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AFFIRMATIVELY FURTHERING FAIR HOUSING

Assembly Bill (AB) 686, signed in 2018 and codified in Government Code Section 65583, establishes new requirements for cities and counties to take deliberate action to relieve patterns of segregation and to foster inclusive communities, a process referred to as affirmatively furthering fair housing. With these new requirements, housing elements are now required to include the following:

- Summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and outreach capacity;
- Analysis of available federal, State, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty (R/ECAPs), disparities in access to opportunity, and disproportionate housing needs within the jurisdiction, including displacement risk;
- Assessment of the contributing factors for the fair housing issues identified in the analysis;
- Identification of the jurisdiction's fair housing priorities and goals, giving highest priority to the greatest contributing factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance;
- Concrete strategies and actions to implement the fair housing priorities and goals in the form of programs to affirmatively further fair housing; and
- Meaningful, frequent, and ongoing public participation to reach a broad audience.

The purpose of these requirements is to identify segregated living patterns and replace them with truly integrated and balanced living patterns, to transform R/ECAPs into areas of opportunities, and to foster and maintain compliance with Civil Rights and Fair Housing Law.

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This chapter begins with a summary of the Assessment of Fair Housing found in Appendix B and calls out the most important findings and contributing factors of fair housing issues in Antioch. It then describes how the sites inventory relates and is responsive to the City's duty to affirmatively further fair housing (AFFH). Finally, this chapter describes how outreach was done in a manner consistent with HCD's AFFH guidance. Appendix B, Affirmatively Furthering Fair Housing, includes this same analysis in more detail.

A. ASSESSMENT OF FAIR HOUSING

The Assessment of Fair Housing covers the following topics: fair housing enforcement and capacity, segregation and integration, R/ECAPs, access to opportunity, disproportionate housing needs and displacement risk, and identification of contributing factors.

1. ENFORCEMENT AND CAPACITY

Antioch residents are afforded fair housing protections under the California Fair Employment and Housing Act (FEHA), Ralph Civil Rights Act, and Unruh Civil Rights Act. There has been a downward trend from 2016 to 2020 in the number of Department of Fair Employment and Housing (DFEH) complaints in the County, but the number cases filed with the Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity (HUD FHEO) has been more volatile. As shown in Table 3-1, these cases peaked in 2019 before drastically falling in 2020. A total of 148 cases were filed in the County between 2015 and 2020, with disability being the top allegation of basis of discrimination, followed by familial status and race.

TABLE 3-1 NUMBER OF FHEO FILED CASES BY PROTECTED CLASS IN CONTRA COSTA COUNTY (2015–2020)

Year	Number of Filed Cases	Disability	Race	National Origin	Sex	Familial Status
2015	28	17	4	2	2	4
2016	30	14	8	7	5	6
2017	20	12	3	5	1	5
2018	31	20	6	3	4	9
2019	32	27	4	4	4	1
2020	7	4	1	0	2	1
Total	148	94	26	21	18	26

Percentage of Total Filed Cases

*Note that cases may be filed on more than one basis.

Source: Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity (FHEO) Filed Cases, 2021.

The City of Antioch contracts with its nonprofit partners, ECHO Housing and Bay Area Legal Aid, to provide fair housing services. The most common actions taken or services provided by ECHO after receiving a complaint are providing clients with counseling, followed by sending testers for investigation. Regardless of actions taken or services provided, almost 45 percent of cases are found to have insufficient evidence, and only about 12 percent of all cases resulted in successful mediation. Testing data from ECHO Housing is shown in Table 3-2 and indicates that housing discrimination may be increasing in Antioch.

Differential treatment was not detected between 2017 and 2019 but in fiscal years 2019-2020, 8 percent of cases indicated differential treatment based on racial voice identification, and in fiscal years 2020-2021, 17 percent of cases indicated discrimination based on potential tenants' use of Housing Choice Vouchers. Antioch had more source of income discrimination identified in this housing testing than the other three jurisdictions tested during this same period (0 percent in Concord and Walnut Creek and 5 percent of cases in Contra Costa County).

TABLE 3-2 ECHO FAIR HOUSING ANTIOCH AUDIT RESULTS

	Fiscal Year 2017-2018	Fiscal Year 2018-2019	Fiscal Year 2019-2020	Fiscal Year 2020-2021
Differential Treatment	0	0	1	2
No Differential Treatment	13	13	11	10
Differential Treatment (Percentage of Total)	0%	0%	8%	17%

Source: ECHO Fair Housing Fair Housing Audit Reports.

The City does not provide direct mediation or legal services, but it does provide resources on the City website and directs residents to ECHO Housing and Bay Area Legal Aid for fair housing assistance. While these organizations provide valuable assistance, the capacity and funding that they have is generally insufficient. Greater resources would enable stronger outreach efforts, including populations that may be less aware of their fair housing rights, such as limited English proficiency and LGBTQ residents. The City of has made recent efforts to partner with nonprofits to engage in greater outreach to the Hispanic community in order to encourage greater participation in government service programs—generally resulting in increased outreach efforts, but “with declining success.”¹ Additionally, while Antioch reported significant new outreach programming for people experiencing homelessness, it also faces a severe continuing lack of available funding and services to support this population. Local knowledge from service providers indicated that seniors are another population that could benefit from targeted outreach on fair housing and that Antioch and East County at large would benefit from increased coordination between service providers.

2. SEGREGATION AND INTEGRATION

The racial and ethnic composition of Antioch diverges significantly from those of the County and the Region and has changed significantly over time. In particular, Antioch has much higher Black and Hispanic population concentrations than both the County and the Region and lower non-Hispanic White and Asian or Pacific Islander population concentrations. The growth in the Black population stands in stark contrast to a County with flat Black population and a region with a declining Black population. Antioch also has higher concentrations of persons with disabilities across all categories than both the County and the Region, particularly for persons with cognitive disabilities. The City's comparatively low-cost housing market and fast pace of growth likely contribute to the continued differences between the City and County in terms of the composition of the population. While Antioch provides a more affordable option for lower-income households seeking for-sale and ownership housing, the high cost of housing in surrounding areas in the Bay Area continues to serve as a barrier for many low- and moderate-income households.

Antioch is one of the most diverse jurisdictions in the region (see Figure 3-1). Segregation is primarily a regional and inter-municipal phenomenon (e.g., Black residents in particular are segregated in Antioch, but

¹ City of Antioch 2017-18 CAPER, available at <https://www.antiochca.gov/fc/cdbg/FY-2017-18-CAPER.pdf>.

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the areas from which they are disproportionately excluded are other parts of the County and Region, not other neighborhoods within Antioch). However, there are concentrations of low-income households, people with disabilities, and people experiencing poverty in certain parts of the city. In particular, the northwest portion of the city on either side of California Route 4 is an area of the city with concentrations of lower-income households, poverty, and persons with disabilities, as shown in Figures 3-2 through 3-4.

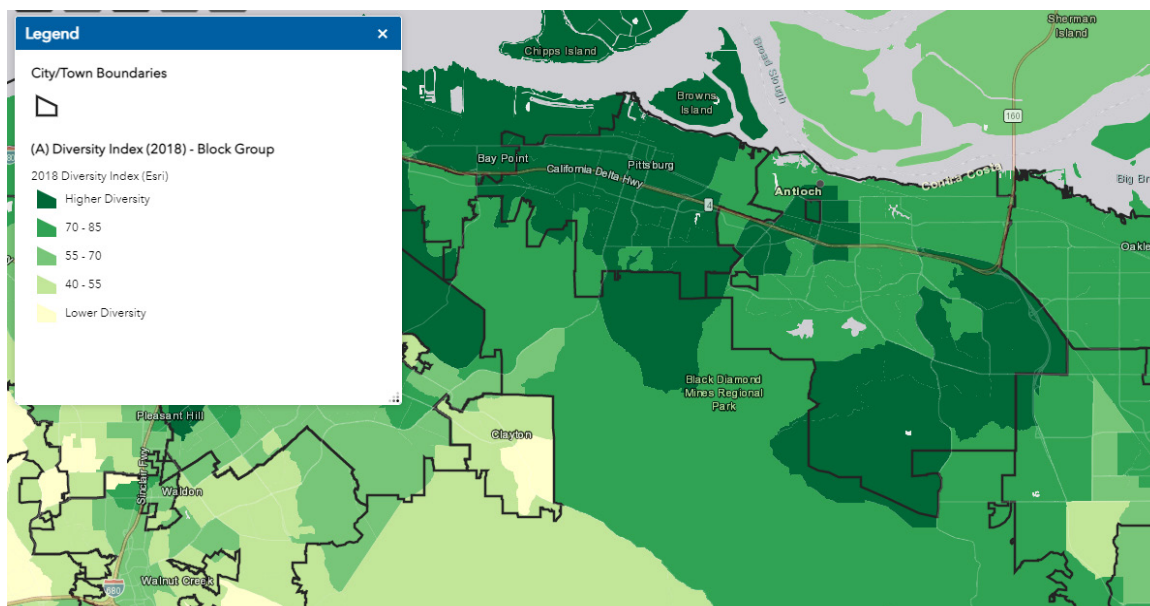


Figure 3-1 Diversity Index Score, 2018

Source: California Department of Housing and Community Development (HCD) AFFH Data Viewer.

