State Density Bonus Law (Gov. Code, § 65915.), the Housing Accountability Act (Gov. Code, § 65589.5.), and the No-Net-Loss Law (Gov. Code, § 65863). Density bonus provisions are currently incorporated into the Zoning Ordinance (Title 17.60.020 Density bonus and other incentives), which the City plans to update to comply with State law. As noted in the City's Affordable Housing Strategy, virtually no new housing units were built between 2010 and 2019, with higher development activity only occurring relatively recently (2018-2021), and in this time, the City has not denied any affordable housing project in its jurisdiction. Through its Housing Element, the City is implementing a plan to ensure adequate sites to accommodate its RHNA obligations at all times during the planning period, and to comply with other legal requirements.

In the course of preparing this Housing Element, the City has conducted a review of the Zoning Ordinance to identify and address potential constraints to housing development such as overly strict use regulations for residential development—especially special needs housing including emergency shelters, mobile home parks, residential care facilities, and single-room occupancy units—in mixed-use and commercial districts; restrictive site development standards that impede redevelopment in higher-density residential, mixed-use, and commercial districts; and high parking requirements for multifamily residential projects with parking reductions subject to discretionary approval. (See Appendix C for more information). As a result of this review, Programs 1-B (Corridor Plan), 1-C (Repeal or Revise the 23rd Street Specific Plan), 1-D (Revise Multifamily Minimum Parcel Size), 1-E (Facilitate Lot Consolidation), 1-F (Incentives for High Density Residential Development), 1-G (Reduced Parking Standards), 1-L (Objective Standards for Ministerial Review), 2-F (Mobile Home Parks), 2-G (Single-Room Occupancy Hotels), 2-I (Incentives for Affordable and Special Needs Housing), 3-B (Emergency Shelters), 3-C (Employee Housing), and 3-D (Residential Care Facilities) have been added to the Housing Action Plan in Chapter 4 of this Housing Element to remove identified constraints. Although the City has not enacted local fair housing laws, such as rent control, inclusionary ordinances, or eviction protection ordinances, the City adopted an emergency ordinance (expired May 31, 2020) for a COVID-19 Eviction and Rent Moratorium and complies with State law pursuant to the Tenant Protections Act of 2019 (AB 1482).

D.2 Segregation and Integration

Patterns of segregation within a community may arise from both public and private housing discrimination, whether intentional or unintentional. Although racial and ethnic segregation is perhaps the most common and well-known form, other protected classes may also experience segregation. This section explores patterns and trends of segregation based on race and ethnicity, disability, familial status, and income level in San Pablo and the surrounding region. These groups are not mutually exclusive, and there may be considerable overlap across each protected class. For additional data and analysis regarding special housing needs groups, please see Appendix B Housing Needs Assessment.

RACE AND ETHNICITY

Racial and ethnic patterns of segregation in San Pablo should be understood in the context of changing regional and local demographics. As shown in Table D-1, the population of Contra Costa County has increased by 9.2 percent between 2010 and 2020, with a projected increase of about 14.2 percent between 2020 and 2040. The non-Hispanic white population has the lowest projected growth rate between 2020 and 2040, while the non-Hispanic multiracial population has the highest projected growth rate. While over 50 percent of the population is something other than non-Hispanic white, non-Hispanic whites represent a plurality of the population at about 45.5 percent, followed by Hispanics of any race (25.5 percent) and non-Hispanic Asians (15.3 percent). The 2020-2025 AI confirms that the county is a large, diverse jurisdiction. The racial/ethnic makeup of the population is similar to the broader San Francisco-Oakland-Hayward, California Metropolitan Statistical Area (MSA), although the share of Hispanic residents is slightly higher and the share of non-Hispanic Asian or Pacific Islander is slightly lower in the county than in the broader region. The 2020-2025 AI also notes that diversity and integration are not synonymous, and that the county has both areas of racial and ethnic concentration as well as more integrated areas. Patterns of segregation will be explored in more detail below.

Table D-1: Population Growth by Race/Ethnicity, Contra Costa County, 2010 - 2040

Race/Ethnicity	Population			Percent Change	
	2010	2020	2040 Forecast	2010-2020	2020-2040
White (NH) ¹	504,651	523,428	554,969	3.7%	6.0%
Black (NH)	94,745	103,467	124,890	9.2%	20.7%
American Indian or Alaska Native (NH)	3,067	3,311	3,805	8.0%	14.9%
Asian (NH)	151,457	175,546	210,435	15.9%	19.9%
Native Hawaiian or Pacific Islander (NH)	4,578	5,215	5,882	13.9%	12.8%
Multiracial (NH)	37,576	45,754	63,879	21.8%	39.6%
Hispanic (any race)	256,480	293,079	348,676	14.3%	19.0%
Total	1,052,554	1,149,800	1,312,536	9.2%	14.2%

1. NH refers to non-Hispanic.

Source: California Department of Finance, Table P-2D County Population by Total Hispanic and Non-Hispanic Race (2010-2060)

Despite the diversity of the county, population is unevenly distributed geographically by race/ethnicity. While East County is relatively white and wealthy, West County—including San Pablo—has a relatively high minority population and lower average household income. Table D-2 breaks down 2019 population estimates by race/ethnicity by county subdivisions, or census county divisions (CCDs), in Contra Costa County.³ San Pablo, along with Richmond, is contained within West Contra Costa CCD, while cities like Walnut Creek and Concord are in Central Contra Costa CCD. West Contra Costa County CCD and Antioch-Pittsburg CCD contain the lowest proportion of non-Hispanic white residents (23.8 percent and 23.6 percent, respectively) in the county, compared to the 61.3 percent seen in Central Contra Costa CCD and 48.8 percent seen in East Contra Costa CCD. Figure D-1 shows the concentration of non-Hispanic white residents by CCD.

Table D-2: Population by Race/Ethnicity, Contra Costa County Subdivisions, 2019

Race/Ethnicity	Percent Non-Hispanic White
West Contra Costa CCD	23.8%
Briones CCD	36.1%
Central Contra Costa CCD	61.3%
Antioch-Pittsburg CCD	23.6%
Tassajara CCD	29.8%
East Contra Costa CCD	48.8%

Source: U.S. Census Bureau, Census 2019 ACS Five-Year Estimates (Table B03002)

San Pablo is considered a majority-minority jurisdiction, as the majority of its population is something other than non-Hispanic white. This differs from other portions of the county, as evidenced in Figure D-1, which tend to have a high proportion of white residents. As of 2019, according to American Community Survey (ACS) estimates, minority residents (i.e., all residents that identify as something other than non-Hispanic white) constituted about 92.3 percent of the city's total population. Unlike the county, about 60.1 percent of the city's population is Hispanic or Latino, followed by 17.2 percent non-Hispanic/Latino Asian and 10.7 percent non-Hispanic/Latino Black or African American, see Table D-3. The number of non-Hispanic/Latino white, non-Hispanic/Latino Black or African American, and non-Hispanic/Latino American Indian and Alaska Native (AIAN) residents has steadily decreased since 2000. While the number of non-Hispanic/Latino Asian and non-Hispanic/Latino other residents decreased between 2000 and 2010, both groups have grown significantly between 2010 and 2019. On the other hand, while non-Hispanic/Latino Native Hawaiian and Other Pacific Islander residents increased between 2000 and 2010, this population has since declined. The number of Hispanic or Latino residents has continually increased since 2000. Population projections by race and ethnicity are unavailable at the city level as they have not been prepared by the

³ County subdivisions, also referred to as census county divisions (CCDs), are delineated by the U.S. Census Bureau for statistical purposes but have no legal function and are not governmental units.

DOF, the Association of Bay Area Governments-Metropolitan Transportation Commission (ABAG-MTC) or Contra Costa County.

Table D-3: Population Growth by Race/Ethnicity, San Pablo, 2000 - 2019

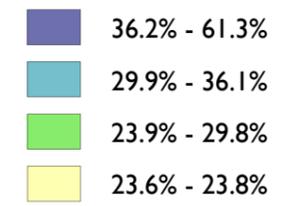
Race/Ethnicity	Population			Percent Change	
	2000	2010	2019	2000-2010	2010-2019
White, Non-Hispanic/Latino	4,886	2,944	2,386	-39.7%	-19.0%
Black or African American, Non-Hispanic/Latino	5,403	4,446	3,325	-17.7%	-25.2%
American Indian and Alaska Native, Non-Hispanic/Latino	125	73	50	-41.6%	-31.5%
Asian, Non-Hispanic/Latino	4,890	4,281	5,312	-12.5%	24.1%
Native Hawaiian and Other Pacific Islander, Non-Hispanic/Latino	146	156	134	6.8%	-14.1%
Other, Non-Hispanic/Latino	1,275	777	1,138	-39.1%	46.5%
Hispanic or Latino	13,490	16,462	18,622	22.0%	13.1%
Minority ¹	25,329	26,195	28,581	3.4%	9.1%
Total	30,215	29,139	30,967	-3.6%	6.3%

1. Minority refers to any person not listed as White, Non-Hispanic/Latino

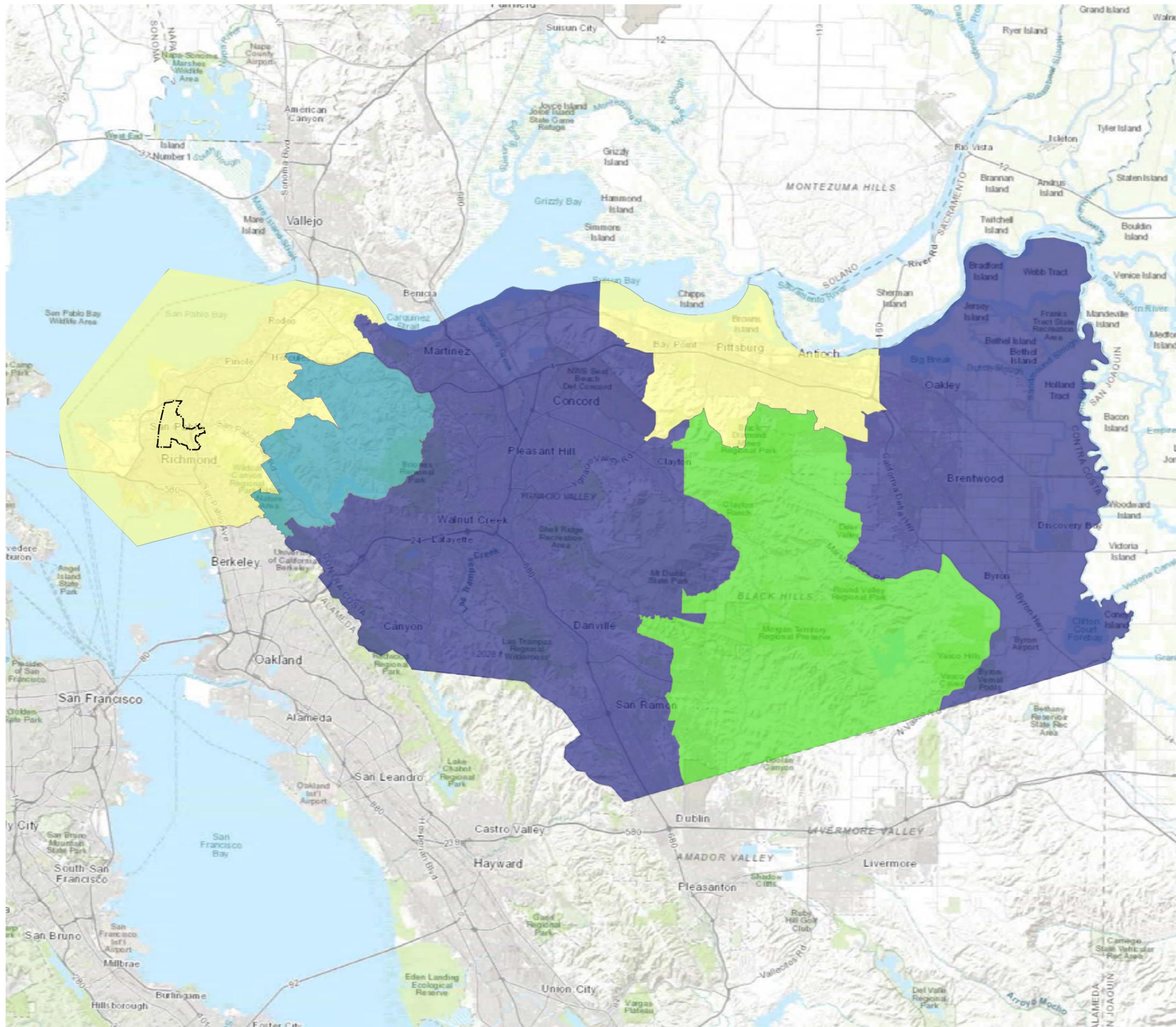
Source: U.S. Census Bureau, Census 2000 (SFI, Table P004); Census 2010 (SFI, Table P9); 2019 ACS Five-Year Estimates (Table DP05)

One method to gauge the extent of segregation in a jurisdiction is the dissimilarity index. The dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is a commonly used tool for assessing residential segregation between two groups. The dissimilarity index provides values ranging from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured. According to HUD, dissimilarity index values between 0 and 39.99 generally indicate low segregation, values between 40 and 54.99 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. It is important to note that the dissimilarity index uses non-Hispanic white residents as the primary comparison group, whereas San Pablo is majority-minority jurisdictions. Dissimilarity index values compare racial and ethnic groups against the distribution of non-Hispanic white residents in a community and do not directly measure segregation between minority groups (e.g., non-Hispanic Black or African American and Hispanic or Latino segregation).

SAN PABLO GENERAL PLAN UPDATE
 Figure D-1: Proportion of Non-Hispanic White Residents, Contra Costa County



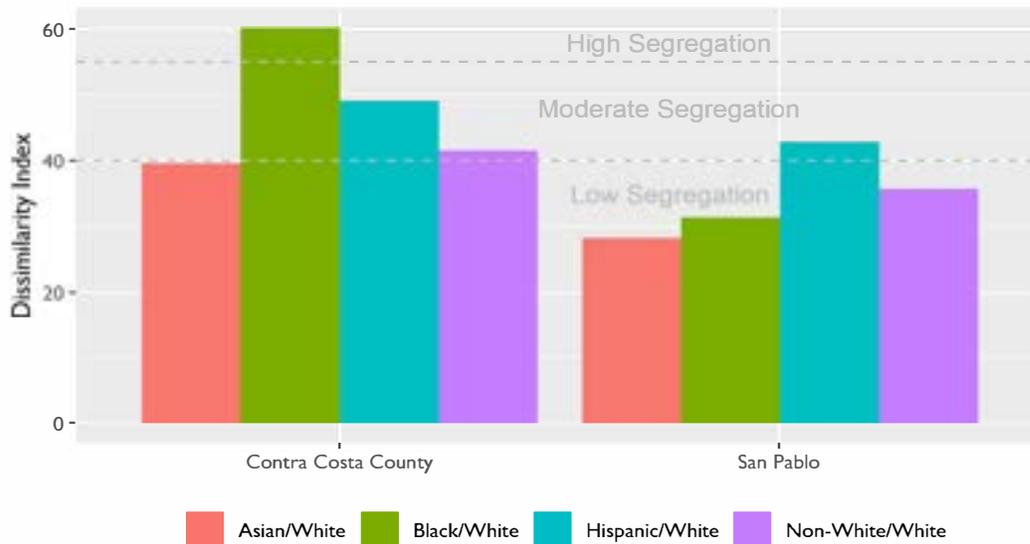
City Limits



SOURCE: U.S. Census Bureau, Census 2019 ACS Five-Year Estimates (Table B03002); City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

Chart D-3 provides dissimilarity indices for San Pablo and the county derived from 2019 ACS estimates. While the county has relatively high levels of segregation, the city maintains relatively low levels. For instance, there is high segregation between Black and white residents in the county, but low levels of segregation for Black and white residents in San Pablo. However, there is a moderate level of segregation between Hispanic and white residents in the city.

Chart D-3: San Pablo and Regional Dissimilarity Index



Source: U.S. Census Bureau, 2019 ACS Five-Year Estimates (Table B01003 and Table B03002)

The 2020-2025 AI finds that segregation in the county is primarily an inter-jurisdictional rather than an intra-jurisdictional phenomenon. It notes that there are high concentrations of Black and Hispanic populations in east and west county communities, while there are a low number Black and Hispanic residents in the central county. Geographically, San Pablo is part of West County. Hispanic residents are concentrated in San Pablo, as well as the cities of Pittsburg and Richmond. The trend of inter-city segregation explains why the county has higher levels of segregation as measured by the dissimilarity index while individual cities, like San Pablo, have relatively lower levels.

At the county level, segregation for Black residents has decreased since 1990, while levels of segregation for Hispanics and Asians/Pacific Islanders have increased. The 2020-2025 AI explains that the primary driver of desegregation has been the out-migration of Black residents from historically Black neighborhoods in the Cities of Richmond, Oakland, and San Francisco towards more suburban jurisdictions in the county with historically smaller Black populations. However, when using the alternate exposure index to measure segregation, the 2020-2025 AI concludes that the exposure of Black residents to non-Hispanic white residents has not changed, and that as the proportion of Hispanic and Asian residents in the county has increased, the neighborhoods in which Black residents have historically lived have become increasingly less Black. Exposure estimates the probability that a member of one racial/ethnic group will interact with a member of another racial/ethnic group in their neighborhood. While the dissimilarity index shows a decreasing imbalance between Black and white residents, this is a byproduct of the increasing share of other minority populations. As the 2020-2025 AI notes, neighborhood amenities are still largely concentrated in predominantly white neighborhoods.

The shortcomings of the dissimilarity index, including the fact that San Pablo is a majority-minority city, may not capture the nuances of segregation between minority groups within the city. Further, the dissimilarity index is only available at the citywide level. To capture these nuances, HCD has provided neighborhood segregation typologies developed by the Urban Displacement Project (UDP) at UC Berkeley. These typologies identify tracts based on which racial/ethnic groups have more than 10 percent representation within a given census tract. The typologies consider five racial/ethnic groups—including Black, Latinx, White, Asian, and Other. As shown in Figure D-2, while most of the city is either 3 or 4 Group Mix, there are concentrations of ethnic/racial groups in the western portion of the city. The southwestern portion of the city is Mostly Latinx, while the areas north of it are Black-Latinx and Asian-Latinx. Further, as displayed in Figure D-3, most of the city is classified as Higher Diversity by the 2018 ESRI Diversity Index, with two sections of relatively lower diversity in the central and eastern portions of the city.

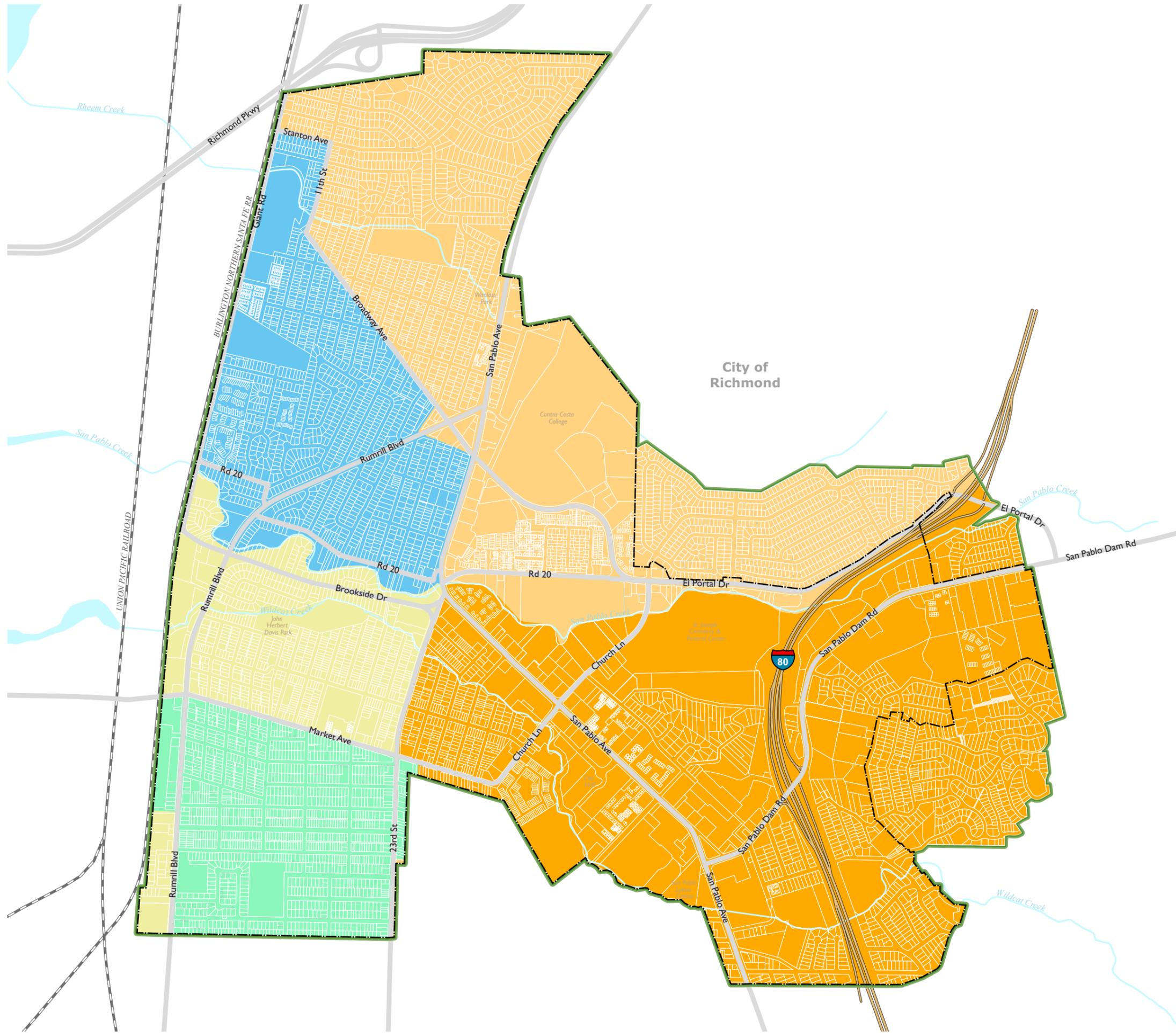
While there is a relatively higher concentration of Latino residents in the western portion of San Pablo, the 2020-2025 AI concluded that it is unlikely that existing land uses and zoning correlate with a concentration of non-white and low-income residents in San Pablo. While multifamily residence zones primarily lie along the San Pablo Avenue and 23rd Street corridors—which are the sites of increased diversity in the city—zoning for single-family residences remains dominant across the city. Further, the City is currently preparing the Rumrill Corridor Plan which will target development along Rumrill Boulevard in the portion of the city classified as Mostly Latinx and Black-Latinx. This will likely include increased multifamily residential or mixed-use development in those areas.

