

RESOLUTION NO. 2021-355

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ELK GROVE
DECLARING ITS INTENT TO AMEND THE GENERAL PLAN TO AMEND THE 2021
HOUSING ELEMENT**

**2021 Housing Element Update
Project No. SPG004**

WHEREAS, California Government Code Section 65300 requires the City adopt a comprehensive, long-term general plan for the physical development of the City; and

WHEREAS, Government Code Section 65302(c) requires that a housing element be included in the general plan as a mandatory element; and

WHEREAS, the requirements for the housing element are provided in Government Code 65580, et. seq.; and

WHEREAS, housing elements are required to be updated every eight years upon adoption of a region's Regional Housing Needs Allocation (RHNA); and

WHEREAS, the Sacramento Region, of which the City is within, was due to prepare and adopt its Cycle 6 Housing Element by May 15, 2021; and

WHEREAS, on May 12, 2021, the City Council adopted the 2021 Housing Element, certifying a Subsequent Environmental Impact Report as required by the California Environmental Quality Act (CEQA); and

WHEREAS, the adopted Housing Element was submitted to the State of California Department of Housing and Community Development (HCD) for review and certification; and

WHEREAS, HCD requested modifications to the Housing Element to further address Affirmatively Furthering Fair Housing; and

WHEREAS, on October 11, 2021, the City released draft amendments to address the HCD comments for public comment; and

WHEREAS, staff continues to work with HCD throughout the process; and

WHEREAS, the Planning Commission held duly a noticed public hearing on November 18, 2021, as required by law to consider all of the information presented by staff, and public testimony presented in writing and at the meeting and voted 5-0 to recommend approval of the amended Housing Element; and

WHEREAS, the City Council held a duly noticed public hearing on December 8, 2021 as required by law to consider all of the information presented by staff, and public testimony presented in writing and at the meeting;

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Elk Grove hereby finds no further CEQA review is required and declares its intent to incorporate updates to the 2021 Housing Element as provided in Exhibit A, attached hereto and incorporated by reference, pursuant to the following findings:

CEQA

Finding: No further environmental review is required pursuant to State CEQA Guidelines Sections 15183 and 15162.

Evidence: A Subsequent Environmental Impact Report was prepared for the Housing Element Update and certified by the City Council in May 2021 with adoption of the Element (State Clearinghouse Number 2020069032). CEQA Guidelines Section 15183 provides that projects consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except where it might be necessary to examine project-specific effects peculiar to the project. Further CEQA Guidelines Section 15162 provides that when an EIR has been certified for a project no subsequent EIR shall be prepared unless the lead agency (City) determines, on the basis of substantial evidence, that there have been substantial changes to the project, the circumstances under which the project has been undertaken, or new information has become known. The proposed changes to the Housing Element do not alter the land use designations, zoning, or allowed density or intensity of development. The revisions provide additional background information for the preparation of the Element and modify several implementation programs to clarify or enhance the quantified objectives. The changes do not add any new programs or actions. Therefore, none of the circumstances described in Section 15162 have been triggered and no further environmental review is required pursuant to Sections 15162 and 15183.

General Plan Amendment

Finding: The proposed General Plan amendment is of substantial benefit to the City and the amendment is internally consistent with the General Plan.

Evidence: The proposed revisions to the Housing Element are necessary in order to maintain consistency with state law and complete the certification process with HCD. The revisions are internally consistent and the changes to the implementation measures further achievement of the City’s housing goals and policies.

PASSED AND ADOPTED by the City Council of the City of Elk Grove this 8th day of December 2021




BOBBIE SINGH-ALLEN, MAYOR of the CITY OF ELK GROVE

ATTEST:


JASON LINDGREN, CITY CLERK

APPROVED AS TO FORM:


JONATHAN P. HOBBS,
CITY ATTORNEY

The following portions of the 2021 Housing Element are amended as shown in track changes.



CITY OF ELK GROVE 2021–2029 HOUSING ELEMENT BACKGROUND REPORT

City Council Draft

MayDraft Revisions – October 2021
V3

Submitted to:

CITY OF ELK GROVE
8401 Laguna Palms Way
Elk Grove, CA 95758

2. IMPLEMENTATION ACTIONS

Action 1. Housing Inventory. To the extent that there are high-density residential sites identified as accommodating the City's Regional Housing Needs Allocation (RHNA) that ultimately develop with a use other than high-density residential development, the City will ensure that it maintains adequate inventory to accommodate the RHNA, including by rezoning as necessary.

Time Frame: Review the sites inventory annually and as sites are developed to ensure sufficient capacity.

Responsibility: Strategic Planning and Innovation; Development Services (Housing and Public Services Division)

Potential Funding Source(s): City Development Services Fund

Action 2. Rezone Housing Sites. The City has a lower-income regional housing need of 4,265 units. To meet the lower-income regional housing need, the City will, concurrently with adoption, identify and rezone some or all of the sites identified in **Tables 33 and 34** of Chapter 12.4 (Technical Appendix). These sites will require a minimum of 20.1 units per acre and will allow up to 30 units per acre. The rezone will result in a minimum of 4,265 units to accommodate the lower income RHNA. The City will encourage integration of low-income units throughout the sites identified.

If the City does not complete the rezone prior to the start of the planning period (May 15, 2021), sites will be rezoned consistent with Government Code Section 65583, subdivision (c)(1) and 65583.2 subdivisions (h) and (i). The rezone will accommodate 100 percent of the shortfall during the planning period and will include the following components.

- Permit owner-occupied and rental multifamily uses by right and do not require a conditional use permit or other discretionary review or approval for developments in which 20 percent or more of the units are affordable to lower income households.
- Permit the development of at least 16 units per site and a minimum of 20 dwelling units per acre for suburban and metropolitan jurisdictions;
- Ensure at least 50 percent of the shortfall of low- and very low-income regional housing need can be accommodated on sites designated for exclusively residential uses;
- Ensure sites will be available for development during the planning period where water and sewer can be provided.

The City has, since 2003, required Design Review for all multifamily development. Design Review would be required for multifamily projects on these sites. Projects under 151 units are reviewed at the "staff-level" through consideration by the Zoning Administrator, while larger projects are reviewed by the Planning Commission.

Time Frame: Concurrent with adoption of the Housing Element, or within the first 3 years of the planning period. Encourage integration as projects are processed through the Planning Division. Monitor affordability and location of rezoned sites. As part of additional rezoning for purposes of maintaining adequate sites (e.g., no net loss law), the City will continue to identify and rezone sites at appropriate densities throughout the City to promote more inclusive communities.

Responsibility: Strategic Planning and Innovation; Development Services (Housing and Public Services Division)

Potential Funding Source(s): City Development Services Fund, SB2/LEAP or REAP Funding

Action 3. Unit Replacement (New, State Law). Pursuant to California Government Code, Section 65583.2, replacement units are required for all sites identified in the site inventory when any new development (residential, mixed-use, or non-residential) occurs on a site that has been occupied by or restricted for the use of lower-income households at any time during the previous five years. Replacement requirements are set forth in Government Code Section 65915(c)(3).

This requirement applies to:

- Non-vacant sites
- Vacant sites with previous residential uses that have been vacated or demolished

Time Frame: The replacement requirement will be implemented immediately and applied as applications on identified sites are received and processed.

Responsibility: Development Services (Planning Division)

Potential Funding Source(s): City Development Services Fund

Objectives: Require new housing developments to replace all affordable housing units lost due to new development.

Quantified Objective: ~~2 households~~ Replace any of the 31 units identified in the sites inventory if ~~are~~ a) they are planned to be demolished for purposes of building new housing, and b) they are determined to be occupied by low-income households, provide assistance to prevent displacement of lower-income households due to loss of affordable units.

Action 4. Lot Configuration and Large Lot Development (New, Staff Recommendation). To facilitate the development of affordable housing and provide for development phases of 50 to 150 units, the City will routinely coordinate with property owners and give high priority to processing subdivision maps that include affordable housing units.

Additionally, the City will adopt incentives for development of high-density residential sites such as reducing minimum front and side yard setbacks to enhance design flexibility and create a more pedestrian-oriented environment and modifying parking standards.

Time Frame: As projects are processed through the Development Services Department throughout the planning period and incentives will be adopted as part of Title 23 within one year of adoption of the Housing Element.

Responsibility: Development Services (Planning Division)

Potential Funding Source(s): City Development Services Fund

Action 5. Lot Consolidation. To ensure that there is a sufficient supply of multifamily zoned land to meet the City's RHNA, the City will help facilitate lot consolidations to combine small residential lots into larger developable lots by providing information on development opportunities and incentives for lot consolidation to accommodate affordable housing units available on the City's website and discussing with interested developers. As developers/owners approach the City interested in lot consolidation for the development of affordable housing, the City will offer the following incentives on a project-by-project basis:

- Allow affordable projects to exceed the maximum height limits,
- Lessen set-backs, and/or
- Reduce parking requirements.

The City will also consider offsetting fees (when financially feasible) and concurrent/fast tracking

of project application reviews to developers who provide affordable housing.

Time Frame: Ongoing, as projects are processed through the Development Services Department. Annually meet with local developers to discuss development opportunities and incentives for lot consolidation.

Responsibility: Development Services (Planning Division)

Potential Funding Source(s): City Development Services Fund

Quantified Objective: 149 lower-income units in high opportunity areas to facilitate mobility.

Action 6. Zoning for Missing Middle Housing Types (New, Missing Middle Study). The City shall review and amend the Zoning Code and applicable design guidelines to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g. duplexes, triplexes, fourplexes, courtyard buildings) to create housing for middle- and moderate-income households and increase the availability of affordable housing in a range of sizes to reduce displacement risk for residents living in overcrowded units or overpaying for housing.

Time Frame: Within three years from adoption of the Housing Element

Responsibility: Development Services (Planning Division), Strategic Planning and Innovation

Potential Funding Source(s): City Development Services Fund, SB2/LEAP or REAP Funding

Quantified Objective: 40 middle- and moderate-income units to support housing mobility and access to high opportunity areas.

Action 7. Development Streamlining (New, State Law). The City will establish a written policy or procedure and other guidance, as appropriate, to specify the Senate Bill (SB) 35 streamlining approval process and standards for eligible projects, as set forth under California Government Code, Section 65913.4.

Time Frame: Establish a policy or procedure by June 2021. Ongoing, as projects are processed through the Development Services Department

Responsibility: Development Services (Planning and Building Divisions)

Potential Funding Source(s): City Development Services Fund, SB2/LEAP or REAP Funding

Action 8. Financial Assistance. Support affordable housing development through provision of direct assistance from the Affordable Housing Fund and/or other City-controlled housing funding sources and, as needed, facilitate developers' applications for State and Federal affordable housing funding. City assistance could be provided in the form of land, in line with the City's strategic land acquisition program, or in the form of loans or grants for specific projects.

Time Frame: Ongoing, as funding allows. Consider updating the Affordable Housing Fee by December 2022.

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): Affordable Housing Fund, CalHome, Community Development Block Grant (CDBG), HOME, or other U.S. Department of Housing and Urban Development (HUD) or California Department of Housing and Community Development (HCD) funding

Quantified Objective: Provide funding assistance for the development of ~~125300~~ affordable housing units, targeting development of 60 of these units in areas of concentrated overpayment to reduce displacement risk and 200 in high opportunity areas to facilitate mobility for lower-income households

Action 9. Fee Waivers. When feasible, continue to provide deferrals or exemptions from select fees to all affordable housing projects and participate in the Sacramento Regional County Sanitation District's fee waiver and deferral program to reduce impact fees for affordable housing development.

Time Frame: Ongoing, as projects are processed through the Development Services Department

Responsibility: Development Services (Planning and Building Divisions)

Potential Funding Source(s): City Development Services Fund, Sacramento Regional County Sanitation District

Quantified Objective: 4 affordable housing projects (approximately 450 units) to increase supply and prevent displacement of lower-income households.

Action 10. Parking Study (New, Staff Recommendation). Conduct a parking study to determine parking needs for senior housing and affordable housing projects. Based on results, continue to allow flexibility in development standards, such as parking reductions for senior projects, and by allowing development incorporating universal design measures.

The City will also review parking requirements for emergency shelters to ensure that parking standards are sufficient to accommodate all staff, provided standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.

Time Frame: Complete parking study by December 2021, allow flexibility as projects are processed through the Development Services Department. Review parking standards for emergency shelters and amend, if necessary, by December 2021.

Responsibility: Strategic Planning and Innovation, Development Services (Planning and Building Divisions)

Potential Funding Source(s): City Development Services Fund, SB2/LEAP or REAP Funding

Action 11. Homeless Needs Assessment. Continue to contribute funding to Elk Grove Homeless Assistance Resource Team (HART), Sacramento Self Help Housing, and other local and regional entities and work closely with these groups to assess the needs of people experiencing homelessness and develop plans to address homelessness at a regional level. The City will annually meet with local service providers and regional agencies (as applicable) to assess the needs regarding homelessness in the City and region.