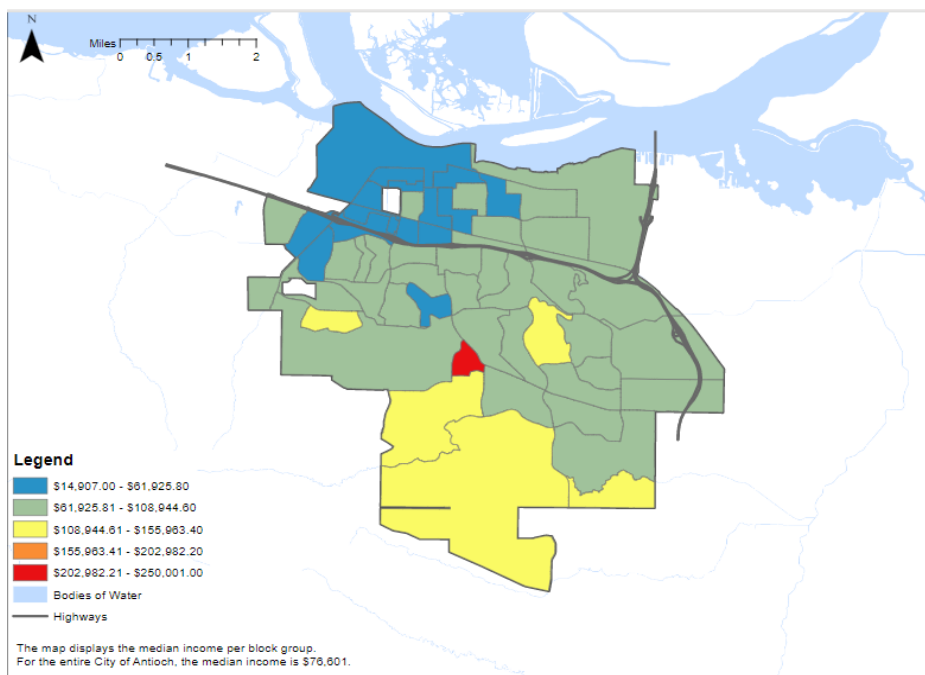


Figure 3-2 Median Income per Block Group, 2019

Source: ACS 2019 5-year estimates, Table B19013.

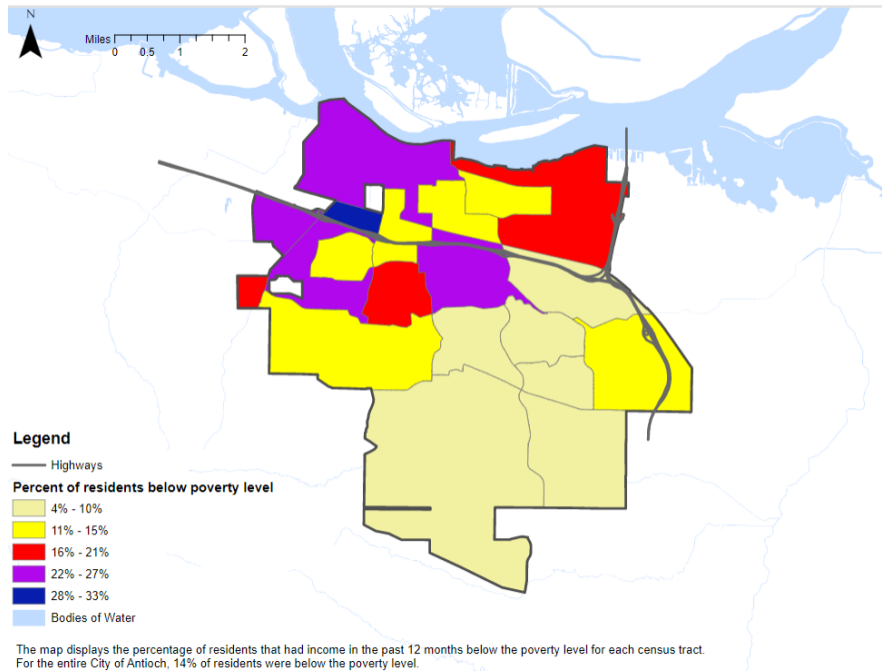


Figure 3-3 Percent of Households in Poverty per Block Group, 2019

Source: ACS 2019 5-year estimates, Table B17001.

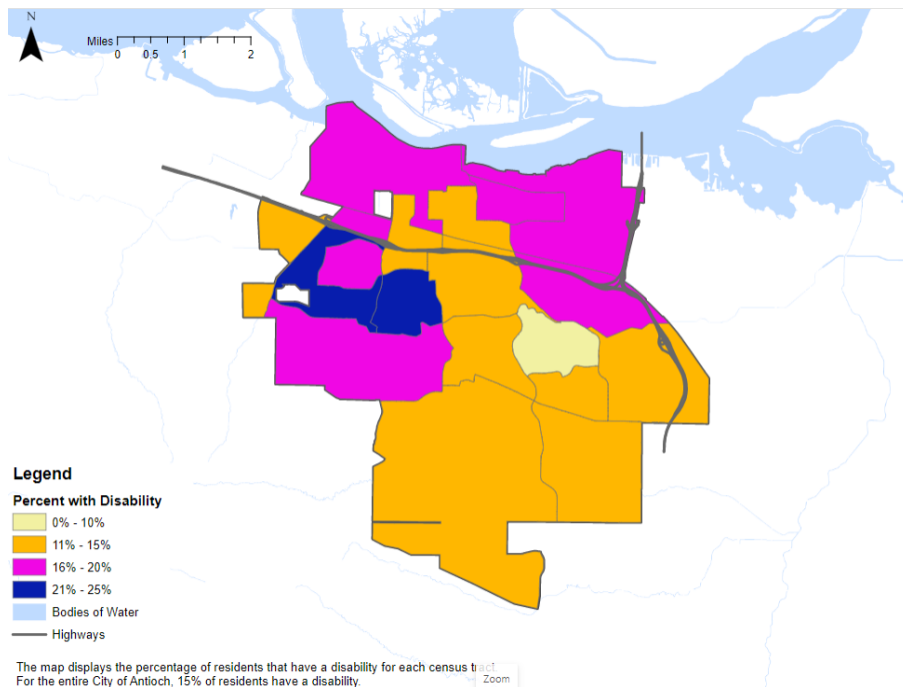


Figure 3-4 Percent of Persons with a Disability per Block Group, 2019

Source: ACS 2019 5-year estimates, Table B18101.

3. R/ECAPs

In Contra Costa County, the only area that meets the official HUD definition of a R/ECAP is in Concord. However, according to the 2020-2025 Contra Costa County Analysis of Impediments to Fair Housing Choice (2020 AI), when a more localized definition is used that considers the Bay Area's high cost of living, 12 additional census tracts qualify as R/ECAPs. In Antioch, the census tract known as the Sycamore neighborhood is considered a R/ECAP when utilizing this expanded definition. Antioch's R/ECAP is the navy blue rectangle just north of State Route 4 in Figure 3-3. When comparing this area to the racial dot map in Figure 3-5, it becomes evident that this neighborhood has higher portions of Latino and Black residents.

According to data from the Urban Institute,² the Sycamore neighborhood (i.e., census tract 307202) has 680 extremely low-income renters and is in the 96th percentile statewide for housing instability risk.³ It is in 97th percentile on the Urban Institute's Equity Subindex, which is based on the shares of people of color, extremely low-income renter households, households receiving public assistance, and people born outside the US. According to City staff, the renters in this neighborhood are predominantly Black, Indigenous, and people of color (BIPOC) women with children.⁴ Local organizations cited the age and condition of housing stock in this area as a contributing factor; the homes near Highway 4 are older, smaller, and less expensive in this area and neighborhoods with newer housing stock are often resistant to welcoming residents with lower incomes (e.g., voucher holders). These patterns have led to a concentration of extremely- and very low-income Latino and Black households in northwestern Antioch.