The 2020-2025 AI identifies three trends that will likely contribute to future segregation in the county: the regional housing crisis, aftereffects of the foreclosure crisis, and open space and growth boundaries. The high costs of new housing, as well as gentrification and displacement pressures, may continue patterns of segregation at the regional level as lower-income households and Black and Hispanic or Latino households face increasingly constrained housing choices. Further, the foreclosure crisis, which was particularly acute in San Pablo, has contributed to the decline of household wealth in communities of color, the deterioration of the physical quality of homes, and reduced opportunities for affordable homeownership. Finally, conserved open space limits the amount of land available for the development of higher-density affordable housing and raises equity questions in evaluating the future use of protected areas.

PERSONS WITH DISABILITIES

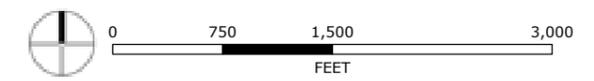
Persons with disabilities may face discriminatory housing practices based on their disability, including the lack of accessible dwellings and refusal by housing providers to provide reasonable accommodations. As noted in the Housing Needs Assessment Appendix, according to 2019 ACS five-year estimates, 3,685 persons (12.0 percent of the non-institutionalized population) in San Pablo had a disability. This proportion is about equivalent to Contra Costa County (11.2 percent) and

SAN PABLO GENERAL PLAN UPDATE
 Figure D-2: San Pablo Neighborhood Segregation



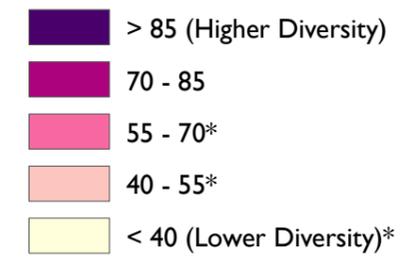
- 3 Group Mixed
- 4 Group Mixed
- Asian-Latinx
- Black-Latinx
- Mostly Latinx

- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads

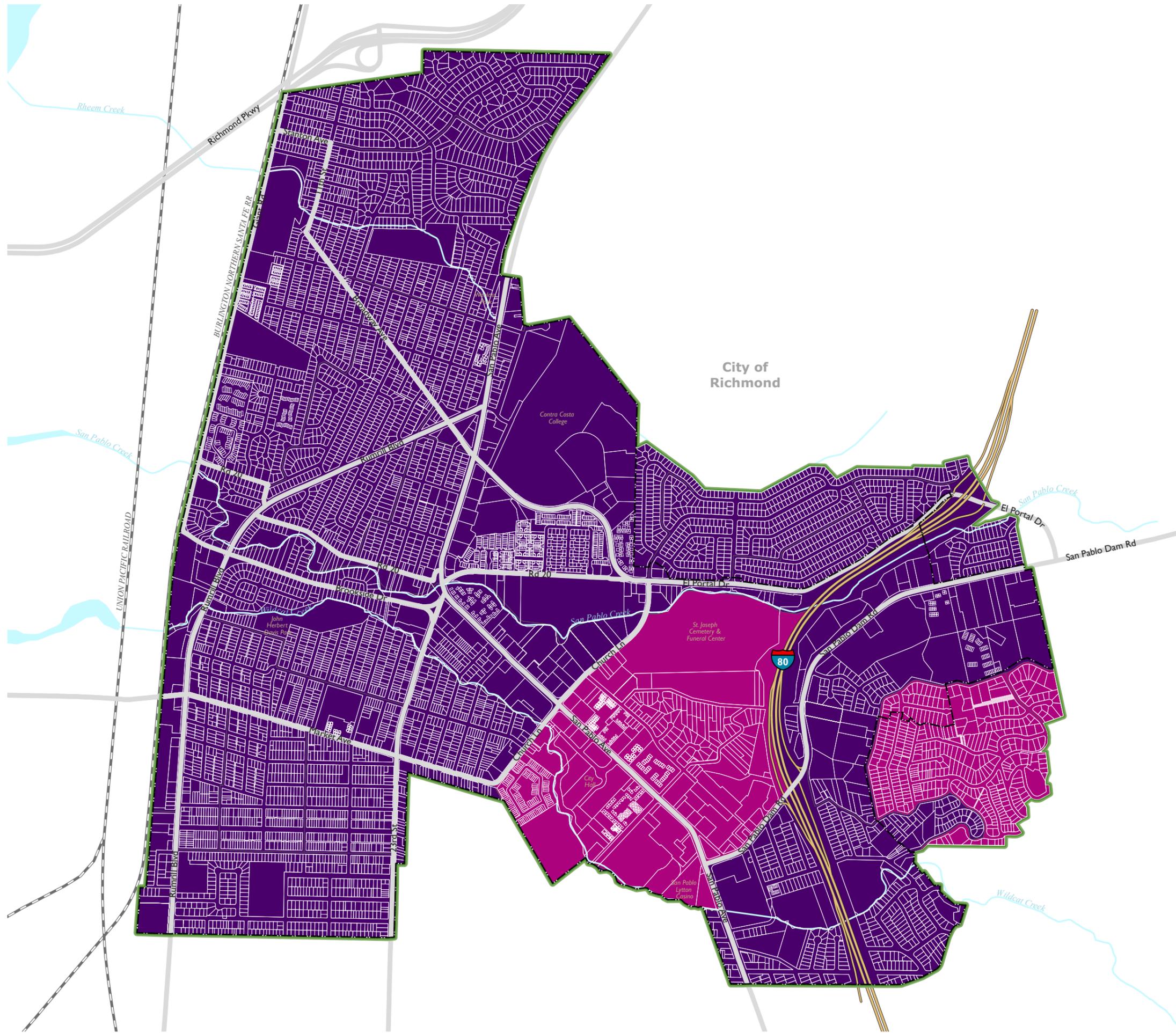
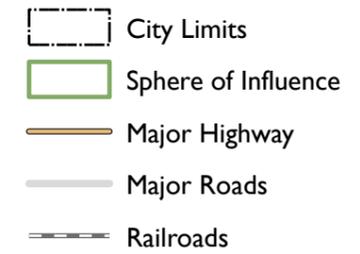


SOURCE: HCD AFFH Data and Mapping Resources - Urban Displacement Project, 2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-3: San Pablo Diversity Index



*No census blocks contained in this category.



SOURCE: HCD AFFH Data and Mapping Resources - ESRI, 2018; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

slightly higher than that of the Bay Area (9.6 percent). As shown in Figure D-4 below, there is a slight concentration of persons with a disability in the southern and eastern portions of the city. This is likely linked to the presence of facilities that serve the needs of the disabled in these locations, including Vale Healthcare, a 2-2-bed skilled nursing facility for older adults at 13484 San Pablo Avenue; the Hatlen Residential Center for the Visually Impaired at 2430 Rd 20; and the concentration of Section 8 housing that serves people with disabilities within the Rumrill PDA. However, no single census tract contains a population with a disability that exceeds 20 percent of the tract's total population, which is the threshold typically used by HCD as an indicator of overconcentration.

FAMILIAL STATUS

Familial status may be another basis for discriminatory housing practices, including discrimination against families with children. Such discrimination may limit the choices of where families can live and lead to geographic concentrations within a community. Female householders with children in particular may be targets of discrimination. Within San Pablo, as indicated in Table D-4, most children under 18 years live in married-couple households. About 29.3 percent of children live in female householder, no spouse present households, while 11.8 percent of children live in male householder, no spouse present households. While the rate of female-headed households is higher in San Pablo than in Contra Costa County as a whole (12.2 percent) and the Bay Area (10.4 percent),⁴ City staff reports that the family support network available to single mothers is strong. In addition to informal support from friends and relatives in the community, resources catering to the needs of single mothers in San Pablo include Contra Costa Health's San Pablo WIC at 501 Gateway Avenue, which offers an array of programs, services, and classes for women, infants & children; and Ujima Family Recovery Services, a non-profit charitable organization dedicated to helping families recover from alcoholism, drug addiction and behavioral health problems, located at 1901 Church Lane.

Table D-4: Children Under 18 Years in San Pablo Households, 2019

<i>Household Type¹</i>	<i>Number</i>	<i>Percent</i>
Married-Couple	4,486	58.9%
Male Householder, No Spouse Present	903	11.8%
Female Householder, No Spouse Present	2,233	29.3%
Other	0	0.0%
Total	7,622	100.0%

1. All households with children are considered family households.

Source: U.S. Census Bureau, 2019 ACS Five-Year Estimates (Table S0901)

Figures 3-5 through 3-6 below indicate there are some patterns of geographic concentration based on familial status. These figures show the percentage of children within a census tract that live within a certain type of family household. For instance, Figure D-5 shows there is a comparatively lower share of children living in female-headed households in the southern and eastern portions of the city, while Figure D-6 shows a relatively higher concentration of children living in married-couple households in

⁴ U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001. (ABAG Housing Element Data Package 2021).

the southern, eastern and northern portions of the city. At the regional scale, the 2020-2025 AI notes that Contra Costa County has a higher percentage of households that consist of families with children than in the broader Bay Area region. Within the county, there is a concentration of households headed by single mothers in San Pablo, Richmond, North Richmond, Bay Point, Pittsburg, and Antioch. These areas tend to have high combined Black and Hispanic/Latino populations. This differs from areas in the central county, which have low concentrations of single mothers and have relatively higher populations of white or Asian and Pacific Islander communities.

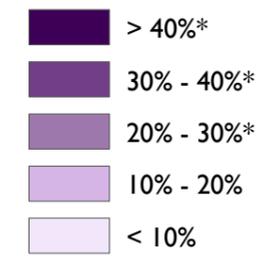
PEOPLE EXPERIENCING HOMELESSNESS

Based on the 2023 Point-in-Time (PIT) Count, as discussed in the Housing Needs Assessment (Appendix B), there were 48 individuals experiencing homelessness in San Pablo on the night of January 24, 2023. This represents a 28.4 percent decrease over 2020 PIT totals in the city. Staff reports that homeless encampments are most typically found on vacant land adjacent to the I-80 freeway and near San Pablo and Wildcat Creeks in the city. There are currently no homeless or transitional shelters in San Pablo, though Contra Costa County offers various health and social services in San Pablo at the West County Behavioral Health Center. To access services elsewhere in the County, transit service is available. As discussed in greater detail below (see D.4 Disparities in Access to Opportunity), there are seven local bus lines that serve the City, providing connections to the regional transportation network, including Bay Area Rapid Transit (BART) stations in Richmond and El Cerrito, the Amtrak rail station in Richmond, and the Richmond Passenger Ferry Terminal. Virtually every parcel in San Pablo is within 1/4 mile of a bus line.

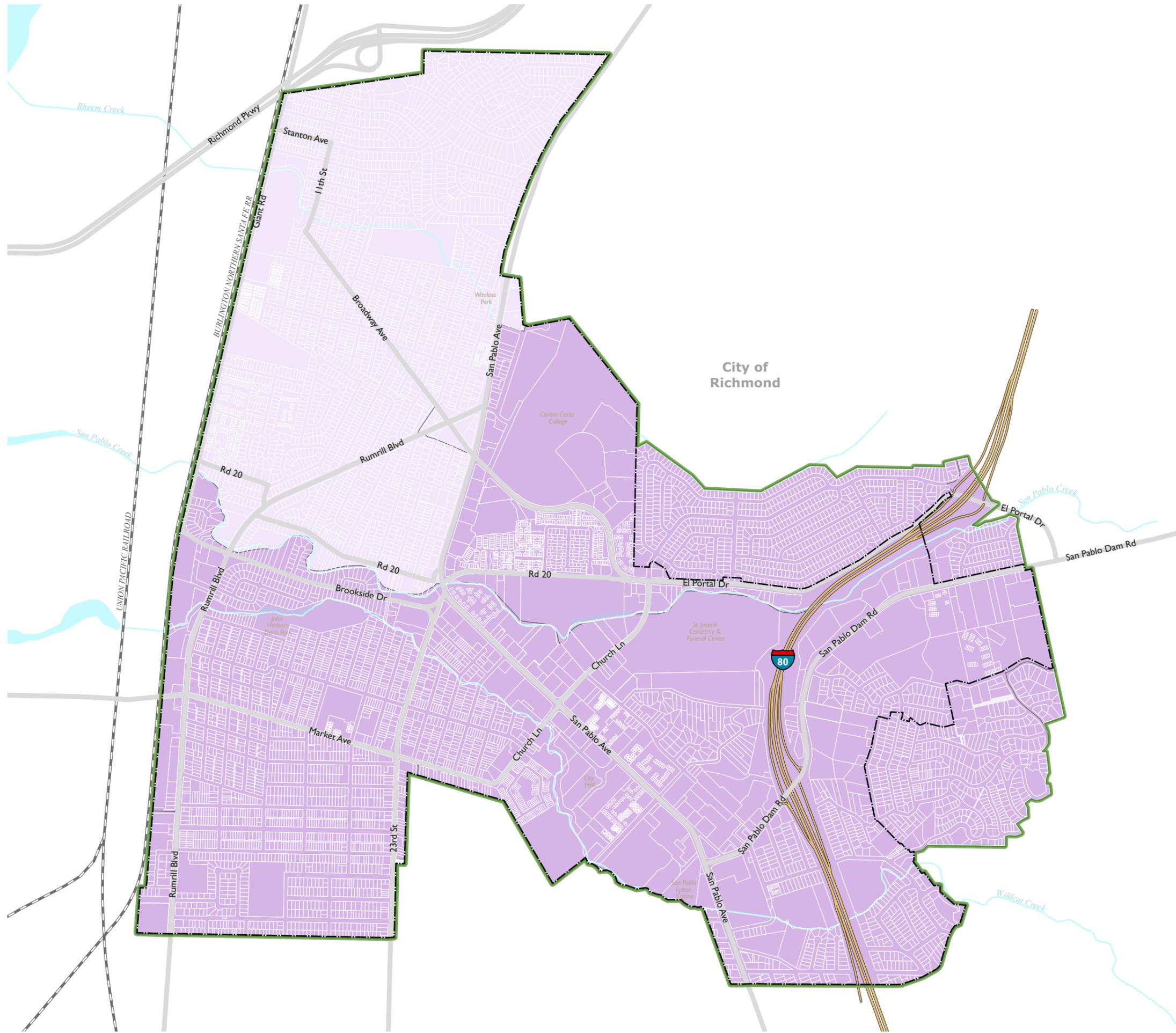
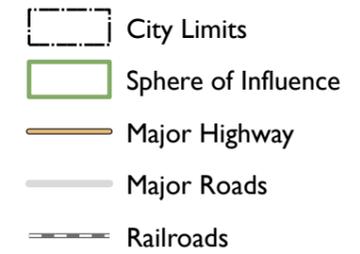
People experiencing homelessness in San Pablo have not necessarily been displaced from housing in the community. Anecdotal information from City staff indicates that some homeless individuals came to San Pablo to gamble at the Lytton Casino but lack the resources to return home.

SAN PABLO GENERAL PLAN UPDATE

Figure D-4: Persons with Disabilities

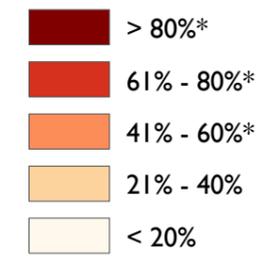


*No census tracts contained in this category.

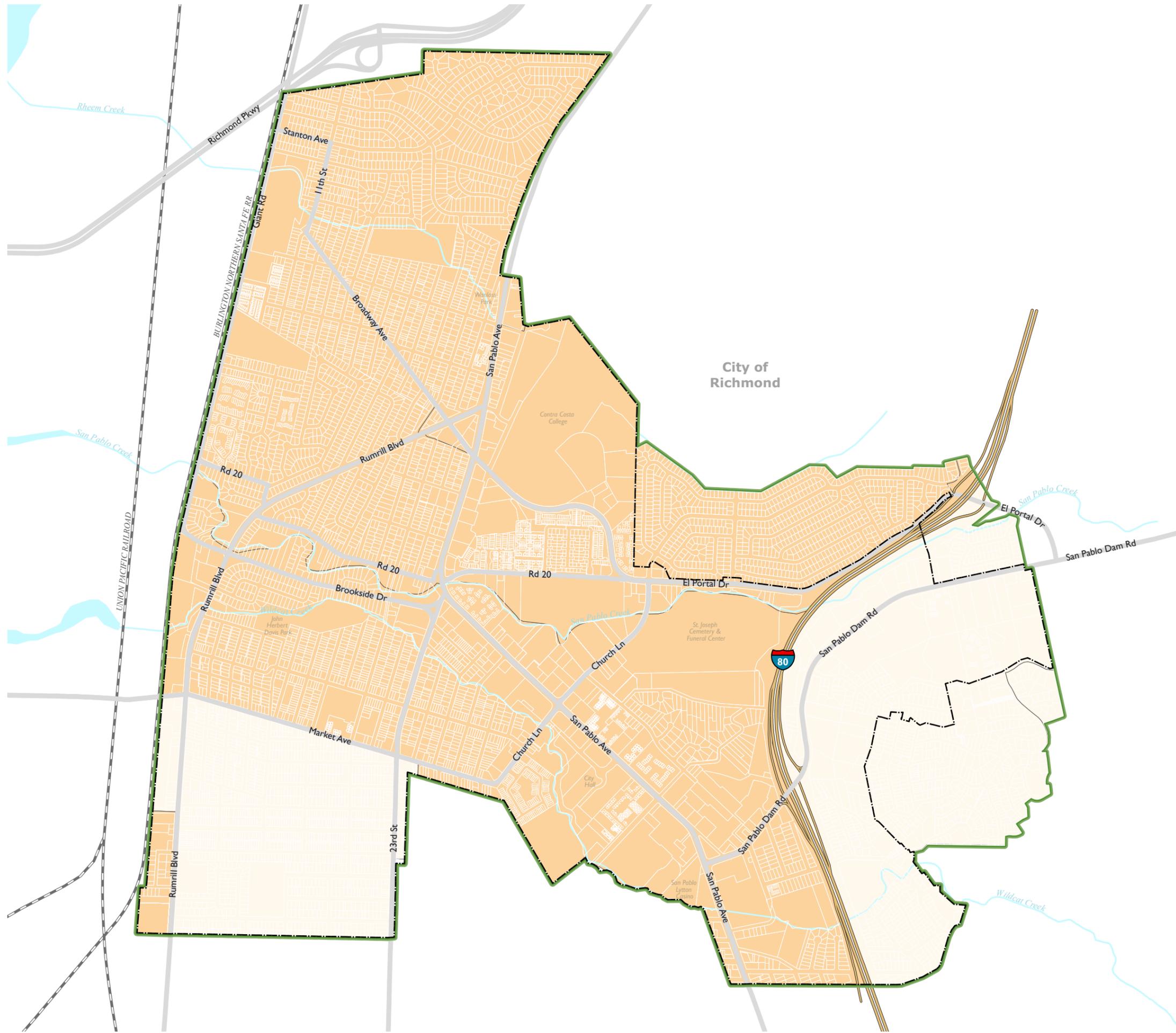
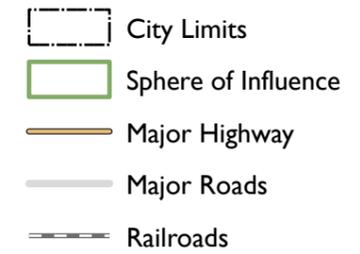


SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-5: Percent of Children in Female
Householder Households



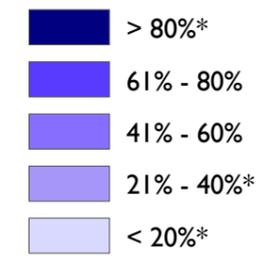
*No census tracts contained in this category.



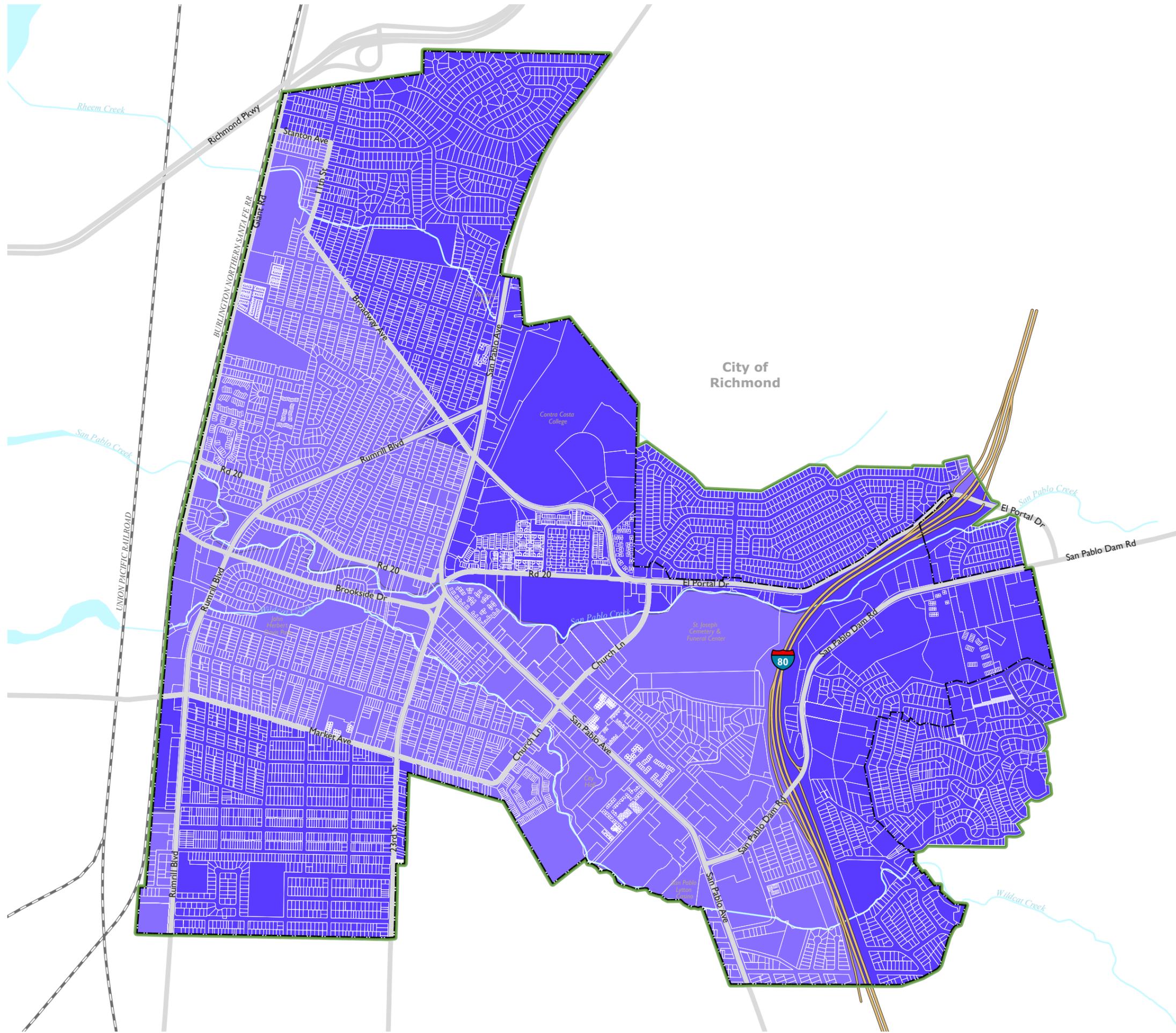
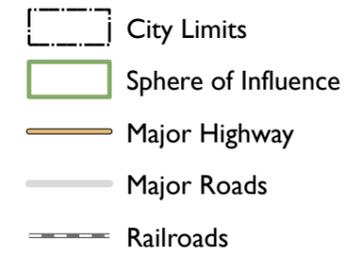
SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE

Figure D-6: Percent of Children in Married-Couple Households



*No census tracts contained in this category.