To City will also review and amend provisions and standards for emergency shelters to ensure they are objective and in compliance with Government Code Section 65583(a)(4).

Time Frame: Ongoing, review and amend standards for emergency shelters by December 2021.

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): CDBG funds (when available), City Community Service Grant funds (as determined by the City Council)

Action 12. Developmental Disability Services. Work with the Alta California Regional Center to implement an outreach program that informs families within the City about housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the City's website, and/or providing housing-related training for individuals/families through workshops.

Time Frame: Development of an outreach program within one year of adopting the Housing Element, and annually coordinate with regional offices and developers to pursue opportunities.

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): City Development Services Fund

Action 13. Low-Barrier Navigation Centers (New, State Law). Amend the City's zoning regulations to add low-barrier entry practices to the City's Navigation Housing use and permit them by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses, if the center meets certain statutory requirements. See Government Code section 65662. Low-barrier practices may include, but are not limited to:

- Permitting the presence of partners if it is not a population-specific site;
- Allowing pets;
- Providing space for the storage of possessions; and
- Providing privacy such as partitions around beds or private rooms.

Time Frame: Within one year from adoption of the Housing Element

Responsibility: Strategic Planning and Innovation

Potential Funding Source(s): City Development Services Fund

Action 14. Transitional and Supportive Housing (New, State Law). Amend the Zoning Code to comply with Government Code Section 65583(c)(3), which deals with transitional and supportive housing. The City will amend the Zoning Ordinance to allow transitional and supportive housing in the mobile home subdivision (RM-1) and Mobile Home Park Combining District (MHP) zones as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. The City will also amend the Zoning Ordinance to allow supportive housing in the Light Industrial (LI) zone, as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.

Time Frame: Within one year from adoption of the Housing Element

Responsibility: Development Services (Planning Division)

Potential Funding Source(s): City Development Services Fund

Action 15. Affordable Housing Database. Continue to update the affordable housing unit database and to provide information regarding affordable housing opportunities, ~~both~~ through direct response to inquiries ~~and~~, making information available on the City's website and targeted marketing to affirmatively further fair housing as new city-funding projects are developed. The City will make multi-lingual information available as requested.

Time Frame: Ongoing, at least annual targeting

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): Affordable Housing Fund

Quantified Objective: Assist 400 lower-income households locate potential housing opportunities to reduce displacement risk and facilitate mobility throughout the community.

Action 16. Development Incentives for Low Income Households and Special-Needs Groups. Continue to provide regulatory incentives for the development of units affordable to extremely low-, very low-, and low-income households, including second dwelling units, senior housing, infill projects, mixed-use and multifamily units, and housing for special-needs groups, including agricultural employees,

persons with disabilities (including developmental disabilities), and individuals and families in need of emergency/transitional housing. The City will take subsequent action, as appropriate, to make the development of such units more financially feasible including providing financial incentives, such as reducing, waiving, and/or deferring fees, where feasible, offering fast track/priority processing, density bonuses, and flexibility in development standards.

Additionally, the City will amend the Zoning Code to comply with State Density Bonus Law.

Time Frame: Ongoing, as projects are processed through the Development Services Department, amend the Zoning Code to comply with State Density Bonus Law within one year from adoption of the Housing Element. Following this, review the Zoning Code and revise as needed annually. Annually outreach to developers, review and prioritize local funding at least twice in the planning period, and support expediting applications on an ongoing basis.

Responsibility: Development Services (Planning Division)

Potential Funding Source(s): City Development Services Fund, CDBG, Affordable Housing Fund

Quantified Objective: 350 units over the planning period; of these, 200 units in high opportunity areas to promote access to resources and mobility for target households.

Action 17. Rehabilitation Programs. Continue to operate housing repair and/or rehabilitation programs that assist lower-income households occupying housing in need of repair, including the Minor Home Repair Program, which offers forgivable loans to low-income homeowners whose homes have one or more health and safety hazards. Identify areas of concentrated rehabilitation need, beginning with areas with a higher concentration of lower-income households as identified in the Assessment of Fair Housing, to assist in repairs and potential mitigation of costs, displacement, and relocation impacts on residents. Provide information on available housing repair programs to homeowners by posting information having flyers in multiple languages (English, Hmong, Chinese, Vietnamese, Spanish) available on the City's website and at City Hall, and through mailings of the City newsletter.

The City will also assist homeowners to identify and apply for rehabilitation funding and will develop a code enforcement process in which code enforcement staff will follow up with landlords to ensure repairs are made so that the unit can be occupied

Time Frame: Ongoing, as homeowners approach the City. Identify neighborhoods every two years. Create flyers in multiple language within by June 2022 and at least annual mailings.

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): CDBG funds (when available)

Quantified Objective: 40 households; facilitate place-based revitalization by connecting 15 lower-income households with rehabilitation programs and promoting availability of programs in areas of concentrated substandard housing.

Action 18. Utility Assistance (New, Staff Recommendation). Continue to refer individuals interested in utility assistance to the appropriate local energy provider, including the Sacramento Municipal Utility District (SMUD) and Pacific Gas and Electric (PG&E), both of which offer programs to assist with utility costs, and to nonprofit organizations that may offer utility assistance.

The City will also provide assistance with paying past-due utility bills (electric, gas, and water) to low-income households that are at risk of experiencing utility shutoff due to non-payment. Temporarily increase the level of funding available to serve households experiencing a COVID-related loss of income.

Time Frame: Ongoing, at least annual marketing

Responsibility: Development Services (Housing and Public Services Division), in partnership with nonprofit entities

Potential Funding Source(s): City Development Services Fund, CDBG funds as available), City Community Service Grant funds (as awarded by City Council)

Quantified Objective: 520 households; of these, 220 will be lower-income households to prevent displacement due to utility costs, particularly in areas of concentrated overpayment.

Action 19. Affirmatively Further Fair Housing (New, State Law). Implement the regional Analysis of Impediments to Fair Housing Choice (AI), prepared in 2019, to address disparities in housing needs and in access to opportunity for all persons regardless race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, and genetic information as protected categories by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.

The City identified barriers to fair housing through the Fair Housing Assessment (see Chapter 12.4, Section 4, Housing Needs Assessment). Actions the City may take to address the identified barriers, and foster an inclusive community, include:

- ~~Implement Actions 7, 17, 22, and 23 the following actions~~ to affirmatively further fair housing, ~~including targeting community~~ in coordination with the efforts of Action 19:
 - ~~Place-based revitalization through place-based programs, enhancing mobility between neighborhoods, and developing strategies to reduce displacement risk in areas with a higher concentration of lower income households and overpayment (e.g., Actions 3, 15, 18, and; Action 17~~
 - ~~Strategies to facilitate housing mobility: Action 5, 6, 8, 15, 16, 21}, 22, and facilitating 23~~
 - ~~Strategies to expand~~ affordable housing in high opportunity areas ~~(e.g., Actions 2, 5, 6, 8, 16, and 23~~
 - ~~Strategies to reduce or prevent displacement risk: Actions 3, 8, 9}, 15, 18, 21~~
- By December 2022, develop a targeted program to connect lower-income residents with affordable homeownership and rental opportunities. During the planning period, facilitate housing mobility by assisting 400 lower income households to locate affordable housing opportunities.
- Promote the availability of multi-lingual resources by ensuring that City provided services and materials are available in languages other than English or that they make clear the availability of interpretation or translation services. Translate materials and make materials available by December 2021.
- Work with fair housing providers such as Renters Helpline on an annual basis to track fair housing complaints and identify areas of fair housing law in need of increased enforcement.
- Meet biannually, with the first meeting occurring by June 2022, with local and regional transit agencies to assess whether the current routes and frequency meet demand and determine additional needs, if necessary.

- Where possible, improve bus stops to allow the safe deployment of wheelchair lifts and, where not possible, determine if a new stop can be added near the original that does allow life deployment. Assess where bus stops need improvements by August 2022.
- Encourage development of multifamily housing in areas with high performing schools to improve access to these schools for lower-income households by annually providing developers with information on incentives for affordable multifamily development and maintaining a list of available sites near high performing schools. [Encourage the development of 200 multifamily units to improve housing mobility opportunities in high resource areas.](#)
- Provide information about fair housing choices to residents by distributing fair housing materials upon request and contracting with a fair housing rights nonprofit to provide fair housing services on an ongoing basis, including fair housing complaint intake, investigation, resolution, general housing (landlord/tenant) counseling, mediations, assistance, referrals, and resolution.
- Proactively ~~monitoring~~monitor rental housing providers for discriminatory practices by contacting fair housing service providers biannually for information on housing providers with complaints filed against them and using CDBG funds for fair housing enforcement and technical assistance activities.
- Meet with other jurisdictions in the region by June 2023 to identify fair housing strategies and discuss whether a regional fair housing strategy would be beneficial from a cost and/or efficiency perspective.
- Use local permitting and approval processes to ensure all new multifamily construction meets the accessibility requirements of the federal and state fair housing acts. [Through these processes, facilitate the development of 45 new accessible housing units throughout the community.](#)
- Increase residential infill opportunities through changes in zoning and long-range plans. Process zone changes as requested by developers. Implement zoning and development incentives, such as inclusionary zoning, in-lieu fees, and density bonuses. [Encourage place-based revitalization through facilitating development of 140 residential infill units.](#)
- Support development or resale of affordable homeownership opportunities through both developers' operations and obtaining resources to support low-income homebuyers, including affirmatively marketing to under-represented homeowners and developing and funding a first-time homebuyers' program. [See Action 15 for quantified objective to connect lower-income households with housing opportunities to facilitate housing mobility.](#)
- Provide financial support annually, as available, to organizations that provide counseling, information, education, support, and/or legal advice to lower-income households, including extremely low-income households, and persons experiencing homelessness.
- Affirmatively ~~recruiting~~recruit a diverse and multilingual staff as positions become available.
- Analyze and abate environmental hazards before developing affordable housing.
- As the City grows, use data to identify areas of high need and areas of high opportunity; rezoning higher-density sites in identified areas of high opportunity.
- Provide education to the community on the importance of completing Census questionnaires when the Census is distributed.
- To affirmatively promote more inclusive communities, the City will review and revise the City's requirements for residential care facilities with 7 or more persons by December 2021

and permit them as a residential use subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. These types of facilities are still subject to state licensing requirements.

- To ensure residents across the City, regardless of location, have access to positive environmental conditions, the City will review open space requirements for new developments and will revise as necessary to ensure all residents have access to healthy outdoor spaces.

Time Frame: Ongoing. Refer to each strategy in the AFFH program for specific timeframes.

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): Affordable Housing Fund, CDBG

Quantified Objective: See individual strategies bulleted in Action 19 with specific targets.

Action 20. Monitor At-Risk Units. Maintain and update the City's affordable housing database as a mechanism to monitor and identify units at risk of losing their affordability subsidies or requirements. For complexes at risk of converting to market rate, the City may:

- Contact property owners of units at risk of converting to market-rate housing within one year of affordability expiration to discuss the City's desire to preserve complexes as affordable housing.
- Reach out to owners to see their intent on renewing affordability restrictions. In addition, the City will coordinate with owners of expiring subsidies to ensure the required notices to tenants are sent out at 3 years, 12 months, and 6 months.
- Reach out to agencies interested in purchasing and/or managing at-risk units.
- Work with tenants to provide education regarding tenant rights and conversion procedures pursuant to California law.

Time Frame: Annually monitor and apply for funding as Notices of Funding Availability are released

Responsibility: Development Services (Housing and Public Services Division)

Potential Funding Source(s): City Development Services Fund

Action 21. Innovative Housing Options (New, Staff Recommendation). Explore innovative and alternative housing options that provide greater flexibility and affordability in the housing stock. This may include consideration for further reduction in regulatory barriers for ADUs and junior ADUs, tiny houses, inclusionary housing, microhomes and other alternative housing types as well as explore a variety of densities and housing types in all zoning districts.

To promote and incentivize the development of ADUs, the City will provide pre-approved building plans by December 2021 and consider eliminating impact fees for ADUs (e.g., roadway, facilities).

The City will use the findings of this program to target development of a variety of housing types in areas of concentrated overpayment to reduce displacement risk as well as promote inclusion and support integration of housing types based on income to facilitate mobility opportunities in high resource areas and areas of high median income.

Time Frame: Explore innovative and alternative housing options to help further housing production by 2022, amend the zoning ordinance as needed. Amend the Zoning Ordinance to comply with Government Code Section 65852.2 pertaining to ADUs by July 2021 and provide preapproved plans and consider eliminating impact fees by December 2021.

Responsibility: Development Services (Planning Division)

Funding Source: City Development Services Fund, Affordable Housing Fund, SB2/LEAP or REAP funding

Quantified Objective: Approximately 15 ADUs and/or other innovative housing options to increase supply and prevent displacement of lower-income households.