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

HUD developed a definition of R/ECAPs based on the racial/ethnic makeup of an area as well as its poverty rate. For a metropolitan area to be considered a R/ECAP under HUD's definition, it must:

- 1) Have a non-White population of 50 percent or more, and
- 2) Have extreme levels of poverty, meaning either:
 - a. At least 40 percent of the population lives at or below the federal poverty line, or
 - b. The poverty rate is three times the average census tract level poverty rate in the region, whichever is less.

Because the federal poverty rate is utilized in this definition, the Bay Area's high cost of living is not reflected. The Bay Area's cost of living far exceeds the national average, and so a broader definition of R/ECAP is utilized in this Housing Element, consistent with the County Costa County Consortium Analysis of Impediments to Fair Housing (June 2019). This refined definition includes census tracts that

- 1) Have a non-White population of 50 percent or more, and
- 2) Have poverty rates of 25 percent or more.

² Where to Prioritize Emergency Rental Assistance to Keep Renters in Their Homes – Antioch. 2021. Available at https://www.urban.org/features/where-prioritize-emergency-rental-assistance-keep-renters-their-homes?cm_ven=ExactTarget&cm_cat=LAB_Prioritizing+Rental+Assistance_CoC+%26+HUD+grantees&cm_pla=All+Subscribers&cm_ite=new+tool+developed+by+a+team+of+Urban+Institute+researchers&cm_ainfo=&&utm_source=urban_EA&&utm_medium=email&&utm_campaign=prioritizing_rental_assistance&&utm_term=lab&&utm_content=coc_hudgrantees. Urban Institute, 2021. *Where to Prioritize Emergency Rental Assistance to Keep Renters in Their Homes*, May 14.

³ Calculated based on shared of people living in poverty, renter-occupied housing units, severely cost-burdened low-income renters, severely overcrowded households, and unemployed people.

⁴ House, Teri, CDBG & Housing Consultant, City of Antioch. 2021. Personal communication with Urban Planning Partners, July 15.

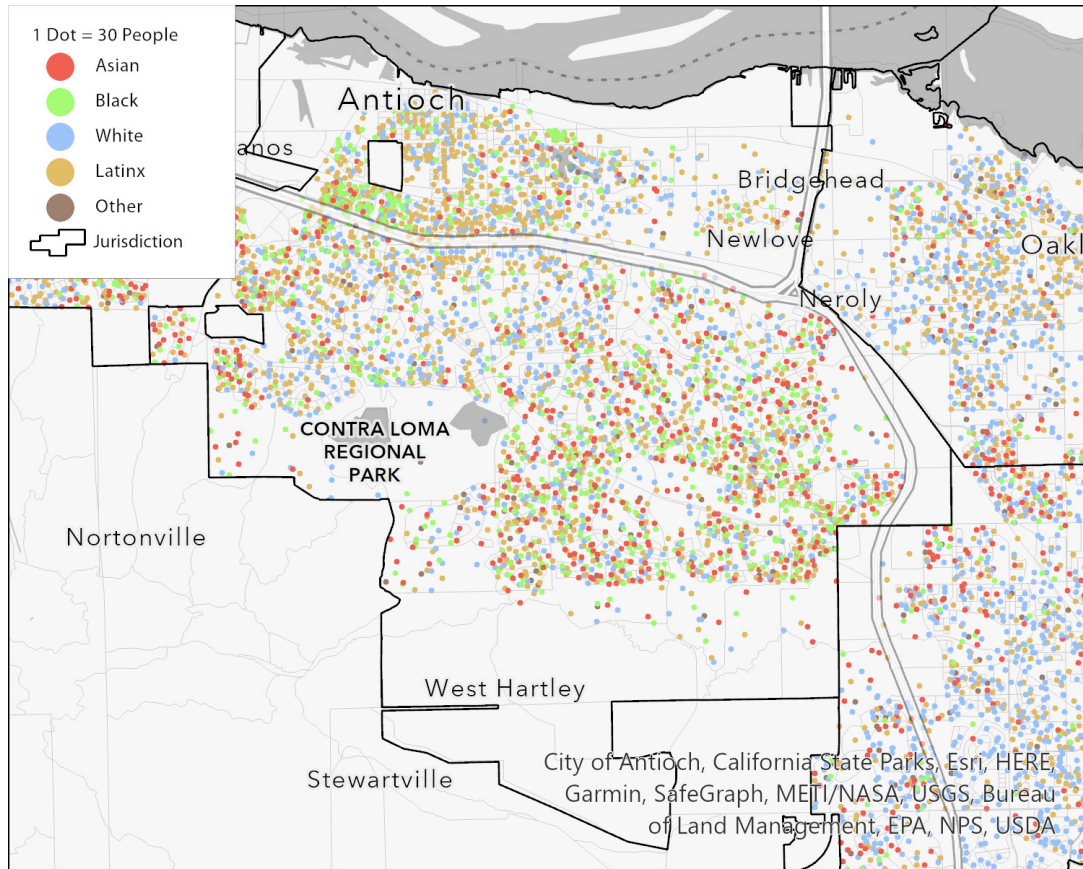


Figure 3-5 Racial Dot Map of Antioch (2020)

Universe: Population. Source: U.S. Census Bureau, 2020 Census State Redistricting Data (Public Law 94-171) Summary File, 2020 Census of Population and Housing, Table P002.

Note: The plot shows the racial distribution at the census block level for City of Antioch and vicinity. Dots in each census block are randomly placed and should not be construed as actual placement of people.

4. ACCESS TO OPPORTUNITY

The California Tax Credit Allocation Committee (TCAC) identifies high resource census tracts using metrics related to environmental health, economic mobility, and educational attainment. Neighborhoods with the highest TCAC scores (i.e., high resource neighborhoods) are considered by TCAC to be those that offer low-income residents the best chance of a high quality of life. Low resource areas are characterized as having fewer opportunities for employment and education, or a lower index for other economic, environmental, and educational indicators.

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As shown in Figure 3-6, most census tracts within Antioch are identified as being Low Resource, with a few in the southeast bordering with Brentwood and Oakley as Moderate Resource. Compared to the rest of the County and Region, the TCAC score shows that Antioch has lower opportunity areas and lower access to resources for its residents. This is related to several factors, including the relative lack of high-quality transit and associated reliance on costly cars and long commutes, the lack of jobs, poor air quality from past and present industrial uses in the north, and lower educational outcomes.

5. DISPROPORTIONATE HOUSING NEEDS

There are significant disparities in the rates of renter and owner-occupied housing by race/ethnicity in Contra Costa County, although Antioch has significantly higher homeownership rates for Hispanic and Black residents than in the County as a whole. Renters are more cost-burdened than owners. In Antioch, approximately 25 percent of renters spend 30 to 50 percent of their income on housing compared to 20.6 percent of those that own. Additionally, 34.3 percent of renters spend 50 percent or more of their income on housing, while 12.5 percent of owners are severely cost-burdened. Overcrowding is also more prevalent in rental households.

As lower-income residents have been displaced from more expensive parts of the Bay Area, poverty in Eastern Contra Costa County has increased dramatically. From 2000-2014, the increase in poverty in Antioch was among the highest in the Bay Area. Displacement is thus perpetuating segregation as low-income people of color increasingly concentrate in east County. The University of California, Berkeley found that in Antioch, 31.3 percent of households live in neighborhoods that are susceptible to or experiencing displacement and 19.2 percent live in neighborhoods at risk of or undergoing gentrification.

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE (TCAC) INDICATORS OF OPPORTUNITY

TCAC utilizes indicators related to educational attainment, environmental health, and economic mobility to measure access to opportunity. The indicators consulted are listed below.