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

INCOME LEVEL

Geographic concentration by income, including concentration of poverty, is another type of segregation that may exist within a jurisdiction. The concentration of low- or moderate-income (LMI) individuals provides one method to gauge the extent of such segregation. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI – based on the HUD income definition of up to 80 percent area median income (AMI). Figure D-7 provides the distribution of LMI block groups across San Pablo. As can be seen, nearly the entire city is considered an LMI area, with a small portion in the southeastern corner that does not cross the 51 percent threshold.

Poverty rates and the concentration of poverty over time can provide an insight into the economic wellbeing of households and individuals in the county and in San Pablo. According to the 2020-2025 AI, poverty in the eastern portion of the county has risen dramatically as lower-income residents have been displaced from more expensive parts of the Bay Area. In the county, the highest concentrations of both low-income and non-white populations are in Antioch, Concord, Hercules, Pinole, Pittsburg, Richmond, San Pablo, and Walnut Creek (low-income only). As of 2019, about 16.3 percent of San Pablo's population is below the federal poverty line. Further, poverty is unevenly distributed by race/ethnicity (see Table D-5). Residents living below the poverty line who identify as white alone, Black or African American alone, non-Hispanic/Latino white, or Hispanic or Latino of any race are overrepresented when compared to their share of the total population, while residents who identify as Asian alone are underrepresented among those below the poverty line. For instance, while Black or African American alone residents make up 10.8 percent of the total population, they constitute 14.6 percent of the population living below the poverty line. Residents who identify as Asian alone, on the other hand, make up 17.4 percent of the population but only constitute 11.4 percent of the population living below the poverty line.

Table D-5: Poverty Rates in San Pablo, 2019

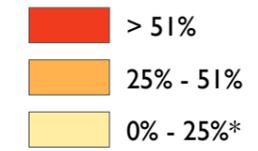
Race/Ethnicity ¹	Total Population		Population Below Poverty Level	
	Number	Percent	Number	Percent
White alone	11,284	36.9%	2,237	45.0%
Black or African American alone	3,315	10.8%	728	14.6%
American Indian and Alaska Native alone	156	0.5%	19	0.4%
Asian alone	5,306	17.4%	566	11.4%
Native Hawaiian and Other Pacific Islander alone	134	0.4%	0	0.0%
Other alone	10,378	33.9%	1,425	28.6%
Hispanic or Latino origin (of any race)	18,575	60.8%	3,052	61.3%
White alone, not Hispanic or Latino	2,263	7.4%	496	10.0%
Total	30,573	100.0%	4,975	100.0%

1. People who identify as Hispanic or Latino may be any race.

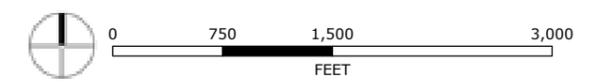
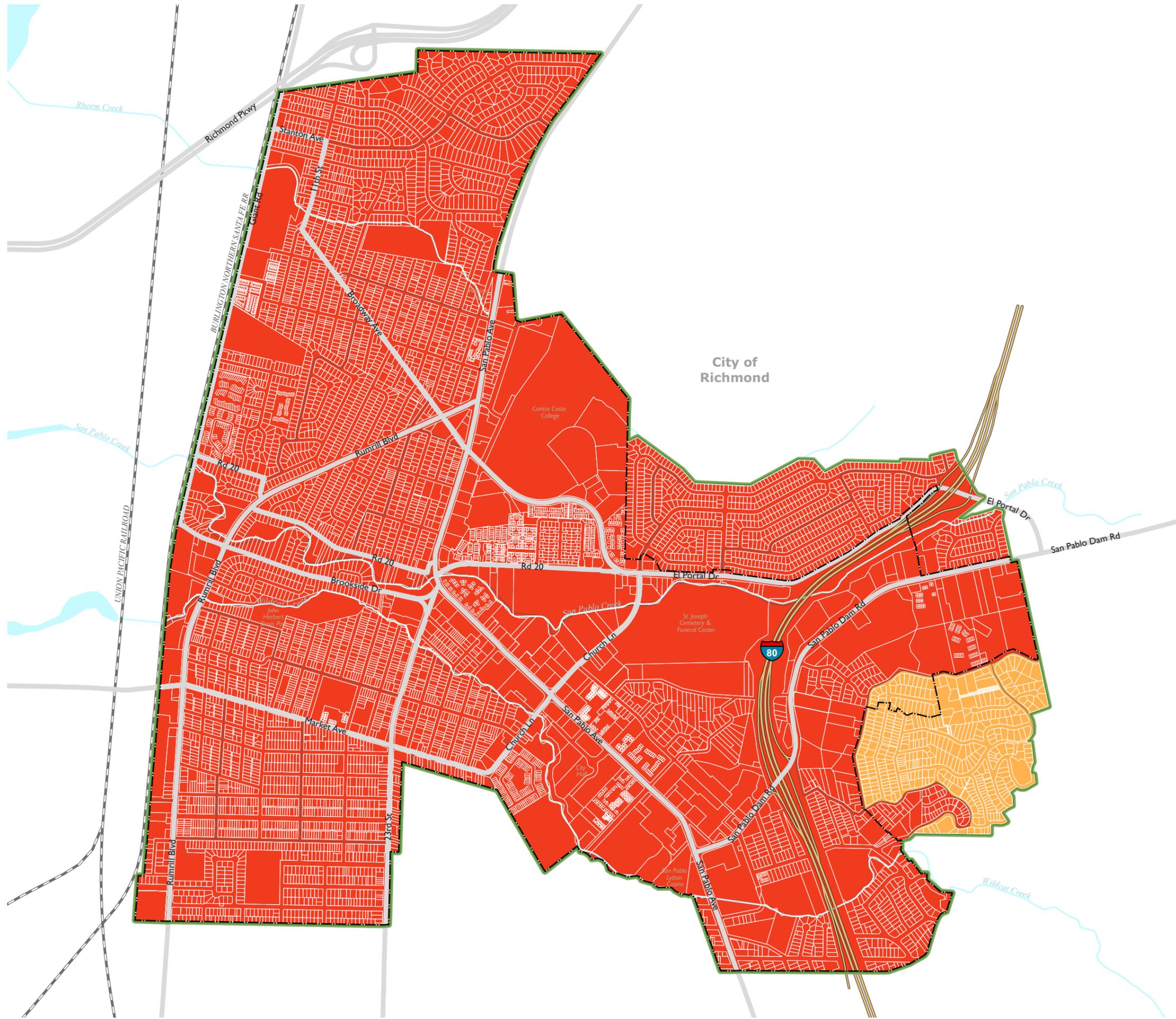
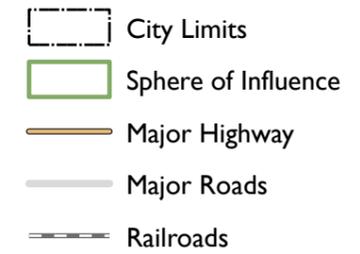
Source: U.S. Census Bureau, 2019 ACS Five-Year Estimates (Table S1701)

Despite relatively high levels of poverty in the city, overall rates have decreased between 2014 and 2019. As is shown in Figures 3-8 and 3-9, the poverty rate has decreased in the western and northern portions of the city, although it has remained relatively stable in the central portion of the city along San Pablo Avenue. In both years, no tract has consisted of higher than 30 percent of its population living below the poverty line. In 2019, most tracts saw between 10 and 20 percent of their population living below the poverty line while some areas saw between 20 and 30 percent.

SAN PABLO GENERAL PLAN UPDATE
 Figure D-7: Low- to Moderate-Income
 Population, Block Groups

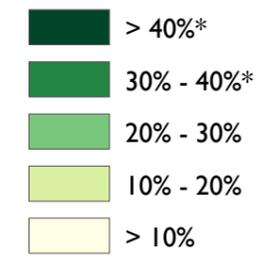


*No census blocks contained in this category.

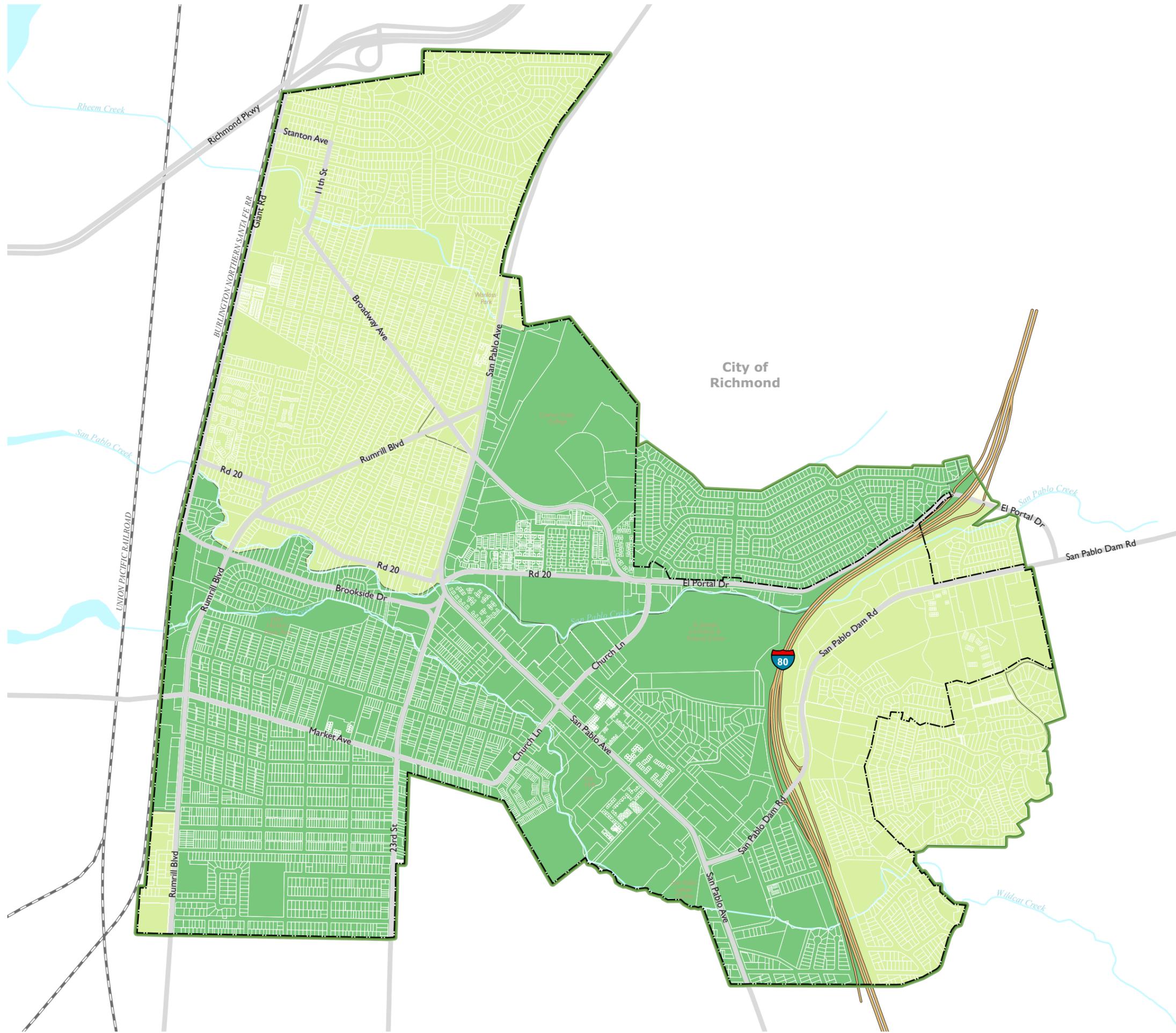
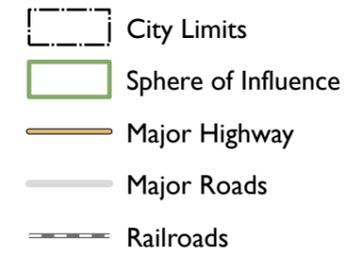


SOURCE: HCD AFFH Data and Mapping Resources - ESRI, 2018; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-8: Poverty Status, 2014

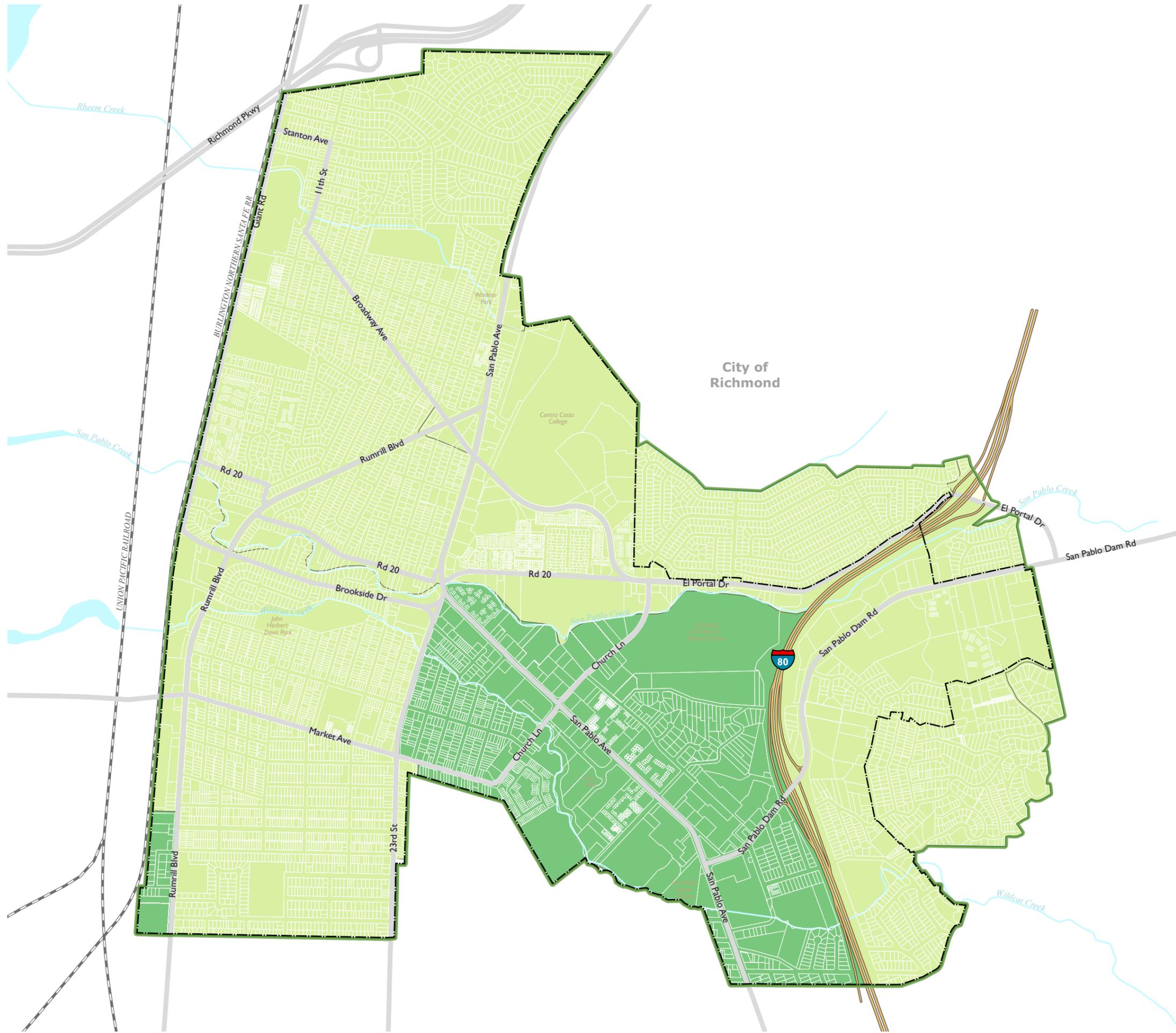


*No census tracts contained in this category.



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2010-2014; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-9: Poverty Status, 2019



- > 40%*
- 30% - 40%*
- 20% - 30%
- 10% - 20%
- < 10%

*No census tracts contained in this category.

- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2010-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

D.3 Racially/Ethnically Concentrated Areas of Poverty and Affluence

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition: R/ECAPs must have a non-white population of 50 percent or more, and the poverty rate must exceed 40 percent or be three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. According to HUD estimates provided by HCD, during the 2009-2013 period there were no R/ECAPs in San Pablo. Further, based on 2019 ACS estimates there were still no R/ECAPs in the city. However, as seen in Figure D-10, as of 2019 there are a few R/ECAPs in the region surrounding the city, including in East Bay cities like Albany and Berkeley.

While there is no standard definition for Racially/Ethnically Concentrated Areas of Affluence (RCAAs) provided by either HUD or HCD, they are generally considered to be areas with high concentrations of wealthy, non-Hispanic white residents. An article by Edward G. Goetz, et al. published in HUD's *Cityscape* journal defines an RCAA as a "census tract in which 80 percent or more of the population is White and has a median income of at least \$125,000."⁵ Figure D-10 displays the locations of RCAAs under this definition; while there are no RCAAs in the city, there are a number located across the San Francisco Bay in Marin County, including along the Tiburon Peninsula.

While there are no R/ECAPs under the official definition in San Pablo, all of West County could be considered one in context of the region. As noted previously, 76.2 percent of West Contra Costa CCD is comprised of a population considered something other than non-Hispanic white. According to 2019 ACS estimates, about 11.6 percent of the population of this area lives under the poverty line. This is the second highest rate among CCDs in the county—only exceeded by the 15.6 percent seen in the Antioch-Pittsburg CCD—while the entire county experiences an 8.7 percent poverty rate. West County poverty rates are also higher than the average Bay Area poverty rate, which was about 8.5 percent in 2019 for the nine-county region according to ACS estimates.

As a result of West County's unique status in the Bay Area region, the City has developed several economic development programs to alleviate poverty. The City works in collaboration with the San Pablo Economic Development Corporation (SPEDC), whose mission to develop, diversify, and stabilize the local economy through workforce and business education and training. SPEDC offers workshops, trainings, and classes for businesses, entrepreneurs, and individuals. It also acts as a resource center for new businesses with owners located in San Pablo and provides ongoing support to existing businesses. SPEDC offers the Nano Revolving Loan Fund, which is designed to stimulate economic growth in west Contra Cost County through lending small businesses the capital they need. In addition to support for small businesses, SPEDC also provides workforce development services. They provide grant funding for qualified city residents to enroll in career training for construction and carpentry, information technology, barbering, and commercial driver's licensing. In partnership with Contra Costa College, SPEDC awards financial aid covering 50 percent of enrollment fees, books, and

⁵ Edward G. Goetz, et al. "Racially Concentrated Areas of Affluence: A Preliminary Investigation" (*Cityscape*, Vol. 21 No. 1, 2019), pp. 99-123.

supplies, along with childcare funding, for San Pablo residents enrolled in “Career Technical Education” programs at the College. SPEDC also administers the Removing Barriers Job Readiness program, which is a comprehensive support service aiming to prepare the workforce for careers that pay a progressive wage and benefits. Services under the Removing Barriers program include subsidized childcare, job readiness and financial literacy workshops, free professional clothing, and low-cost tattoo removal. Further, SPEDC offers support for utilizing the Workforce Initiative Subsidy for Homeownership (WISH) program, offered through the Federal Home Loan Bank of San Francisco. Over the course of the COVID-19 pandemic, SPEDC pivoted to include food and housing security, as well as ensuring personal protective equipment and meals reached first responders and essential workers. They also expanded their training to include COVID-19 awareness through the Teamster’s Trust.