Action 22. Housing Choice Voucher Acceptance (New, Staff Recommendation). Evaluate the rate of usage of tenant-based Housing Choice Vouchers (Section 8) in affordable housing properties in which the City has a financial investment, in order to ensure that voucher holders are fairly represented. Provide education to property owners and managers at properties where voucher usage is lower than expected, ensuring properties throughout the city accept tenant-based Housing Choice Vouchers to facilitate mobility and provide choices for lower-income households throughout the city

Time Frame: Biennially (every two years)

Responsibility: Development Services (Housing Division)

Funding Source: Affordable Housing Fund

Quantified Objective: Balance usage of vouchers throughout the City by encouraging 50 property owners and landlords in areas with underrepresented lower-income population to accept vouchers.

Action 23. Housing Choice Voucher Education (New, Staff Recommendation). Implement a Housing Choice Voucher (Section 8) education program to share information about the program and available incentives with rental property owners and managers as well as training on avoiding discriminatory practices based on income or other protected classes. Distribute this information to property owners and managers across the City, increasing marketing as needed in areas with a lower proportional number of voucher holders, to improve access to affordable housing in all areas of the City. When the waitlist for tenant-based vouchers is open, publicize the opportunity through the City's social media and/or other public information channels. The City will target education and outreach in areas of the city with a disproportionately low rate of voucher holders compared to the City overall in an effort to increase availability of voucher-accepting units in these areas and facilitate mobility opportunities for lower-income households throughout the city.

Time Frame: Annually for rental property owners/managers; when waitlist is open for general public

Responsibility: Development Services (Housing Division)

Funding Source: Affordable Housing Fund

Quantified Objective: 250 households; of these, Increase the supply of voucher-accepting units by 50 units to provide additional housing opportunities throughout the City.

the COVID-19 pandemic, the town halls were held virtually, which enabled community members to attend regardless of their location. Residents were also provided the option to call in the meeting from a landline or cell phone to participate regardless of their access to internet to view the meeting live; the slides and a recording of all presentations were posted on the City's website following the town halls so residents could view them at a later date through a public internet option if needed. The City of Elk Grove also offers translation services to all residents through means of an interpreter or larger scale translation for events such as these town halls. However, no residents requested translation for any Housing Element update events or materials. Additional information on these events and their associated outreach efforts is discussed in detail in Chapter 12 Public Participation of this Housing Element.

The RHNA site selection tool was published on the City website, along with a request for additional public comment, for residents to create their own housing plan and understand the factors that are used to identify sites. These outreach efforts were conducted in addition to standard public hearings. The tool presented 43 possible sites for consideration that had been selected based on their current use, vacant or underutilized status, proximity to transit and services, and their surrounding uses. Residents had the opportunity to use the interactive site selection tool to understand RHNA requirements, recommend possible rezones, or raise any concerns about specific sites or changes. This interactive outreach tool provided an opportunity for extended outreach to give residents time to consider and respond to the list of potential sites. City staff then reviewed the responses to select sites that most equitably distributed them across the [cityCity](#) and access to resources while responding to the current population's preferences.

Finally, the City conducted one-on-one consultation meetings with service providers and community organizations who serve special needs groups and other typically hard to reach groups during the outreach process. The purpose of these consultations was to solicit direct feedback on housing needs, barriers to fair and affordable housing, and opportunities for development from all community groups, not just those who are able to attend the public hearings and town halls. The primary concerns raised by stakeholders included availability of affordable housing and land accessible to non-profit developers, accessibility of public transit options, and limited capacity of services and housing for homeless individuals.

Assessment of Fair Housing

State Government Code Section 65583 (10)(A)(ii) requires the City of Elk Grove to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs including displacement risk. According to the 2020 TCAC/HCD Opportunity Maps, the City of Elk Grove does not include any areas of high segregation or poverty, or areas of low access to resources. However, as seen in **Figure A-1**, the areas immediately north and west of the City are areas of low resource and areas of segregation and poverty. While the City does not plan for housing for these areas, it is likely that many of these residents rely on Elk Grove for services and it is possible that people that work in Elk Grove live in these areas. As such, the City has taken a broader view than just the City limits when assessing fair housing issues.

Some of the indicators identified by TCAC and HCD to determine the access to opportunity include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others. These indicator scores decrease as the level of designation decreases until "Low Resource" areas, which typically have limited access to education and employment opportunities and may have poor environmental quality. The City also individually analyzed several factors, described below, to assess patterns that may further fair housing issues and identify actions to combat these. The results of the AI have also been incorporated in this Assessment of Fair housing.

Elk Grove had its start in 1850 when stage lines connected the area that is now the City of Elk Grove to Sacramento and Stockton. At this time, small residences and businesses began to be constructed, forming a small town at the intersection of today's Elk Grove Boulevard and Highway 99. When the Central Pacific Railroad came to the Sacramento region in the late 1860s, it was not extended to Elk Grove, stunting the growth of the community

at a time when other communities in the region began to flourish with new connections to the railroad. By the mid-1870s, the railroad was extended to Elk Grove and growth began. This new wave of growth was followed quickly by construction of a high school and public amenities such as a library and park. As with many jurisdictions in the Sacramento region, agriculture was the original industry of Elk Grove and supported the ~~city's~~City's growth over the next century until its incorporation in 2000. The agricultural history resulted in low-density development that has filled in over time but informs existing land use patterns dominated by single-family development. Significant growth in the past three decades has seen a reduction in the non-Hispanic white population and an overall increase in diversity in Elk Grove, while maintaining the family oriented-culture and development patterns. Additionally, as result of most of the City's growth occurring in the last 30 years, land use regulations and patterns were not influenced by historic segregation trends such as redlining, a discriminatory lending practice in the 1930s that resulted in racially segregated communities, or exclusionary zoning. Elk Grove's growth was largely free from these discriminatory practices and has resulted in a diverse community, as described in this assessment. The trends resulting from recent growth are analyzed in detail in the Assessment of Fair Housing.

Patterns of Integration and Segregation

During the AI process and analysis conducted as part of this Housing Element, the City assessed patterns of segregation with a focus on segregation based on disability, race and ethnicity, income, and familial status. The Analysis of Impediments included extensive surveying of residents in Elk Grove, and throughout the region, and ultimately found that Elk Grove has low rates of segregation based on all of these protected characteristics compared to the region. However, patterns still emerge.

Poverty rates tend to be lower among non-Hispanic White residents than any other group, and there has been a very slight increase in the percent of the population below the poverty line compared to 2010. Additionally, as **Figure A-2** shows, the household median income in Elk Grove is higher than most surrounding areas and there are no areas of concentrated poverty (4-person households earning less than \$26,200 in 2020). ~~As~~Similarly, while there is one neighborhood with a slightly higher rate of poverty, most of Elk Grove has seen a decrease in poverty since 2014 (see **Figures A-3** and **A-4**). However, the AI process found that Elk Grove neighborhoods are more likely to be economically strong than other areas of the region. There is one area within the City that has a higher rate of poverty, between Elk Grove Florin Road and Waterman Road, south of Elk Grove Boulevard, that also has a significantly higher concentration of linguistically isolated residents than most of the City. Therefore, the City has included **Actions 15** and **19** to ensure that low-income residents of this area, and others, are aware of affordable rental and homeownership options and to increase availability of multi-lingual resources.

Since 1990, Elk Grove has experienced a significant shift from a predominantly non-Hispanic White population (75 percent) to a more diverse community (as seen in **Figure A-35**), where the non-Hispanic White population has decreased to 36 percent of the total population. While the predominant population is still White in much of the City (see **Figure A-6**), this has decreased in recent years as diversity has increased, particularly west of Highway 99. Additionally, the percent of foreign-born residents has doubled since 1990. Most areas of the City have a diversity index between 70 and 85, with 100 being perfect integration. However, there are two areas of the City with higher levels of racial segregation as shown in **Figure A-35**: the area located between Elk Grove Boulevard, Elk Grove Florin Road, and Highway 99 and the area south of Laguna Creek Trail, east of the railway, and the intersection of Waterman Road and Elk Grove Boulevard. These areas do not have notably higher concentrations of poverty or other characteristics of protected class, but do have higher concentrations of non-English speaking (linguistically isolated) households, which may be the cause of lower levels of diversity and higher segregation. Across the SACOG region, jurisdictions west of the foothills of the Sierra Nevada mountain range tend to have higher rates of diversity, as is the case in the City of Elk Grove. Elk Grove mirrors many of the suburban communities surrounding the City of Sacramento and many areas of Yolo and Sutter counties. The City will monitor fair housing complaints to ensure that there are not increased rates of discrimination based on race in these areas and will work with fair housing advocates to address ways to promote integration. There are no areas of racially or ethnically concentrated poverty in Elk Grove.

Elk Grove is family oriented, with the highest rate of families with children of anywhere in the region (56 percent

of households) (Figure A-7). In nearly all areas of the City, the percent of the population that lives alone does not exceed 10 percent. The dominance of single-family development and the presence of families does not inherently suggest segregation based on familial type, but the low rate of vacancy (3.17 percent overall, 0.55 percent for rental units, and 0.46 percent for ownership units) and dominance of single-family development may present a barrier to households and families seeking other housing options.

In 2014, there was a concentration of persons with a disability in the residential area between Highway 99, Bond Road, and Elk Grove Florin Road. At that time, more than 45 percent of the population in this area had at least one disability, higher than all other areas of the City. By 2019 however, this concentration had decreased and the percent of the population with a disability became more constant across the developed areas of the City. In contrast, the percent of the population with a disability, and areas of higher concentration, has remained stable across the SACOG region over time. Elk Grove has a similar or lower percent of the population with a disability than all areas of the SACOG region. As discussed in the Special Housing Needs section above, the most common disability among Elk Grove residents is ambulatory. To meet the needs of these residents, there are 55 adult residential care homes that are licensed or have licenses pending. In addition to housing facilities, Elk Grove Adult Community Training, Inc. and Aim Higher Inc. both provide education, training, and social services for adults with developmental disabilities, and E-Van, operated by the City, provides transportation service for residents with disabilities. Therefore, there are no patterns of segregation or limited access to opportunity for residents with a disability in the City of Elk Grove or surrounding areas.

The dominance of single-family zones in the City may also contribute to patterns of segregation by limiting where households that may rely on the lower cost of multifamily housing may live. While zones that allow multifamily development are integrated throughout the City within all residential neighborhoods and near commercial areas and services, there are still large areas dominated by single-family development. Throughout the public participation process, which relied on a variety of methods to reach all socio-economic segments of the community as described in the Outreach subsection of this assessment, the City worked with community members to identify housing preferences. The input received was incorporated into **Action 6** to amend the Zoning Code to encourage and promote a variety of dwelling unit types and sizes to meet the needs of a range of incomes. The intent of this implementation action is to combat patterns of segregation based on income or other factors that may result from current zoning and land use regulations.

Access to Opportunity

In a statewide ranking of 2016 California Assessment of Student Performance and Progress (CAASPP) test scores listed on School-Ratings.com, of the 35 schools in Elk Grove, 29 percent ranked 9 or higher, meaning scores were in the 80th percentile or better compared to other similar schools in the state. Only 1 school was ranked below the 50th percentile; however, the four schools that ranked the lowest are all located in the area west of Highway 99. However, while there is a concentration of lower performing schools in this area, four of the 10 highest ranking schools (in the 80th percentile and above) are also located in this area. Therefore, the residents in the area west of Highway 99 have access to proficient educational facilities. Additionally, the AI process found that access to proficient schools does not vary by race or poverty status in Elk Grove. The City has included **Action 19** to promote the availability of multi-lingual resources to all residents, with a focus on areas with lower performing schools or limited access to services, and to work with the school district to develop a strategy to connect all students with high performing schools.

Elk Grove residents are served by E-tran, a transit system operated by the City. E-tran provides regular service throughout the City and along Highway 99 into Downtown Sacramento. Routes run along major corridors in the City, offering connections to neighborhoods throughout the City, into Sacramento, and to the closest SacRT light rail stations. The City offers discounted passes to seniors, persons with disabilities, recipients of Medicare, students, and veterans to increase accessibility for these special needs groups. All buses are wheelchair accessible, but not all bus stops are suitable for use of the lift due to safety. The consultation process and AI process both found that, despite most bus routes running at 20–30-minute intervals 7 days a week, residents still felt the routes and availability were not sufficient. The City will therefore assess whether demand exists to increase the number of

routes and frequency of buses as well as the potential of improving all bus stops to allow the safe deployment of a wheelchair lift (**Action 19**).

As shown in **Figure A-48**, nearly all of the City of Elk Grove has the furthest proximity to jobs than any of the surrounding areas. However, Elk Grove is a commuter city to the City of Sacramento, as seen by the significant improvement in proximity to jobs closer to Downtown Sacramento. The distribution of job proximity suggests that many Elk Grove residents commute out of the City. There are no areas of poverty in Elk Grove that would suggest that residents have moved out of Sacramento to find more affordable housing, it is more likely that residents are seeking the family-oriented character of Elk Grove. However, there may be opportunities to attract jobs into the City to serve the supply of workers that reside there. See Chapter 5 of the General Plan, Economic Development, for details on the City's goals and policies for jobs development.