Economic

- Percent of population with income above 200% of the federal poverty line
- Percent of adults with a bachelor's degree or above
- Percent of adults aged 20-64 who are employed in the civilian labor force or in the armed forces
- Number of jobs filled by workers with less than a bachelor's degree that fall within a given radius of each census tract population-weighted centroid

Environmental

- CalEnviroScreen 4.0 Pollution indicators

Education

- Percentage of 4th graders who meet or exceed math proficiency standards
- Percentage of 4th graders who meet or exceed literacy standards
- Percentage of high school cohort that graduated on time
- Percent of students not receiving free or reduced-price lunch

For more information, visit: <https://www.treasurer.ca.gov/ctcac/opportunity.asp>

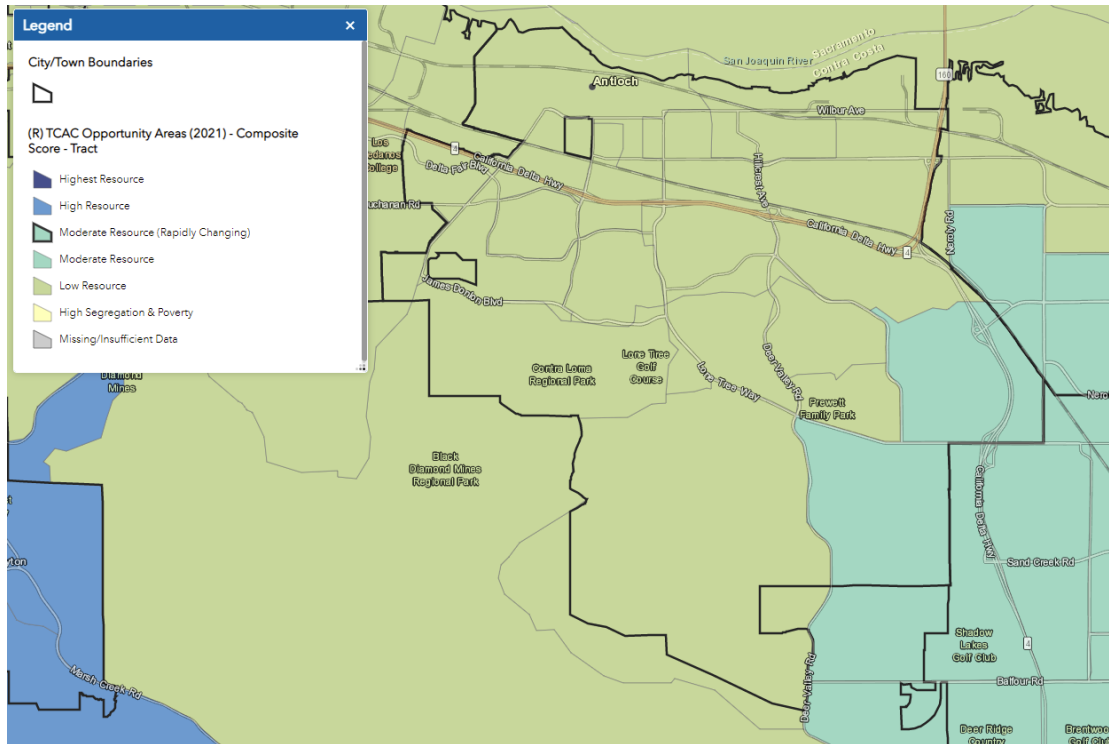


Figure 3-6 2021 TCAC/HCD Opportunity Map by Census Tract, Antioch

Source: California Department of Housing and Community Development (HCD) AFFH Data Viewer.

6. CONTRIBUTING FACTORS

Based on local knowledge obtained through community outreach and the findings of the 2020 AI, the following factors have contributed to the fair housing issues summarized above:

- **Regional Housing Crisis and Displacement.** Historic underproduction of housing means that private new construction goes on the market at a very high price point that is most oftentimes unaffordable to Black and Hispanic households. Low-income communities of color in the Bay Area are being displaced to Antioch and other cities in East County as those with higher incomes compete with them for limited housing stock.
- **Lack of Community Revitalization Strategies.** A lack of jobs (partially driven by the closing of factories) and slow recovery from the foreclosure crisis has contributed to the increased concentration of poverty in Antioch. The decline of Redevelopment Agencies has eliminated key funding for investing in neighborhood in need of revitalization.
- **Lack of Investment in Specific Neighborhoods.** Northwestern Antioch suffers from a lack of both private and public investment, which contributes to lower access to opportunity and the status of the Sycamore neighborhood as a R/ECAP.
- **Community Opposition to Housing.** The Not In My Backyard (NIMBY) movement is a significant contributing factor to housing underproduction and racial segregation in the Bay Area. The NIMBY movement is not as active in Antioch, but it is more active in Western and Central County and contributes to the regional segregation that excludes Black and Hispanic residents in Antioch from more affluent cities in central County. It can also create disproportionate housing needs as residents are forced into substandard and/or overcrowded conditions when there is not adequate housing supply that is affordable.

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- **Lack of Regional Cooperation.** Many high opportunity areas with predominantly Non-Hispanic White populations in Contra Costa County have opposed efforts to bring more affordable housing development into their cities. This phenomenon contributes to segregation and the creation of R/ECAPs when cities do not permit their “fair share” of housing because it puts greater housing pressure on other jurisdictions that are more likely to permit housing and reduces housing options and mobility.
- **Land Use and Zoning Laws.** In general, throughout the Bay Area, people of color disproportionately occupy high-density housing, which can generally be built only in areas zoned for multi-family homes, multiple dwellings, or single-family homes on small lots. This tends to segregate people of color into the municipal areas zoned for high-density housing, which has implications on access to opportunity and the perpetuation of R/ECAPs.
- **Private Discrimination.** Fair housing testing has revealed differential treatment in Antioch and lending discrimination is also present with loan applications submitted by Blacks and Latinos uniformly denied at higher rates than those of Whites or Asians. This private discrimination contributes to limited access to opportunity for people of color and perpetuates patterns of segregation and R/ECAPs.

B. SITES INVENTORY

The section describes how the sites inventory is consistent with the City’s obligation and goal to AFFH. It discusses how the inventory improves and avoids exacerbating fair housing issues in the city, avoids isolating or concentrating the RHNA by income group in certain areas of the community, and relates to local knowledge and other relevant factors. This section also discusses the distribution of sites relative to patterns of segregation and integration, R/ECAPs, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

1. UNIT DISTRIBUTION - ENVIRONMENTAL JUSTICE (EJ) NEIGHBORHOODS, R/ECAPs, AND ACCESS TO OPPORTUNITY

As mentioned above, Antioch does not have any high-opportunity areas; the vast majority of the city is considered Low Resource by TCAC except for neighborhoods on the easternmost edge of the city. Additionally, while there are no R/ECAPs using HCD’s definition, Antioch does include one census tract known as the Sycamore neighborhood (census tract 307202) that is considered a R/ECAP when using a more localized definition that considers the Bay Area’s high cost of living.

Antioch also has neighborhoods that are considered “disadvantaged communities” under State law. “Disadvantaged communities” are areas within the city where a combination of social, economic, and environmental factors disproportionately affect health outcomes. They are identified as census tracts that are at or below the statewide median income *and* experience disproportionate environmental pollution and other hazards that can lead to negative health outcomes. For purposes of this Housing Element, these neighborhoods are referred to as EJ neighborhoods given that “disadvantaged communities” is not a preferred term for residents of these neighborhoods.

There are 12 census tracts in Antioch that are considered low-income areas, comprising 7,905 acres of the city, or approximately 41 percent of the entire city. Of these 12 census tracts, there are 5 that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation. These 5 census tracts are Antioch’s EJ neighborhoods, and they make up 3,460 acres of the city, or approximately 18 percent of the total city area.

In addition to generally spreading the RHNA equally across the city, special attention was made to avoid placing low-income units in the EJ and low-income neighborhoods. Figure 3-7 shows the distribution of sites on top of the EJ neighborhoods (in purple) and low-income areas (in blue). The R/ECAP Sycamore neighborhood is shown in a darker blue and is included in the area of land that is considered an EJ neighborhood. Sites that would include affordable units (referred to as affordable housing sites) are shown in hatching.⁵ As shown in Figure 3-7, affordable housing sites are not identified in the Sycamore neighborhood and are sparingly identified in the EJ neighborhoods so as to avoid concentrating low-income persons in one part of town and exacerbating economic segregation. Figure 3-8 shows the distribution of sites on top of the TCAC access to opportunity index. Although Antioch does not have high opportunity areas, local knowledge indicates that areas in the south have new housing stock and higher median incomes and are not as impacted by environmental hazards. For these reasons, sites in the southern and eastern portions of the city were sought for locating affordable housing. Six affordable housing sites are located in the City's two moderate resource census tracts.