D.4 Disparities in Access to Opportunity

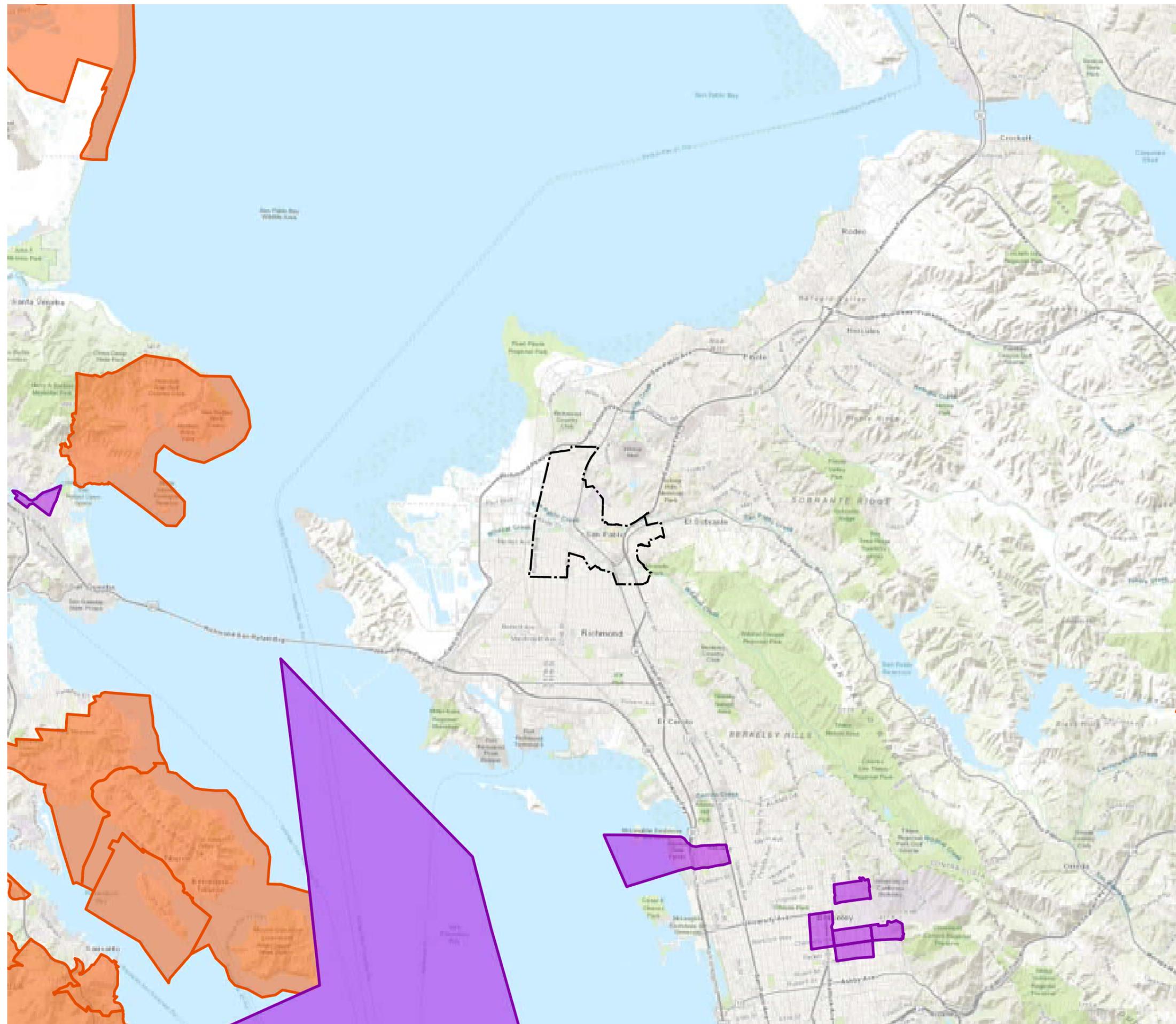
To help quantify access to opportunity within a jurisdiction, HCD and TCAC convened in the California Fair Housing Task Force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force developed a series of Opportunity Maps to determine areas with the highest and lowest resources by census tract. Highest resource tracts are the top 20 percent of census tracts with the highest index scores relative to the region, while high resource tracts are the next 20 percent. The remaining tracts are then evenly divided into the low resource and moderate resource categories. Index scores are compiled by domain, as outlined in Table D-6 below. The economic, environmental and education domains were further aggregated to create a composite index, which determines each tract’s resource level.

Table D-6: Domain and Indicators for HCD/TCAC Opportunity Maps

<i>Domain</i>	<i>Indicator</i>
Economic	Poverty Adult Education Employment Job Proximity Median Home Value
Environmental	CalEnviroScreen 3.0 indicators
Education	Math Proficiency Reading Proficiency High School Graduation Rates Student Poverty Rate
Filter	Poverty and Racial Segregation

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Map, December 2020

Figure D-10: Locations of Racially/
Ethnically Concentrated Areas of Poverty
(R/ECAPs) and Racially Concentrated
Areas of Affluence (RCAAs), 2019



-  Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)
-  Racially Concentrated Areas of Affluence (RCAA) Locations
-  City Limits



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

Understanding disparities in access to opportunity within a community requires an assessment of the regional as well as the local context. The following section provides a summary of regional opportunity and opportunity in San Pablo. Citywide opportunity is broken down into the distinct categories of educational, economic, and environmental opportunity based on metrics provided by HCD.

REGIONAL CONTEXT

The 2020-2025 AI explores the distribution of five types of opportunity: educational, employment, transportation, access to low poverty neighborhoods, and access to environmentally healthy neighborhoods. Analysis is based on indices provided by the HUD AFFH tool. The higher the index score, the better an area's access to opportunity. The indices are defined as follows:

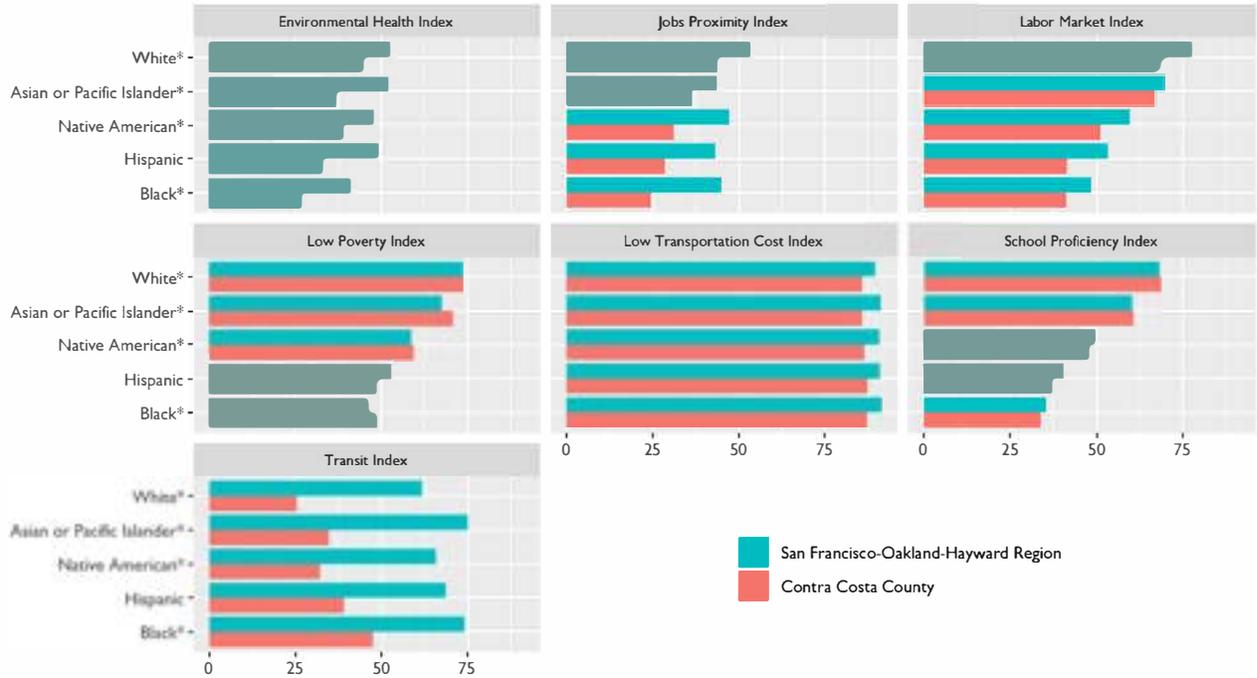
- Environmental Health — Summarizes potential exposure to harmful toxins at a neighborhood level.
- Jobs Proximity — Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA).
- Labor Market — Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood.
- Low Poverty — A measure of the degree of poverty in a neighborhood, at the Census tract level.
- Low Transportation Cost — Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. As shown below on charts D-4 and D-5, the transportation cost index is virtually the same (relatively high) for all racial groups.
- School Proficiency — 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 schools.
- 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.

Chart D-4 below shows index scores based on the July 2020 HUD data release. In Contra Costa County access to opportunity is generally highest for non-Hispanic white residents. Residents who identify as Hispanic or non-Hispanic Black, on the other hand, have the lowest access to opportunity while non-Hispanic Asians and Pacific Islanders as well as non-Hispanic Native Americans live in a wider variety of neighborhoods. The major exception to this is the relatively low transit index scores of non-Hispanic white residents. This trend is like that seen in the wider San Francisco-Oakland-Hayward metropolitan area, although the county typically experiences lower index values. Similar patterns are evident for the total population and those that live below the poverty line, as shown in Chart D-5.

The indices are a useful tool to gauge opportunity at regional scale, but they do not identify opportunity by geographic distribution. Based on the 2021 TCAC Opportunity Areas composite score, as shown in Figure D-11, access to opportunity is lowest in West County and northeastern sections of the county—including the cities of San Pablo, Richmond, Pittsburg, and Antioch—and highest in the

central section of the county—including cities like Walnut Creek and Lafayette. San Pablo is situated within a sub-regional low resource zone of an otherwise moderate to high resource county.

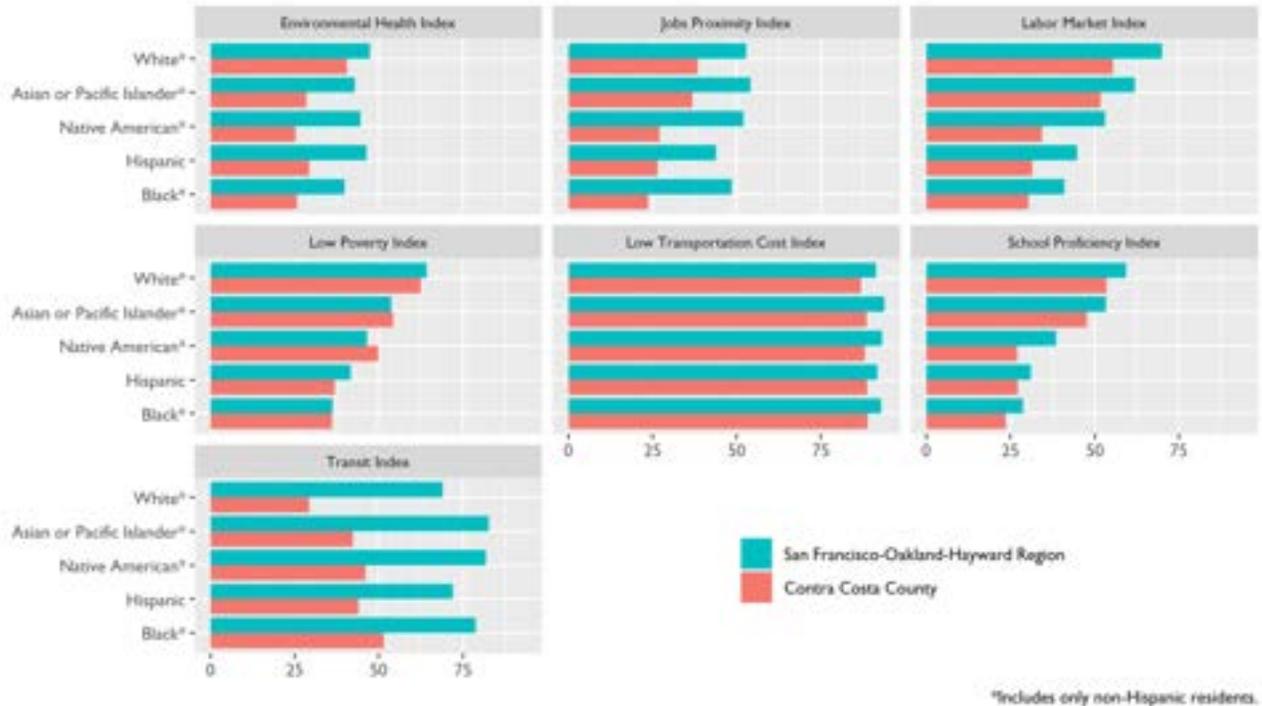
Chart D-4: Opportunity Indices, Total Population



*Includes only non-Hispanic residents.

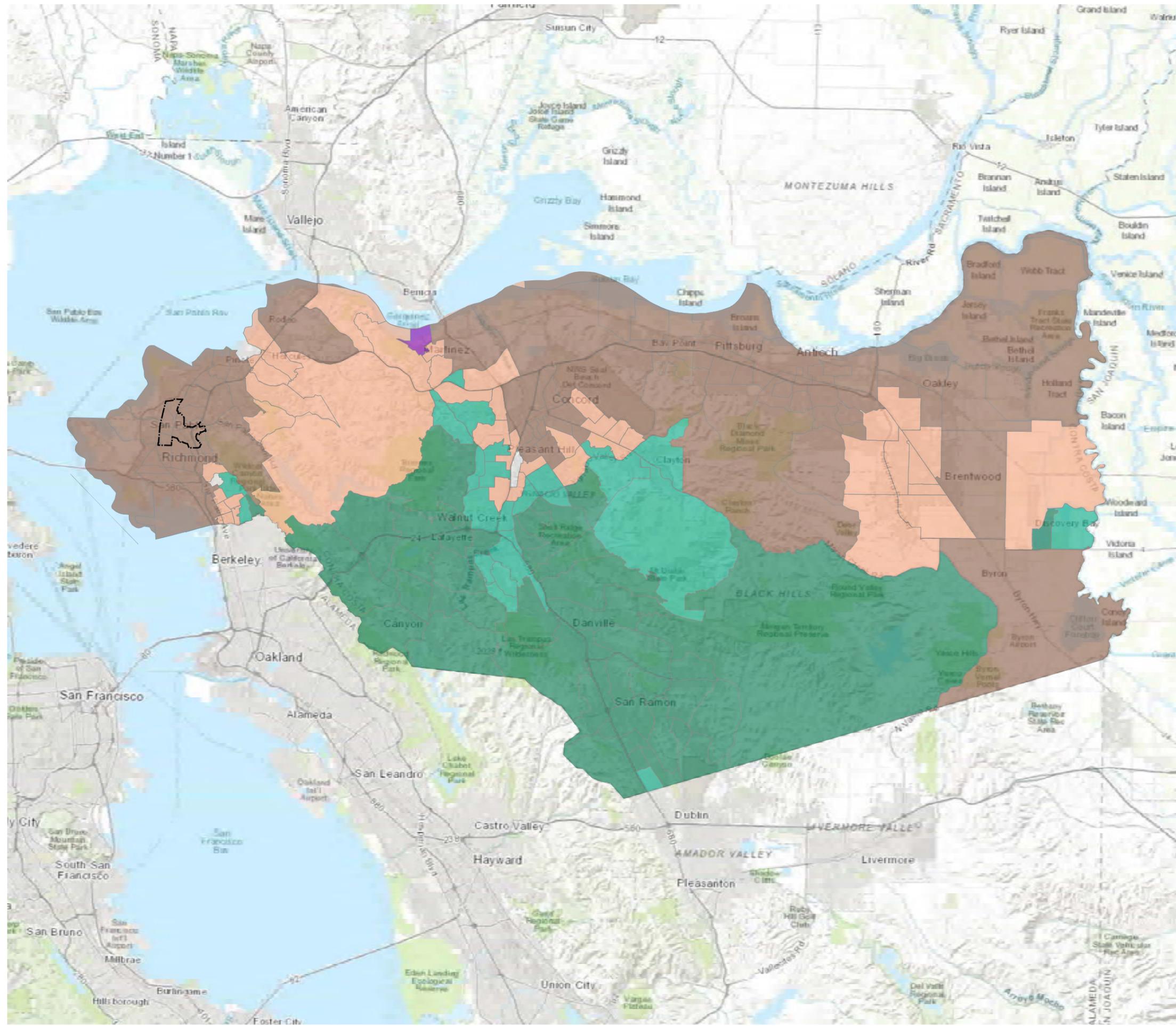
Source: HUD, AFFHT0006 Table 12, July 2020

Chart D-5: Opportunity Indices, Population Living Below the Poverty Line



Source: HUD, AFFHT0006 Table 12, July 2020

SAN PABLO GENERAL PLAN UPDATE
 Figure D-II: TCAC Opportunity Areas –
 Composite Score, Countywide



- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data
- City Limits



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

LOCAL CONTEXT

According to the 2021 TCAC Opportunity Areas composite score (see Figure D-12), all tracts in San Pablo are classified as low resource. As seen in Figure D-11, this is typical of cities in West County, including the neighboring cities of Richmond, El Sobrante, and Pinole. Higher resources areas are located to the east of San Pablo in central and east county, as well as to the south in El Cerrito and the East Bay cities of Albany and Berkeley.

Economic Opportunity

The 2021 TCAC Opportunity Areas economic score, presented in Figure D-13, summarizes access to economic opportunity in San Pablo. Like the composite score, the city experiences lower economic outcomes than other Bay Area communities, although there is a small portion outside of the City limit but within the City's sphere of influence with slightly more positive economic outcomes. Low access to economic opportunity is present in other cities that border San Pablo in West County, although some portions of Richmond in the south have slightly more positive outcomes.

San Pablo is a geographically small city with somewhat limited employment options. While most residents travel outside of the city for work, about 1,018 jobs were added in the city between 2010 and 2019 (20.5 percent increase), according to the U.S. Census Bureau Longitudinal Employer-Household Dynamics program. Economic development is a priority for the City, and there are a number of local strengths to build on. This includes the San Pablo Lytton Casino as well as Contra Costa College. Further, despite the closure of Doctor's Medical Center in 2015—which was previously the city's top employer—San Pablo remains strong in the healthcare and social services industry. While Casino and hospitality-related jobs are typically low paying and relatively low-skilled, they provide an important source of local employment. Employment with the College and health care sector tends to be better paid with relatively high-skilled jobs. Additionally, the city is well located within the Bay Area, with good connections to the regional road network and relatively easy access to the Richmond Bay Area Rapid Transit (BART) station and Richmond Ferry Terminal.

The City of San Pablo Economic Development Department works with other City departments, Local Successor Agency staff, economic development consultants, the SPEDC, the San Pablo Merchants Association, the San Pablo Chamber of Commerce, and other agencies and non-profits to develop partnerships and leverage resources to the benefit of San Pablo residents. Ongoing economic development efforts are discussed in detail above in Section D.3 *Racially/Ethnically Concentrated Areas of Poverty and Affluence*. Initiatives include small business loans, support for low income entrepreneurs, and workforce development programs. Further, the Rumrill Corridor Plan currently in development will identify economic development strategies that leverage local workforce strengths and market opportunities to nurture and grow small-scale manufacturing, production, and repair-oriented businesses along with workforce housing in the Rumrill PDA..

Educational Opportunity

The 2021 TCAC Opportunity Areas education score, which quantifies access to educational opportunity, is provided Figure D-14. Like at the composite score and economic opportunity index, San Pablo experiences lower levels of educational opportunity throughout the city, as compared to other portions of the Bay Area. This reflects patterns seen in neighboring jurisdictions—less positive educational outcomes in Richmond and other West County cities and more positive educational outcomes in central and eastern Contra Costa County as well as in El Cerrito and the East Bay cities

of Albany and Berkeley. Compared to Richmond and Contra Costa County, San Pablo has a smaller share of residents with high levels of educational attainment. According to 2019 ACS estimates, 13.1 percent of San Pablo residents over 25 have a bachelor’s degree or higher (i.e. graduate or professional degree), compared to 28.2 percent of Richmond residents and 42.4 percent of county residents.

The West Contra Costa Unified School District (WCCUSD) provides public elementary, middle, and high school education to San Pablo residents. The WCCUSD is currently in the process of updating its Long-Range Facilities Master Plan, last approved in 2016. The updated Master Plan is expected to address changes in teaching and learning, District operations, and the implications of COVID-19 for future learning needs. Most San Pablo schools are currently running under capacity. Table D-7 summarizes test score results from the 2018-2019 Smarter Balanced assessments of math and English language arts (ELA), which forms part of the State’s California Assessment of Student Performance and Progress (CAASPP). The proportion of students who meet or exceed standards in ELA or math is lower in WCCUSD than in the county or State. However, there is no geographic discrepancy within San Pablo, and WCCUSD is implementing programs such as the Expanded Learning Program, the Parent Efficacy Trainer of Trainer (ToT) Model, and English learner programs to improve student performance.

Table D-7: CAASPP Smarter Balanced Test Results, 2018-2019

District/Region	Percent Met or Exceeded Standard	
	English Language Arts	Mathematics
State of California	51.10%	39.73%
Contra Costa County	54.64%	44.32%
West Contra Costa Unified School District	35.16%	23.94%

Source: California Department of Education, CAASPP, Smarter Balanced Summative Assessments, 2018-2019

The City is also implementing initiatives to help improve scholastic performance for local students and expand on campus support services. In 2011, the City launched the San Pablo Beacon Community Schools Initiative to turn its six schools into community schools. Under the initiative, WCCCUSD, the City, the County, community-based organizations, businesses, families and philanthropists work jointly address the identified needs of students, families and the community in a comprehensive, integrated and accountable way. Community schools provide a range of programs and services, from housing assistance to health screenings, family support, counseling and other services to families while acting as community hubs. In addition to the basic-needs services, the schools host programs, adult classes and tutoring in the evenings and on the weekends. Helms Middle School in San Pablo has a partnership with nonprofit counseling service Bay Area Community Resources to station full-time therapists, social workers and mentors on the campus.

Other initiatives include the San Pablo Team for Youth (SPTFY) provides funds to public and non-profit agencies for the expansion and/or enhancement of school-based programs and services for children, youth, and families. During the fourth cycle of the program, the City of San Pablo offered organizations the opportunity to qualify for Lead Agency funds to implement Beacon Community Schools in San Pablo. The San Pablo Scholarship Pilot Program directly targets barriers that may prevent disadvantaged students from pursuing further education by providing scholarships for post-high school education and career technical training to young San Pablo residents. In 2023, the first

year of the program, 79 scholarships were awarded to San Pablo high school graduates. Of these awardees, 63 (approximately 80 percent) identified as Hispanic.

Located east of San Pablo Avenue in the northern portion of San Pablo, Contra Costa College provides college-level education and attracts students from all over the county. The campus encompasses 23 buildings on 83 acres of land. In fall 2018, the College enrolled 7,263 students, an increase of 338 students from fall 2014. The College does not have dormitory facilities, and all students arrange their own housing. However, a 1.5-acre site located on a triangle of land surrounded by Rumrill Boulevard, Broadway Avenue, and San Pablo Avenue has been proposed as a mixed-use project with upper floors dedicated to housing for international students at the College. However, no entity currently has a proposal for the development of this site. Recent expansions and upgrades to the College include the opening of a new College Center building in 2016, renovations to the Applied Arts Building in 2018, and the rebuilding of the campus Safety Center in 2018. Currently under construction are a new science building and a remodeled physical education and athletic facilities.