In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community's environmental scores. A community within the 75th percentile or above is one with higher levels of pollution and other negative environmental indicators and is considered a disadvantaged community. There are no disadvantaged communities in the City of Elk Grove. As shown in **Figure A-9**, the highest percentile in the City (58th percentile) is east of Highway 99 north of Sheldon Road. The corridor along Highway 99 has a slightly higher percentile, indicating worse incrementally environmental conditions, compared to areas further from heavy traffic and commercial and industrial uses. Outside of the City of Elk Grove, particularly to the north in South Sacramento, environmental conditions are significantly worse, and have resulted in disadvantaged communities. While Elk Grove environmental conditions are lower than adjacent communities, it is similar to other suburban communities in the SACOG region further from urban cores (i.e. the cities of Folsom, Roseville, Lincoln, and Placerville). Additionally, while there are slight differences between neighborhoods based on proximity to the highway in Elk Grove, there are no areas with considerably poor environmental conditions. To ensure residents across the City, regardless of location, have access to positive environmental conditions, the City will review open space requirements for new developments and will revise as necessary to ensure all residents have access to healthy outdoor spaces (**Action 19**).

Disproportionate Housing Need and Displacement Risk

As discussed in the Housing Needs Assessment of this Housing Element, overcrowding is not a significant issue in Elk Grove, with less than 2.5 percent of the households living in housing units too small to accommodate their household. According to California Health and Human Services (CHHS), the approximately 8.2 percent of California residents live in overcrowded households, on average. CHHS also reports that all census tracts in Elk Grove, except for one, have a rate of overcrowding of approximately 2.5 percent or less, significantly less than the statewide average and indicating that it is unlikely that residents of most of Elk Grove are at risk of displacement as a result of overcrowding. Unlike most of the census tracts however, approximately 10.6 percent of residents in the area located between Big Horn Boulevard to the east, Bruceville Road to the west, Elk Grove Boulevard to the south and Laguna Boulevard to the north live in an overcrowded household. This tract includes an elementary school and a middle school and the increased rate of overcrowding may be attributable to families with children that share rooms living within walking distance to schools. The City has included Action 6 to encourage construction of a variety of housing types to increase availability of housing at a range of sizes in an effort to reduce displacement risk due to unit size for all residents. The rate of overcrowding in Elk Grove is significantly lower than neighborhoods of south Sacramento immediately north of Elk Grove and most urban areas in the western portion of the SACOG region; overcrowding in Elk Grove more similarly reflects trends seen in jurisdictions in Placer and El Dorado counties including the cities of Roseville, Rocklin, Placerville, Folsom, and Auburn.

As shown in **Figure A-510**, renters are overpaying for housing across the City. The area with the highest level of poverty has the highest rate of overpayment. In contrast, as seen in **Figure A-611**, the percentage of homeowners overpaying for housing is significantly lower across the City. The City has included **Actions 16** and **17** to target investment in developing a variety of housing choices in the area of the cityCity with the highest percentage of lower-income households and overpayment. Increasing the availability of affordable housing in a variety of sizes

and types reduces the risk of displacement for these residents and promotes housing mobility in areas of higher opportunity by increasing the available options. While housing appears to be more affordable to homeowners in Elk Grove, a survey of residents for the AI found that there is a 10-percentage point gap between Hispanic and non-Hispanic White homeowners and that mortgage loan denial rates are higher for minority groups. Additionally, households that include a member with a disability are half as likely as a non-disability household to own a home in the region. Thus, there is a disproportionate need for affordable and accessible homeownership opportunities in the City and a risk of displacement for both renters and owners who are overpaying for housing.

In addition, issues presented by overpaying for housing and inequitable access to funding, housing condition can present a safety concern for residents living in substandard housing in need of repairs. Approximately two-thirds of housing units in the City of Elk Grove were constructed since 1990; typically, housing that is less than 30 years old is less likely to be in need of repairs or rehabilitation. According to CHAS, less than one percent of residents across Elk Grove are living in housing that lacks a complete kitchen or plumbing. While this suggests that most housing in the City is suitable for occupancy, approximately a third of households that include a member with a disability live in a home that does not meet their needs. Additionally, approximately a quarter of residents in the Sacramento region consider their housing to be in poor condition; while the results of this survey for the AI are not isolated to Elk Grove, it can be assumed that at least some low-income households in the City are living in substandard conditions.

~~Access to affordable housing, and opportunities for homeownership, further disproportionate housing needs and increase risk of displacement in Elk Grove. To address displacement risks and housing need, the City will provide incentives to encourage affordable development and will develop a targeted program to connect lower income residents with affordable homeownership and rental opportunities in the City (Actions 16 and 19). Additionally, the City will assist homeowners to identify and apply for rehabilitation funding and will develop a code enforcement process in which code enforcement staff will follow up with landlords to ensure repairs are made so that the unit can be occupied (Action 17).~~

~~Displacement occurs when a household is no longer able to remain in their home for any number of reasons. There are several indicators of displacement risk that include overcrowding, overpayment, and substandard housing conditions. Other key indicators include an increase in home prices and rents, low vacancy rates, wage increases that are less than home price increases. The Sacramento Association of Realtors releases a monthly report of single-family home prices in the Sacramento area, including the City of Elk Grove. According to this report for August 2021, Sacramento area prices ranged from a median sales price of \$347,000 in the South City Farms/Fruitridge Manor/Avondale area (95824 ZIP code) to \$1,325,000 in the East Florin Road area (95830 ZIP code), just northeast of the City of Elk Grove. In Elk Grove, median sales prices ranged from \$560,000 (95758 ZIP code) to \$690,000 (95757 ZIP code). While the median home price in Elk Grove is in the upper 50 percent of home prices in the Sacramento region, it is incrementally more affordable than areas such as East Sacramento, Land Park, Midtown and Downtown, Arden Oaks, and the City of Folsom. However, the rising cost of housing in Elk Grove is reflective of trends throughout the region and state but increases the displacement risk for residents, particularly lower-income households. The influx of higher-income households in recent years has raised home values in Elk Grove and has driven demand for more expensive housing and resulted in a drastically low vacancy rate in the meantime, thus furthering displacement risk for lower-income households.~~

~~The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the City may also indicate an increased risk of displacement due to housing costs outpacing wage increase, a trend that is felt throughout the region, state, and nation. According to Zillow, the median home sales prices in City of Elk Grove has increased 18 percent annually since 2011, increasing from approximately \$210,000 in September 2011 to approximately \$588,000 in September 2021. Rental prices have also increased rapidly, increasing from \$1,250 for a 2-bedroom unit in August 2015 to \$1,938 in August 2021, for an average annual increase of 9 percent. While housing costs have risen significantly in recent years, wages have not kept pace. The median income in Elk Grove has increased by less than 2 percent annually, from \$78,564 in 2011 to \$93,780 in 2019 according to the American Community Survey. The difference in these trends indicates growing unaffordability of housing in the City of Elk Grove that may prevent low-income households from~~

As part of the AI process and development of the 2020-2025 Consolidated Plan, the City met with several local stakeholder organizations who work with protected classes including Sacramento Self Help Housing, the Disability Advisory Committee, Homeless Assistance Resource Team, Elk Grove Food Bank Services, Senior Center of Elk Grove, and Elk Grove United Methodist Church. Each of these organizations discussed barriers to fair housing for clients they work with, predominantly the lack of affordable housing or service enriched housing for special needs group such as homeless individuals, seniors, and individuals with disabilities. Stakeholders also discussed a need for more extensive transportation options to connect residents with services and a general increase in the number of housing units to aid in alleviating the constraints of a low vacancy rate. Fair housing issues identified in the AI process, including discriminatory lending and lack of accessible housing for persons with disability are discussed throughout this Assessment of Fair Housing to identify patterns and actions to address them.

In their 2019 Annual Report, the California Department of Fair Employment and Housing (DFEH) reported that they received 66 housing complaints for residents of Sacramento County, less than 1 percent of the total number of cases in the State that year (934). As part of the Fair Housing Assistance Program (FHAP), DFEH dual-files fair housing cases with HUD's Region IX Office of Fair Housing and Equal Opportunity (FHEO); HUD's FHEO reported that 19 housing discrimination cases were filed from residents of Elk Grove between January 1, 2013, and September 1, 2020. This number provides a snapshot of discrimination cases that exist as many may go unreported or be referred to other agencies, such as the Renters Helpline. Of the 19 cases filed with HUD, eight alleged discrimination due to a disability and six were due to race (Table 29). None of these cases were filed against the City or housing authority. In addition to filed cases, there were 29 inquiries made to HUD about Elk Grove housing providers. Two of these inquiries were made on the housing authority, and one on the City. However, the 29 inquiries resulted in 12 findings of no valid bases, 13 the filer failed to respond, 2 declined not to pursue, and for 1 the provider was not located. As a result, none of these cases, including those against the public housing authority and City, were pursued as valid cases.

**Table 29
Alleged Bases for Housing Discrimination Cases in Elk Grove**

Basis	Number	Percent of Total
Disability	8	42.1%
Familial Status	3	15.8%
Race	6	31.6%
National Origin	3	15.8%
Religion	2	10.5%
Retaliation	3	15.8%
Sex	2	10.5%
Color	1	5.3%
Total Cases	19*	100%

Source: HUD Region IX Office of Fair Housing and Equal Opportunity, 2020

*The number of alleged bases exceeds the total number of cases because some cases alleged multiple bases.

Neither the California DFEH nor HUD FHEO were able to provide the specific locational origin of cases either because they do not track the geographic origin of complaints or due to confidentiality concerns. Therefore, the City was unable to conduct a spatial analysis of fair housing cases to identify any patterns or concentrations of fair housing issues in the City. Action 19 includes an action to work with fair housing enforcement organizations and agencies to track issues and identify patterns in the City.

Sites Inventory

The City examined the opportunity area map prepared by the California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) (Figure A-1). The opportunity area map identifies areas in every region of the state whose characteristics have been shown by research to

support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.

Using the statewide opportunity area map and indicators of segregation, displacement risk, and access to opportunity as overlays to the City's sites inventory, the City was able to identify if the sites identified in the inventory to accommodate the lower-income RHNA disproportionately concentrate these units or increase patterns of segregation. As shown in Figures 1 through 3 of the Adequate Sites analysis the City has not clustered any of the non-entitled sites in any one area. Sites identified to meet the lower-income RHNA are distributed across neighborhoods with moderate- and above moderate- incomes, thus increasing the potential for mixed income communities and a variety of housing types to meet the needs of both family and nonfamily households. Additionally, the sites are distributed across the City to address the need for more affordable housing in areas of increased overpayment to reduce displacement risk for those residents. The area with the highest concentration of sites is along the southern border of the City in a currently undeveloped special plan area (SEPA) where future development will include non-residential uses such as commercial space, offices, community facilities, and retail in addition to housing to ensure that new residents in this area have access to strong economic and educational opportunities, as do other areas of the City. With new development, the City will also assess the need to expand transit opportunities into these areas to ensure residents can access all resources and services that they need (**Action 19**).

The sites selected to meet the City's RHNA were identified using City knowledge and input from the community through the RHNA tool to ensure that all sites were suitable for development and encouraged integration of housing types, household incomes, and household types. Additional information on the site selection process and rezone of candidate sites is described in detail in Chapter 6 (Adequate Sites) of this Housing Element. The City will ensure that the lower-income housing units identified as part of specific plans are integrated throughout the development to encourage mixed-income neighborhoods and promote access to opportunity for all residents.

Contributing Factors

Discussions with community members, organizations, fair housing advocates, the AI outreach process, and this assessment of fair housing issues identified several factors that contribute to fair housing issues in Elk Grove, including those identified in the fair housing issues matrix below.