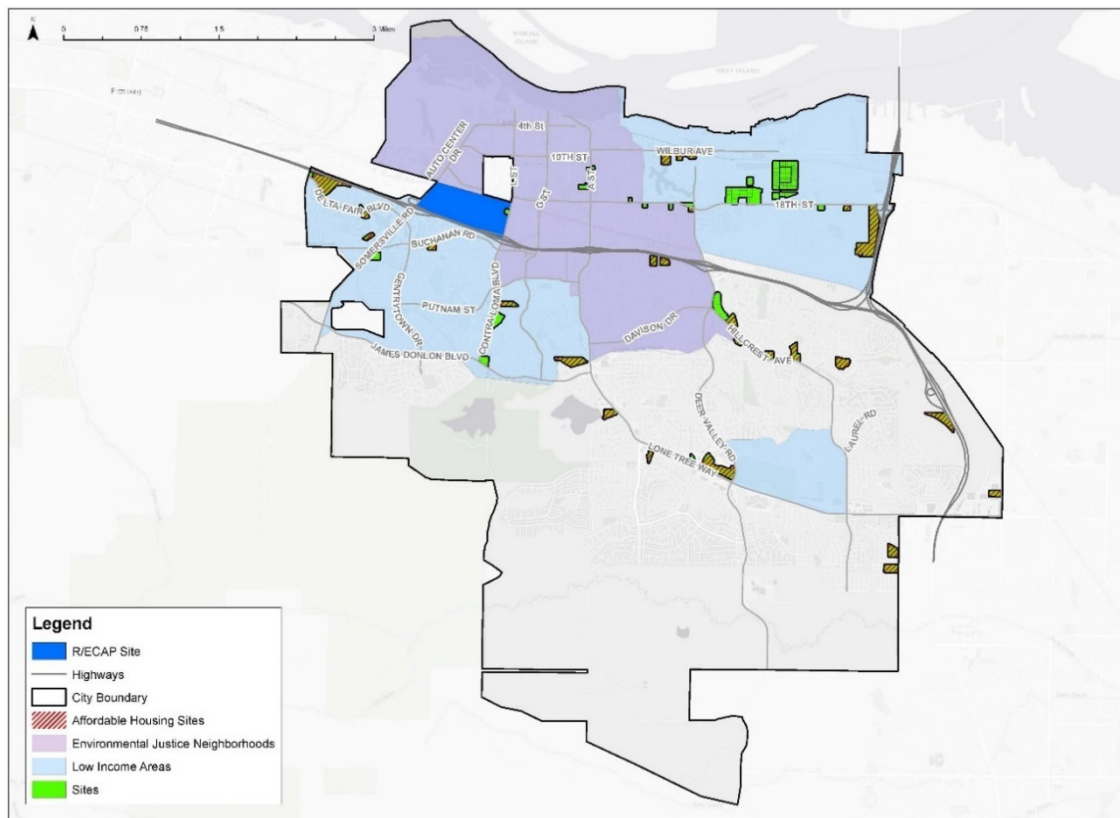


Figure 3-7 RHNA Distribution and EJ, R/ECAP and Low-Income Areas

⁵ All sites with affordable units are anticipated to be mixed-income projects with units ranging from very low-income to above moderate-income, but the term “affordable housing site” is used for clarity.

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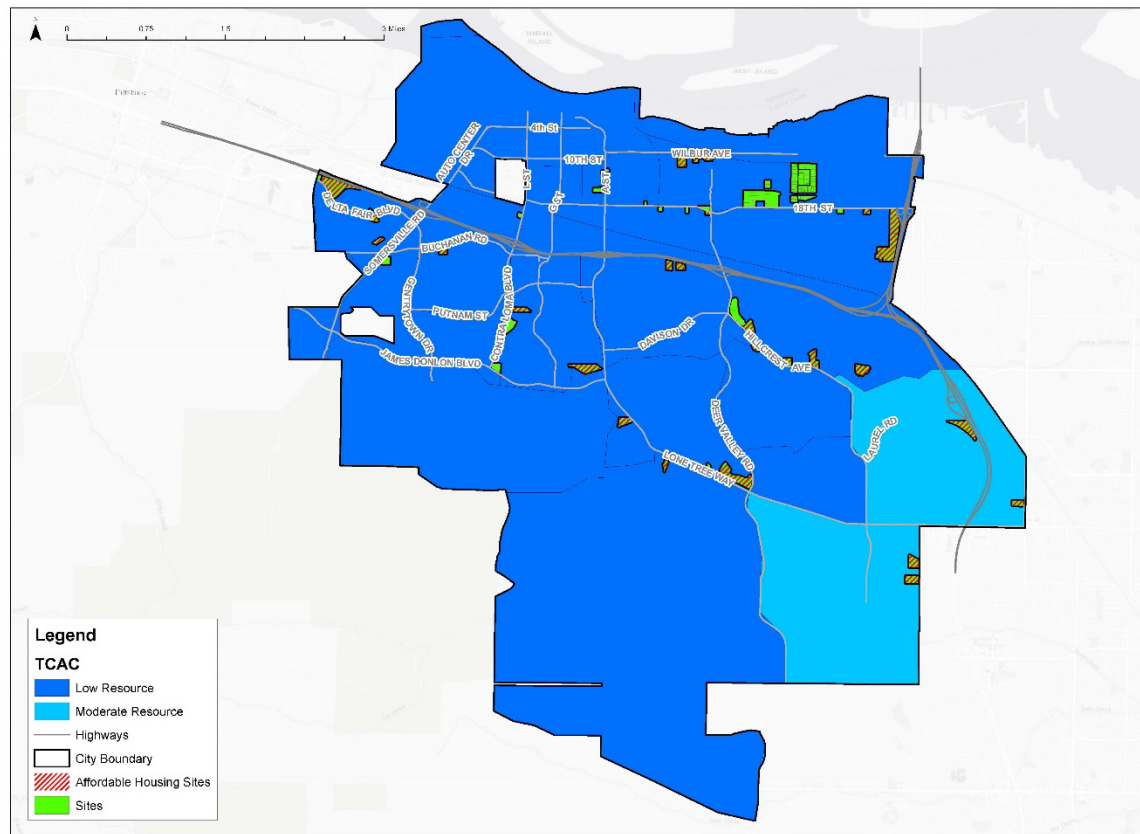


Figure 3-8 RHNA Distribution and Access to Opportunity

Table 3-3 shows the distribution of sites and units across these neighborhoods compared to the city at large. As shown in the table, 10 percent of affordable sites are located in EJ neighborhoods and only 4 percent of units identified to satisfy the lower-income RHNA are identified in EJ neighborhoods. Looking citywide, 18 percent of the city is located in an EJ neighborhood. This confirms that sites are not concentrated in EJ areas and in fact the opposite is true; affordable units are underrepresented in EJ neighborhoods compared to the citywide conditions. Furthermore, although only 14 percent of the city's land area is a moderate resource area (and much of this area is undeveloped), 16 percent of the affordable housing units are sited in these two census tracts.

A larger portion of the city is considered below the statewide median income than considered an EJ neighborhood; 41 percent of the entire city is considered a low-income neighborhood. As shown in Table 3-3, 58 percent of affordable sites and 55 percent of affordable units are identified in these census tracts. Therefore, there are more affordable housing sites and units in low-income census tracts than the city baseline of 41 percent of all land area. However, this does not indicate that sites are disproportionately located in these areas. As shown in Figure 3-7, affordable housing sites are dispersed throughout the city. Moreover, approximately 3,400 acres on the City's southern edge are undeveloped and given the City's goals to encourage infill development and limit sprawl, this area of the city was not considered a suitable area to encourage housing development. The decision to focus on infill development limited the availability of land by approximately 18 percent. Excluding the roughly 3,400 acres of undeveloped land in the south, the census tracts that are below the median income then make up half of the available land for the sites inventory. The dispersion rate of 55 percent of affordable units being located in a low-income census tract is then on par with 50 percent of the whole city's available land area that is in a low-income census tract. The 55 percent of affordable units that are in the low-income neighborhoods is a reasonable

dispersion given the availability of limited availability of land and the wide expanse of low-income neighborhoods in the city and that the low-income census tracts are often near transportation and services. The City will utilize strategies to encourage housing mobility and to protect existing residents with the intent to avoid creating disproportionate impacts for residents in lower-income neighborhoods. In addition, all projects in the EJ and low-income neighborhoods are anticipated to be mixed-income projects bringing investment and economically diverse residents to these parts of the city.