Contra Costa College is also home to Middle College High School, an Early College High School program that offers a nurturing and academically challenging environment for students at risk of not meeting their potential in a traditional high school environment. The program gives students with high potential a special opportunity to gain a range of skills that will provide motivation and support for their lifelong personal, academic, and social growth. Middle College students earn a high school diploma while working towards the completion of an Associate Degree or 60 transferable credits in four to five years.

SAN PABLO GENERAL PLAN UPDATE
 Figure D-12: TCAC Opportunity Areas –
 Composite Score, San Pablo

 Low Resource

-  City Limits
-  Sphere of Influence
-  Major Highway
-  Major Roads
-  Railroads



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

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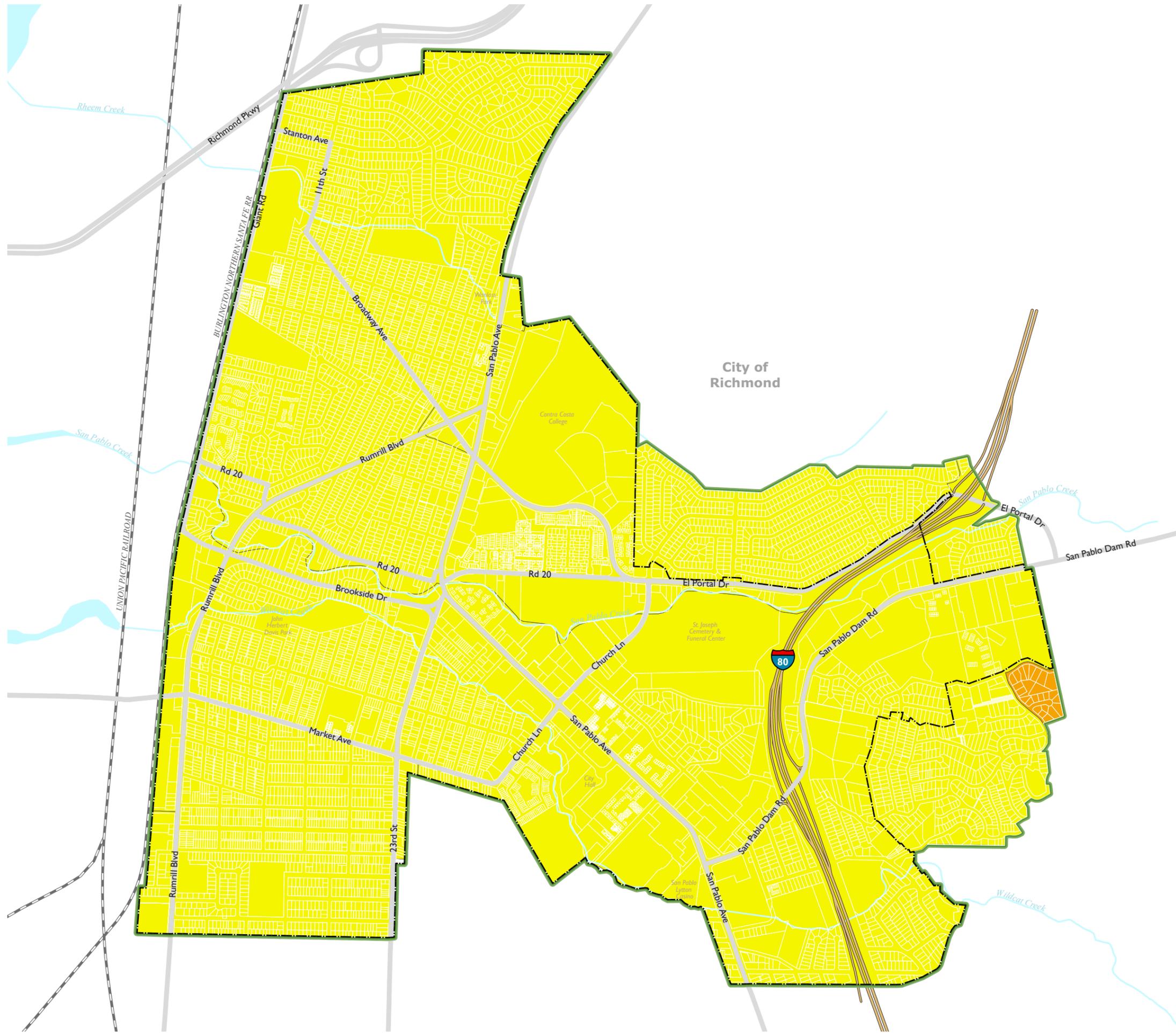
SAN PABLO GENERAL PLAN UPDATE

Figure D-13: TCAC Opportunity Areas Economic Score, San Pablo

- > .75 (More Positive Economic Outcomes)*
- .50 - .75*
- .25 - .50
- < 0.25 (Less Positive Economic Outcomes)

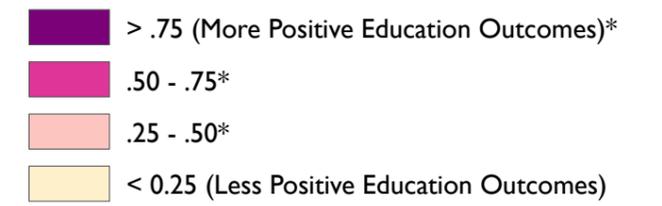
*No census tracts contained in this category.

- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads

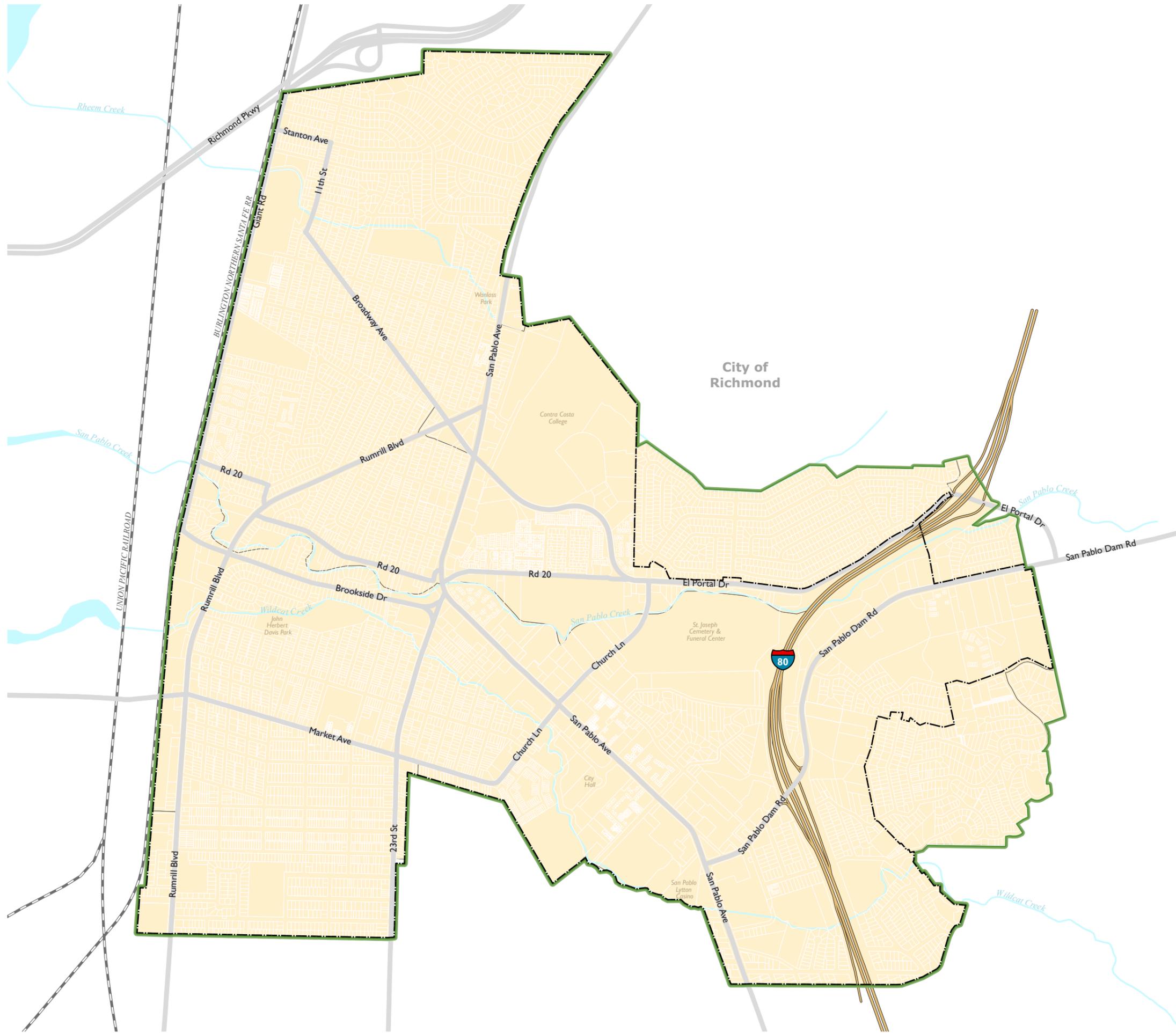
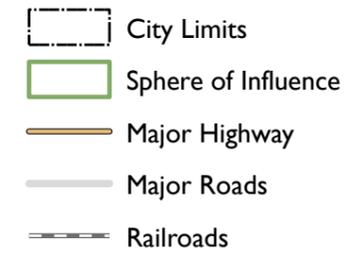


SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
 Figure D-14: TCAC Opportunity Areas,
 Education Score, San Pablo



*No census tracts contained in this category.



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

Environmental Opportunity

Environmental opportunity quantifies the extent of environmental quality in a neighborhood, which can have a major impact on community health and quality of life. Figure D-15 visualizes access to environmental opportunity in San Pablo based on indicators from CalEnviroScreen 3.0 as compiled by TCAC. Contrary to the trends apparent in other opportunity metrics, San Pablo experiences more positive environmental outcomes. The most positive outcomes are seen in the southern and central portions of the city; however, this does not fully account for actual conditions in the city. For example, while neighborhoods east of I-80 are shown to have lower access to environmental opportunity, this area of the city has the densest tree canopy coverage in San Pablo. Additionally, it is home to Brentz Lane Park and two areas of natural open space within the City limit, and just beyond the City limit to the east is Wildcat Regional Park, a 2,789-acre park that extends from the Tilden Nature Area above the Berkeley hills in the south to historic Alvarado Park at the north end in Richmond. Wildcat Canyon is a popular place for hikers, mountain bikers, and equestrians, easily accessible from San Pablo and other East Bay Cities. On the other hand, the central and southern parts of the city are shown as having more positive environmental opportunity scores, but there are fewer parks and tree canopy coverage is lower than in other parts of San Pablo. Large surface parking areas at Helms Middle School and Salesian College Preparatory are also urban heat islands that absorb and re-emit the sun's heat, increasing ambient temperatures in the summer. Northwestern neighborhoods are shown as having less positive environmental opportunity scores than other parts of the city. These neighborhoods do in fact have fewer parks and less tree canopy coverage than other neighborhoods.

Expanding access to parks and recreational facilities is a priority for San Pablo and the Land Use Element of the General Plan proposes to add six new park locations and create a network of greenways. In recent years, the City has made important progress in expanding parks. The design of a new pocket park at 17th and Bush in the southwest of the city is complete and in November 2023 the City announced plans to build the “San Pablo Area for Recreation and Community” or S.P.A.R.C., a new full-service park on the former El Portal Elementary School site at 2600 Moraga Road, next to Contra Costa College. The Community Health and Environmental Justice Element of the General Plan incorporates strategies for increasing tree canopy coverage and addressing urban heat throughout the community. It also provides direction for linking park facility improvement priorities to a ranking system keyed to public health and recreational goals, and establishing an incentive system to encourage additional land dedication and park development beyond the minimum City requirements.

In the local areas bordering the city, more positive environmental outcomes are generally located along the borders of East Bay regional parks and protected space, like the Wildcat Canyon Regional Park. In Richmond and other East Bay cities adjacent to the San Francisco Bay, less positive environmental outcomes are evident in tracts located along the waterfront.

Transportation Access

Whereas at the county level, transit access varies significantly by race with White residents having the lowest access score and Black residents having the highest score (see Charts D-4 and D-5 above), that trend is not apparent in San Pablo. The whole of the City is well served by public transit. As shown on Map D-16, there are seven local bus lines that serve the City, including Alameda-Contra Costa Transit District (AC Transit) line 72R, which runs at 12 minute headways during weekday peak hours. Local buses provide connections to the regional transportation network, including Bay Area Rapid Transit

(BART) stations in Richmond and El Cerrito, the Amtrak rail station in Richmond, and the Richmond Passenger Ferry Terminal. There is a transit hub on the campus of Contra Costa College. This hub is a “timed transfer stop” which provides synchronized bus-to-bus transfers. Also as shown on Map D-16, all residential areas of San Pablo are within a 1/2-mile of transit service and 93.5 percent of all residential parcels in the city (7,570 of 8,095 parcels) are within a 1/4-mile of transit.

D.5 Disproportionate Housing Needs & Displacement Risk

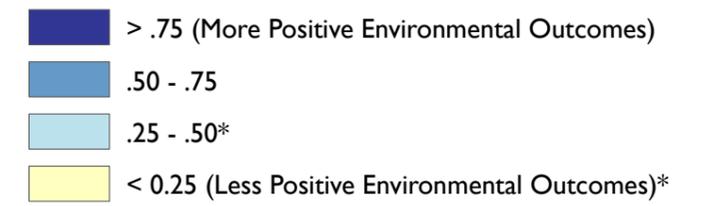
According to HCD’s AFFH Guidance Memo, disproportionate housing need “generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area.” Consistent with HCD guidance, this analysis evaluates disproportionate housing need in San Pablo through the assessment of cost burden, overcrowding, and displacement risk.

At the regional level, according to the 2020-2025 AI, a significant percentage of residents throughout the county experience some form of housing need. This includes relatively high levels of cost burden, overcrowding, and incomplete kitchen or plumbing facilities. Based on that analysis, Hispanic and Black residents are particularly prone to experience severe housing problems, including in San Pablo, Richmond, North Richmond, Hercules, Concord, Pittsburg, Antioch, and Oakley.

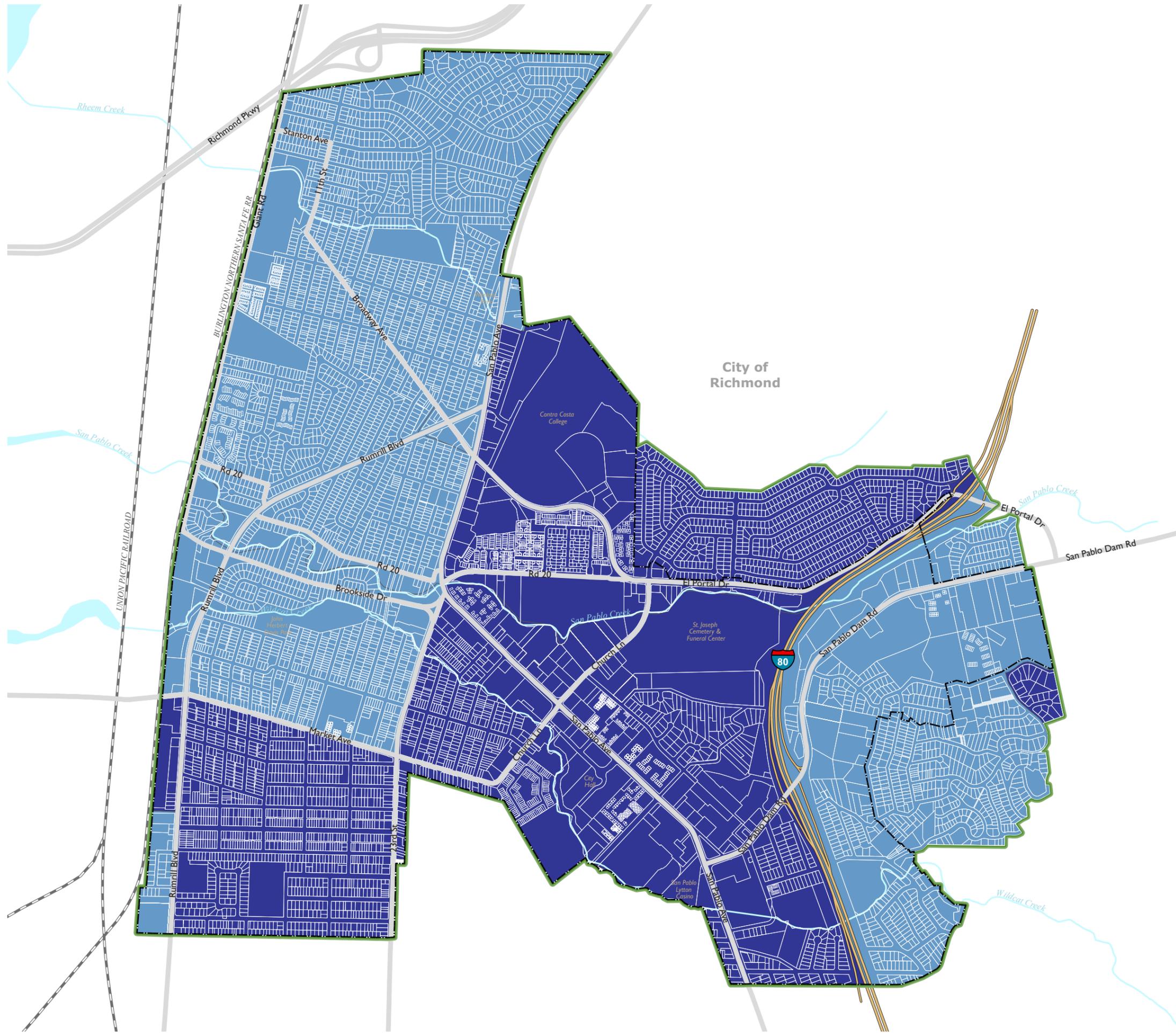
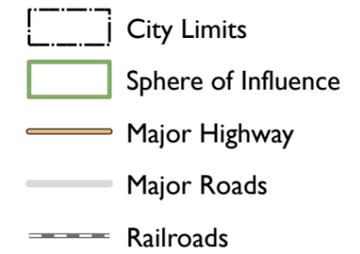
COST BURDEN

High rates of cost burden, as discussed in the Housing Needs Assessment Appendix, are prevalent in San Pablo. Nearly half of all households experience some level of cost burden, while lower-income households and renter-occupied households constitute the majority of all households experiencing cost burden. As Chart D-6 demonstrates, rates of cost burden are also unevenly distributed by race and ethnicity. Most non-Hispanic Asian/Asian Pacific Islander (API), non-Hispanic white and Hispanic or Latinx households do not experience cost burden, while most non-Hispanic Black or African American, non-Hispanic AIAN, and non-Hispanic other or multiple race households do experience cost burden. Non-Hispanic AIAN households face particularly high levels of cost burden (77.3 percent), and non-Hispanic Black or African American households face the highest levels of severe cost burden (30.1 percent).

SAN PABLO GENERAL PLAN UPDATE
 Figure D-15: TCAC Opportunity Areas,
 Environmental Score, San Pablo



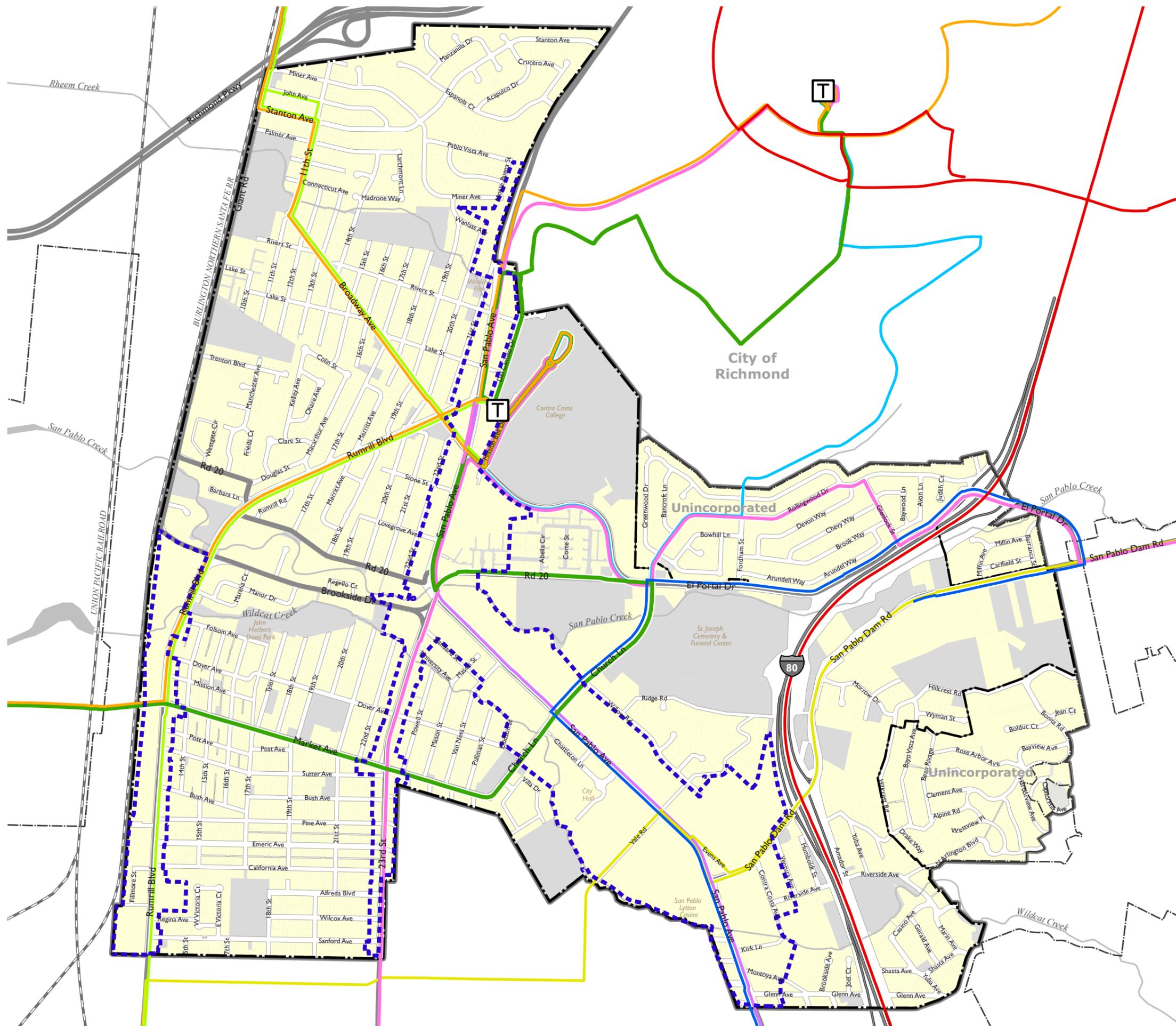
*No census tracts contained in this category.