**Table 29a
Contributing Factors to Fair Housing Issues**

<p><u>AFH Identified Fair Housing Issues</u> Discussions with community members, organizations, fair housing advocates, the AI outreach process, and this assessment of fair housing issues identified several factors that contribute to fair housing issues in Elk Grove, including those identified in the fair housing issues matrix below. <u>AFH Identified Fair Housing Issues</u></p>	<p>Contributing Factors</p>	<p>Meaningful Actions</p>
<p>Displacement risk for residents due to economic pressures.</p>	<p>Limited affordable rental options. Barriers to homeownership, especially for minority groups. High cost of housing. Cost of rehabilitation and repairs.</p>	<p>Require replacement of any lower-income units lost to development (Action 3). Provide lot consolidation assistance and other incentives for affordable housing (Action 5).</p>

<p><u>AFH Identified Fair Housing Issues</u> Discussions with community members, organizations, fair housing advocates, the AI outreach process, and this assessment of fair housing issues identified several factors that contribute to fair housing issues in Elk Grove, including those identified in the fair housing issues matrix below. <u>AFH Identified Fair Housing Issues</u></p>	<p>Contributing Factors</p>	<p>Meaningful Actions</p>
	<p>Shortage of affordable housing for large families near schools.</p>	<p>Encourage construction of middle housing types to provide a variety of unit sizes for moderate income households (Action 6).</p> <p>Provide financial assistance and fee waivers for construction of affordable housing (Actions 8 and 9).</p> <p>Provide repair and rehabilitation assistance (Action 17).</p> <p>Connect lower-income residents with affordable rental and homeownership options through a current database of available housing (Actions 15 and 19).</p>
<p>Disproportionate access to services.</p>	<p>Concentration of non-English speaking households.</p> <p>Insufficient supply of accessible units for households with a disability, especially near services.</p> <p>Limited availability of public transit.</p> <p>Concentration of more poorly ranked schools in lower-income and linguistically isolated neighborhoods.</p>	<p>Increase availability of multi-lingual resources (Action 19).</p> <p>Work with the school district to improve access to high performing schools for lower-income students (Action 19).</p> <p>Conduct an analysis of unmet transit need (Action 19).</p>
<p>Lack of variety in housing types to meet a range of needs and incomes.</p>	<p>Dominance of single-family development.</p> <p>Low vacancy rates overall, reducing options to move to appropriately sized housing.</p>	<p>Promote missing middle-density housing types (Action 6).</p> <p>Encourage construction of ADUs, tiny homes, and other alternative housing types (Action 21).</p>

Based on this assessment and the contributing factors to fair housing, the City has identified addressing the supply of accessible, affordable housing and access to homeownership opportunities as priorities to further fair housing. **Action 19** has been included to affirmatively further fair housing and take meaningful actions that, taken together, address disparities in access to affordable rental and ownership opportunities and disparities in access to suitable housing. Additionally, the City has incorporated actions to address other factors that contribute to fair housing throughout several other programs in this Housing Element.

10. PUBLIC PARTICIPATION

State law requires cities and counties to make a diligent effort to achieve participation by all segments of the community in preparing a Housing Element.

The City conducted a broad range of public outreach and meetings to develop housing policies and programs and finalize the site inventory to address the needs of the City's residents and workforce. All these efforts have informed and contributed to the development of the 2021–2029 Housing Element update. As a part of identifying current and future housing needs for residents, City staff conducted several public outreach efforts, including:

- Town Hall meetings
- Planning Commission and City Council meetings
- Consultations with stakeholders and nonprofits
- An online, interactive RHNA site selection tool
- Ongoing mailing list

TOWN HALL MEETINGS

City staff hosted four town hall meetings to introduce the public to the Housing Element update process, state requirements, and gather their input on sites being considered for the site inventory. The City provided advanced notice of the meetings to residents through noticing in the City-wide newsletter, publishing in weekly public affairs announcements, project-specific emails, and social media posts. The variety of methods used was intended to reach residents of all socio-economic groups. The City provides translation services for materials and presentations in several languages by request; however, no residents requested notices or meetings be provided in a language other than English. To facilitate these requests, the City provides interpretation services as needed for all calls received or persons that come to City Hall. Following the presentation by City staff, an open question and answer (Q&A) session was held during both meetings.

July 2020 Town Halls

Two town hall meetings were held in July 2020, first on July 27 and again on July 29. During the July 27, 2020, meeting, the public requested more explanation on the factors that contributed to the City's RHNA and expressed concerns over the effects of increased affordable housing stock, concentrations of such housing, and the negative impacts of the COVID-19 pandemic on housing affordability and stability. The City provided additional information on the high-opportunity nature of Elk Grove and how this contributed to their RHNA and described strategies to avoid overconcentration of lower-income households through the sites inventory. Participants also raised questions regarding potential incentives to increase affordable housing stock, candidate sites that are pending development, special-needs housing, and long-term housing security for current residents of the City facing future growth. City staff were able to provide detailed answers to address and answer the public's questions and concerns and encouraged them to continue to share their feedback on site location and other thoughts through their online tools and mailing list.

The town hall held on July 29, 2020, featured the same presentation and Q&A format to provide a second opportunity for members of the community to participate and provide input. Many of the same types of questions were raised during this meeting. Participants at this town hall also raised questions regarding the supply of affordable homeownership opportunities, the possibility of an inclusionary housing ordinance, and need to expand the construction labor force.

October 2020 Town Halls

The next two town halls were both held on October 7, 2020. The first was held in the afternoon and had 10 attendees; there were no participants in the evening town hall. At this town hall, the City presented the programs included in the Housing Element and discussed new state law that drove the inclusion of several programs, changes that were made as a result of staff recommendation, and those programs that are being continued from the previous Housing Element. As with the previous town halls, this meeting included a brief presentation followed by an open Q&A session.

February 2021 Town Halls

In February 2021, the City held a round of Town Hall meetings to introduce the draft Housing Element and review the recommended housing sites.

PLANNING COMMISSION MEETINGS

On April 16, 2020, City staff presented an Introduction to the 2021 Housing Element Update at the Planning Commission meeting to discuss income and affordability needs, the Housing Element process overall, RHNA, and the site-selection strategy. This meeting presented the same information to the Planning Commission as the City presented in the Town Hall meetings to introduce the process and involve Commissioners early in the update. Given the complexity of this update, the Commissioners expressed their appreciation for this early introduction to the update and requested more written information explaining what was covered in the presentation. Beyond comments related to receiving materials early, no commissioners or members of the public had any questions at this meeting.

On August 6, 2020, a second Planning Commission meeting was held to introduce the candidate housing sites and introduce the online sites tool.

Additional Planning Commission meeting(s) were held during the adoption process for the Housing Element.

CITY COUNCIL MEETINGS

[Placeholder, to be updated after CC meetings are held.]

On May 12, 2021, City staff presented the Draft 2021 Housing Element Update to the City Council for review and comment prior to submittal to HCD. This presentation included an overview of the update process, outreach efforts, and changes made in response to State law.

Additional City Council meeting(s) were held during the adoption process for the Housing Element.

ONLINE SITES TOOL

To encourage interactive participation from the public, the City developed an online RHNA tool, based upon the Balancing Act financial outreach platform, to give residents an opportunity to provide feedback on the sites targeted for low- and very low-income households. This tool allows residents to create their own housing plan for the City by selecting or deselecting sites, choosing whether to rezone a site or not, and visualize what is necessary to meet the City's RHNA. This method gathers public input on which sites the public would like to see included in the 6th Cycle sites inventory and where they approve of potential rezonings. This occurs through a process similar to how the Planning Commission and City Council will review the sites, in that it allows and requires participants to see the whole of the list rather than focusing just on the sites near them.

The feedback from the public on this tool will be summarized and presented to Planning Commission and City Council to inform their decision on which sites to include in the inventory.

CONSULTATIONS

As part of the Consolidated Plan development process, City staff conducted consultations, meetings, and a survey of more than 17 local organizations and agencies. Eight of these also provided input directly related to aspects of the Housing Element and discussed current and future housing needs. In addition to these consultations, staff met with the Sacramento Housing Alliance specifically for feedback on the Housing Element update. The input from each of these organizations is discussed here.

Sacramento Housing Alliance

The Sacramento Housing Alliance (SHA) discussed a need to increase access to sites for non-profit developers. Many sites are developed by for-profit developers, reducing availability of land without consistently increasing the supply of affordable housing. SHA discussed the need to rezone more sites to RD-30 with a minimum of 25 units per acre, and to consider making surplus public lands available for housing development. These public lands may include public service land or land owned by Caltrans or the Water District. SHA also expressed a need to improve public participation from all income groups through noticing the Housing Element through more avenues, sending individual mailers to every resident, and connecting with community organizations that may have connections with underrepresented groups. Staff shared with SHA representatives the City's plans for outreach and discussed ways that SHA could help publicize and generate interest in matters related to the Housing Element.

Disability Advisory Committee

The Disability Advisory Committee identified priorities for sidewalks, curb ramps, increased or larger ADA parking spaces, and more affordable services and public facilities, including a day center. They also discussed a need for increased transit services near affordable housing options and expressed the need for more lower-level accessible apartment units and/or affordable complexes with elevator access to accessible units, in addition to more inclusive housing options with services on site.

City of Elk Grove Youth Commission

Staff attended a meeting of the Youth Commission to collect feedback on community needs. Members noted the need for increased services in the areas of mental health, public transportation, and services provided to homeless and low-income families. They also discussed the need for additional afterschool activities and/or places for youth to go, such as drop-in centers, as well as services focused on supporting low-income youth.

Elk Grove Homeless Assistance Resource Team (HART)/Homeless Solutions Committee

Staff attends every meeting of the HART/Homeless Solutions Committee and used this as an opportunity to gather feedback directly as it relates to housing needs in the City. Committee members noted the high level of need of chronically homeless, homeless families, and the increase of seniors experiencing homelessness. They noted that many persons experiencing homelessness have mental health and/or substance abuse issues, and that finding housing in Elk Grove is particularly difficult due to an exceptionally strong housing/rental market and long waitlists for affordable housing complexes. Future needs include extending winter sanctuary, increased services for seniors (including homelessness prevention efforts), employment training, supportive services (such as mentoring and potential day center), and most importantly transitional and permanent housing.

Elk Grove Food Bank Services

The Food Bank noted a high, and increasing, level of demand for their services and affordable housing, especially for seniors, veterans, and persons experiencing homelessness. They also noted an increase in need for services for veterans experiencing or at risk of homelessness and prevention services to keep seniors from becoming homeless.

Sacramento Self Help Housing

SSHH noted a lack of housing options in Elk Grove for persons who are homeless and/or extremely low-income, as well as an increase in families experiencing homelessness. They expressed need for permanent and transitional housing options, as well as overnight shelters, day centers, and navigation support. SSHH also discussed a need for rental assistance programs, an increase in the number and availability of affordable housing units, public subsidy programs for low-income disabled households, increase in public transportation options, and additional services for persons with disabilities. A lack of short-term housing options means clients enrolled in programs remain homeless even while searching for housing. Additionally, high rental rates and significant competition for units leads to few very low-income clients being able to find housing locally.

Development Services – City of Elk Grove

Department representatives noted a continued need for affordable housing, especially permanent housing, as well as accessibility improvements, home repair programs, and public utility assistance. They also noted the need for streetlight improvements, public facilities such as a new library, neighborhood clean-up programs, and financial assistance programs for low-income residents needing public services.

Meals on Wheels by ACC

Meals on Wheels spoke with City staff and noted an increase in demand for home-delivered meals to Elk Grove seniors, including a growing waitlist for program participation. They have also seen a need for services and programs to help older adults remain in their home and receive safety net services.

Affordable Housing Developers

Staff consulted several affordable housing developers who have built projects in Elk Grove or are interested in doing so. Most developers noted the funding challenges of new projects, including the need for multiple funding sources and City gap financing. In meeting with a group of local affordable housing developers convened by SHA, developers shared information such as viable project characteristics (e.g., preferred site size, unit counts required for on-site management), common financial needs (e.g. City subsidy, impact fee waivers), and opportunities for partnership with the City to increase affordable housing stock. This information helped the City to design programs such as the new lot split program.

ONGOING PUBLIC PARTICIPATION

The City encourages ongoing public input throughout the process through a mailing list that residents can sign up for on the City's Housing Element update website. The City made the draft widely available and publicized its availability by posting on the City's website, running a notice in the local newspaper, and sending an email blast for all persons registered through the City's website. In addition to notices to the community, the City sent a direct email notice to interest groups that had participated throughout the Housing Element update process including developers, advocacy groups, and service providers. The City sent a mailed notice to homeowners regarding the approval process and availability of the draft Housing Element.