TABLE 3-3 LOWER INCOME SITES DISTRIBUTION

	Percentage of Land Area	Number of Affordable RHNA Sites	Percentage of Affordable RHNA Sites	Number of Affordable RHNA Units	Percentage of Affordable RHNA Units
In low-income neighborhoods	41%	24	58%	829	55%
In EJ neighborhoods	18%	4	10%	62	4%
Outside low-income and EJ neighborhoods*	45%	11	27%	445	29%
In Moderate Resource Neighborhoods	14%	6	15%	241	16%
Citywide	100%	41	100%	1,515	100%

Notes: Rows do not total the citywide number given that all EJ neighborhoods are also low-income neighborhoods. Consolidated sites with common ownership (i.e., consolidated sites B and G at Windsor Drive and Jessica Court, respectively) are counted as one site each.

*Sites in this category are still in TCAC Low Resource census tracts but are outside of the lower-income census tracts and EJ areas shown in purple and blue in Figure 3-7.

Source: City of Antioch and Urban Planning Partners, 2022

2. POTENTIAL EFFECTS ON ECONOMIC AND RACIAL SEGREGATION

As discussed above, the primary racial segregation Antioch exhibits is a regional and inter-city phenomenon, meaning that BIPOC residents in Antioch (especially Black residents) are excluded from other parts of the Region but are not concentrated in neighborhoods within Antioch. The city does exhibit patterns of economic segregation though with concentrations of lower incomes and people experiencing poverty in the northwest portion of the city.

The sites inventory is not anticipated to exacerbate or create patterns of racial segregation. See Appendix B for visualizations of the sites inventory by income level on top of racial data by census tract. Figures 3-9 and 3-10 illustrate the inventory on top of data showing the median income and poverty rates of each census block. As illustrated in these figures and discussed in Appendix B, the distribution of sites is unlikely to exacerbate existing patterns of economic segregation or to create racial segregation, as demonstrated by the following facts:

- The one census tract with the highest median income includes one site and it is an affordable housing site.
- The census tracts with the lowest median incomes have a mix of affordable and market-rate sites to bring a balanced approach of adding investment in these communities while also providing anchors against displacement risk where it is highest in northwestern Antioch.
- The sites inventory identifies only one site in the census tract experiencing the greatest rates of poverty, which is Antioch's R/ECAP (the Sycamore neighborhood). The sites inventory includes one market-rate site here. It does not site low-income units in areas with a greater concentration of low-income households.

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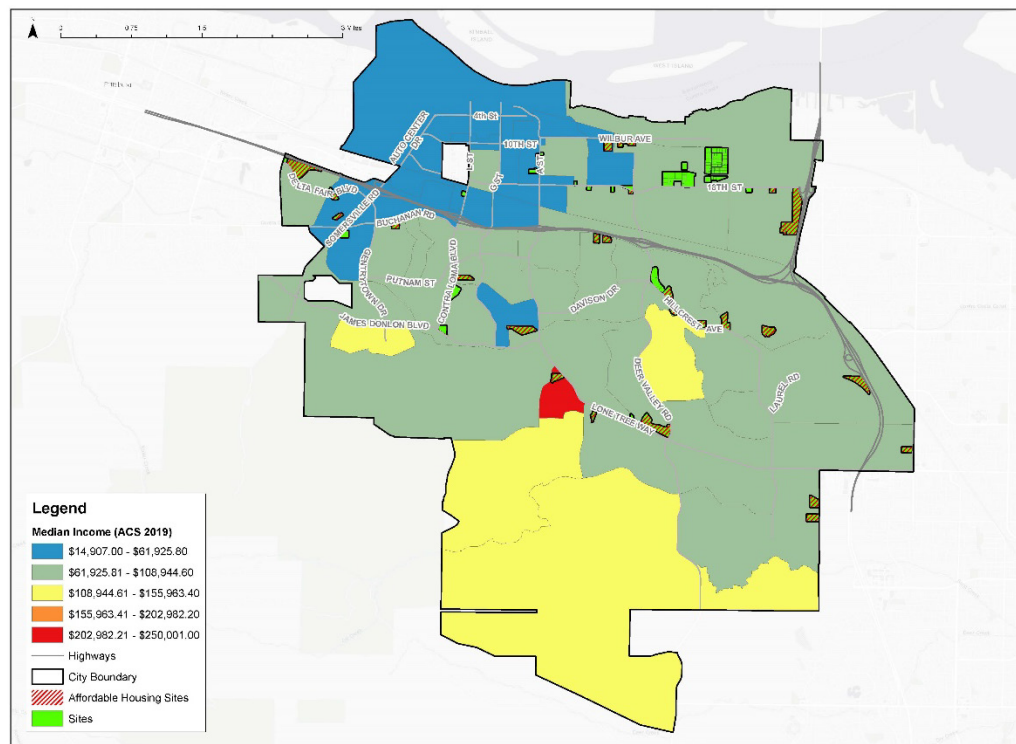


Figure 3-9 Sites Inventory and Median Income per Block Group, 2019

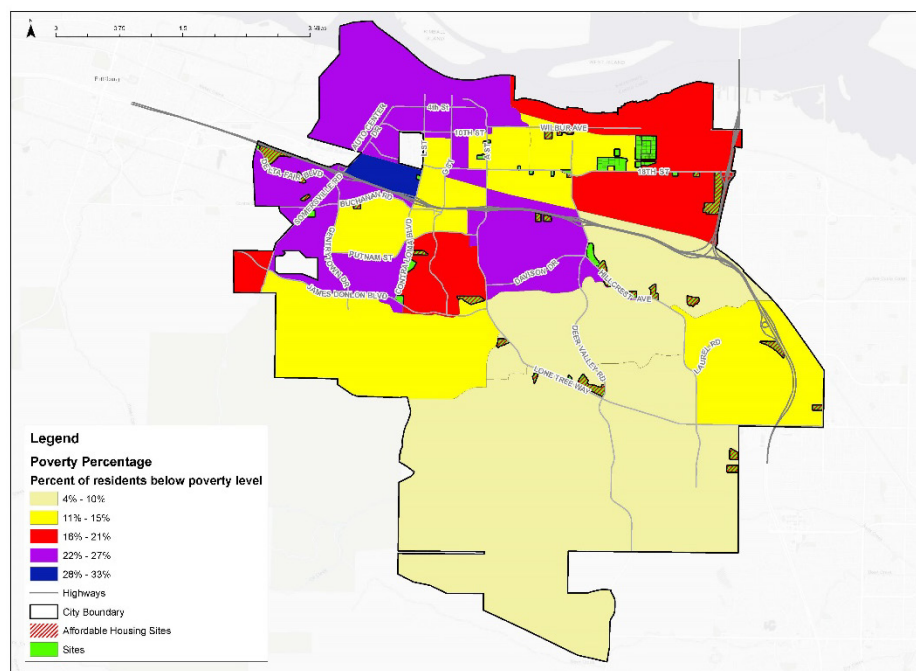


Figure 3-10 Sites Inventory and Percent of Households in Poverty per Block Group, 2019

- Sites in the northwest with higher rates of poverty do not include affordable housing sites in order to avoid concentrations of low-income residents in one area of Antioch.
- Antioch's racial and ethnic diversity is spread throughout the city and the sites inventory does not disproportionately place sites in areas with greater populations of people of color. The areas of Antioch that do have higher rates of White residents are identified to accommodate affordable housing units.
- Sites with 100 percent market rate units (i.e., units that are identified for moderate- and above-moderate incomes) are spread throughout the city but they are not located in the census tract with the highest median income.

3. DISPROPORTIONATE HOUSING NEEDS AND DISPLACEMENT RISK

As previously discussed, renters are disproportionately affected by housing needs including overpayment, overcrowding, and displacement risk. With implementation of the Housing Element, there is some potential to ease overcrowding and cost burden as there will be more housing options available for a variety of income levels in all areas of the city.

Figure 3-11 shows the inventory of sites on top of gentrification and displacement typology, as mapped by the Urban Displacement Project. As shown in Figure 3-11, the southern half of Antioch is categorized as stable moderate/mixed income. This is the area where mixed-income projects that include affordable units are identified, which can help ensure the stability and economic diversity of this area. Northwestern Antioch, on the other hand, is at risk of gentrification while the central portions of Antioch in the north and west are low-income/susceptible to displacement. Given EJ issues also concentrated in this area, many of the census tracts with displacement vulnerability and gentrification risk were expressly avoided as areas to place new housing. As a result, little development is anticipated in the Housing Element in northwest Antioch and sites that are identified in these areas are primarily market-rate development so as to not concentrate lower-income populations in the northwest. The addition of some market-rate development in this area has the potential to add to the intensity of the displacement and gentrification risk. However, the City has included programs to protect vulnerable residents from displacement, including implementation of tenant protections consistent with AB 1482. Additionally, the sites identified in the low-income/susceptible to displacement neighborhoods include affordable housing sites. The development of affordable units in these neighborhoods would help protect Antioch residents from displacement.