SOURCE: HCD AFFH Data and Mapping Resources - HCD & TCAC Opportunity Areas Mapping Analysis, 2021; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE

Figure D-16: Transit Access



- T Public Transit Hubs
- Local Transit Routes**
- 376
- 70
- 71
- 72
- 72R
- 74
- 76
- Transbay Transit Lines**
- L
- LA
- Priority Development Area (PDA)
- Residential Areas
- City Limits
- Sphere of Influence
- Unincorporated
- Major Highway
- Major Roads
- Railroads

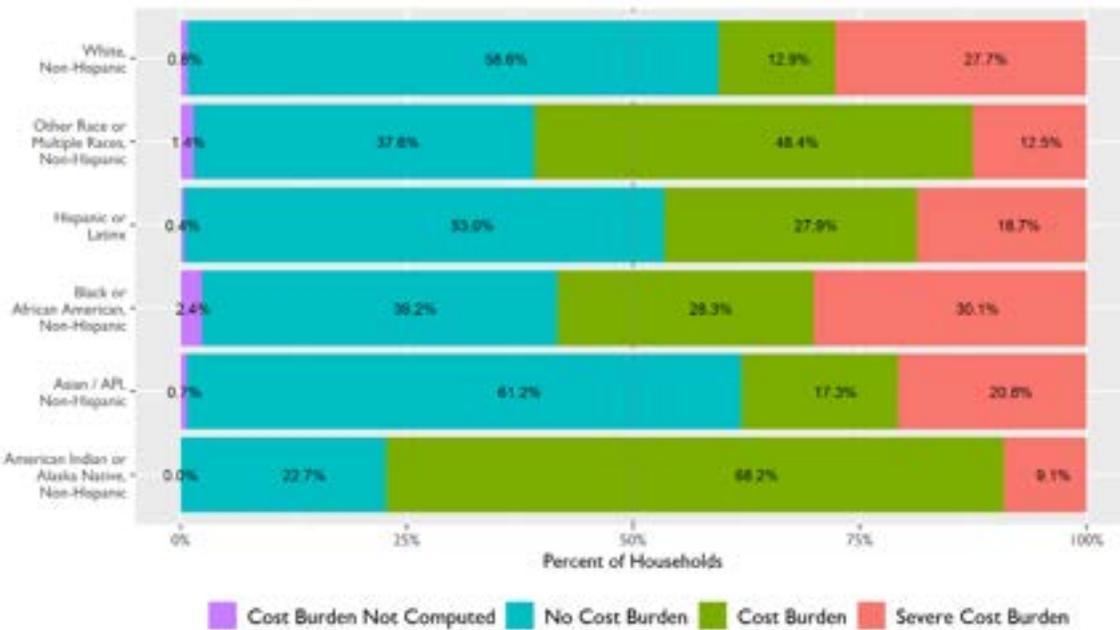


SOURCE: Kittleson, 2021; US Census, 2020; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

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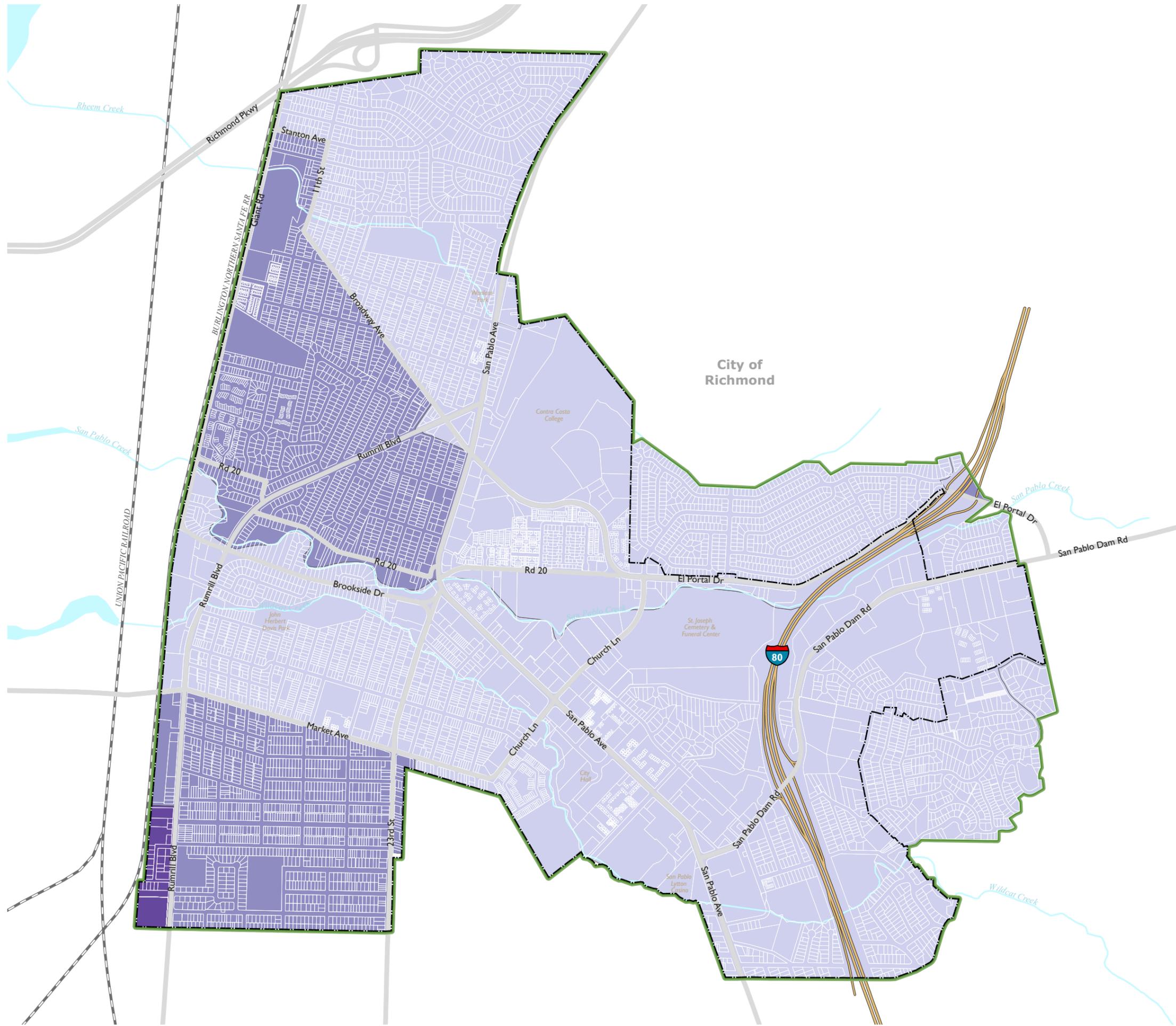
In addition to racial/ethnic disparities, cost burden is unevenly distributed by geographic location in the city. Figure D-17 displays the concentration of homeowner cost burden – the highest share of cost burdened owner-occupied households is in the southwestern portion of the city. The area west of San Pablo Avenue, south of Broadway Avenue, and along Rumrill Boulevard also has a relatively high concentration of cost burden. In most of the city, however, the share of cost burdened homeowners is between 20 percent and 40 percent. Figure D-18 shows slightly different patterns for renter cost burden. While the southwestern portion of the city also has higher proportions of cost burdened renters, the central portion of the city also maintains a relatively high share. In both areas, between 60 percent and 80 percent of renters experience cost burden. The lowest shares of renter cost burden are found east of the Interstate 80 (I-80) freeway.

Chart D-6: Cost Burden by Race/Ethnicity in San Pablo



Source: ABAG-MTC Housing Needs Data Workbook (U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release)

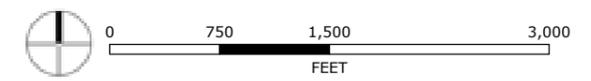
SAN PABLO GENERAL PLAN UPDATE
 Figure D-17: Homeowner Cost Burden, 2019



- > 80%*
- 60% - 80%
- 40% - 60%
- 20% - 40%
- < 20%*

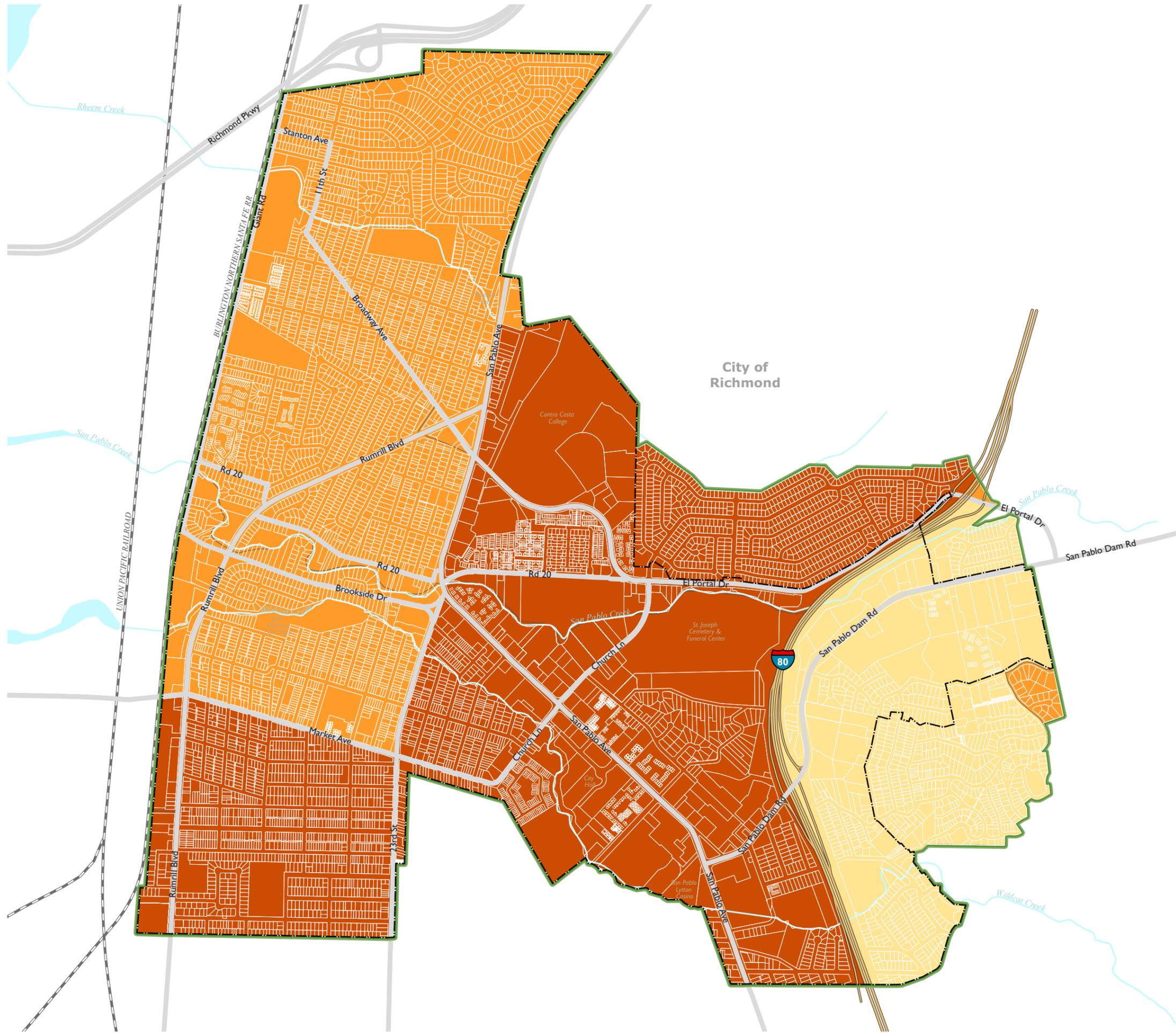
*No census tracts contained in this category.

- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-18: Renter Cost Burden, 2019



*No census tracts contained in this category.

-  City Limits
-  Sphere of Influence
-  Major Highway
-  Major Roads
-  Railroads



SOURCE: HCD AFFH Data and Mapping Resources - ACS, 2015-2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

OVERCROWDING

Rates of overcrowding are much higher in the city than in the county or region, are discussed in the Housing Needs Assessment Appendix. While about 17.0 percent of housing units in San Pablo are considered overcrowded, only 5.0 percent of the county's units and 6.9 percent of the Bay Area's units are. Groups that experience relatively high rates of overcrowding include renters, both lower-income households and some higher-income households, Hispanic or Latinx households, and other race or multiple race households. Through the AFFH Data and Mapping Resources tool, HCD has also provided geographic overcrowding data compiled by the California Health and Human Services Agency (CHHS). Figure D-19 shows that tracts with an overconcentration of overcrowded housing are located in the area north of Market Avenue and west of 23rd Street, as well as the southwestern corner of the city along Rumrill Boulevard. There is high opportunity for additional housing development in the Rumrill Boulevard and San Pablo Avenue areas, which may help to reduce overcrowding.

The lowest rates of overcrowding are apparent in the area east of the I-80 and the area surrounding Contra Costa College. Further, according to the online survey conducted for the AHS, about 34.0 percent of San Pablo residents either strongly disagreed or disagreed with the statement "My home provides sufficient living space for me and the members of my household."

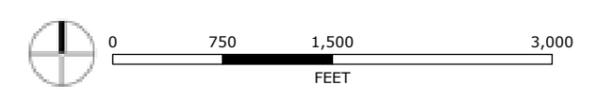
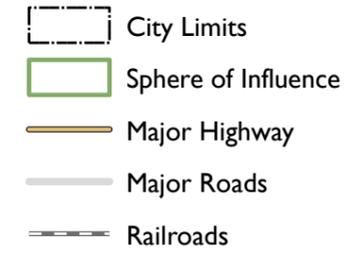
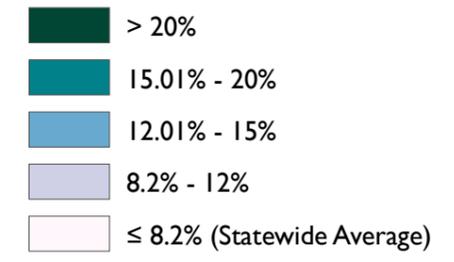
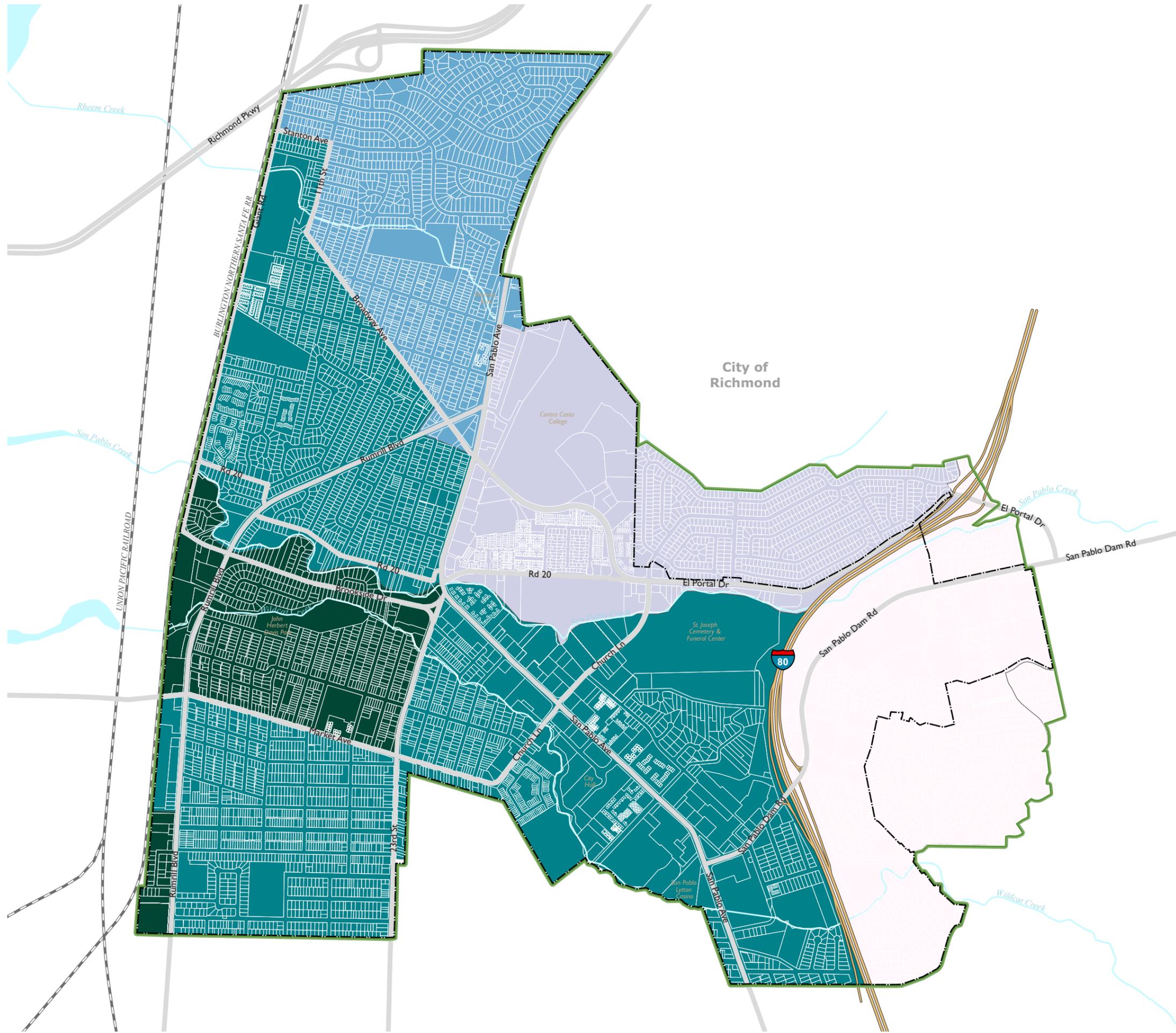
Factors contributing to the relatively higher rate of overcrowding in San Pablo are primarily cultural and socio-economic. The City has no household size limits and staff observes that multigenerational and non-standard family arrangements are common. Younger unrelated and unmarried adults may also share accommodations out of financial necessity. Particularly in new immigrant households, adult children, cousins, other relatives, and friends may live together with a nuclear family. This leads to unpermitted ADU construction, the most common type of code violation in the community. Staff reports that the unpermitted units are typically built to provide accommodations for friends and family, rather than tenants.

DISPLACEMENT RISK

Gentrification pressures, including increased risk of displacement, are a central component of the Bay Area housing market. As the 2020-2025 AI notes, the displacement of residents is a major contributing factor to patterns of segregation both in Contra Costa County and in the broader Bay Area. Lower-income people of color displaced from other sectors of the Bay Area, like San Francisco and Oakland, are increasingly concentrating in East County communities like Antioch. Despite rising housing costs, much of the county remains relatively affordable and may be less prone to the displacement pressures faced elsewhere in the Bay Area region. West County cities like San Pablo are not experiencing as much of this outmigration but do continue to provide relatively affordable housing for a population that tends to be lower-income and proportionately less non-Hispanic white than elsewhere in the Bay Area.

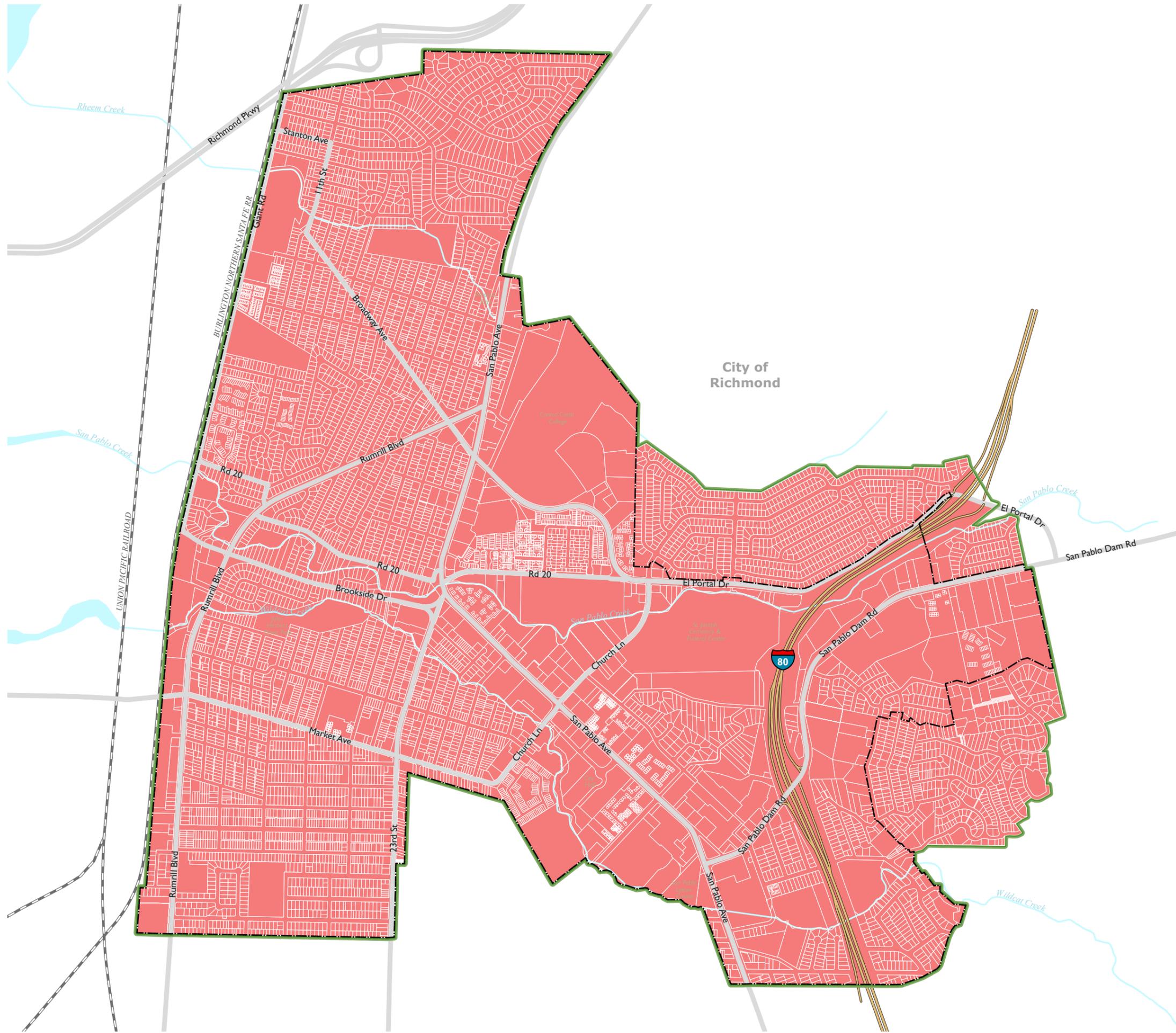
However, in San Pablo—as discussed in the Housing Needs Assessment Appendix—an affordability gap exists for lower-income homeowners as well as extremely low-income renters. Although housing costs are comparatively low in the city, they have increased tremendously over the past several years. In evidence of this, local demand for COVID-era Housing and Rental Assistance program, which provided both mortgage write downs and rental assistance for local

SAN PABLO GENERAL PLAN UPDATE
 Figure D-19: Overcrowded Households



SOURCE: HCD AFFH Data and Mapping Resources - CHHS, January 2020; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

SAN PABLO GENERAL PLAN UPDATE
Figure D-20: Sensitive Communities



Vulnerable

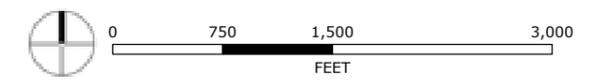
City Limits

Sphere of Influence

Major Highway

Major Roads

Railroads



SOURCE: HCD AFFH Data and Mapping Resources - Urban Displacement Project, 2019; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

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residents, saw overwhelming demand and staff reported long lines for free food giveaways at the San Pablo Library during the pandemic. As housing costs increase, this gap may expand and subject lower-income households to displacement pressures that have otherwise been absent or relatively low in the city. Communities of color may be particularly impacted by this dynamic. UDP has provided “sensitive communities” typologies to quantify the risk of displacement within a community. Sensitive communities are those with populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. As is evidenced in Figure D-20, every tract in the city is considered a sensitive community. The same is true for many of the census tracts in the neighboring city of Richmond.