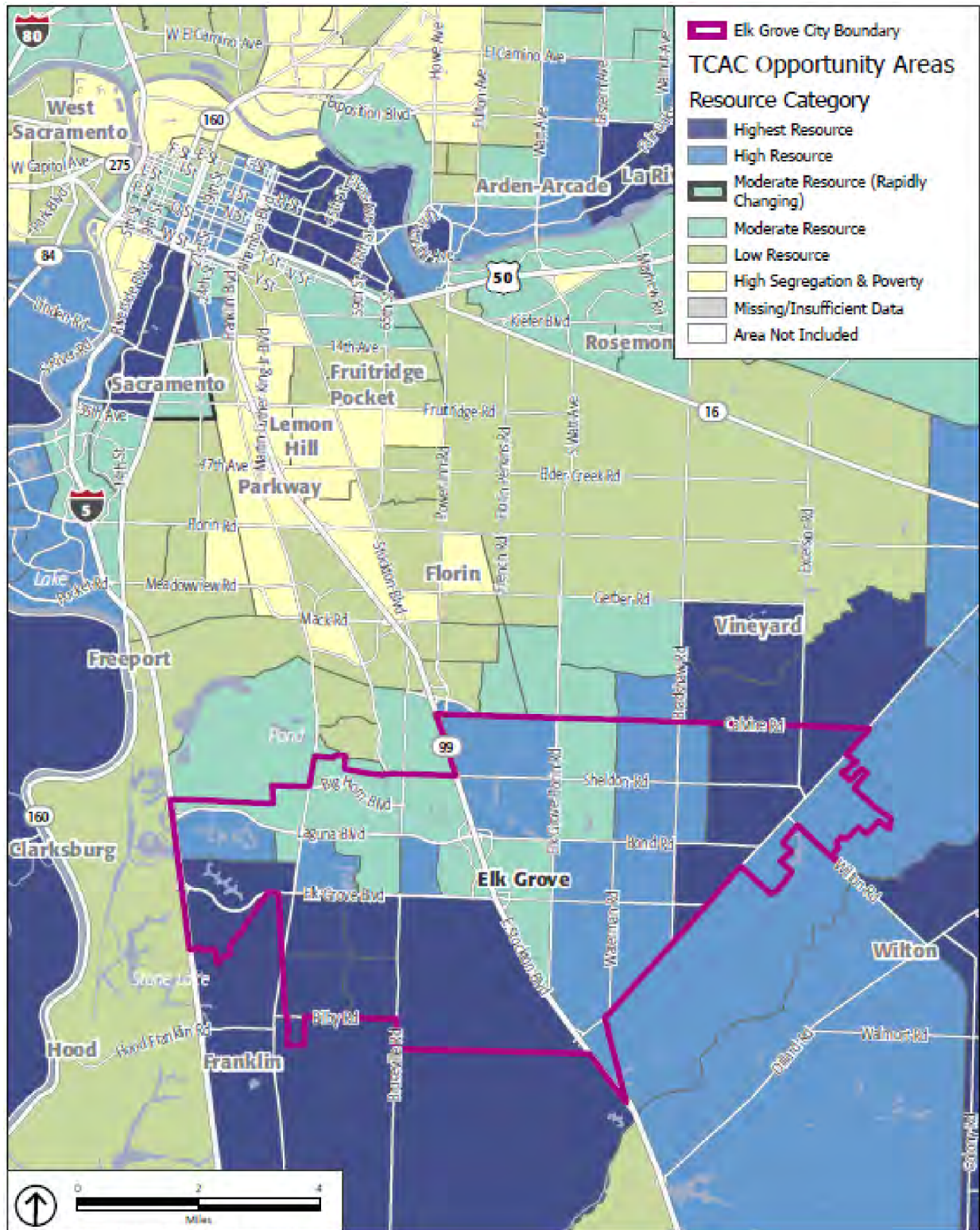
PUBLIC COMMENT

The Draft Housing Element was released for a 45-day review period on February 12, 2021 and was made available on the City's website and noticed to residents through the same methods as Town Hall meetings. Additional direct noticing was sent to local housing advocate groups.

During the review period, two public comment letters were received. The City reviewed the comments received and revised the draft Housing Element to reflect comments, where appropriate. Additional comment letters were received on the Subsequent Environmental Impact Report and were also considered as part of the update.

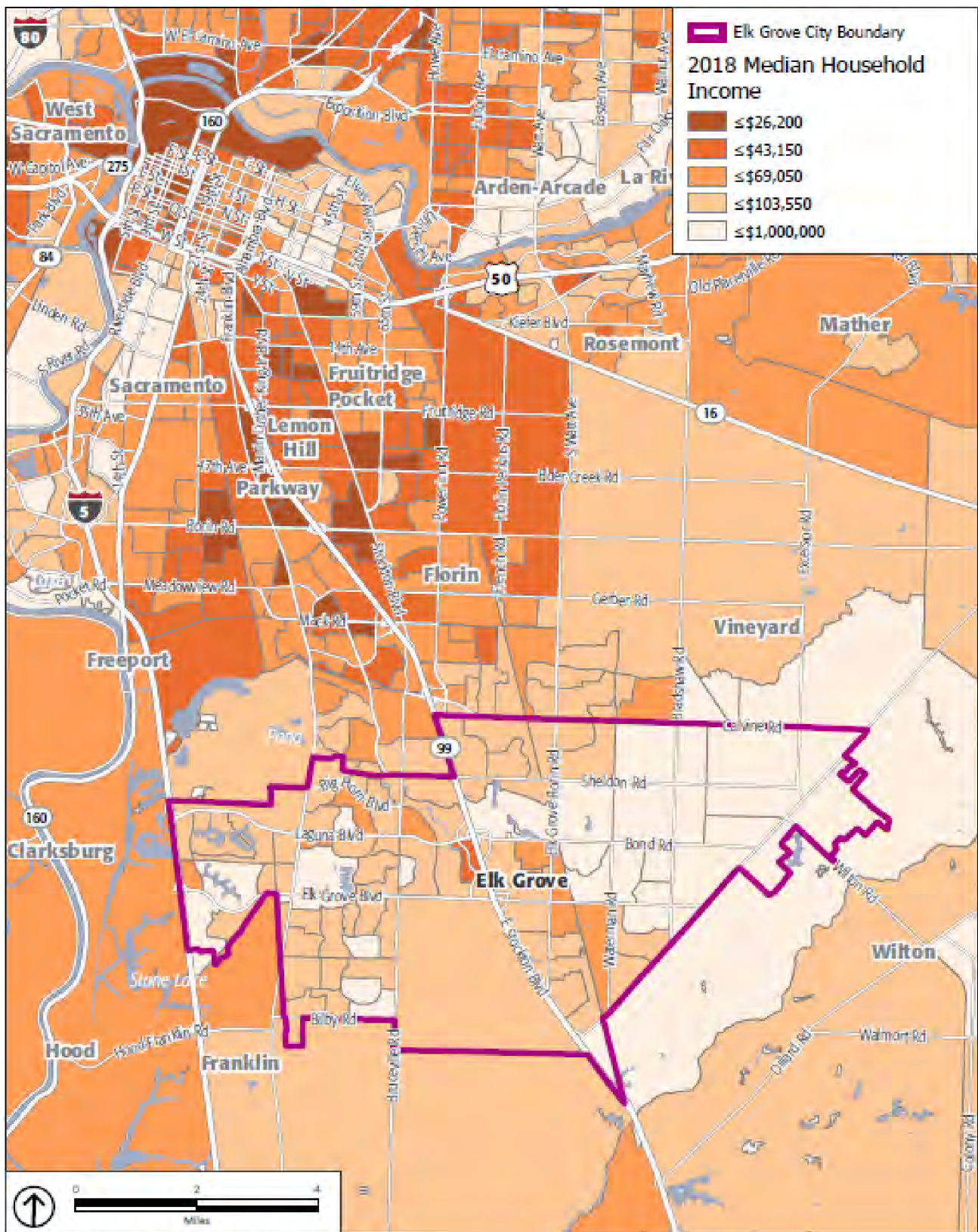
APPENDIX A: FAIR HOUSING ASSESSMENT MAPS

Figure A-1: TCAC/HCD 2020 Opportunity Areas



Source: Esri, HCD; PlaceWorks, 2021.

Figure A-2: Median Household Income



Source: Esri; US Census (2018); PlaceWorks, 2021.