Finally, the displacement map shows two census tracts in northeastern Antioch at risk of becoming exclusive. The sites identified in this part of Antioch are primarily sites for missing middle housing around Viera Avenue and mixed-income projects with affordable units along 18th Street and Hillcrest Avenue. By increasing the diversity of housing types and facilitating the development of multi-family housing, including potentially affordable units, the sites inventory would counteract current trends of potential exclusion in this area.

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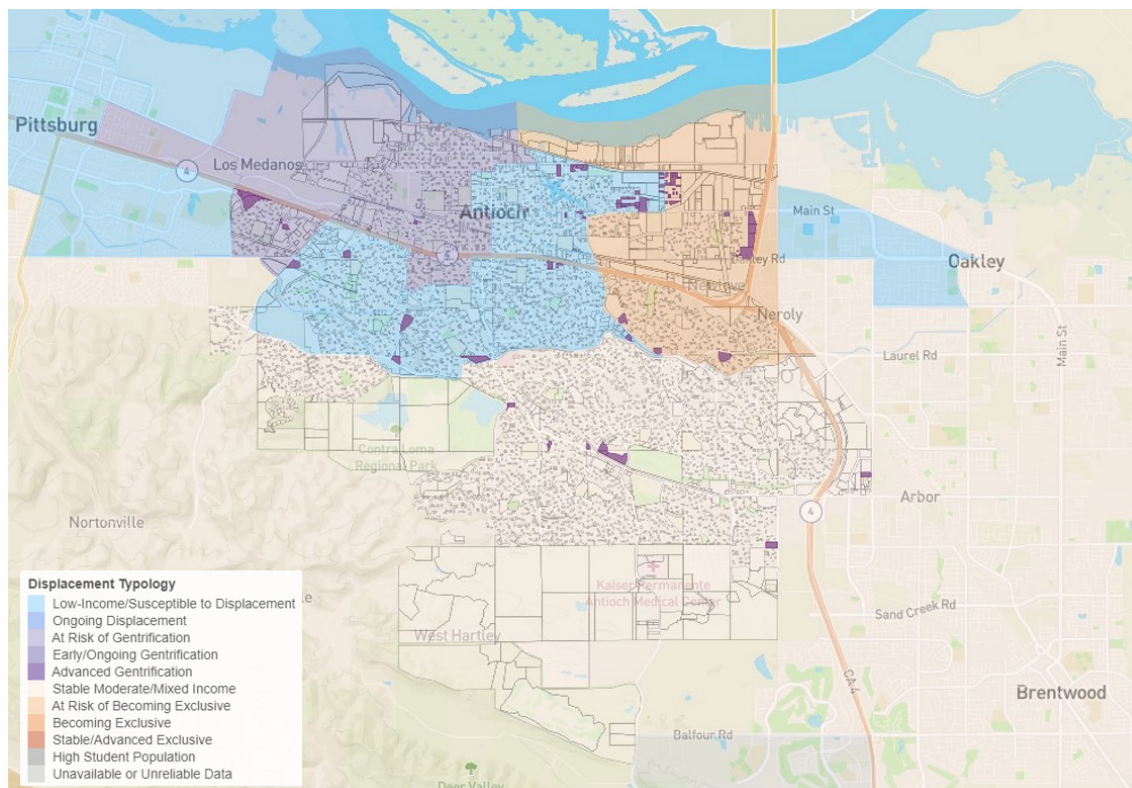


Figure 3-11 Sites Inventory and Displacement Typology

Notes: Consolidated site G at Jessica Court is not visible on the map given discrepancies with APNs. These sites are in eastern Antioch in the stable moderate/mixed income category.

Source: Housing Element Site Selection (HESS) Tool and Urban Displacement Project.

C. OUTREACH

In addition to requirements around certain analysis and data, HCD guidance on AFFH stipulates that community participation is another area where the City can demonstrate its commitment to AFFH. Throughout the Housing Element update, best practices from the HCD guidance on AFFH were used, including using a variety of meeting types and locations, ample time for public review, translating key materials, conducting meetings and focus group fully in Spanish to create a safe space for residents to provide feedback in their native language, avoiding overly technical language, and consulting key stakeholders who can assist with engaging low-income households and protected classes. Overall, the goals for this outreach were to reach and include the voices of those in protected classes and increase resident participation overall. Chapter 8, Participation of this Housing Element describes all community engagement activities undertaken during the update process and how community feedback was incorporated into the Housing Element. Appendix B describes outreach findings specifically to fair housing.

D. MEANINGFUL ACTIONS

Pursuant to Government Code Section 65583 (c)(10)(A)(v), the Housing Element includes several policies and programs to proactively address fair housing issues. Table 1-2 below summarizes the fair housing issues, contributing factors, and implementation programs included in the Housing Element to affirmatively further fair housing in Antioch.

TABLE 3-4 FAIR HOUSING ACTION PLAN

Actions	Fair Housing Issues	Contributing Factors	Implementation
Action Area 1. Enhancing housing mobility strategies			
Action 1.1: Consistent with the sites inventory, rezone sites throughout the city to permit multi-family units in areas where it was not previously allowed, including areas with relatively higher median incomes and relatively newer housing stock.	Persons with disabilities and Hispanic and Black households are concentrated in census tracts with low median incomes and older housing stock.	Lack of high opportunity areas; lack of affordable housing; lack of accessible affordable units.	<p>Objectives: Remove barriers to housing in areas of opportunity and strategically enhancing access</p> <p>Quantified Objectives: Rezoning six sites in the City's Moderate Resource census tracts</p> <p>Responsible Party: Community Development Department</p> <p>Timeline: January 2023</p>
Action 1.2: Incentivize the creation of ADUs to provide housing that is affordable in higher opportunity areas. In partnership with Habitat for Humanity (or other similar providers), create an ADU/JADU loan product to assist homeowners in constructing ADUs/JADUs for rental housing. The program design could provide loans to homeowners to construct ADUs or JADUs with public money that would be repaid with the rental income from the completed ADU/JADU. Loan recipients would be required to affirmatively market their ADU to populations with disproportionate housing needs, including persons with disabilities, Hispanic households, Black households, and female-headed households. This would include translation of materials into Spanish and sharing information with community organizations that serve these populations, such as legal service or public health providers.	Persons with disabilities have disproportionate housing needs.	Lack of high opportunity areas; lack of affordable rental housing; lack of accessible affordable units.	<p>Objectives: Increase housing mobility by generating wealth for low-income homeowners and by facilitating the development of ADUs that are affordable to lower-income households in areas with relatively higher incomes</p> <p>Quantified Objectives: Subsidized development of 25 ADUs by the end of the Planning Period</p> <p>Responsible Party: City Partnership with Habitat for Humanity</p> <p>Timeline: Program design completed by June 2025. Funding and approvals granted for 5 ADUs by Dec 2026 and then 5 ADUs annually thereafter</p>

3. AFFIRMATIVELY FURTHERING FAIR HOUSING

Actions	Fair Housing Issues	Contributing Factors	Implementation
Action Area 2. Encouraging new housing choices and affordability in high resource areas and outside of areas of concentrated poverty.			
Action 2.1: Require affordable housing developments be affirmatively marketed to households with disproportionate housing needs, including persons with disabilities, Hispanic households, Black households, and female-headed households. This would include translation of materials into Spanish and Tagalog and sharing information with community organizations that serve these populations, such as legal service or public health providers. All marketing plans would include strategies to reach groups with disproportionate housing needs.	Persons with disabilities and Hispanic and Black households are concentrated in census tracts with low median incomes and older housing stock.	Lack of high opportunity areas; Lack of affordable housing and especially affordable housing in high opportunity areas; Lack of accessible affordable units.	<p>Objectives: Encouraging new housing choices and affordability</p> <p>Quantified Objectives: Affordable housing projects and available affordable units are advertised to at least 3 community organizations</p> <p>Responsible Party: Community Development Department</p> <p>Timeline: Ongoing. Marketing plans are submitted at time of building inspection</p>
Action 2.2: Incentivize developers through direct subsidies, development standards concessions, or fee waivers/reductions to increase the number of accessible units beyond the federal requirement of 5% for subsidized developments.	Persons with disabilities have disproportionate housing needs and persons with disabilities are most likely to file fair housing complaints.	Lack of accessible affordable units; Lack of access to economic opportunity; Concentration in low income and low opportunity census tracts.	<p>Objectives: Encouraging new housing choices and affordability for populations with special needs housing</p> <p>Quantified Objectives: Two projects that go beyond the federal minimum of 5% accessible units for subsidized projects</p> <p>Responsible Party: City of Antioch, Planning Dept</p> <p>Timeline: Menu of incentives created by January 2024 and outreach to developers by June 2024</p>
Action 2.3: Develop a program to prioritize City funding proposals for City-funded affordable housing that are committed to supporting hard to serve residents (e.g., unhoused populations, extremely low income, special needs)	Persons with disabilities have disproportionate housing needs and persons with disabilities are most likely to file fair housing complaints. Antioch has higher numbers of unhoused residents and disabled residents than other cities in the county.	Lack of accessible affordable units; Lack of access to economic opportunity; Concentration in low income and low opportunity census tracts.	<p>Objectives: Encouraging new housing choices and affordability for populations with special needs housing</p> <p>Quantified Objectives: Reduce unsheltered unhoused population by 40%. Construction of 190 units of housing for extremely low-income individuals</p>