While the entire city may be considered a sensitive community, this can obscure the specific pressures that may be experienced across different neighborhoods in San Pablo. In addition to the sensitive communities typology, UDP has also produced displacement typologies that more precisely describe the risk of displacement based on 2018 ACS data. As shown in Figure D-21, the area south of Market Avenue and between Rumrill Boulevard and 23rd Street is considered at risk of gentrification, as is the area along San Pablo Avenue from 23rd Street to the I-80. East of the I-80, this area is considered low-income/susceptible to displacement. Much of the northern portion of the city is not classified. None of the city is experiencing ongoing displacement or any of the more advanced forms of gentrification, both of which are consistently seen in other Bay Area cities like Oakland and San Francisco. Table D-8 below provides the complete range of typologies and their defining criteria.

Further, all multifamily units in San Pablo are protected by the State’s Tenant Protections Act of 2019 (AB 1482), which includes an annual rent cap and just-cause protections. The City does not have any additional local rent stabilization or just-cause eviction policies in place. Counseling and legal tenant services are offered by nonprofit organizations such as Bay Area Legal Aid, which has an office in Richmond.

Please see Appendix B Housing Needs Assessment for additional detail on the housing needs of lower income households and households with special needs, including persons with disabilities, elderly, large households, single parent households, farmworkers, and people experiencing homelessness. Appendix B identifies the disproportionate needs that these groups face in San Pablo. Programs to address the needs of these groups have been incorporated into Chapter 4, the Housing Action Plan.

Table D-8: Gentrification and Displacement Census Tract Typologies

Typology	Criteria
Low-Income/Susceptible to Displacement	<ul style="list-style-type: none"> • Low- or mixed-income tract in 2018
Ongoing Displacement of Low-Income Households	<ul style="list-style-type: none"> • Low- or mixed-income tract in 2018 • Absolute loss of low-income households, 2000-2018
At Risk of Gentrification	<ul style="list-style-type: none"> • Low or mixed-income tract in 2018 • Housing affordable to low- or mixed-income households in 2018 • Did not gentrify 1990-2000 or 2000-2018 • Marginal Change in housing costs or Zillow home or rental value increases in the 90th percentile between 2012-2018 • Local and nearby increases in rent were greater than the regional median between 2012-2018 or the 2018 rent gap is greater than the regional median rent gap
Early/Ongoing Gentrification	<ul style="list-style-type: none"> • Low or mixed-income tract in 2018 • Housing affordable to low- or mixed-income households in 2018 • Increase or rapid increase in housing costs or above regional median change in Zillow home or rental values between 2012-2018 • Gentrified in 1990-2000 or 2000-2018
Advanced Gentrification	<ul style="list-style-type: none"> • Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs • Gentrified in 1990-2000 or 2000-2018
Stable Moderate/Mixed Income	<ul style="list-style-type: none"> • Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018
At Risk of Becoming Exclusive	<ul style="list-style-type: none"> • Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Marginal change or increase in housing costs
Becoming Exclusive	<ul style="list-style-type: none"> • Moderate-, mixed-moderate-, mixed-high-, or high-income tract in 2018 • Housing affordable to middle-, high-, mixed-moderate-, and mixed-high-income households in 2018 • Rapid increase in housing costs • Absolute loss of low-income households, 2000-2018 • Declining low-income in-migration rate, 2012-2018 • Median income higher in 2018 than in 2000
Stable/Advanced Exclusive	<ul style="list-style-type: none"> • High-income tract in 2000 and 2018 • Affordable to high- or mixed-high-income households in 2018 • Marginal change, increase, or rapid increase in housing costs

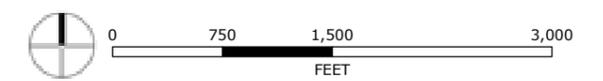
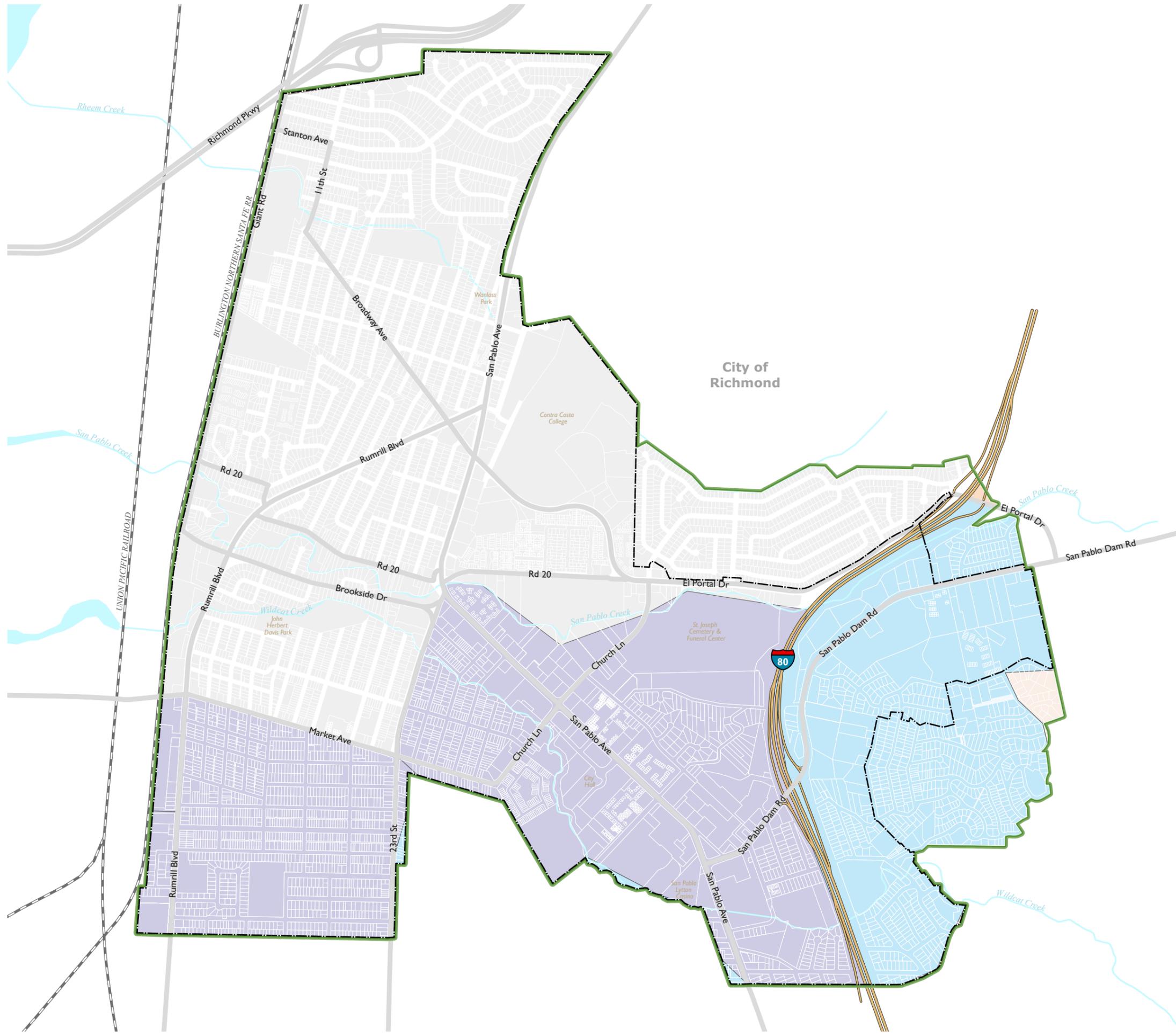
Source: UC Berkeley, Urban Displacement Project, 2018

SAN PABLO GENERAL PLAN UPDATE

Figure D-21: Gentrification and Displacement Typologies

- Low-Income/Susceptible to Displacement
- At Risk of Gentrification
- Stable Moderate/Mixed Income
- At Risk of Becoming Exclusive
- Unavailable or Unreliable Data

- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads



SOURCE: Urban Displacement Project, 2018; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

D.6 Other Relevant Factors

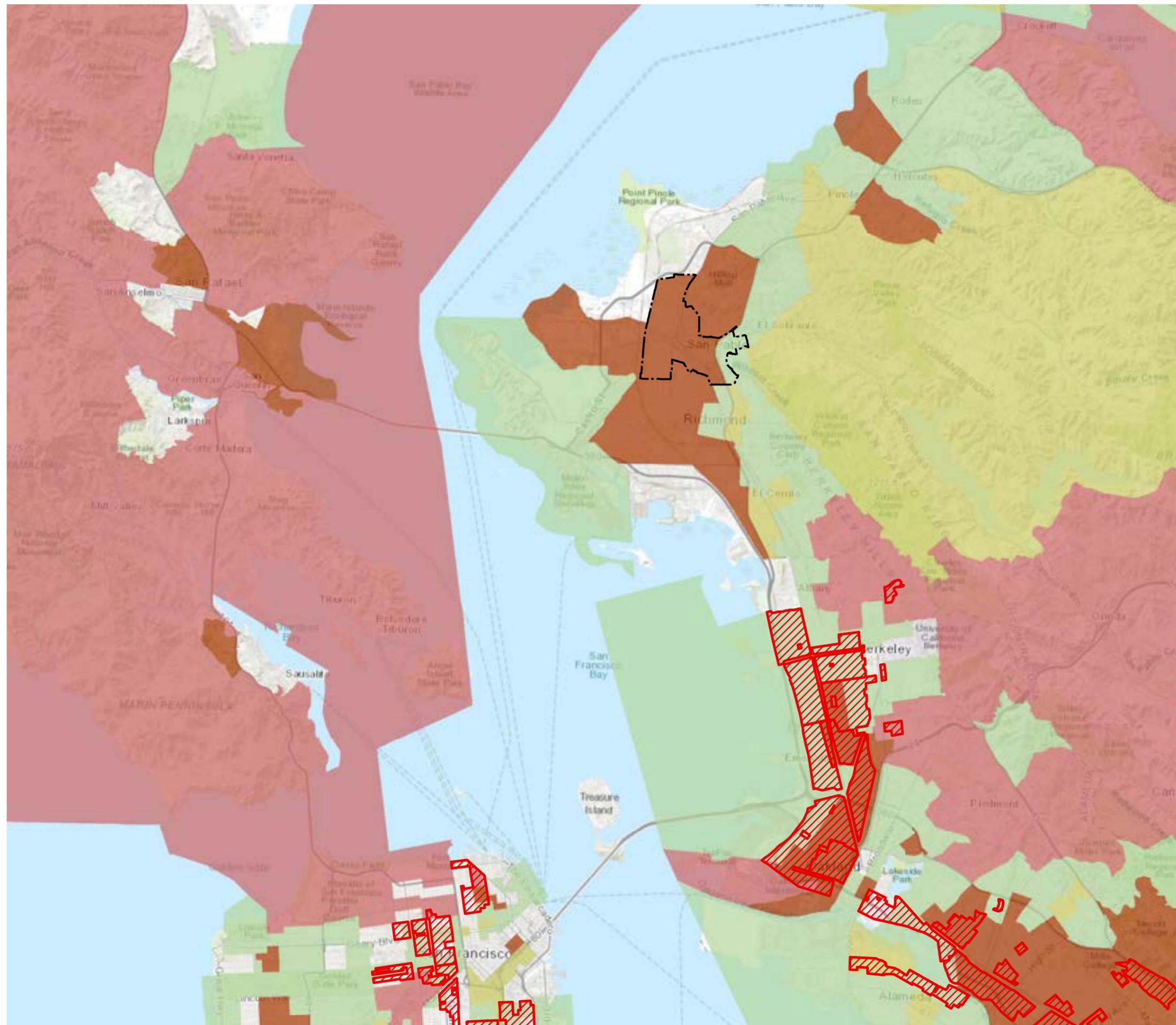
Historical practices and actions such as redlining, racially restrictive covenants, and urban renewal, in addition to more contemporary patterns such as predatory lending/foreclosure and gentrification-induced displacement, have unequivocally shaped the social and physical landscape of American cities, and these harmful events continue to impede fair housing. Although historical redlining maps did not extend to the boundaries of San Pablo today, past discriminatory practices have shaped current conditions in the community. In the late 19th Century as the area industrialized, many people of color moved to the area for jobs with the Santa Fe Railroad, and by 1902 over half of the company's workforce was non-White. Santa Fe offered housing for workers with specific areas dedicated to Mexican American, Japanese, and Native American workers. In the decades after World War II, the federal government effectively subsidized suburban neighborhoods on the express condition that they would be White only. The Federal Housing Administration's 1938 Underwriting Manual stated that including a restrictive covenant would make projects more likely to get government loans. As White families moved to new suburban neighborhoods, Latino and Asian families moved in, drawn by some of the most affordable housing prices in the Bay Area. Over time, San Pablo became a majority-minority community.

Lower home values in a community mean there is less tax revenue to fund schools, and lower levels of educational attainment limit job opportunities. Additionally, throughout the 20th Century up until today, people of color face discrimination lending practices which have hampered their ability to purchase a home, the surest means of building generational wealth. Disparities in social determinants of health such as access to quality education, economic opportunities, safe parks, clean air, and other environmental factors are compounded with the very health outcomes they exacerbate such as asthma, obesity, cardiovascular disease, and cancer. As such, achieving fair housing is an integral component of environmental justice and an essential lever to break the feedback loops that perpetuate segregation and racial inequity.

Cities in present-day Contra Costa County had relatively low populations in the 1930s and were therefore not included in the Home Owners' Loan Corporation (HOLC) redlining maps. However, redlining and similar past practices in East Bay communities have shaped the patterns in race, poverty, educational attainment, and other socioeconomic characteristics (as discussed in above sections) present in West Contra Costa County and specifically San Pablo today. Map D-22 shows how the areas where federally sanctioned redlining occurred in the region (i.e., in Oakland and San Francisco) generally correspond to areas that experience at least some level of segregation and predominantly communities of color, whereas they typically do not correspond to areas that are either integrated or predominantly white. Segregation patterns in and around San Pablo are similar to those occurring in East Oakland, portions of which were redlined. These spatial trends are largely paralleled by those mapped in the preceding sections (see Maps D-8 to D-21). The enduring legacy of past policies as well as the subregional context (e.g., development/settlement patterns as a result of proximity to industrial jobs in Richmond and Oakland) therefore underline the role and importance of present planning decisions in ensuring a more equitable future.

SAN PABLO GENERAL PLAN UPDATE

Figure D-22: Racial Segregation/Integration in 2020 and Regional Redlining in the 1930s



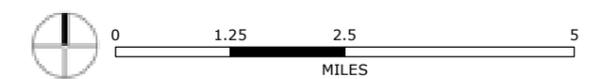
Racial Segregation/Integration (OBI, 2020) - Tract

- Racially Integrated
- Low-Medium Segregation
- High POC Segregation
- High White Segregation

Home Owners Loan Corporation Grade (1930s)

- Redlined (D, "Hazardous")

City Limits



SOURCE: HCD AFFH Data and Mapping Resources 2.0 - Othering & Belonging Institute, 2020; City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2023

The Health Element of the City of San Pablo 2030 General Plan, one of the first in California, incorporates policies related to healthy transportation and physical activity; healthy food access and equity; and access to public services. In parallel with the Housing Element Update, the Health Element, which is being renamed Health and Environmental Justice, is being updated to ensure full compliance with State law (Government Code 65302(h)(1) through (4)) that requires the City to adopt goals and policies to reduce the unique or compounded health risks in disadvantaged communities, promote civic engagement in the public decision-making process, and prioritize improvements and programs that address the needs of disadvantaged communities. The Health and Environmental Justice will incorporate:

- Policies to increase tree canopy coverage in residential areas and establish cooling centers to help mitigate the adverse health impacts from the projected increase in extreme heat events and average daily summertime temperatures. These policies address an approximately 30-degree difference projected between the hottest and coolest areas of the City, and localized urban heat islands include Helms Middle School, Lifelong Emergency Medical Clinic, and the industrial/commercial center between Giant Highway and Center Street.
- Policies to ensure continued focus on improving air quality through regional collaboration.
- Policies to help bridge the "digital divide" in San Pablo, where 12.2 percent of the population either has no computer in their home or has a computer but lacks an internet subscription. These policies include pursuing partnerships to provide public Wi-Fi in certain parks or public areas, as well as expanding mobile-friendly and non-digital communication with residents.

D.7 A strategy to prioritize investments in DACs, which includes the preparation of a Corridor Plan for Rumrill Boulevard to improve environmental conditions, economic opportunities, and housing choices along a segment of the corridor that runs between Brookside and Costa, designated as a PDA. Sites Inventory

State law requires a jurisdiction to identify sites to meet its RHNA obligations throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. This includes ensuring that sites are distributed such that they combat housing discrimination, eliminate racial bias, redress historic patterns of segregation, and lift barriers that restrict access. Affirmatively furthering fair housing will help foster inclusive communities so that households at all income levels and of all racial/ethnic makeups can enjoy a more equitable distribution of opportunity and proximity to jobs, transit, a high-quality education, and environmental benefits.

To satisfy this requirement, the extent to which buildout of the Sixth Cycle Housing Element inventory may further entrench or help ameliorate existing patterns of segregation and/or exclusion of protected categories was assessed. As previously discussed, none of the Census tracts wholly or partially within the City of San Pablo's corporate limits is classified as a R/ECAP or RCAA, but the City is located within a broader context that is notably majority-minority (non-Hispanic white population) with

higher proportions of lower-income households. Though none are designated as High Segregation and Poverty neighborhoods, all Census tracts in San Pablo are classified as Low Resource, indicating that they all rank among the lowest statewide for economic, educational, and environmental opportunities for residents. In the absence of Highest or High Resource areas within the City, this assessment focuses on how buildout of the sites inventory would affect the concentration of lower and moderate income households in San Pablo, approximated based on characteristics such as the proportion of renter-occupied units subsidized by Housing Choice Vouchers (HCVs). The results of the analysis are shown in Table D-9.

As described more fully in Chapter 3: Housing Resources, the inventory identifies 55 sites with a combined capacity for 637 above moderate, 280 moderate, and 319 lower income units. Table D-9 shows the distribution of units from the sites inventory by income category in each Census tract, alongside the existing (2021) socioeconomic characteristics of those tracts based on data made available from HCD. As noted above, Census tracts in the City share many similar characteristics, such as active displacement risk and high proportions of non-White population. On the other hand, the percentages of low to moderate income population, rent burdened households, overcrowded households, and rate of HCVs have more variance. Notably, Census tracts 6013368001, 6013369002, 6013369001, and 6013366001 have relatively higher proportions of HCVs, whereas Census tracts 6013366002 and 6013368002 have the lowest levels. The location of Census tracts within the city is shown on Map D-23.

Of the four Census tracts with the highest rates of HCV use, two contain lower-income sites. However, one of these (Census Tract 6013369002, located east of I-80) has the fewest existing households and the lowest concentration of non-White population, as well as a lower proportion of low- to moderate-income population. As such, development of units affordable to lower-income households in this Census tract would not contribute to segregation but rather increase opportunities for racial and economic levels to be more similar to the rest of the City. On the other hand, Census Tract 6013369001 (located south of San Pablo Creek between I-80 and 23rd Street) has the highest number of existing households and highest concentration of low- to moderate-income population, with a proportion of non-White population comparable to the rest of the City. However, this Census tract also contains the greatest share of moderate- and above-moderate-income units in the sites inventory, so the addition of new lower-income units in this tract would help ensure an inclusive mix of housing and reduce risk of displacement for current residents. New housing opportunities for lower-income households in Census Tract 6013367200 along the southern border of the City would likewise serve to further fair housing choice in San Pablo.

As many socioeconomic characteristics are shared by Census tracts citywide, it is difficult to assess the degree to which implementation of the Sixth Cycle Housing Element would help close the gaps in access to opportunity. Nevertheless, the Housing Action Plan (see Chapter 4) and related policies in the General Plan—such as those in the Environmental Justice Element—are designed to address existing disparities and provide new opportunities to meet the needs and enrich the lives of all San Pablo residents.