Figure A-3: Poverty Status, 2014

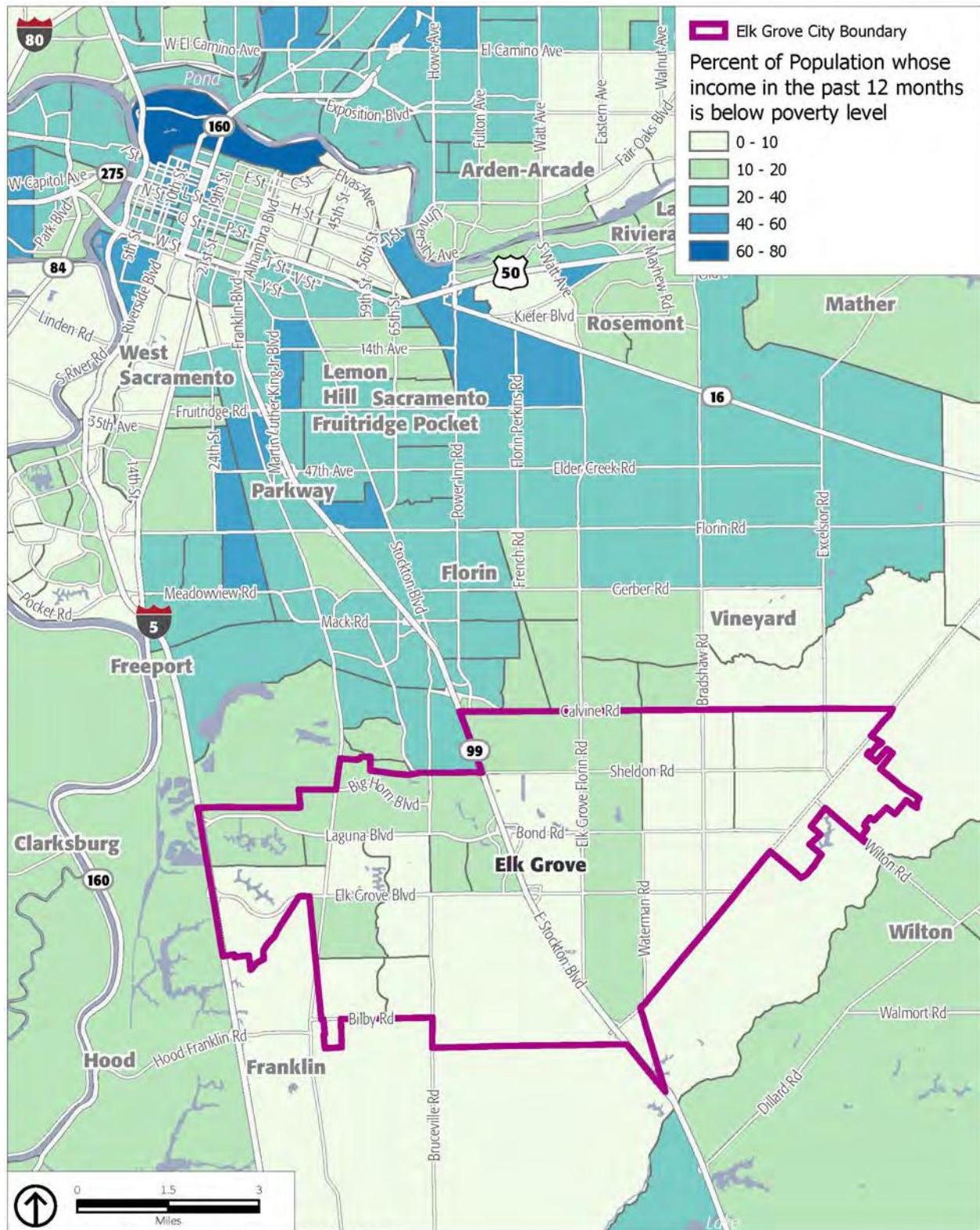


Figure A-4: Poverty Status, 2019

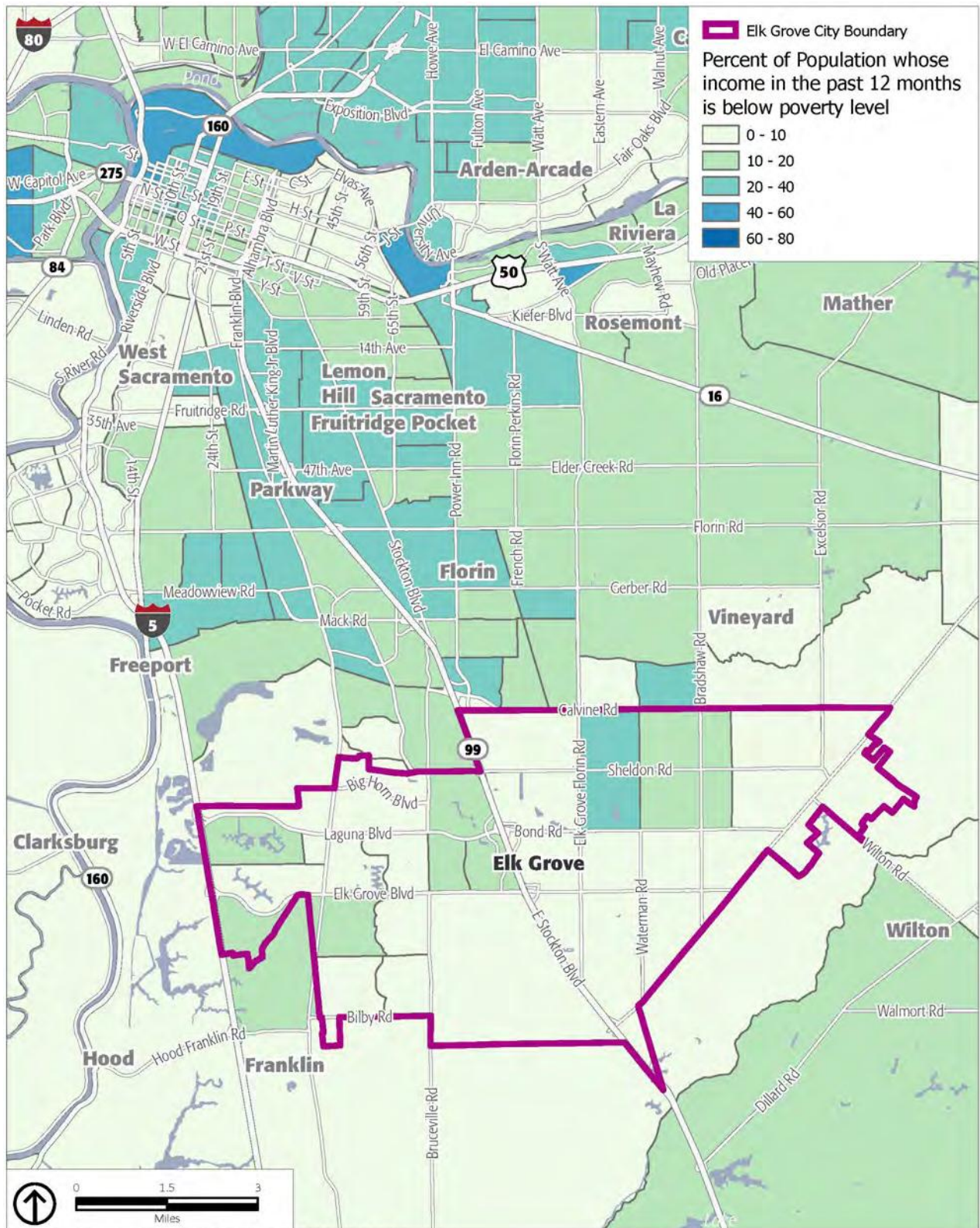


Figure A-5: Diversity Index

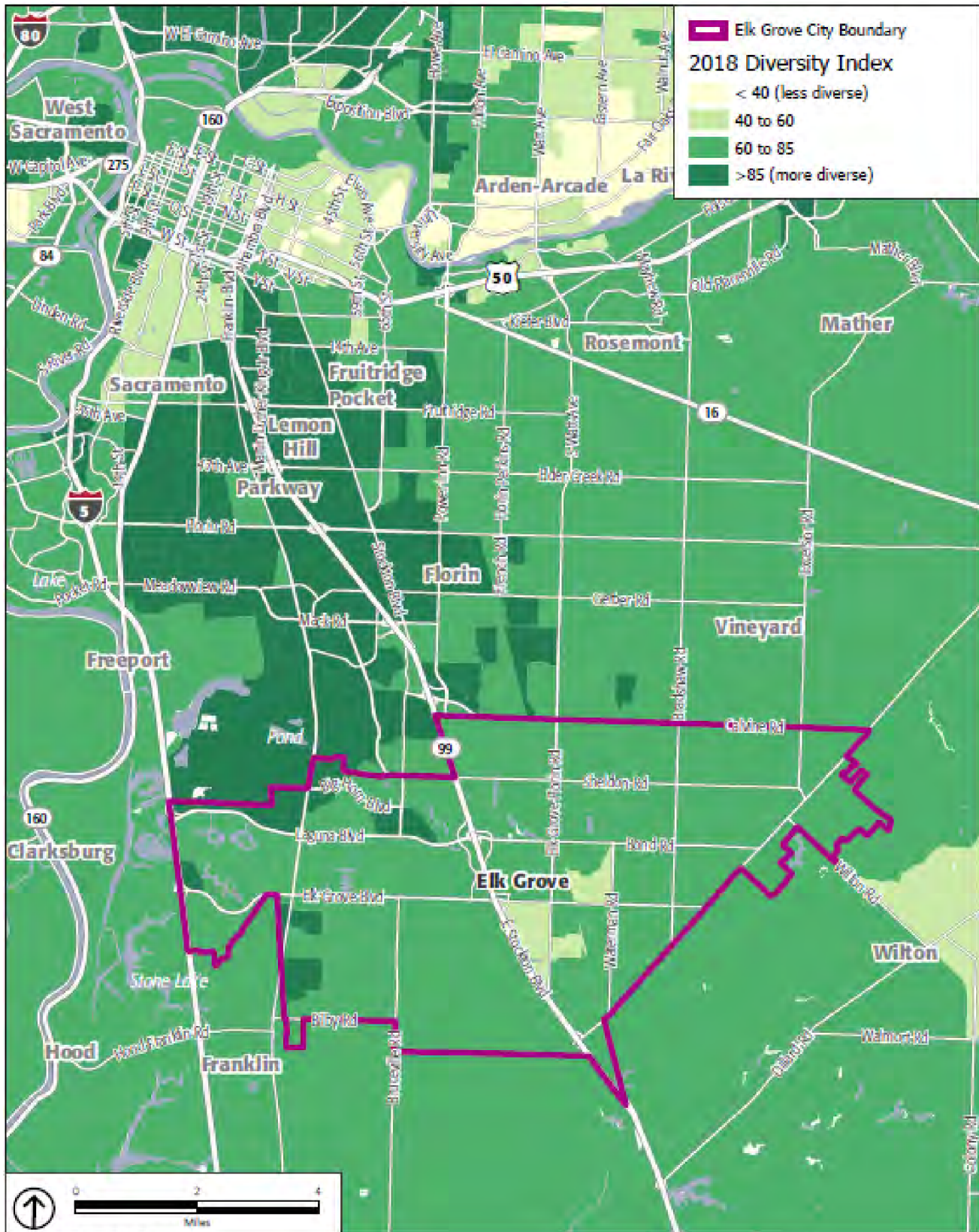
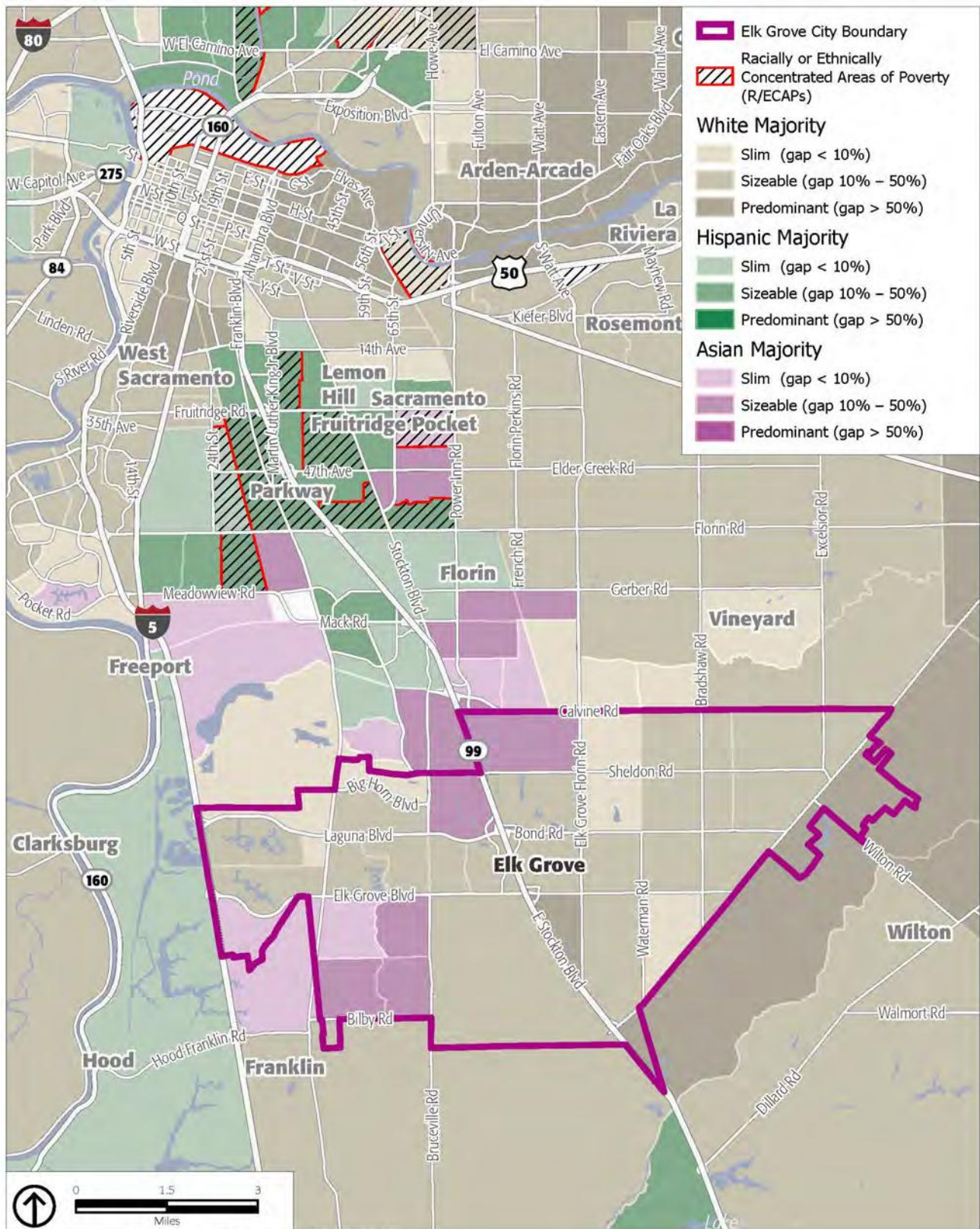
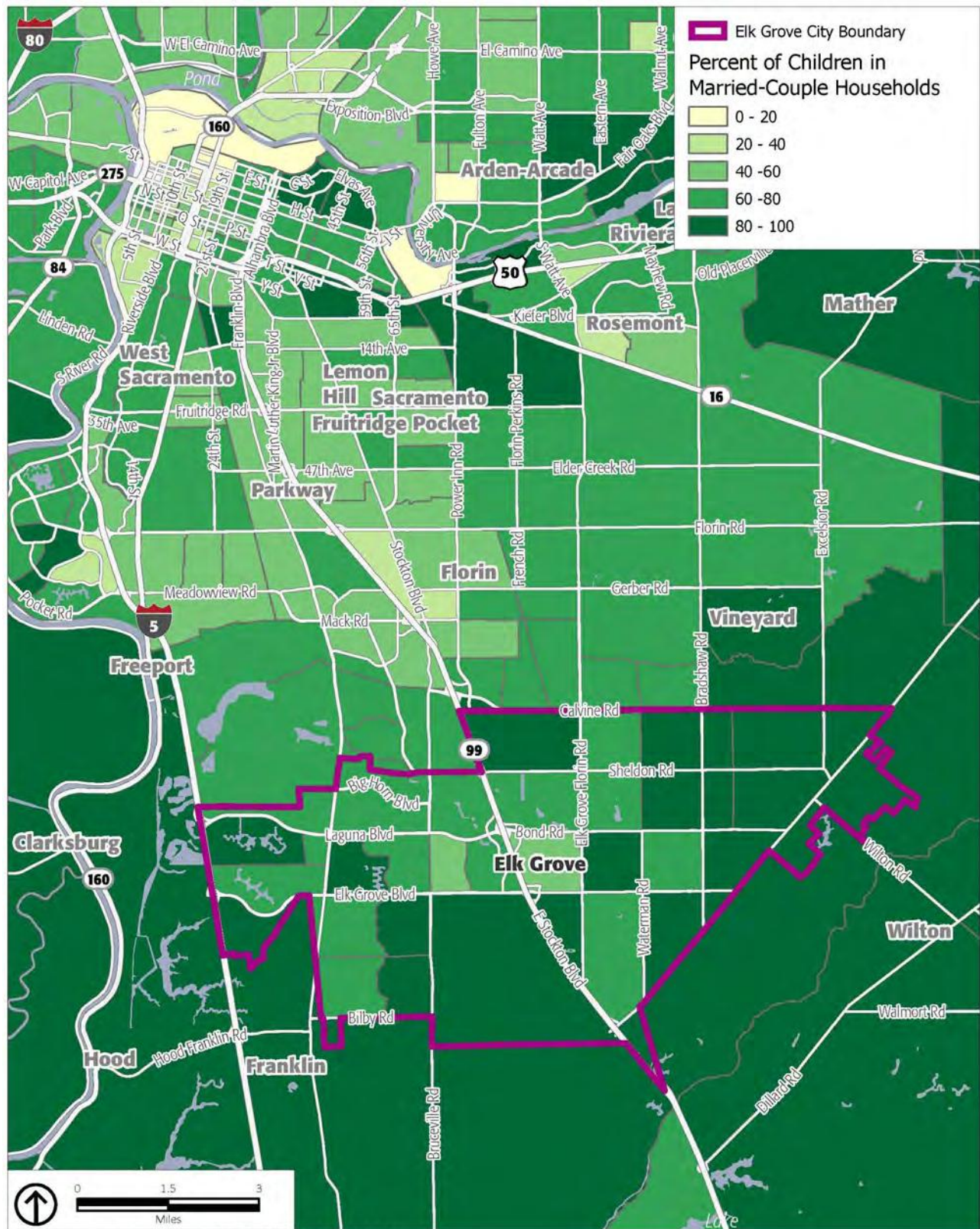