3. AFFIRMATIVELY FURTHERING FAIR HOUSING

Actions	Fair Housing Issues	Contributing Factors	Implementation
			Responsible Party: City of Antioch, Housing Timeline: Program designed completed by April 2024
Action Area 3. Improving place-based strategies to encourage community conservation and revitalization including preservation of existing affordable housing.			
Action 3.1: Develop and implement EJ policies to improve quality of life in EJ neighborhoods.	Hispanic households are concentrated in EJ neighborhoods.	Lack of high opportunity areas; Lack of affordable housing in high opportunity areas; Lack of accessible affordable units; Concentration of NOAH (i.e., older housing stock) in EJ neighborhoods.	Objectives: Alleviate disparate impacts experienced by households living in EJ neighborhoods, especially related to environmental outcomes Quantified Objectives: Improve CalEnviroScreen composite score in EJ area by 10% Responsible Party: City of Antioch, various departments Timeline: Adoption of EJ policies by February 2023
Action 3.2: Continue to fund minor home repairs and implement a preference for projects in the following order: 1) Projects in the Sycamore neighborhood (i.e., Antioch's ethnically concentrated area of poverty) 2) Projects in EJ neighborhoods 3) Projects in census tracts with lower median incomes The City will affirmatively market the home repair program to residents in these areas, such as through a targeted mailings and posting of flyers in to the subject census tracts in English, Spanish, and Tagalog.	Hispanic households are concentrated in EJ neighborhoods.	Lack of affordable housing in high opportunity areas; Lack of high opportunity areas; Concentration of NOAH (i.e., older housing stock) in EJ neighborhoods.	Objectives: Conserve and improve assets in areas of lower opportunity and concentrated poverty Quantified Objectives: Rehabilitation of 40 homes in target neighborhoods Responsible Party: City of Antioch Housing Dept Timeline: Conduct publicity campaign for the program once annually in addition to hosting information on City website
Action 3.3: Monitor affordable housing projects that are at risk of conversion to market rate. Support regional and local efforts to examine displacement of affordable housing and lower income households. Assist with the retention of special needs housing that is at risk of expiring affordability requirements.	Hispanic and Black households and persons with disabilities have disproportionate housing needs.	Historic discrimination and continued mortgage denials; Concentration in low opportunity census tracts; High housing costs and low wages	Objectives: Preserve existing affordable housing Quantified Objectives: Preservation of 54 units before 2032

3. AFFIRMATIVELY FURTHERING FAIR HOUSING

Actions	Fair Housing Issues	Contributing Factors	Implementation
			Responsible Party: City of Antioch, Housing
			Timeline: Preservation strategies established and outreach to non-profit partners by January 2031
Action 3.4: Promote economic development in the EJ neighborhoods and Sycamore neighborhood in particular. The City will prioritize economic development and infrastructure expenditures in and around lower-income and environmental justice neighborhoods, to enhance business and housing opportunities. This could include facade improvements and small business grant recipients. Through implementation of the Downtown Specific Plan, which includes policies and programs to reduce or eliminate regulatory obstacles to development in the Downton and to facilitate the development of high-quality market-rate and affordable housing, the City will encourage investment in one of the City's lowest income areas, and the Specific Plan will bring new homes, stores, amenities, and services. Through the redevelopment of the Downtown, and the Rivertown Area in particular, the additional high-density housing could also provide a variety of housing types, including affordable housing. The City will explore methods for providing low-interest loans and below-market leases for tax-foreclosed commercial properties to low-income residents seeking to start businesses within the EJ neighborhoods.	Persons with disabilities and Hispanic and Black households are concentrated in census tracts with low median incomes and older housing stock.	Lack of high opportunity areas; Lack of access to economic opportunity; Concentration of NOAH (i.e., older housing stock) in EJ neighborhoods.	Objectives: Place-based strategies to encourage community conservation and revitalization
			Responsible Party: City of Antioch, Economic Development, Public Works, and Planning
			Timeline: Ongoing. Adoption of EJ policies by February 2023
Action Area 4. Protecting existing residents from displacement			
Action 4.1: Establish tenant protections to implement AB 1482 with measures related to relocation, documentation, and right to return policy in eviction cases.	Persons with disabilities and Black and Hispanic households have disproportionate housing needs and persons with disabilities are most likely to file fair housing complaints.	Lack of accessible affordable units; Concentration in low income and low opportunity census tracts; Historic discrimination and continued mortgage denials; High housing costs and low wages	Objectives: Protect residents from displacement and preserve housing affordability
			Responsible Party: City of Antioch, Housing Dept.

3. AFFIRMATIVELY FURTHERING FAIR HOUSING

Actions	Fair Housing Issues	Contributing Factors	Implementation
Action 4.2: Partner with ECHO Housing and/or Bay Area Legal Aid to perform fair housing training for landlords and tenants. Attendance at a fair housing training will become a condition for approval of landlords' business licenses. The training would include information on reasonable accommodation and source of income discrimination, as well as other fair housing information with emphasis on certain topics driven by housing complaint data and information from stakeholders.	Persons with disabilities and Black and Hispanic households have disproportionate housing needs and persons with disabilities are most likely to file fair housing complaints.	Lack of accessible affordable units; Lack of understanding of reasonable accommodation requirements by landlords and property owners.	<p>Timeline: Staffing plan and program design established by April 2024.</p> <p>Objectives: Protect existing residents from displacement and enforce Fair Housing laws</p> <p>Quantified Objectives: Conduct 2-3 workshops per year on fair housing rights and resources</p> <p>Responsible Party: ECHO Housing and/or Bay Area Legal Aid in partnership with the City</p> <p>Timeline: Program design to track attendance and condition business license approval completed by January 2024. Program launch March 2024</p>
Action 4.3: Continue to maintain a webpage specific to fair housing including resources for residents who feel they have experienced discrimination, information about filing fair housing complaints with HCD or HUD, and information about protected classes under the Fair Housing Act.	Persons with disabilities and Black and Hispanic households have disproportionate housing needs and persons with disabilities are most likely to file fair housing complaints.	Lack of accessible affordable units; Lack of understanding of reasonable accommodation requirements by landlords and property owners.	<p>Objectives: Enforce Fair Housing laws</p> <p>Quantified Objectives: Increase participants in fair housing programs by 5%</p> <p>Responsible Party: City of Antioch in partnership with ECHO Housing and/or Bay Area Legal Aid</p> <p>Timeline: Ongoing</p>
Action 4.4: Ensure that all multi-family residential developments contain signage to explain the right to request reasonable accommodations for persons with disabilities as a condition of business license approval. Make this information available and clearly transparent on the City's website in English, Spanish, and Tagalog and fund landlord training and outreach on reasonable accommodations.	Persons with disabilities have disproportionate housing needs and are most likely to file fair housing complaints with HUD.	Lack of accessible affordable units; Concentration in low income and low opportunity census tracts; Lack of understanding of reasonable accommodation requirements by landlords and property owners.	<p>Objectives: Enforce Fair Housing laws</p> <p>Quantified Objectives: Increased reasonable accommodation requests and fulfilled requests by 10%</p> <p>Responsible Party: City of Antioch</p> <p>Timeline: Information added to City website by January 2024</p>

3. AFFIRMATIVELY FURTHERING FAIR HOUSING