Table D-9: AFFH Housing Element Sites Analysis

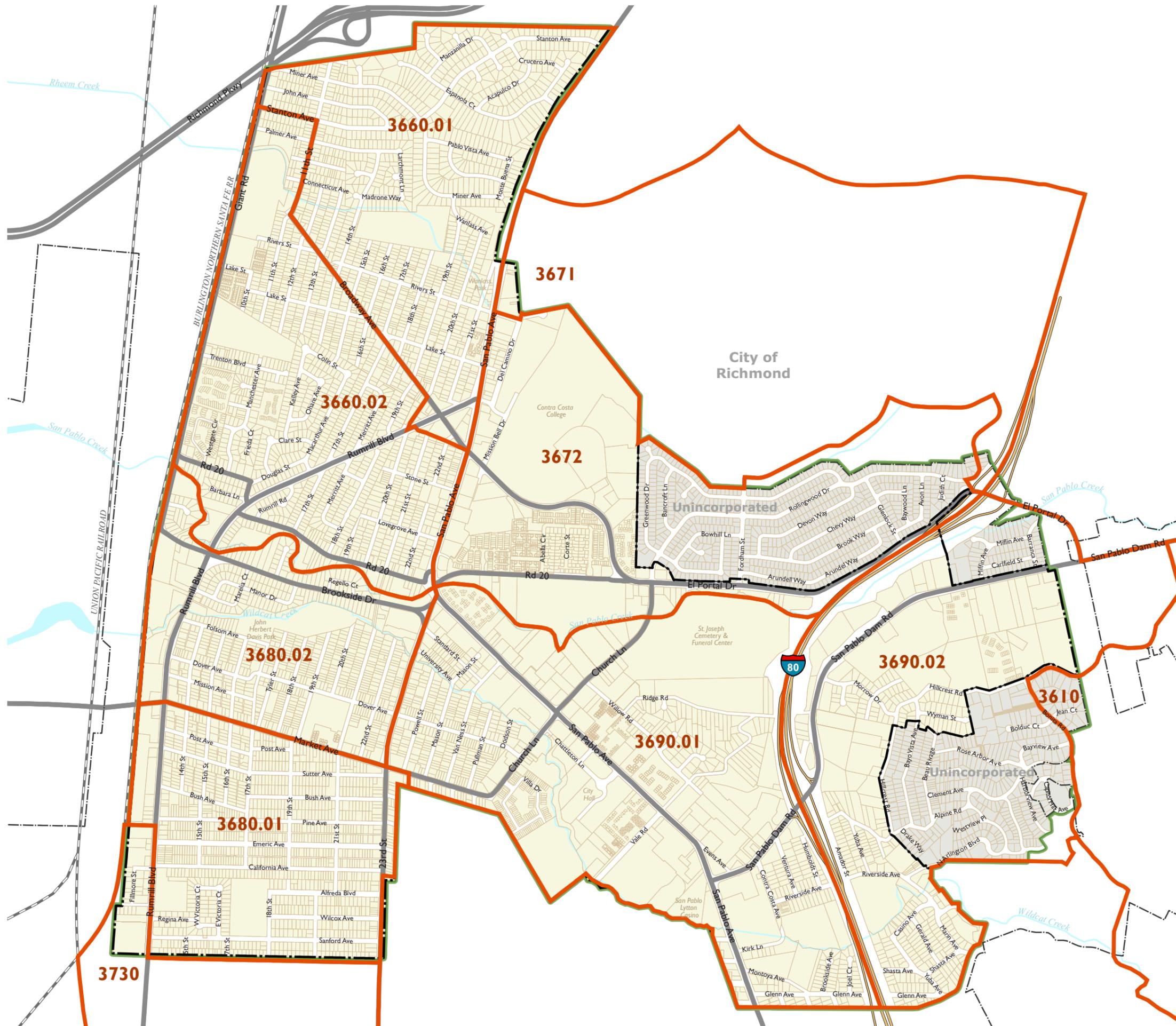
Tract ¹	Sites Inventory Capacity			2017-2021 ACS Estimates						
	Low Income	Moderate Income	Above Moderate Income	Existing Households	Non-White Pop.	Low to Mod. Income Pop.	Rent Burdened Households	Over-crowded Households	HCV Use ²	Displacement Risk (2022)
6013368001	-	48	117	1,323	91%	72%	57%	18%	16%	2 Income Groups Displacement
6013369002	135	17	11	1,010	69%	47%	52%	18%	13%	At Risk of Displacement
6013369001	62	135	316	2,536	90%	75%	67%	20%	12%	2 Income Groups Displacement
6013366001	-	2	6	1,209	93%	43%	53%	16%	12%	At Risk of Displacement
6013373000	-	24	53	1,352	95%	67%	39%	27%	10%	2 Income Groups Displacement
6013367200	122	4	10	1,758	96%	53%	48%	11%	10%	2 Income Groups Displacement
6013367100	-	-	-	2,148	93%	36%	77%	6%	9%	At Risk of Displacement
6013368002	-	34	83	1,137	95%	60%	46%	16%	7%	2 Income Groups Displacement
6013366002	-	16	41	1,730	96%	73%	55%	24%	4%	2 Income Groups Displacement

Notes:

1. All Census tracts within the City of San Pablo are designated as Low Resource according to TCAC Opportunity Area Maps (2023).
2. Calculated as the percentage of renter-occupied units that are subsidized by Housing Choice Vouchers (2021).

Sources: U.S. Census Bureau 2017-2021 ACS 5-Year Estimates; TCAC/HCD, 2023; HCD/Urban Displacement Project, 2022; Dyett & Bhatia, 2023.

Figure D-23: Census Tracts



- Census Tracts, 2020
- City Limits
- Sphere of Influence
- Unincorporated
- Major Highway
- Major Roads
- Railroads



SOURCE: US Census, 2020; City of San Pablo, 2021; Contra Costa county GIS, 2021; Dyett & Bhatia, 2021

DYETT & BHATIA
Urban and Regional Planners

D.8 Summary and Conclusions

State law requires that jurisdictions identify fair housing issues as well as contributing factors and priority levels for each factor. Further, a jurisdiction must identify specific goals and actions it will take to reduce the severity of fair housing issues within that jurisdiction. This section fulfills these requirements based on the assessment provided above, as well as relevant information from the 202-2025 AI. Goals and actions related to AFFH are incorporated into the broader Housing Action Plan contained within Chapter 4 of this Housing Element.

San Pablo is a majority-minority community with a high degree of racial diversity across census tracts. While the city experiences relatively high rates of poverty, this has been steadily declining in recent years. Further, workforce development programs, offered through the SPEDC, have likely contributed to the city's significant job increase between 2010 and 2019. San Pablo home sales prices and rents are relatively affordable compared to other communities in the Bay Area; however, housing prices have increased significantly in recent years and the fair housing issues in the community relate to housing cost burden and risk of displacement. While there are no R/ECAPs in the city, San Pablo itself and West County can be considered one in the context of the wider region. There is also some evidence of racial/ethnic discrimination in lending services, as well as geographic concentrations based on familial status, income, and race/ethnicity.

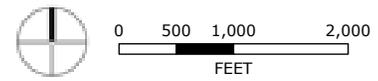
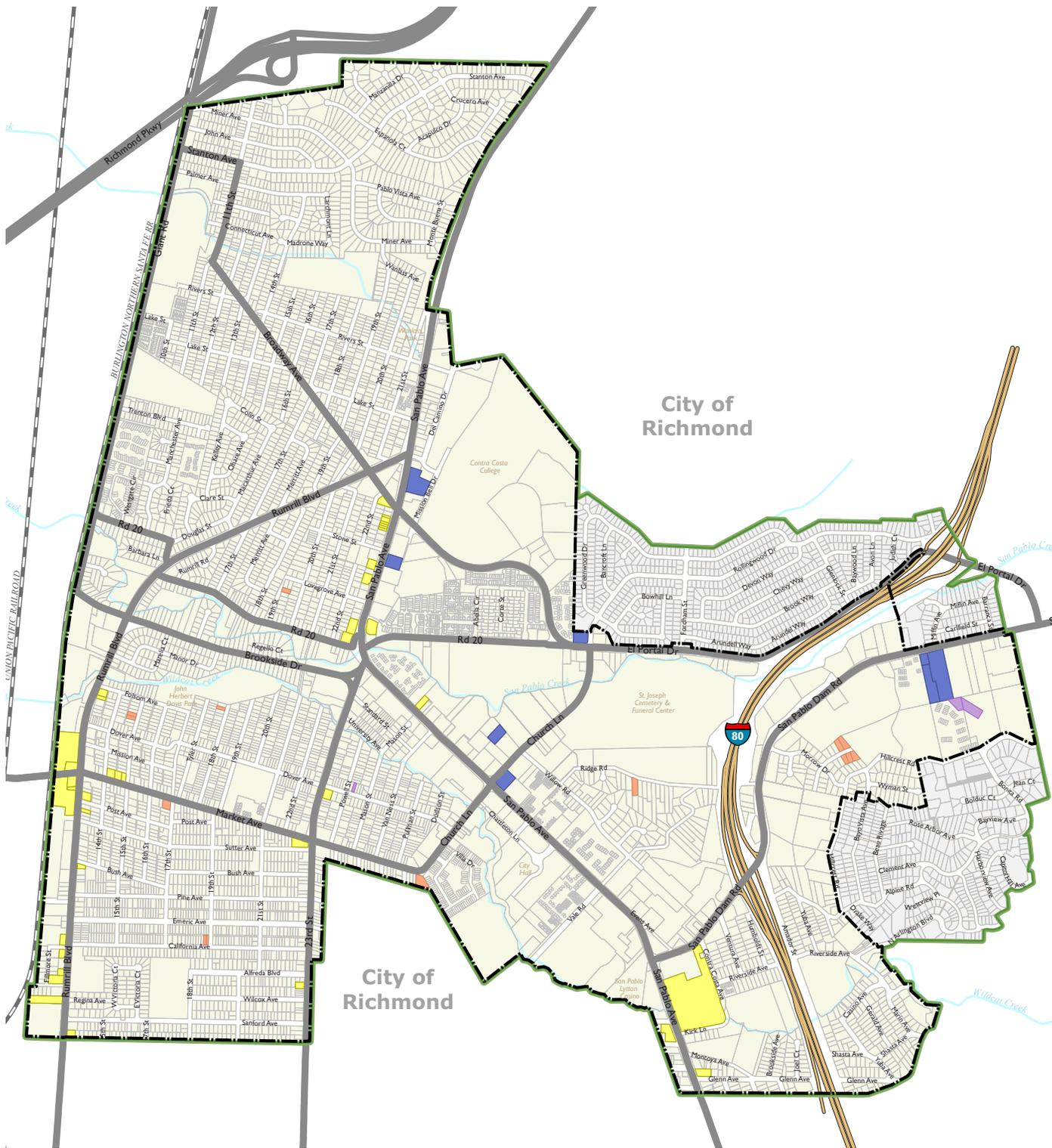
Based on the findings of this assessment and relevant portions of the 2020-2025 AI, Table D-10 presents a summary of existing fair issues and their contributing factors, as well as a description for each. Issues that are primarily related to environmental justice or economic development and do not have a direct bearing on fair housing will be addressed in the respective element of the General Plan update. Priority levels were assigned as follows:

- **High** – Designates contributing factors that limit or deny fair housing choice (i.e., has the potential to violate the Fair Housing Act).
- **Medium** – Designates contributing factors which should be addressed in the near term. These issues do not violate the Fair Housing Act but may increase fair housing issues in the city. These factors may be beyond the City's immediate capabilities to address.
- **Low** – Designates contributing factors that either do not need to be or cannot be addressed immediately by the City, but should be addressed later on during the eight-year

SAN PABLO HOUSING ELEMENT

Housing Inventory Sites

- Low and Very Low Income
- Moderate Income
- Above Moderate Income
- Mixed Income
- City Limits
- Sphere of Influence
- Major Highway
- Major Roads
- Railroads



SOURCE: City of San Pablo, 2021; Contra Costa County GIS, 2021; Dyett & Bhatia, 2021

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 Urban and Regional Planners
 Date: 11/20/2023

Table D-10: Fair Housing Issues and Contributing Factors

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	2023-2031 Metrics, Timing & Geographic Targeting
HIGH	Enforcement/Outreach	Substandard housing conditions often go unreported.	<ul style="list-style-type: none"> Multigenerational and non-standard family arrangements are common, with friends and extended family living together. Consequent overcrowding leads to unpermitted construction and unsafe housing conditions, but close personal ties between residents and owners and lack of formal lease agreements limit leverage of tenants to request improvements. 	<ul style="list-style-type: none"> Continue RH&S Program (Program 4-F) Awareness of Fair Housing Programs (Program 3-H) 	<ul style="list-style-type: none"> Inspect 750 rental and owner-occupied units per year each year of cycle citywide (Program 4-F) Designate an Equal Opportunity Coordinator within the City responsible for outreach and referrals to appropriate agencies by Q3 2024 (Program 3-H) Host regular "housing clinics" with non-profit groups offering free legal services in English and Spanish starting Q1 2025 (Program 3-H)
		A disproportionate share (67%) of all housing discrimination complaints in San Pablo are filed on the basis of disability.	<ul style="list-style-type: none"> Discriminatory real estate/rental practices Lack of public knowledge about State and federal fair housing law 	<ul style="list-style-type: none"> Outreach to People Living with Developmental Disabilities in San Pablo (Program 3-I) Just Cause Eviction Protections (Program 3-G) Awareness of Fair Housing Programs (Program 3-H) 	<ul style="list-style-type: none"> Launch program in 2024; conduct outreach to developers and non-profits to identify development opportunities for housing accessible to persons with developmental disabilities (Program 3-I) Assist residents of 141 assisted units at risk of conversion by 2030 (Program 3-G) Designate an Equal Opportunity Coordinator within the City responsible for outreach and referrals to appropriate agencies by Q3 2024 (Program 3-H) Host regular "housing clinics" with non-profit groups offering free legal services in English and Spanish starting Q1 2025 (Program 3-H)
		Lack of awareness of housing services among resident population.	<ul style="list-style-type: none"> Lack of public knowledge about affordable housing programs 	<ul style="list-style-type: none"> Landlord/Tenant Dispute Resolution (Program 3-F) Just Cause Eviction Protections (Program 3-G) 	<ul style="list-style-type: none"> Tracking system to record the number of referrals and document residents' concerns (Program 3-F)

Table D-10: Fair Housing Issues and Contributing Factors

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	2023-2031 Metrics, Timing & Geographic Targeting
				<ul style="list-style-type: none"> Awareness of Fair Housing Programs (Program 3-H) Outreach to People Living with Developmental Disabilities in San Pablo (Program 3-I) 	<ul style="list-style-type: none"> Assist residents of 141 assisted units at risk of conversion by 2030 (Program 3-G) Designate an Equal Opportunity Coordinator within the City responsible for outreach and referrals to appropriate agencies by Q3 2024 (Program 3-H) Host regular "housing clinics" with non-profit groups offering free legal services in English and Spanish starting Q1 2025 (Program 3-H) Launch program in 2024; conduct outreach to developers and non-profits to identify development opportunities for housing accessible to persons with developmental disabilities (Program 3-I)
		Higher than average rates of home loan denial for all people of color.	<ul style="list-style-type: none"> Discriminatory lending patterns 	<ul style="list-style-type: none"> Loan Assistance for Sustainable Housing (Program 2-D) 	<ul style="list-style-type: none"> 16 loans to qualified first-time buyers citywide by 2031 (Program 2-D)
MEDIUM	Segregation/Integration	While San Pablo is classified as a Higher Diversity community and general levels of racial/ethnic segregation remain low within the city, the city itself exists in a segregated sub-region of the county.	<ul style="list-style-type: none"> High concentration of subsidized housing in southwestern portion of the city High rates of poverty citywide 	<ul style="list-style-type: none"> Rumrill Corridor Plan (Program 1-B) Loan Assistance for Sustainable Housing (Program 2-D) 	<ul style="list-style-type: none"> 225 new market rate housing units by 2031 (Program 1-B) 16 loans to qualified first-time buyers by 2031 (Program 2-D)
HIGH	Access to Opportunity	San Pablo experiences lower levels of educational opportunity throughout the city	<ul style="list-style-type: none"> Lower levels of educational attainment Socio-economic factors that interfere with learning Financial ability to pursue higher education 	<p>Program 4-H Continue and expand efforts to increase educational opportunity:</p> <ul style="list-style-type: none"> San Pablo Beacon Community Schools Initiative San Pablo Team for Youth San Pablo Scholarship Pilot Program 	<ul style="list-style-type: none"> Maintain 6 full-service community schools citywide through 2031 Increase number of public and non-profit partners and expand and/or enhance school-based programs and services for children, youth, and families citywide

Table D-10: Fair Housing Issues and Contributing Factors

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	2023-2031 Metrics, Timing & Geographic Targeting
					<ul style="list-style-type: none"> Provide 300 post-high school scholarships to disadvantaged local students annually citywide
HIGH	Access to Opportunity	All areas of San Pablo experience less positive economic outcomes than other Bay Area communities	<ul style="list-style-type: none"> Lower educational attainment levels and low income Needs for skills development Limited English language ability 	Program 4-I Support SPEDC Workforce Development Initiatives	Support EDC in providing the following citywide each year starting 2023: <ul style="list-style-type: none"> Employment services for 195 individuals; Job training for 130 individuals; Support services for 75 businesses
HIGH	Access to Opportunity	Citywide, residents experience more positive environmental outcomes, but neighborhoods in the northwest have fewer parks and less tree canopy coverage, and the central part of the city is more vulnerable to the effects of urban heat Air pollution adversely affects health in the Richmond-North Richmond-San Pablo subregion.	<ul style="list-style-type: none"> Deficit of park facilities Uneven, minimal tree canopy coverage Subregional air quality related to industrial uses and freeways 	Program 4-J air quality, parks and urban greening initiatives	<ul style="list-style-type: none"> Finalize and implement the Clean Air Community Emissions Reduction Plan by Q4 2025 Construct one new park in northwestern neighborhood by Q4 2030 Establish an Adopt-a-Tree program by Q2 2026 and plant 50 trees citywide each year after inception with a focus central and western neighborhoods Target incorporation of one voluntary CalGreen urban heat mitigation strategy in each development within PDAs starting Q1 2025
HIGH	Disproportionate Need/Displacement Risk	Higher rates of overcrowding for renters (20.8%) and homeowners (11.0%) in San Pablo than county or Bay Area average, particularly in the San Pablo Ave and Rumrill PDAs.	<ul style="list-style-type: none"> Lack of housing supply Lack of housing units suitable for large families Income levels Cost burden 	<ul style="list-style-type: none"> Rumrill Corridor Plan (Program 1-B) Incentives for Affordable and Special Needs Housing (Program 2-I) Housing for Extremely Low-Income Households and Special Needs Groups (Program 3-A) 	<ul style="list-style-type: none"> 314 new housing units in Rumrill PDA by 2031 (Program 1-B) 273 new lower income and special needs RHNA units in PDAs by 2031 (Program 2-I) 115 extremely low-income units citywide by 2031 (Program 3-A)

Table D-10: Fair Housing Issues and Contributing Factors

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	2023-2031 Metrics, Timing & Geographic Targeting
HIGH	Disproportionate Need/Displacement Risk	Citywide, the community is sensitive to displacement pressures as rents rapidly rise and 57.4% of renter households are cost burdened. American Indian (77.3%) and African American (58.4%) households experience noticeably higher rates of cost burden than other groups and therefore higher risk of displacement. Lower-income households may be especially vulnerable to displacement pressures due to the housing affordability gap, particularly in the Rumrill and 23 rd Street PDAs; however, displacement is not yet ongoing.	<ul style="list-style-type: none"> • Cost burden • Poverty/education levels • Preponderance of single-family housing • Affordability gap for lower-income households • Higher costs associated with property management companies • Lack of available HCVs 	<ul style="list-style-type: none"> • Rumrill Corridor Plan (Program 1-B) • Community Land Trust Collaboration (Program 2-A) • Rental Assistance (Program 2-B) • Mobile Home Parks (Program 2-F) • Landlord/Tenant Dispute Resolution (Program 3-F) • Just Cause Eviction Protections (Program 3-G) 	<ul style="list-style-type: none"> • Implement anti-displacement measures in Rumrill PDA by Q1 2026 (Program 1-B) • Acquisition of property in in PDAs and single-family neighborhoods (Program 2-A) • Assistance for 720 households most at risk of homelessness annually, with a focus on Rumrill and 23rd Street PDAs (Program 2-B) • Preservation of 398 mobile homes in Rumrill PDA by 2031 or access to comparable affordable units (Program 2-F) • Tracking system to record the number of referrals and document residents' concerns (Program 3-F) • Assist residents of 141 assisted units at risk of conversion by 2030 (Program 3-G)
HIGH	Disproportionate Need/Displacement Risk	Although declining, citywide poverty rate is high relative to county and region. Notably higher rates of poverty for Black (14.6%) and Latino (61.3%) households than would be indicated by their share of the population, 10.8% and 60.8% respectively.	<ul style="list-style-type: none"> • Aftereffects of the foreclosure crisis • Poverty/education levels • Relatively higher rate of female-headed households 	<ul style="list-style-type: none"> • Housing for Extremely Low-Income Households and Special Needs Groups (Program 3-A) • Special Needs Housing (Program 2-I) <p>Program 4-H Continue and expand efforts to increase educational opportunity:</p> <ul style="list-style-type: none"> • San Pablo Beacon Community Schools Initiative • San Pablo Team for Youth • San Pablo Scholarship Pilot Program 	<ul style="list-style-type: none"> • Permits for at least 115 extremely low-income units citywide by 2031 (Program 3-A) • 273 new units affordable to lower income households citywide in the planning period (Program 2-I) • Maintain 6 full-service community schools citywide through 2031 • Increase number of public and non-profit partners and expand and/or enhance school-based programs and services for children, youth, and families citywide • Provide 300 post-high school scholarships to disadvantaged local students annually citywide

Table D-10: Fair Housing Issues and Contributing Factors

Priority Level	Fair Housing Issue	Description	Contributing Factor(s)	Meaningful Actions	2023-2031 Metrics, Timing & Geographic Targeting
				Program 4-I Support SPEDC Workforce Development Initiatives	Support EDC in providing the following citywide each year starting 2023: <ul style="list-style-type: none"> • Employment services for 195 individuals; • Job training for 130 individuals; • Support services for 75 businesses