Figure A-6: Predominant Population



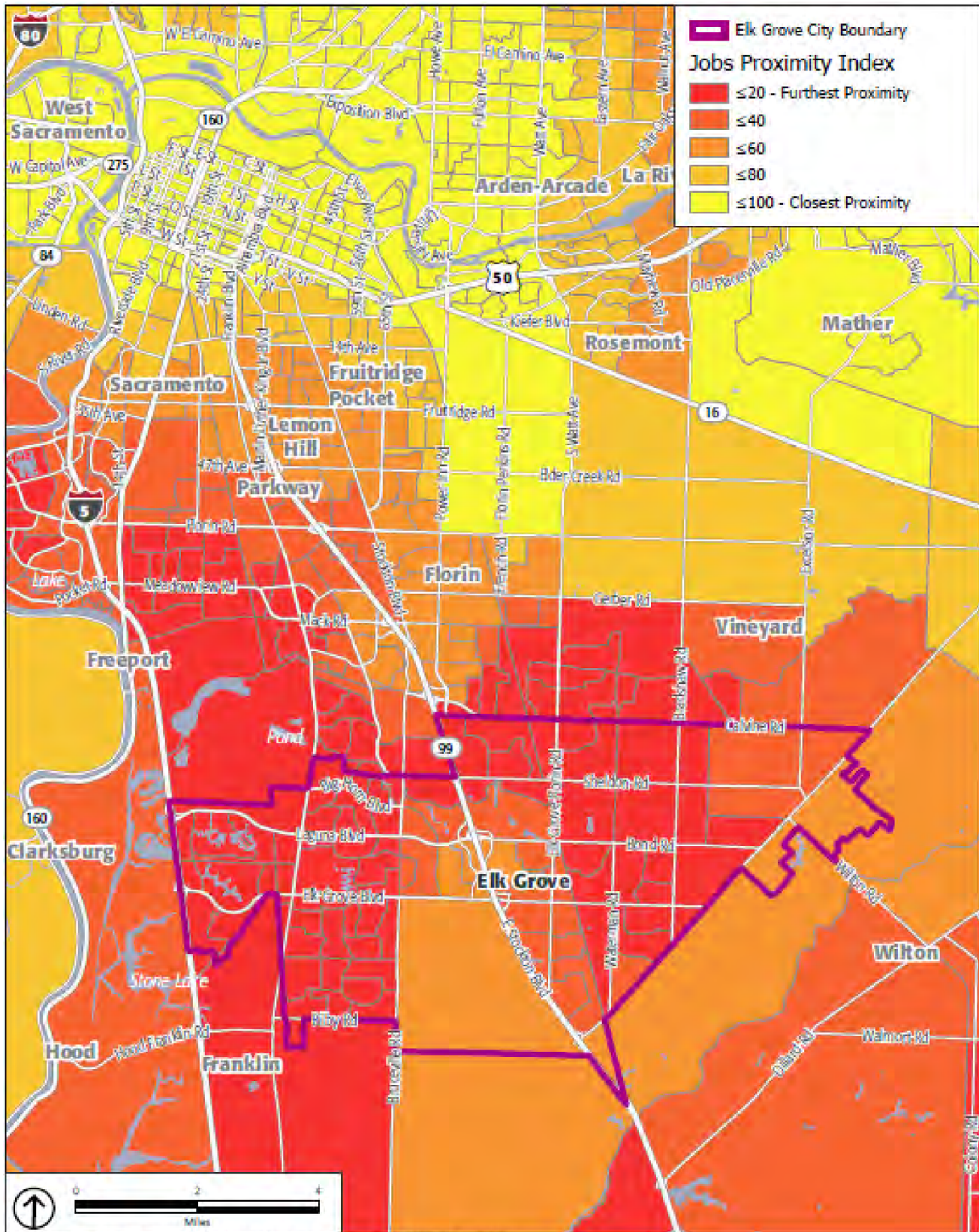
Source: Esri; US Census (2018); HUD (2013-2019)

Figure A-7: Familial Status – Married Couples with Children



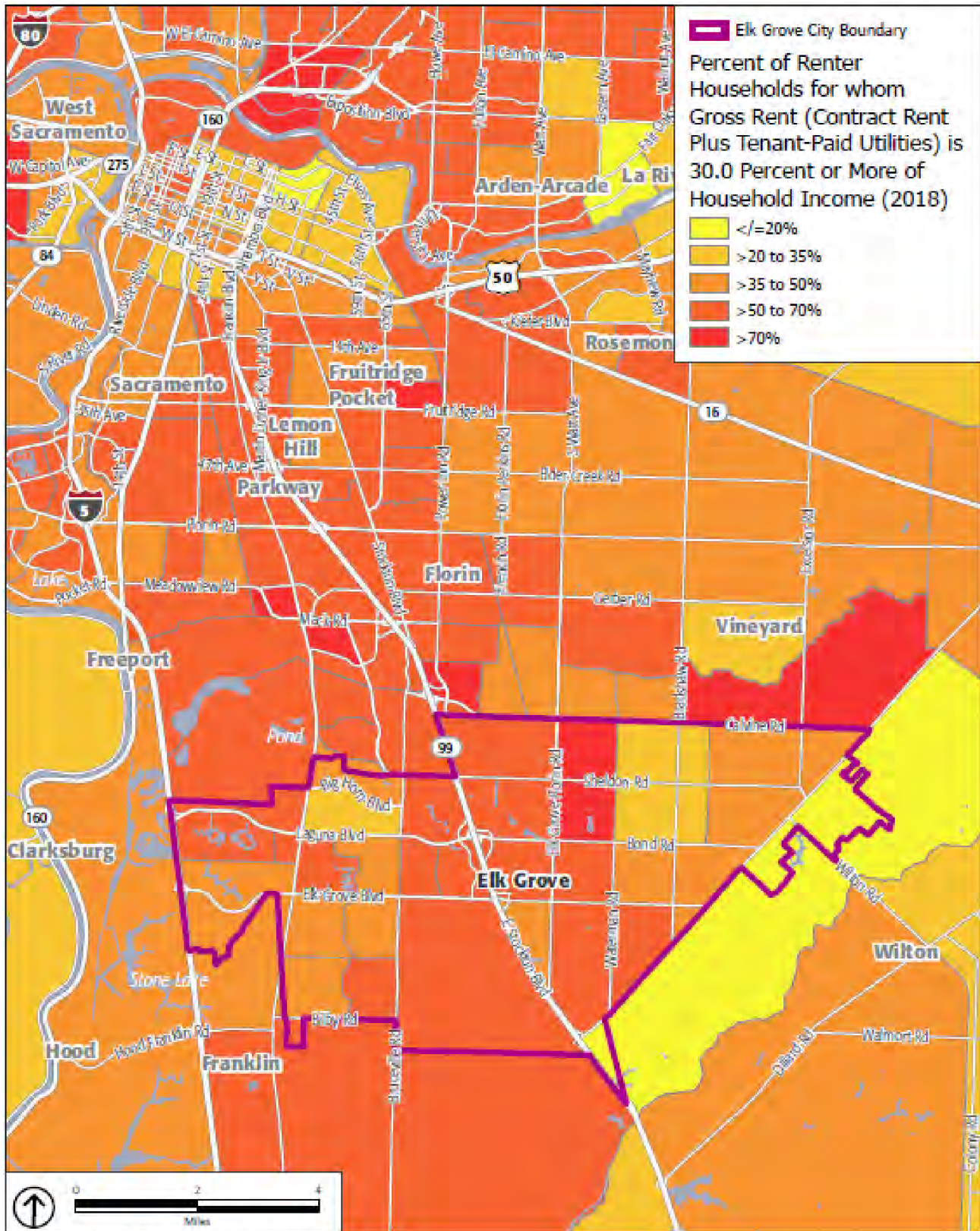
Source: Esri; US Census (2018); ACS (2015-2019)

Figure A-8: Proximity to Jobs



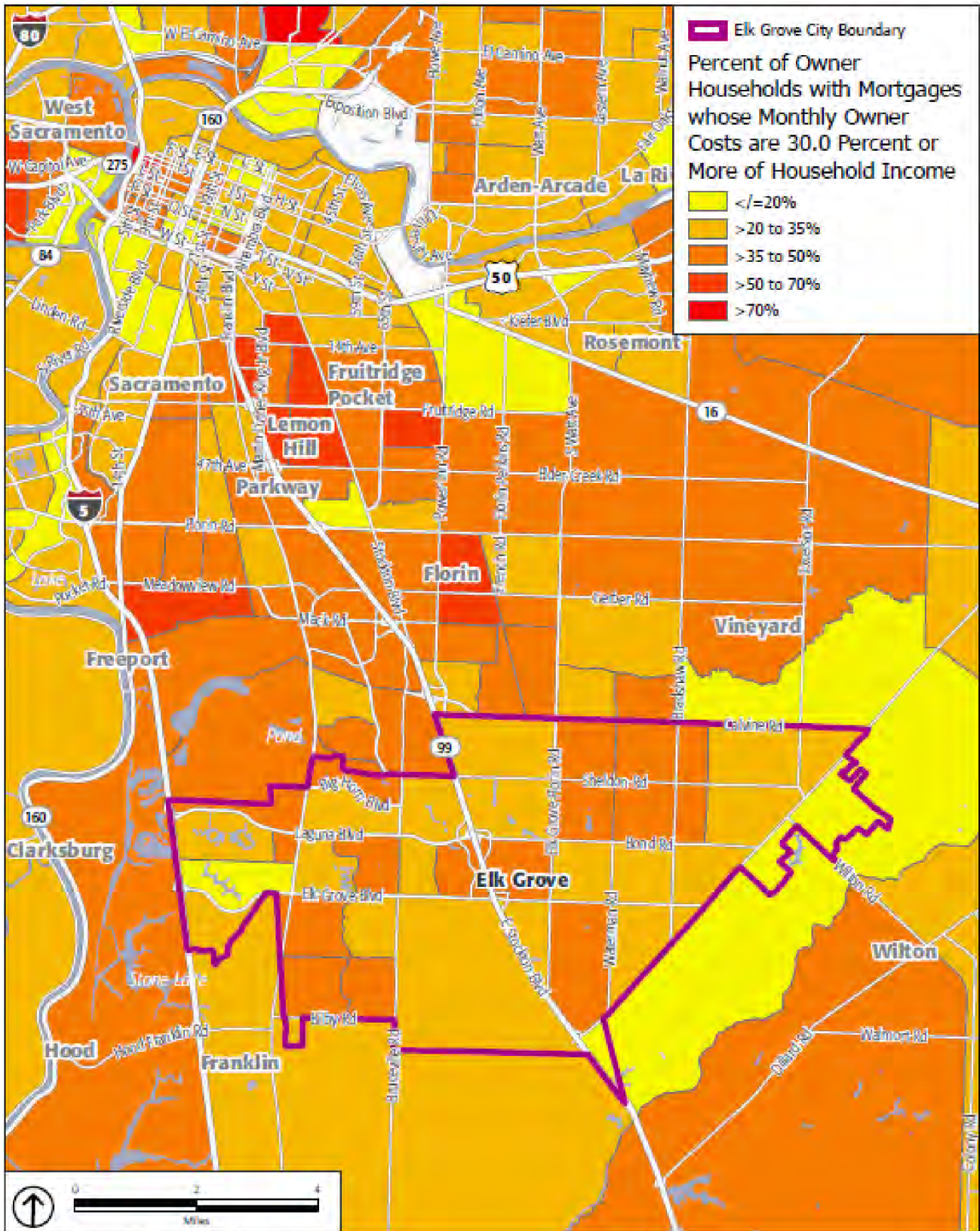
Source: Esri; US Census (2018); HUD (2017); PlaceWorks, 2021.

Figure A-10: Percent of Renters Overpaying for Housing



Source: Esri; US Census (2018); PlaceWorks, 2021.

Figure A-11: Percent of Owners Overpaying for Housing



CERTIFICATION
ELK GROVE CITY COUNCIL RESOLUTION NO. 2021-355

STATE OF CALIFORNIA)
COUNTY OF SACRAMENTO) ss
CITY OF ELK GROVE)

I, Jason Lindgren, City Clerk of the City of Elk Grove, California, do hereby certify that the foregoing resolution was duly introduced, approved, and adopted by the City Council of the City of Elk Grove at a regular meeting of said Council held on December 8, 2021 by the following vote:

AYES: **COUNCILMEMBERS:** *Singh-Allen, Suen, Hume, Nguyen*

NOES: **COUNCILMEMBERS:** *None*

ABSTAIN: **COUNCILMEMBERS:** *None*

ABSENT: **COUNCILMEMBERS:** *Spease*



Jason Lindgren, City Clerk
City of Elk Grove, California